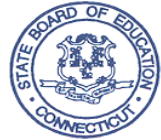




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of the National School Lunch and School Breakfast Programs

FROM: John Frassinelli, Chief
Bureau of Health/Nutrition, Family Services and Adult Education

Handwritten signature of John Frassinelli

DATE: September 26, 2014

SUBJECT: Operational Memorandum #57-14
1. Verification Procedures
2. Verification Collection Report – Due December 12, 2014

1. Verification Procedures - By November 15 of each year local education agencies (LEAs) must complete verification of a sample of their approved free and reduced price meal applications. The verification sample is obtained from new meal applications on file as of the first operating day in October. The sample size is selected using one of the methods outlined in the updated United States Department of Agriculture’s (USDA) guidance Eligibility Manual for School Meals dated August 2014. Updated verification forms are also found on the Connecticut State Department of Education’s Child Nutrition Programs’ (CNPs) Web site. Additionally, attached are two tools to assist you in conducting this process:

- Important Points to Remember; and
• The Verification Check List.

As a reminder, LEAs may use the Alternate One or Alternate Two methods of verification if the district meets either of the following conditions:

Condition #1 known as a Lowered non-response rate

- Any district where the non-response rate for the prior school year is less than 20 percent; or

Condition #2 known as an Improved non-response rate

- LEAs with more than 20,000 children approved for free and reduced price meals by application as eligible for free or reduced price meals as of October 1 of the school year may use an alternate sample size for any school year when its non-response rate for the preceding school year is at least 10 percent below the non-response rate for the second preceding school year.

If a school district’s 2013-14 Verification Summary Report indicated that they had a non-response rate of 20 percent or more, the school district is required to use the Standard Sample Size to conduct verification.

USDA Clarification on Responded vs. Not Responded

Table with 2 columns: RESPONDED MEANS and NOT RESPONDED MEANS. Rows describe documentation requirements and household notification.

2. **Verification Collection Report** – The USDA has revised the Verification Collection Report and the new version is located at: <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320644>. Please review prior to conducting the verification process since there are some changes (i.e., district will now be required to report those questionable household applications that were selected for verification **for cause**.) **This report will be due to the Connecticut State Department of Education no later than December 12, 2014.** Please note that this collection report must be filed by *all* National School Lunch Program and School Breakfast Program sponsors, including all Residential Child Care Institutions and all Special Assistance Alternative sites (i.e., Provision 2 and Community Eligibility Provision sponsors.) **One report per sponsor** must be submitted. **Note:** *Failure to submit the report by the due date could lead to the withholding of your CNPs claims for reimbursements.*

Completed Verification Collection Reports must be forwarded to Maria Santini, Child Nutrition Programs, 25 Industrial Park Road, Middletown, CT 06457 or e-mail [maria.santini@ct.gov](mailto:maria.santini@ct.gov).

Questions pertaining to this memorandum may be directed to:

Consultants for School Nutrition Programs	
County	Consultant
• Fairfield County	Fionnuala Brown <a href="mailto:fionnuala.brown@ct.gov">fionnuala.brown@ct.gov</a> 860-807-2129
• Hartford County (towns/cities beginning with A-R)	Teri Dandeneau <a href="mailto:teri.dandeneau@ct.gov">teri.dandeneau@ct.gov</a> 860-807-2079
• Hartford County (towns/cities beginning with S-W) • Windham County	Susan Alston <a href="mailto:susan.alston@ct.gov">susan.alston@ct.gov</a> 860-807-2081
• Litchfield County	Allison Calhoun-White <a href="mailto:allison.calhoun-white@ct.gov">allison.calhoun-white@ct.gov</a> 860-807-2008
• Middlesex County • Tolland County	Andy Paul <a href="mailto:andrew.paul@ct.gov">andrew.paul@ct.gov</a> 860-807-2048
• New Haven County	Jackie Schipke <a href="mailto:jackie.schipke@ct.gov">jackie.schipke@ct.gov</a> 860-807-2123
• New London County	Monica Pacheco <a href="mailto:monica.pacheco@ct.gov">monica.pacheco@ct.gov</a> 860-807-2073

JF:tdd

Attachments: (2)

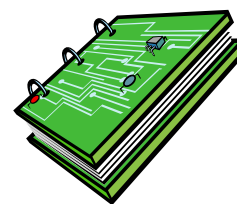
## IMPORTANT POINTS TO REMEMBER WHEN DOING VERIFICATION

Prior to conducting verification, refer to the U.S. Department of Agriculture's (USDA) [Eligibility Manual for School Meals](#), revised August 2014.

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**Please share this information with the appropriate personnel conducting verification.**

- ☐ Start on **October 1**. The number selected for verification must be based on the total number of newly approved **applications**, i.e., Income, Temporary Family Assistance (TFA) and SNAP: Supplemental Nutrition Assistance Program on file by **October 1**.
- ☐ Local Education Agencies (LEAs) are not allowed to conduct **100 percent verification at the time of application**. Additionally, LEAs may *not* verify more than the sample size that is required. For example, a LEA must not select a few “extra” households to verify to be on the “safe side.” A LEA may only verify the total number of households determined by the calculation of the sample size.
- ☐ Prior to notifying the household that they were selected for verification, a confirmation review (to ensure that the application was determined correctly) must be done by someone other than the determining official. This must also be documented. Note: Any LEA that conducts a confirmation review of *all* applications at the time of certification is not required to conduct confirmation reviews at the time of verification. For more information, refer to the [Eligibility Manual for School Meals](#) (revised August 2014).
- ☐ LEAs must allow households to provide documentation of income from **any point in time between the month prior to application and the time the household is required to provide income documentation for verification**.
- ☐ If a household submits a paper application for a foster child and the foster child's name does not appear on the direct certification list, the foster child application is subject to verification if selected. Refer to the [Eligibility Manual for School Meals](#) (revised August 2014) for more information.
- ☐ If a child's name appears on the direct certification list, they are not subject to verification.
- ☐ If a free and reduced price paper application is received and the household lists a SNAP or TFA name and number on the application, and the number is not confirmed through the direct certification list, this application IS SUBJECT TO VERIFICATION and should be included in the pool of applications that are considered for the formal verification process. These applications are considered to be categorically free eligible. They are not directly certified.
- ☐ Residential child care institutions (RCCI) with **day students** must have approved meal applications or direct certification information on file to claim these day students as free or reduced. Verification will need to be conducted in those RCCIs that claim day students as free or reduced based on the approval of an application.



## IMPORTANT POINTS, continued

- ☐ For **each selected household**, complete a [Verification Selection Worksheet](#). This tracks the verification process and must be kept on file.
- ☐ The following categories are **not** subject to verification and must **not** be included in the total number of applications when determining the verification sample size: **Students that are directly certified based on the direct certification list, homeless, runaways, foster children that are directly certified, and children enrolled in a federally funded Head Start or Even Start Program.**
- ☐ Do not collect the social security information from the adults in the verified household.
- ☐ Go to USDA's [Foreign Language Translations](#) to find foreign language forms. LEAs must ensure the Limited English Proficiency households are provided adequate language assistance and understand the need to respond to the verification request.
- ☐ **Always round up** and make sure that the number of applications to be verified is correctly calculated. For example, if the sample size is 3.03, **4** applications must be selected for verification.
- ☐ Formal letters notifying households that they have been selected for verification must be sent and copies of these completed letters must be kept on file in the school district. Proper documentation is essential to demonstrate successful completion of the verification process. Keep copies of everything. **Verification cannot be conducted over the phone.** It must be done in writing.
- ☐ Letters of notification must give deadline dates for a response from the parents/guardians. Never say "as soon as possible" or "immediately." Also, indicate in the letter the consequences of their failure to respond, i.e., their child(ren) will no longer be eligible for free or reduced-price meal benefits if they do not respond by the date indicated.
- ☐ All final letters notifying the household of a reduction in benefits due to verification must include **fair hearing procedures**. The CSDE's [Sample Letter of Adverse Action](#) contains the fair hearing language.
- ☐ If a student selected for verification transfers out of the system during the verification process, the LEA must select another household application to be verified.
- ☐ Verification must be completed **by November 15**.
- ☐ If verification cannot be completed by November 15, then the school district's superintendent must send a letter to John Frassinelli, Chief, Bureau of Health/Nutrition, Family Services and Adult Education, requesting an extension and providing the reason for the request. This request must be received by the CSDE Child Nutrition Programs office no later than **November 1**. Please also copy Teri Dandeneau on the letter.
- ☐ Prior to completing the verification process, review and complete the [Sample School District Verification Check List](#).
- ☐ The **Verification Collection Report** must be completed by **all LEAs** participating in the National School Lunch Program and School Breakfast Program including those that do not conduct the verification process, e.g., RCCIs. This form is due no later than **December 12** and may be found at <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320644>.

## IMPORTANT POINTS, continued

**Verification for Cause** is not the same thing as the formal verification process. The LEA has an obligation to verify all questionable applications. This can be done at any time throughout the school year. While it is not part of the formal verification process, USDA now requires that LEAs report all applications that were pulled for “verification for case” on the Verification Collection Report in part VC-1. For more information, refer to the [Eligibility Manual for School Meals](#).



For more information and forms, see the Connecticut State Department of Education’s (CSDE) [Verification Procedures](#) Web page or contact the [school nutrition programs](#) staff in the CSDE Bureau of Health/Nutrition, Family Services and Adult Education, 25 Industrial Park Road, Middletown, CT 06457.

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## Sample School District Verification Check List

Local Education Agency (LEA): \_\_\_\_\_ Date: \_\_\_\_\_

1. Type of verification conducted:

Standard Sample Size  Alternate One  Alternate Two

2. Were the [\*Eligibility Manual for School Meals\*](#) and appropriate Connecticut State Department of Education (CSDE) *operational memoranda* followed to ensure that the verification sample was chosen correctly?  Yes  No

If "NO" explain:

3. Did anyone from the district/institution attend training on verification conducted by the CSDE during the past year?  Yes  No

If "NO" explain:

4. Was more than the required sample size verified?  Yes  No

If "YES" explain:

5. Were the state agency (CSDE) sample verification forms used?  Yes  No

If "NO" explain:

6. Was the verification process completed by November 15?  Yes  No

If "NO" explain:

7. Was a confirmation review conducted by a person other than the determining official?  Yes  No

If "NO" explain:

8. Were households with foster children verified correctly?  Yes  No

If "NO" explain:

9. Were the notifications of changes in eligibility to families sent in a timely manner?  Yes  No

If "NO" explain:

## Sample School District Verification Check List, continued

10. Were applications that did not need to be verified replaced by similar applications to meet the required number to be verified?  Yes  No  
If "NO" explain:
11. Was the option to decline to verify no more than 5 percent of applications in the selected sample utilized by the district?  Yes  No  
If "YES" explain:
12. Check here if all calls within the district are local calls:
13. Was there a second attempt to obtain the family information for verification? After a reasonable period, if unable to verify the eligibility, was a notice of adverse action sent to the families?  Yes  No  
 Not applicable  
If "NO" explain:
14. If there was a benefit change due to verification, was it properly applied in the lunchroom (ticket, roster and/or other system)?  Yes  No  
 Not applicable  
If "NO" explain:
15. Were any households selected for Verification for Cause?  Yes  No  
If "YES" explain:  Not applicable



For more information and forms, see the Connecticut State Department of Education's (CSDE) [Verification Procedures](#) Web page or contact the [school nutrition programs](#) staff in the CSDE Bureau of Health/Nutrition, Family Services and Adult Education, 25 Industrial Park Road, Middletown, CT 06457.

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