Verification

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Additional Resources

- [ISBE Verification Information Website](#)

Pre-Verification Procedures

Use of Direct Certification System

Prior to beginning the verification process, **all LEA's are required to have accessed and used the electronic direct certification** system available through IWAS/WINS. Public schools must access and use the *Annual File*, and subsequent *Monthly Files* to directly certify students. Private schools must use either the *File Upload Match* or *Single Child Match* options to meet this requirement.

On October 1, **districts must attempt to direct certify as many students as possible that are currently on applications.**

> Use of the electronic direct certification system is done prior to the application count that must be done on October 1.

Students that are able to be direct certified will no longer need to have their application included in the October 1 application count. The reduction of total applications will reduce the number of applications that must be verified.

Please refer to the *Electronic Direct Certification* section of this handbook for further information.

Verification Requirements

Verification is the confirmation of eligibility to receive free and reduced-price meals under the National School Lunch and School Breakfast Programs. Verification is only required when eligibility is determined through the use of a paper or electronic household application, not through direct certification or for students determined to be categorically eligible. Verification must include either confirmation of income eligibility or that a member of the household being verified is receiving SNAP, TANF, or other directly verifiable status.

Verification Time Line

- October 1, Prior to Application Count – Attempt to direct certify students currently receiving benefits based on a household eligibility application.

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- October 1, After use of Electronic Direct Certification System – Count all approved household applications on file, by category, and begin verification process. This includes *Income, SNAP/TANF,* or *Foster Child* applications.

- Last Operating Day of October – Count of **all** eligible students by category (Categorically eligible, free based on SNAP/TANF, free based on income, reduced based on income). LEAs will need to be prepared to provide student counts

- November 15 (on or before) – LEAs must have completed verification process.

- December 15 (on or before) – Submit Verification Summary Report (VSR) to ISBE. LEAs must submit a VSR.

Exceptions from Verification Process –

- Schools/RCCIs in which **ALL** students have been directly certified, including students documented as being foster, migrant, runaway or homeless

- RCCIs that **do not have any** day students

- Districts in which **ALL** sites participate in the Community Eligibility Provision (CEP)

- Districts in which **ALL** sites only participate in the Special Milk Program and/or Illinois Free meal programs

- Districts in which **ALL** sites serve students with no separate charge for food and no cash assistance is claimed; i.e., non-pricing programs claiming paid rate of reimbursement

- Districts in which **ALL** schools participate in Provisions 1, 2, or 3 except in those years in which applications are taken for all students in attendance; i.e., the base year

- Districts that **do not have any** free or reduced price eligible students

Steps for Completing Verification

Step 1: Select Sample

The sample size is based on the total number of approved applications: *Household Size/Income; SNAP/TANF; OR Foster Child.* Application count does not include students in split-session pre-k or kindergarten programs that are only participating in the Special Milk Program.

Standard Sample Size –

The lesser of 3 percent **OR** 3,000 of **all** approved household applications on file as of October 1. Applications must be selected from income based error-prone* applications first. If there are not enough error-prone applications to comply with the required sample size, LEAs may

randomly select additional applications to fulfill the 3 percent **OR** 3,000 application requirement from all remaining approved household applications.

＊ **Error-prone applications** are those applications with a total household income listed within: $23.07 per week; $46.15 per every two weeks; $50 twice per month; $100 per month; OR $1,200 per year, **above or below** the FREE income eligibility limit; OR, **below** the REDUCED income eligibility limit. Income eligibility guidelines.

> EXAMPLE:
> An LEA has 200 approved *Household Size/Income*, *SNAP/TANF*, or *Foster Child* applications on file as of October 1. Six applications will need to be verified (3 percent of 200). These 6 applications must be selected from income based error-prone applications first. If there are not enough error-prone applications, the remaining applications may be selected randomly from all remaining approved household applications. **When calculating sample size, LEAs must round ALL numbers up to the next whole number**. *For example*, 1.12 = 2, 7.48 = 8, etc.

> **LEAs cannot verify more or less than the required sample size.**
> **LEAs are NOT allowed to verify 100% of all approved household applications.**

Step 2: Conduct Confirmation Review

Once the verification sample has been selected, LEAs must designate a Confirming Official to conduct a confirmation review on each application selected for verification. The confirmation review is done to check the accuracy of the initial determination of benefits on the household application. This step must be done prior to contacting households regarding their selection for verification. The Confirming Official must be someone other than the Determining Official.

LEAs may choose to confirm **all** household applications, but the minimum requirement is to confirm those selected for verification. LEAs that confirm any other amount of apps (every 5th, 10th, 20th) would not be in compliance with USDA requirements.

If through the confirmation review, the initial determination of the application is found to be:

- Correct – **Proceed to Step 3: Complete Verification**.

- Incorrect – **Status should be changed from free to reduced-price**.
  - Do not change benefit level or notify the household until verification is completed.
  - Proceed with Step 3: Complete Verification.

- Incorrect – **Status should be changed from <u>reduced-price to free</u>**.
  - Make the increased benefits available immediately.
  - Notify the household of the change in benefits. The sample letter *We Have Confirmed Your Application* should be used.
  - Proceed with Step 3: Complete Verification.

- Incorrect – **Status should be changed from <u>free or reduced-price to paid</u>**.
  - Immediately send the household a notice of adverse action. The sample letter *We Have Confirmed Your Application* should be used.
  - Do not verify application.
  - Select another application for verification. If an error-prone income application is terminated because of the confirmation review, then the LEA should select another error-prone income application as a replacement; new income application for income application; or new SNAP/TANF application for SNAP/TANF application.
  - Confirmation review must be done on newly selected application.

The Confirming Official may mark (CO:) and sign on the household application below the determining official's signature or complete the [Confirmation Review and Verification Form](#) (68-21) and attach to the reviewed applications.

<u>Decline to Verify Option</u>

After completing the confirmation reviews, the LEA may, on a case-by-case basis, replace up to five percent of applications in the selected sample. Applications may be replaced when the LEA believes the household would be unable to satisfactorily respond to the verification request; i.e., language barriers, family moves frequently, etc.

Any application removed from the sample under this option must be replaced with another approved application of the same type as the declined application. For example, a declined error-prone income application should be replaced by another error-prone income application. If there are no more error-prone income applications, select one randomly from all remaining approved applications that were on file as of October 1. The newly selected application must then go through a confirmation review.

In those LEAs where five percent of the total applications results in less than one application, one application may still be replaced. All results of the five percent calculation are rounded up to the next whole number.

Step 3: Complete Verification by Direct OR Standard Verification Procedures

Direct Verification Procedures

An additional feature of the Electronic Direct Certification system available in IWAS/WINS is the *Direct Verification* option. The use of Direct Verification option can speed up the verification process for LEAs, and may eliminate the need for LEAs to contact households that were selected for verification.

> **Direct verification SHOULD be the LEA's first step to verify ALL household applications that have been selected for verification.**

ALL household applications selected for verification, whether originally approved based on income (FREE or REDUCED), SNAP/TANF, or Foster Child, can be attempted to be directly verified by using the Direct Verification link. If **any** household member (student or not) listed on the household application is verified to be receiving SNAP/TANF/free Medicaid benefits, then all school-age members of that household that are attending a school participating in the NSLP are then *verified* to be eligible to receive free meals.

If **any** household member (student or not) listed on the household application is verified to be receiving reduced Medicaid benefits, then all school-age members of that household that are attending a school participating in the NSLP are then *verified* to be eligible to receive reduced meals.

In the case of income applications, whether approved for FREE or REDUCED benefits, LEAs can use the Direct Verification link to search for students listed on household applications selected for verification. There may be situations where families applied based on income, not fully understanding the benefit of using a SNAP/TANF ID number; OR may have applied and been approved for SNAP/TANF/Medicaid benefits after the original income application date.

Any household application(s) selected for verification that are verified to be eligible for FREE benefits through direct verification, do not require any contact or requests for information from the household.

> **EXCEPTIONS**:
> 1) Households originally approved for REDUCED benefits that are verified to be eligible for FREE benefits through direct verification, must be sent a *We Have Verified Your Application* letter, notifying them of the change in benefit level.
> 2) Households originally approved for FREE benefits due to a 9-digit number provided on an application that was <u>not</u> found to be Directly Certified, must be sent *We Have Verified Your Application* letter, notifying them of the change in benefit level. The household must

be provided the opportunity to reapply for meal benefits based on household income and size. Household Eligibility Applications received as a result of the change in benefit level due to direct verification must provide documentation to support the income reported on the application. Results of verification of this application must be reported in the Verification Summary Report. Households eligible for reduced benefit must be reported as Directly Certified reduced Medicaid. Households eligible for free benefits must be reported as free benefits and no change of benefit level.

When using the Direct Verification link, LEAs will need to enter in the *Application Date* and either the SNAP/TANF *Case Number* **OR** *Name* and *Address/City* of **any** child's name that is listed on the household application.

The Direct Verification link becomes available on, or about October 1, of each year, and will remain accessible through March.

To directly verify a *SNAP/TANF* application using case ID number:

SNAP/TANF Search Results

When there is a match, any child associated with the number entered will appear on the screen. As with the electronic Direct Certification system, click *Add to Report* for the appropriate student(s). Once the appropriate student(s) are added to the report, click the *Print Report* button. This report will serve as confirmation that verification has been completed.

Searches performed that provide no matches will result in a **No Matching Records Found** message being displayed.

If LEAs are unable to find a match using the SNAP/TANF number provided by the household, a second search should be done using name and address.

To directly verify an *Income, SNAP/TANF,* or *Foster Child* application using student names:

Name and Address Search Results

When searching by *Name* and *Address/City*, the system may return a number of matches based on variations in spelling of the name entered. Entering the city is optional, but using it should reduce the number of matches. LEAs should try searching for all household members listed on the application, not just those enrolled in the school or district.

When multiple names are returned, LEAs should closely examine the list to ensure the correct student(s) have been found. Once the correct student(s) are found, click *Add to Report* for the appropriate student(s). When the appropriate student(s) are added to the report, click the *Print Report* button. This report will serve as confirmation that verification has been completed.

Searches performed that provide no matches will result in a No Matching Records Found message will be displayed.

If information obtained through direct verification of a household application indicates a student is participating in the SNAP, TANF, or other program, no additional verification is required.

Household applications selected for verification that are UNABLE to be directly verified, must be verified using the *Standard Verification Procedures*.

Standard Verification Procedures

Household applicants selected for verification that cannot be directly verified must be sent a letter informing them of their selection.

The *We Must Verify Your Application* letter must include the following information:

- That the household was selected for verification;
- That the household must list all adult household members. Adult household members are **NO LONGER REQUIRED** to provide all or part of their social security number.
- Types of acceptable information needed to complete verification, including pay stubs, social security, support payment decrees, etc;
    - **OR,** in place of income information a household may provide proof that a member of the household being verified receives SNAP/TANF benefits. **Please see** direct verification option.
- That documentation of income or receipt of SNAP/TANF benefits can be provided for any point in time between one month prior to the date of application and the time the household is requested to provide income or SNAP/TANF documentation;
- That information must be provided by a specified date, and failure to do so will result in termination of benefits;
- LEA contact name and telephone number that households may call for assistance regarding the verification process. The call must be free to all households. LEAs may establish a toll-free number, allow households to reverse phone charges, or provide different telephone numbers for each local calling area within the district; and
- A Privacy Act statement.

Income Applications – Acceptable Documentation

Acceptable written evidence for income eligible households must contain the name of the household member, amount of income received, frequency received, and the date the income was received. For example, a pay stub with no dates would be insufficient. Households must submit adequate documentation to allow an accurate determination to be made. If a member of the household is self-employed and submits a tax return from the previous year to document income, net income should be used.

SNAP or TANF Applications – Acceptable Documentation of SNAP or TANF Applications

Acceptable documentation from households includes: A letter on IL Department of Human Services (IDHS) letterhead and signed by family caseworker stating the household member(s) SNAP or TANF number; Or, a monthly statement from IDHS reflecting the type of benefits received by the household.

Required Follow-Up Contact

If the household does not respond, or responds inadequately to the **first** request for verification materials, **the LEA must make at least one additional attempt to obtain documentation of**

eligibility. This second follow-up attempt can be made by mail, telephone, electronic mail, or through personal contact. LEAs must inform households that failure to comply with verification will result in termination of benefits, and must document all contacts.

When is Verification Complete?

The verification process is considered complete when a household:

- Submits all required information to support original household application as submitted. Evidence provided verifies current meal benefit level.
- Indicates, verbally or in writing, that it will not comply with verification request or that they no longer want to receive free or reduced-price meal benefits.
- Submits all required information based on household application as submitted. Evidence provided requires a change, reduction, or termination of benefits.
- Does not respond or comply within required timeframe. Non-compliance results in a termination of benefits.

Step 4: Notify Household

Once the verification process is completed, all household must be notified of the results. The *We Have Verified Your Application* letter should be used.

If verification results in:

- **No change to the benefit level**, notify the household.
- **Increased benefits (reduced-price to free),** notify the household and change the benefits of all children in the household no later than three operating days from the time of the new determination.
- **Decreased or terminated benefits (free to paid, reduced-price to paid, or free to reduced-price),** notify the household providing them the required ten-calendar-day written advance notice. The first day of the ten-calendar-day written advance notice is the day the notice is sent. Households that are subject to a decrease or termination of benefits may request a hearing.

If the household requests a hearing during this ten-calendar-day period, the LEA must continue to provide benefits for which the child was originally approved until a hearing is held. The hearing official must be an individual who was not a part of the approval or verification process.

- If the hearing official rules that benefits must be reduced or terminated, the reduction or termination of benefits must take place within ten operating days after the hearing official renders the decision.
- If the hearing official rules that benefits must be increased, the increase in benefits must take place within three operating days after the hearing official's decision.

<u>If the household does not request a hearing</u> during this ten-calendar-day advance notice, the reduction or termination of benefits must take place no later than ten operating days after the ten-calendar-day advance notice.

Households that Reapply

Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year. However, if benefits to a household have been terminated as a result of verification and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in SNAP or TANF at the time of reapplication. In this instance, the LEA should verify the households' eligibility prior to approval of the household application. These are not considered new applications and the guideline of approving based on face value **does not** apply.

SAMPLE Timeline for Steps 1 through 4

- <u>October 1</u> – Application count completed after direct certification was performed.
- <u>October 2</u> – Sample size calculated based on October 1 application count, and applications to be verified are pulled and a confirmation review is performed.
- <u>October 3</u> – Direct verification is attempted for those applications selected. Those applications unable to be directly verified are sent notification of their selection for verification. **Households have 10 calendar days to comply** with this first request.
- <u>October 13</u> – Households that did not comply with first request must be sent a second notice. **Households have 3 business days to comply** with this second request.
- <u>October 16</u> – Households that did not comply with the second request are sent a letter notifying them that their benefits are being terminated. Benefits will be terminated 10 calendar days from the date notification is sent. In this example the letter is sent on October 16 so the termination of benefits will go into effect on October 26*.
- <u>October 26</u> – The termination of benefits goes into effect, verification is considered complete and results of verification are ready to be compiled for submitting on the required Verification Summary Report.

* PLEASE NOTE: Any family sent a termination of benefits letter has the opportunity to request a hearing. This may delay the actual termination of benefits. If any date(s) set is/are going to fall on a weekend or holiday, the date(s) should be adjusted to the next business day.

LEAs are not required to make more than two requests for verification materials. Delaying closure of verification process may put LEAs at risk of not meeting USDA verification requirements and deadlines.

Step 5: Enrollment and Student Counts – Last Operating Day of October

ALL NSLP sponsors/districts,
MUST provide *Enrollment* and/or *Student Counts* as applicable.

ENROLLMENT COUNTS	STUDENT COUNTS

ENROLLMENT COUNTS

Entered on Step 3 of the Verification Summary Report

Enrollment counts are done by district and are broken down into two categories:

1. Total enrollment of all school sites (Including Provision and CEP sites); And if applicable,
2. Total enrollment of all RCCI sites

STUDENT COUNTS

Entered on Step 2 and/or Step 3 of the Verification Summary Report

Student counts must be taken on the last operating day in October. The actual verification of applications and count of applications is done at the sponsor/district level, but some of the required student counts are done by site. Students CANNOT be double counted - Each student can only be included in one specific group of students.

The student counts that must be taken by site are as follows:

1. Students direct certified as receiving SNAP benefits and all students receiving benefits due to extension of SNAP benefits. This count is for SNAP benefits ONLY. Provision, CEP, and RCCI sites would have a count of '0' (zero).

2. Students direct certified as receiving TANF and all students receiving benefits due to extension of TANF. Or student directly certified as having a Foster Child status. In addition, those students that are documented as being Homeless, Migrant, Runaway, Head Start, or Even Start are also included in this count. Provision, CEP, and RCCI sites would have a count of '0' (zero).

3. Students direct certified as receiving free Medicaid and all students receiving benefits due to extension of Free Medicaid.

4. Students direct certified as receiving reduced Medicaid and all students receiving benefits due to extension of reduced Medicaid.

5. Students certified to be receiving SNAP benefits through use of a DHS/SNAP agency benefits statement or documentation being presented. Any household presenting an award letter should first be checked in the electronic direct certification system. Only if the students were not able to be electronically direct certified should they be included in this count. Presentation of medical, Link, or other card is NOT acceptable. Provision, CEP, and RCCI sites would have a count of '0' (zero).

> With the implementation of the electronic direct certification system in Illinois, the presentation of an award letter or benefits statement from the DHS/SNAP agency is unlikely.

The remaining student counts are for students listed on household eligibility applications, but are **not** site specific. Only the 5 previous student counts are site specific.

6.   All students that were on an application that was approved for FREE meal benefits by providing a SNAP/TANF ID number on an application.

7.   All students that were on an application that was approved for FREE meal benefits by providing income and household size information on an application.

8.   All students that were on an application that was approved for REDUCED PRICE meal benefits by providing income and household size information on an application.

Step 6: Submit Verification Summary Report

Federal regulations require ISBE to collect a summary of LEA verification efforts. This is collected annually through a report in IWAS/WINS entitled *Verification Summary Report*.

Detailed instructions and the report will be available online in November. The Verification Summary Report is **due to ISBE no later than December 15**.

Verification for Cause

The required verification sample cannot exceed the percentages defined in **Step 1: Select Sample**. However, LEAs have an obligation to verify questionable applications. *Income* and *SNAP/TANF* applications may be subject to verification for cause.

Verifications for cause are not part of the required sample and may be done at any time during the school year. Direct verification can be attempted in all verification for cause situations.

Any applications verified for cause prior to submission of the VSR, will need to have the results of the verification for cause reported on the VSR. The VSR is **due to ISBE no later than December 15.**

Tracking Verification Procedures

LEAs should use the *Confirmation Review and Verification Tracking Form (ISBE 68-21).*

Verification Process – *Questions and Answers*

1. Our district always verified 100 percent of the free and reduced-price Household Eligibility Applications. Is this still allowable?

   No, the USDA does not allow verification of ALL applications. Regulations require no more or no less than 3 percent of total approved applications be verified.

2. Jones High School has 180 approved applications on file as of October 1, how many must they verify?

   Six. They must use the standard sample size - 3 percent or 3,000 approved applications (whichever is less) selected at random from error-prone applications. Therefore, they must verify six applications (selected first from error-prone, then random). Three percent of 180 = 5.4, always round up.

3. Devine School District has the following combination approved for free or reduced-price lunch:
   - 16 students based on 3 migrant/homeless/runaway listings
   - 116 students based on 84 income-based applications
   - 7 students based on 4 TANF/SNAP applications
   - 45 students based on 45 TANF/SNAP Direct Certification

   Devine School District does not qualify for the alternate sample sizes. How many applications must they verify under the standard sample size?

   Three. Keep in mind the verification sample is selected from the number of approved applications, not students, on October 1. These applications do not include Direct Certification and homeless/runaway/migrant listings as they are not subject to verification. Therefore, there are 88 approved applications from which you select 3 percent to fulfill the standard sample size. Eighty-eight applications x .03 = 2.64 = 3, always round up.

4. Following the standard sample size guidelines, Devine School District must verify three applications. Of their 88 applications, 2 are error-prone. Is verifying the 2 error-prone applications sufficient?

   No. The sample size required them to verify three (3 percent of 88). They must therefore select the third application at random from all approved applications (which may include a SNAP or TANF application).

5. You must verify 20 applications and one of the error-prone applications you select is from a household you know has recently moved but has not provided you with an address or phone, which makes contacting them difficult. Must you still verify this application?

   You have the option of declining to verify up to 5 percent of your selected sample. With 20 applications, you can decline to verify one application. If you decline to verify an application, you must randomly select another application (first from error-prone and if not enough error-prone, then select randomly from all approved applications).

6. You do not have enough error-prone applications for your sample size, and therefore, randomly select an application with a SNAP number. What is the simplest way to verify such an application?

   Use the Direct Verification link available through the Direct Certification system in IWAS/WINS. If this is successful, you do not need to contact the household.

7. Consolidated School District 123 did not complete and submit the ISBE verification summary report (VSR) by December 15. What are the possible issues that could result from failure to complete and submit an accurate VSR by the deadline?

   Any NSLP/SBP sponsor (district) that does not submit the VSR by the December 15th deadline is subject to withholding of payment of any meal claims filed after December 15th. NSLP/SBP sponsors will be able to continue filing claims, but payment of those claims will not be completed until a complete and accurate VSR is submitted to ISBE.

8. Grand Island School district has a total of 13 NSLP/SBP sites. Three of those sites are operating CEP, and one site is an RCCI with no day students. How many sites of Grand Island School District will need to complete the verification process?

   Nine. CEP sites and RCCIs with no day students are exempted from the verification process, only the 9 sites that actually use and process household eligibility applications will need to complete the actual process of verification.

9. An application approved on August 28 is selected for verification. To document their income, the household submits payroll stubs from July 31 of that year. Are these payroll stubs acceptable?

   Yes. You must accept any documentation date anytime from one month prior to the date of application, up to the date verification materials are requested (for most, this means July through October).