

Verification and VSR Frequently Asked Questions

Illinois State Board of Education Nutrition Division

Q: How many pay stubs are required?

A: If one pay stub submitted by the household is representative of the income reported on the Household Eligibility Application, then one pay stub is sufficient.

Q: How is overtime handled?

A: The school district should work with the household to determine if overtime during the month of application or the month of verification is representative of income worked in other months. The key here is that the district must document the conversation with the household and document how the verifying official determined if the overtime was rare or regular. For example, the verifying official should obtain a pay stub that does not include overtime and compare the information on that pay stub to the income reported on the HEA.

Q: Regarding my Oct. 1 count, I have an approved application that is dated Aug. 20, and the students exited Aug. 31. Should we still count this application and the students for the VSR?

A: No, the Oct. 1 count is literally counting only the approved applications that are for enrolled students on that date.

Q: How does reduced Medicaid impact verification of applications?

A: If an application was received and approved based on household income or at face value for free benefits and now based on a recent release of data, a household member appears on the direct certification file as a reduced Medicaid recipient, the benefits should remain at the original determination level for the school year. Only applications selected a part of the 3% verification sample should be processed for verification to determine if the original benefits may be verified with supporting documentation. If the household is unable to support the original determination, the benefits should be changed from free to reduced. The household must be given a 10-day notification that as a result of verification the benefits will be decreased from free to reduced.

Q: My school's system that tracks eligibility determinations does not recognize directly certified Reduced Medicaid; it is marking the Reduced Medicaid students as free and not reduced.

A: Please share this information with the makers of that system so that they are aware of the updates needing made. Additional information on Reduced Medicaid can be found at <https://www.isbe.net/Documents/DC-Medicaid-Reduced.pdf>

Q: When students on a Household Eligibility Application (HEA) that was selected for verification are found in the Direct Verification file, does this application still count as part of the 3 percent sample?

A: Yes, once the sample is selected, Verification of those applications are completed if they are Directly Verified.

Q: Does the family need to receive any type of notification if they are part of the 3 percent sample and the student is Directly Verified?

A: No. Since the child was Directly Verified you will not need to notify the family.

Q: Are Household Eligibility Applications that are originally approved based on Homeless or Head Start subject to verification?

A: No.

Q: When an application has a student approved with foster benefits and two children from the household approved for reduced benefits based on income, how should the LEA count this application on the Verification Summary Report?

A: When possible the foster student should be Directly Certified. In the case where a foster child cannot be Directly Certified, the application would be counted as a reduced income application for Step 1 of the Verification Summary Report. On Step 3, Section 4 when counting students on application on the last operating day of the month of October, include the foster child with the categorically eligible students and the reduced students as such.

Q: If the carryover period ends after Oct 1, when do we verify those applications?

A: The Oct. 1 application count includes only applications that are received in the current school year and does not include any carryover benefits. USDA encourages LEAs to contact families prior to Oct. 1 to offer and explain the importance of a new application during the carryover period.

Q: From what I understand I need to verify any error-prone applications first. I see that it says if an error-prone application is terminated because of the confirmation review, I should select another application. Can you explain what it means by terminated?

A: You are correct that the first application to use for Verification will be pulled from any error-prone applications you may have received. The confirmation review is the process of rechecking the calculations and original determination. If the original determination is found to be correct, you will proceed with the Verification process. However, if after recalculating the application the original determination was incorrect and the household is no longer eligible for benefits you will need to notify the family of the change in status and select a new application for Verification purposes.

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

A: 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.

Q: Our school has 180 approved applications on file as of Oct. 1, how many must we verify?

A: Six. They must use the standard sample size: 3 percent 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.

Q: Our 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

How many applications must we verify?

A: Three. Keep in mind the Verification sample is selected from the number of approved applications, not students, on Oct. 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.

Q: Our district must verify three applications. Of our 88 applications, two are error-prone. Is verifying the two error-prone applications sufficient?

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

Q: 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?

Q: 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).

Q: 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?

A: 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. If the application cannot be verified through Direct Verification you must contact the household and request supporting documentation for the SNAP number provided on the application.

Q: Our district did not complete and submit the ISBE Verification Summary Report (VSR) by Dec. 15. What are the possible issues that could result from failure to complete and submit an accurate VSR by the deadline?

A: Any NSLP/SBP sponsor (district) that does not submit the VSR by the Dec. 15 deadline is subject to withholding of payment of any meal claims filed after Dec. 15. 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.

Q: Our district has 13 NSLP/SBP sites. Three of those sites are operating CEP, and one site is an RCCI with no day students. How many sites will need to complete the Verification process?

A: Nine. CEP sites and RCCIs with no day students are exempted from the Verification process. Only the nine sites that actually use and process Household Eligibility Applications will need to complete the actual process of verification.

Q: An application approved on Aug. 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?

A: 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.

Q: Can a household affected by a reduction or termination of benefits after the Verification process reapply?

A: Yes they can reapply at any time as eligibility may change, although they are required to submit income documentation or proof of participation in SNAP or TANF at the time they reapply that school year. The LEA should verify eligibility.

Q: If a household does not respond after 10 calendar days to the request for verification documents and a second notification is sent how many days should pass before beginning the termination steps?

A: After the initial 10 calendar day period has passed, LEAs should send a second notification requesting documentation and allow three business days to pass before starting the termination process. Business days means working days, typically Monday- Friday and excluding holidays. If your district is on a fall break or school is out of session for reasons not due to a holiday, i.e., teacher conference days, you should still expect a response within three business days.

Q: Our district has an alternative program that accepts students from neighboring districts, and we feed these students. Who should process their Household Eligibility Applications? Who should claim the meals for reimbursement?

A: Answers to these situations can vary from school to school depending on multiple factors. Please contact ISBE's Nutrition Department for guidance on your specific scenario. Information on "Pupil Placements" can also be found on page J-14 of ISBE's [School Nutrition Programs Handbook](#).

Q: I have a student who is not the recipient of SNAP benefits, but their infant sibling is receiving SNAP. Do those benefits still extend to the older child who is enrolled in school? Or are the benefits only for the enrolled student?

A: If any member of the household infant to grandparent receives SNAP/TANF benefits they can be extended to the school-aged children. Some individuals are not within our age parameters for the data we receive from Department of Human Services (DHS), so they will not display in Direct Certification. Sponsors should give household members meal benefits based on face value and that one application would need to be included in the “pool” of applications that are subject to verification. If they were selected the household would just need to provide the DHS records for the household member associated with the SNAP or TANF case number.

Q: One of the applications we received has a 9-digit number and we approved it for free meal benefits because of this. If the application does not get picked for verification but do we count it in our number of applications we have?

A: Applications with a 9-digit number that cannot be found as Directly Certified should be approved for free meal benefits based on the face value of the application. However, this application is still subject to verification and should be included in the application counts on the Verification Summary Report under question 1, which asks for a total count of all SNAP/TANF applications not found in Direct Certification files.

Additional resources can also be found by visiting our *School-Based Child Nutrition Programs Forms, Documents and Resources* webpage at <https://www.isbe.net/Pages/School-Based-Child-Nutrition-Documents.aspx>. Verification resources for the current year are located under the “SY 2022-23 Verification and VSR” drop-down option.