

The Verification Process

Part 1



September 15, 2026

Good afternoon. This is Kylee Champagne, Education Consultant with LDOE Division of Nutrition Support for the School Food Service Program. Today we will discuss Part 1 of the Verification Process.

Acronyms used in this training:

CEP - Community Eligibility Program

DW CEP - District Wide Community Eligibility Program

LEA - Local Education Agency

NSLP - National School Lunch Program

RCCI - Residential Child Care Institution

SFA - School Food Authority

References: 1) [§245.6a Verification requirements](#)

2) [Eligibility Manual for School Meals](#)

3) [USDA Verification Toolkit](#)

What is Verification?

- ❖ The process of confirming the eligibility for free and reduced-price meals under the National School Lunch Program
- ❖ **MUST** include either confirmation of income eligibility or confirmation that the child is eligible to receive benefits from assistance programs
 - *Verification is performed on a percentage of applications, NOT all the applications on file*



So *what is Verification?* Verification is the process of confirming that applications submitted for participation in NSLP were eligible under the income eligibility guidelines. Section 9(b)(3) of the National School Lunch Act and regulations at [7 CFR 245.6a\(c\)\(1\)](#) establish requirements for LEAs to verify eligibility of children in a sample of household applications approved for free and reduced price meal benefits for that school year. Verification is only required when eligibility is determined through the application process, and is not required for eligibility determinations made through the direct certification process.

Verification **MUST** include either a confirmation of the family's income eligibility, or confirmation that the child is otherwise categorically eligible for participation.

Verification **MAY** also include confirmation of any other information required on the application, such as household size.

Another thing to note, is that not all applications are required to be verified—it is a percentage of applications. We will discuss the methods for selecting applications on a later slide.

Which SFAs are required to complete the Verification Process?

All School Food Authorities participating in school meal programs who utilize the free and reduced application process

1. Traditional
2. Partial CEP
3. RCCIs WITH day students
(verification completed for 'day' students only)

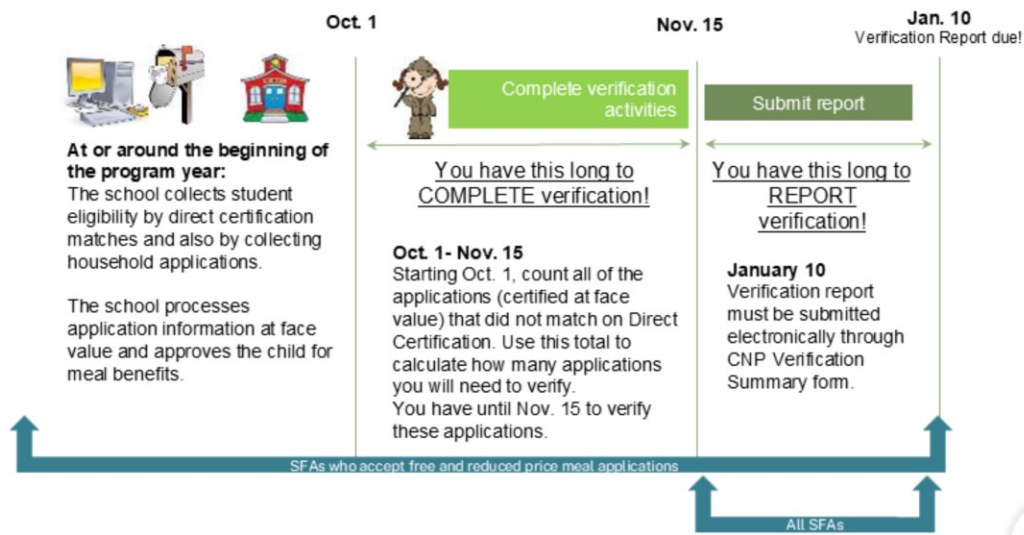
*SFAs who do not collect applications
(DW CEP and RCCIs without day students)
do not have to perform the verification process, but
MUST complete the online Verification Summary Form (FNS 742)*



While we discuss the verification process, it's important to understand which SFAs *are* and which SFAs *are not* required to complete all steps of the verification process. The verification process is required for any participating SFA who uses free and reduced applications: traditional SFAs, partial CEP, and RCCIs with day students. Partial CEP districts will have to complete the entire verification process only on the schools who are not CEP.

***Note** District-wide CEPs and RCCIs without day students will not complete steps 1 - 4 of the verification process, but must complete Step 5: Submit results on Verification Summary Report (FNS-742) due January 10.

Verification Overview



At, or near the beginning of the year, SFAs will collect student eligibility in two ways: through Direct Certification matches and through household applications.

Starting October 1, count all of the applications (certified at face value) that did not match on Direct Certification. Applications that were submitted and found through direct certification are not eligible for verification. Use this total to calculate how many applications you will need to verify. You have until November 15 to verify these applications.

November 15th thru January 10th is the timeline to report the results of Verification on the Verification Summary Form. ALL SFAs, regardless of their type, are required to report results because it includes additional information used by USDA such as enrollment, identified students, and the number of operating sites per SFA.

* Important note on deadlines:

- If October 1 falls on a weekend, use the next operating day to establish the sample pool
- If Nov 15 or Jan 10 fall on a weekend, verification activities and verification reporting must be completed by the deadline. There will be no extensions to these deadlines as these are set in federal regulations.

Verification Activity	Proposed Deadline for SY 26-27
Attend verification trainings offered by the State agency (SA) — register through Louisiana Fit Kids Website: louisianafitkids.com	The Verification Process: Part 1 - September 15, 2026 The Verification Process: Part 2 - November 17, 2026
Request technical assistance or call SA with verification questions as needed.	As needed
Communicate regularly with SIS coordinator to upload eScholar DC lists and determine near matches.	At least monthly. Upload eScholar DC list and determine near matches.
Receive, review, and process meal applications as they are received. Notify the household of the children's eligibility and provide the eligible children the benefits to which they are entitled within 10 operating days of receiving the application. Error prone applications should be "flagged" when the Determining Official determines the eligibility status and signs each application.	
Select the Sample Pool and establish the Sample Size (3% of approved applications, <i>rounded up</i>).	October 1st, 2026
Draft "Notice of Selection" verification letter and place this, along with verification packet, in the mail to the selected households.	Notice of Selection letter and verification packet mailed to selected households by October 12, 2026 with a deadline of October 23, 2026.
If no response is received on or before October 23, the SFA must issue a follow-up letter.	A follow-up verification letter must be sent by October 26, 2026 to all households that have not responded to verification with a final deadline of November 6, 2026.
If no response is received from the households selected for verification, a letter of adverse action will be issued with the deadline to appeal set for 10 calendar days following the date of the letter.	The letter of adverse action must be sent to all households that have not responded to verification by November 9, 2026. This letter must provide a 10-day appeal period following the date of the letter. The status reduction will take place on November 19, 2026.
Maintain organized documentation of applications and verification documents.	Ongoing



This is a proposed timeline of activities we've created with the help of some SFAs who have struggled with missing deadlines in the past. For SFAs who receive and process household applications, this proposed timeline can be utilized as a resource (and modified as needed) to ensure all deadlines are met this school year.

Collection Officials



Next, we will discuss the Collection Officials that are reported for all SFAs on the online CNP applications.

COLLECTION OFFICIALS

Determining Official	Pre-Verifying Official (Confirming)	Verifying Official	Hearing Official
➤ Determines eligibility status and signs all applications ➤ Flags error prone applications ➤ May not be Pre-Verifying/Confirming Official ➤ Responsible for "For School Use Only" Section of application	➤ Only necessary in Verification ➤ Must sign all applications selected for verification ➤ May be a software system	➤ Responsible for Verification ➤ May be the Determining OR Pre-Verifying Official ➤ Must sign all applications selected for Verification	➤ Someone otherwise separate from the process ➤ An unbiased person who can review appeals (business manager, superintendent, child welfare, etc)



There are 4 types of Collection Officials:

- 1) Determining
- 2) Pre-Verifying (also known as Confirming)
- 3) Verifying
- 4) Hearing

Collection Officials are identified as part of the application submitted annually on the CNP website.

THE DETERMINING OFFICIAL

- ❖ Responsible for determining the status of all free/reduced (F/R) applications submitted
- ❖ The status determination is based on information reported on the F/R meal application
- ❖ Large SFAs may have more than one Determining Official

*** The Determining Official must sign each application or batch sheet after the eligibility determination is made.**



8

The Determining Official

- determines eligibility status of all free and reduced applications using the information provided on applications. They will sign all applications as they process them.
- may not be the Pre-Verifying (Confirming) Official who will conduct a second level review of all applications selected for verification.
- is responsible for “For School Use Only” Section of the application.

Larger SFAs may have multiple people designated for the Determining Official roll — many schools will allow the manager for each school to be the Determining Official for all applications coming in to that school.

The Determining Official or Officials Determine Free or Reduced status by:

- checking to make sure the application is complete.
- following up on applications with missing information. Any missing or additional information provided to the Determining Official should be documented on the application in a different color ink and initialed and dated by the person who collected the information.
- calculating and/or evaluating the application for eligibility.
- assigning and recording F/R status on each application or batch sheet.

The Determining Official must sign each application or batch sheet after the eligibility determination is made.

THE PRE-VERIFYING OFFICIAL

The pre-verification of applications is necessary only for applications selected for verification.

- ❖ Responsible for validating status determination made by the Determining Official
- ❖ Cannot be the Determining Official
- ❖ Can be reported as a computer in systems that utilize a computerized application approval process



Next, we will discuss the Pre-Verifying Official.

The Pre-Verifying (Confirming) Official will only verify applications that are selected for Verification. They do not need to confirm the status eligibility of ALL applications as the Determining Official does.

When applications are pulled for Verification, the Pre-Verifying Official will first check the application to confirm that the status was appropriately determined. This person may NOT be the Determining Official; however, the Pre-Verifying Official CAN be reported as a software program that has the ability to check and approve applications.

THE VERIFYING OFFICIAL

➤ Responsible for the annually required verification process:

- Selection process
- Notification of selection
- Follow-up
- Verification of submitted information
- Notification of results of verification

* The Verifying Official can be the Determining or the Pre-Verifying Official



The next Collection Official is the Verifying Official. This person will be responsible for the overall verification process from October 1st - November 15th. This person will be responsible for the selection process, notifying households of selection, following-up with households, reviewing all documentation submitted by households, and notifying households of the results of verification.

Please note that the Verifying Official can be the Determining Official OR the Pre-Verifying Official. Only the Determining and Pre-Verifying Officials cannot be the same person.

REMEMBER:

- ❖ All apps (or batch of apps) require a signature from the Determining Official.
- ❖ However, only applications **selected** for verification require a signature from the Pre-Verifying (Confirming) Official and the Verifying Official.



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All apps (or batch of apps) require a signature from the Determining Official.

However, only applications **selected** for verification require a signature from the Pre-Verifying (Confirming) Official and the Verifying Official.

THE HEARING OFFICIAL

- ❖ Responsible for reviewing a household's challenge of a status determination
- ❖ Should be independent of any activity involved in the application approval or verification process

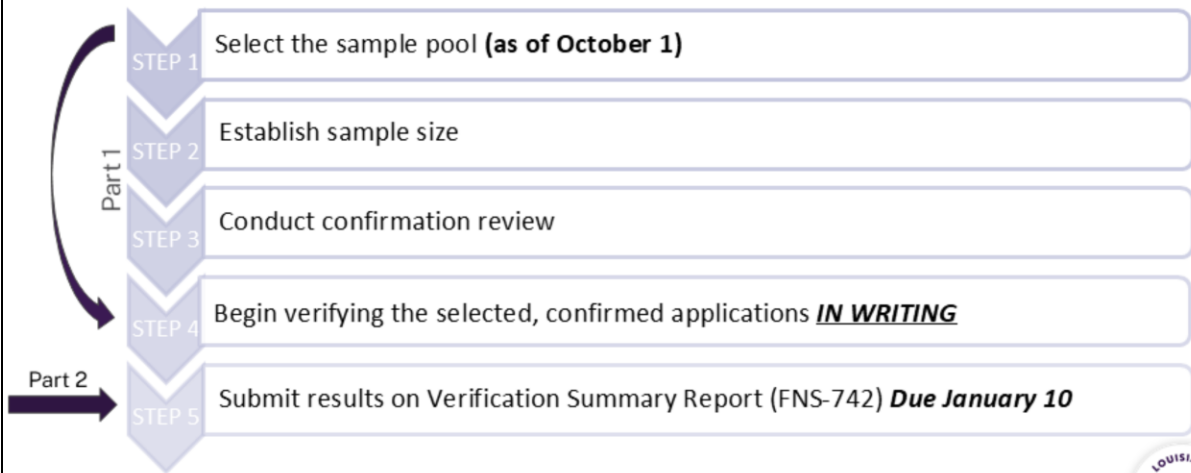


The Hearing Official is responsible for reviewing a household's challenge of a status determination. This person should be otherwise independent of any activity involved in the application approval and verification process. Often, a superintendent, business manager, or child welfare advocate will fill this role.

STEPS TO VERIFICATION



STEPS TO VERIFICATION



Here is an overview of the steps involved.

First, you will select the sample pool as of the number of applications on file on October 1st.

Second, you will **establish your sample size**. The sample size must be based on the October 1st sample pool.

Third, the Pre-Verifying Official will conduct a **confirmation review** of all applications selected for verification.

Next, you will **begin verifying the selected applications in writing**.

And lastly, you will **submit your results on the Verification Summary Form** which typically opens mid-November and is due on or before January 10th.

Now, let's discuss these steps in more detail.

Step 1: SELECT THE SAMPLE POOL

- ❖ SFAs are required to verify approved applications on file as of October 1.
(If October 1 falls on a weekend, use the next operating day to establish the sample pool)
- ❖ Count all of the applications (certified at face value) that did NOT match on Direct Certification.
- ❖ Students approved as free without an application are NOT subject to verification.
- ❖ Any applications pulled for **verification for cause** would also NOT be counted in the sample pool.



The sample pool depends on the total number of approved applications on file as of October 1st of the current school year, including paper and electronic applications. The sample pool is not based on the number of children eligible for free and reduced price benefits, as some eligible students will have established eligibility through the direct certification process and will not have an application on file. In addition, the sample pool does not include applications where all children in the household are determined eligible based on documentation provided by the State or local agency responsible for the administration of SNAP, FDPIR, TANF, or Medicaid or applications where all children in the household are determined to be foster, homeless, migrant, or runaway children.

Step 1: WHO IS SUBJECT TO VERIFICATION?

Those households with a free or reduced-priced APPROVED application on file as of October 1 are subject to verification, including:

1. Income applications:

- Free Income
- Reduced-Priced Income

2. SNAP applications

3. Foster child applications



Those households with a free or reduced price APPROVED application on file as of October 1 are subject to verification including:

1. Income applications:
 - Free Income
 - Reduced-Priced Income
1. SNAP applications
2. Foster child applications

STEP 1: WHO IS NOT SUBJECT TO VERIFICATION?

In some cases, students are determined Free based on agency documents, not a Free or Reduced application, and therefore are not subject to verification:

1. Children who have been certified under Direct Certification (and their siblings) at any point in the current SY
2. Children in RCCIs – except for “day” students
3. **Foster children** that are directly certified (documentation was provided from DCFS to school/central office with no HH involvement)
4. Children deemed homeless, migrant or runaway by the appropriate Official
5. Children enrolled in a Head Start or Even Start program

❖ If the child is categorically eligible under DC, foster, homeless, migrant or runaway by agency records and the parent submitted an application, the application is NOT subject to verification — categorical free eligibility supersedes the application.

Denied or paid applications are not subject to verification



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Children who have been certified under Direct Certification (and their siblings) at any point in the current SY

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Foster children that are directly certified (documentation was provided from DCFS to school/central office with no HH involvement)

Children deemed homeless, migrant or runaway by the appropriate official

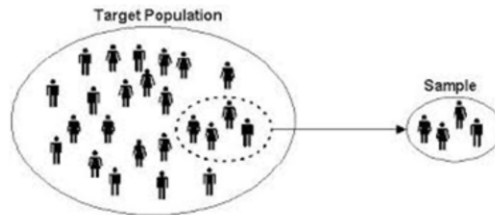
Children enrolled in a Head Start or Even Start program

If the child is categorically eligible under DC, foster, homeless, migrant or runaway by agency records and the parent submitted an application, the application is NOT subject to verification— categorical free eligibility supersedes the application.

Denied or paid applications are not subject to verification

Step 2: ESTABLISH THE SAMPLE SIZE

- ❖ Standard (Basic) Method
- ❖ Alternate 1 (Random)*
- ❖ Alternate 2 (Focused)*



*Only LEAs approved to use Alternate 1 or Alternate 2 may use this method.
Refer to Memo: [Verification Response Rates for SY 2026-2027](#)



Once the sample pool is determined, the LEA must calculate the sample size, or the number of applications that must be verified. **When calculating the sample size, round up to the nearest whole number.** At least one application must always be verified. With the exception of verification for cause, LEAs must not verify more or less than the standard sample size or the alternate sample size (when the alternate sample size is used).

Step 2: THE STANDARD (BASIC) METHOD

❖ Most SFAs will use the standard (basic) method

- Multiply the total free and reduced-priced applications on file as of October 1 by 0.03 to get a 3% Sample Size

* Round up to get a whole number of applications to pull for Verification

❖ Select the 3% of free/reduced-priced applications from error prone applications

Error prone applications are those applications with an income listed within \$100/month (\$1,200/year) above or below the free eligibility limit or \$100/month (\$1,200/year) below reduced-price eligibility limit.

❖ The Determining Official should 'flag' all error prone apps during the approval process

In cases where there are not enough error prone applications to comply with the required sample options, SFAs must randomly select additional applications to fulfill the 3% requirement.



19

The Standard method must be used by an LEA unless the LEA qualifies to use an alternate sample size. The standard size is equal to the lesser of: 3% of all applications approved by the LEA for the school year as of October 1st of the school year, selected from error prone applications; OR 3000 error prone applications approved by the LEA for the school year as of October 1st of the school year.

Note - if using computer software to determine how many applications to sample, ensure to "hand count" and double check the total number required for the sample size. Last year there were a number of LEAs who verified less than the minimum (3%) because their software did not calculate or round up correctly.

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The Determining Official should 'flag' all error prone apps during the approval process

In cases where there are not enough error prone applications to comply with the required sample options, SFAs must randomly select additional applications to fulfill the 3% requirement.

EXAMPLE: THE STANDARD (BASIC) METHOD

An LEA has 210 approved applications as of October 1

- How many applications must be verified?
- By what date?
- What type of applications must be selected?



Let's look at an example.

An LEA has 210 approved applications on file as of October 1st.

How many applications will they need to verify?

By what date?

What type of applications must be selected?

EXAMPLE: THE STANDARD (BASIC) METHOD

- ❖ 210 approved applications as of Oct 1
 $210 \times .03 = 6.3 \rightarrow \underline{7 \text{ applications}}$
Seven applications must be verified by Nov 15

These seven applications must be selected from **error prone** applications

- If you have only six error prone apps, the seventh is selected randomly from the rest of the applications.
- If you have eight error prone apps, you randomly select and verify seven of them.



There are 210 approved applications on file as of October 1st

$$210 \times .03 = 6.3 \rightarrow \underline{7 \text{ applications}}$$

Seven applications must be verified **by Nov 15**

These seven applications must be selected from error prone applications

If you have only six error prone applications, the seventh is selected randomly from the rest of the applications

If you have eight error prone apps, you must randomly select and verify seven of them.

Step 2: ALTERNATE ONE (RANDOM) METHOD

- ❖ If qualified to use this alternate sample, an SFA may select 3% at RANDOM from approved applications on file as of October 1 (regardless of error prone)
- ❖ With the **Random Method**, error prone applications are not identified for verification selection as done in the Basic/Standard Method



In the case that your school system had less than a 20% non-response rate in SY 2026, the Alternate One or *Random Method* is an option.

The Alternate 1 sample size is the lesser of:
3% of all applications approved by the LEA for the school year, as of October 1st of the school year, selected at RANDOM; or
3000 applications approved by the LEA for the school year, as of October 1st of the school year, selected at RANDOM.

With the **Random Method**, error prone applications are not identified for verification selection as done in the Basic/Standard Method

EXAMPLE: ALTERNATE ONE (RANDOM) METHOD

You have 75 approved applications as of October 1

- How many applications will you need to verify?
- By what date?
- What type of applications must you select?



Let's take a look at an example using the Random Method.

You have 75 approved applications as of October 1
How many applications will need to be pulled for verification?
By what date will you need to pull and verify all applications?
What type of applications will you need to pull?

EXAMPLE: ALTERNATE ONE (RANDOM) METHOD

For 75 approved applications as of October 1st, *random selection* would be to used to get the applications required for verification by **November 15th**.

$$75 \times 0.03 = 2.25 \rightarrow \underline{\text{3 applications}}$$



For 75 approved applications as of October 1st, *random selection* would be to used to get the applications required for verification by **November 15th**.

The math used to get this number is $75 \times 0.03 = 2.25 \rightarrow \underline{\text{3 applications}}$.

Please be reminded that you will round up to the nearest whole number. Also note that these applications are randomly selected, without regard to error prone status.

Step 2: ALTERNATE TWO (FOCUSED) METHOD

The sample size is completed in two parts:

1. All approved applications
2. SNAP applications



- ❖ The sample size for all approved apps is determined by:
 - ❖ Taking 1% of all approved apps on file as of October 1
 - ❖ Select these from error prone income applications
- ❖ The sample size for SNAP apps is determined by:
 - ❖ Taking 0.5% of all approved SNAP apps on file as of October 1 (case numbers)



25

LEAs with less than a 20% non-response rate in the prior school year are approved to use the Focused Method.

Using this method, your sample size will equal the lesser of the sum of EITHER:
1000 of all applications approved by the LEA as of October 1st of the school year, selected from error prone applications; or
1% of all applications approved by the LEA as of October 1st of the school year, selected from error prone applications.

PLUS the lesser of:

500 applications approved by the LEA as of October 1st of the school year which provide case numbers in lieu of income information; OR

One-half of one percent (.5%) of applications approved by the LEA as of October 1st of the school year that provide case numbers in lieu of income information.

EXAMPLE: ALTERNATE TWO (FOCUSED) METHOD

You have 245 apps on file as of October 1 with 60 of the 245 being SNAP apps.



- How many error prone applications will you need to verify?
- How many SNAP applications will you need to verify?
- By what date?



Now let's discuss an example using the Alternate Two, or focused, method.

You have 245 applications on file as of October 1st with 60 of the 245 being SNAP applications.

How many SNAP applications do you need to verify?

How many error prone applications do you need to verify?

And, by what date?

EXAMPLE: ALTERNATE TWO (RANDOM) METHOD



You have 245 apps on file as of October 1 with 60 of the 245 being SNAP apps.

- How many error prone applications will you need to verify?

$$245 \times 0.01 = 2.45 \rightarrow \underline{3 \text{ applications}}$$

- How many SNAP applications will you need to verify?

$$60 \times 0.005 = 0.3 \rightarrow \underline{1 \text{ application}}$$



We will complete this example in two steps. First we will calculate how many error prone applications we need to verify by multiplying our total number of applications by 1%. 245 multiplied by 1% is equal to 2.45 or 3 applications. These 3 applications will be pulled from error prone applications.

Next, we will calculate the number of SNAP number applications we need to verify. We will multiply the number of SNAP applications on file by 3%. (Remember that these applications have SNAP numbers that were not found on the Direct Certification SNAP lists.) So in this case, we have 60 SNAP applications multiplied by 1% which is equal to 0.3 rounded up to 1 application.

In this example, we will verify a total of 4 applications— 3 selected at random from error prone, and 1 selected at random from SNAP applications.

Step 2: WHICH METHOD CAN YOU USE?

Systems use their previous years' non-response rates to determine the method they are eligible for:

- ❖ **< 20% non-response rate** in the previous SY may use **any method** for verification
- ❖ **> 20% non-response rate** in the previous SY **must** use the **Basic/Standard Method**

Refer to SFS Memo: [Verification Response Rates for SY 2026-2027](#)



Let's review which method you can use for selecting your sample size. We use the previous school year's non-response rates to determine the method you will use for verification in the current school year. If you have a less than 20% Non-Response rate in the previous SY, you may use ANY method for verification—the Standard/Basic, Alternate 1, or Alternate 2.

However, if your non-response rate was 20% or greater in the previous school year, or if you didn't CONDUCT verification in the previous school year—such as a new SFA, or an SFA that has just started re-using applications, then you will need to use the Basic/Standard method.

Step 2: WHAT IS A NON-RESPONSE RATE?

- ❖ Any SFA with a non-response rate for the preceding school year of less than 20% qualifies for using the random or focused methods.
- ❖ The non-response rate is the percentage of approved household applications with no response to the request for verification information.

Example: In 2025, you select 7 applications for verification. You receive responses from 3.

What is your non-response rate for the 2025-2026 SY?

Which method(s) will you be eligible for in the 2026-2027 SY?



The non-response rate is the percentage of approved household applications with no response to the request for verification information. So we know that any SFA with a non-response rate of less than 20% is eligible to use one of these alternate methods; however, there is also the option to use an alternate method for any SFA with an IMPROVED non-response rate. This is specifically for SFAs who with more than 20,000 children approved by applications as eligible, as of October 1st of the school year. These SFAs may use an alternate sample size for any school year when its non-response rate for the preceding school year was at least 10% below the non-response rate for the second preceding school year. If you have any questions about this qualification for use of an alternate method, please contact the State agency.

Let's look at an example of calculating a non-response rate.

In 2025, you select 7 applications for verification. You receive responses from 3.

What is your non-response rate for the 2025-2026 SY?

And which method or methods will you be eligible to use in the 2026-2027 SY?

Step 2: WHAT IS A NON-RESPONSE RATE?

Example: You select 7 applications for verification.

You receive responses from 3.

What is your non-response rate?

$$4 \text{ non-responders} \div 7 \text{ total applications} \times 100 =$$

57.14% non-response rate

Must use the Standard Method



30

If you divide the number of non-responders by the number of total applications selected for verification and multiply it by 100, you will get your non-response rate percentage. In this case, we had 4 non-responders out of 7 total applications. 4 divided by 7 times 100 is 57.14% non response rate.

In this case, since the non-response rate is 20% or greater, we will need to use the Standard/Basic method.

Step 2: VERIFICATION FOR CAUSE

- ❖ SFAs have an obligation to verify questionable applications (for cause).
- ❖ **'For cause'** may include, but is not limited to, zero income applications or situations where school officials have knowledge of household circumstances that would lead them to question the information on the application.



Apart from the required verification of a specified number of approved applications, regulations in [7 CFR 245.6a\(c\)\(7\)](#) require LEAs to verify any questionable application, including on a case-by-case basis, verifying any application for cause when the LEA is aware of additional income or persons in the household. This is known as Verification for Cause.

Determining Officials are strongly encouraged to contact the household to clarify any information that is unclear or questionable before certifying the application and proceeding with verification for cause. Once households have been requested to provide documentation for cause, the LEA must complete the verification process for these households.

Verification for cause cannot delay the approval of applications, and LEAs can begin the verification process only after determination of eligibility has been made. If an application is complete and indicated that child is eligible for free or reduced price benefits, the application **MUST** be approved while the LEA begins verification for cause.

When conducting verification for cause, the LEA verified applications for cause following the standard verification procedures described in this presentation.

Step 2: REPLACING APPLICATIONS

- ❖ An SFA may replace up to 5 percent of applications in the selected sample.
- ❖ SFAs should consider factors such as household stability and communication difficulties when declining applications.
- ❖ Any application removed from the sample must be replaced with another approved application.
 - ❖ First from error prone, and if not enough error prone, then select randomly from all approved applications.



After completing the confirmation reviews, the LEA may, on a case-by-case basis, replace up to five percent of applications selected. Applications may be replaced when the LEA believes the household would be unable to satisfactorily respond to the verification request. If five percent of total applications in the LEA results in less than one application total, one application may still be replaced. All results of the five percent calculation are rounded up to the next whole number. Any application removed **MUST** be replaced with another approved application selected on the same basis. For example, an error prone application must be substituted for a withdrawn error prone application. The newly selected application must then have a confirmation review.

Note - When an application is selected for verification and, prior to hearing back from the household in question, that household is found on a direct certification list, the application does not have to be replaced in the verification sample pool. The application would be marked as direct certification in the appropriate box in Section 3 of the FNS-742 which is the Verification Summary Form; then the application should be included in field 5-5 (the number of applications being selected for verification) on the FNS-742 and indicate the number of these applications that are being converted to direct certification in the remarks portion.

Step 3: CONDUCT CONFIRMATION REVIEW

Once the sample has been selected applications must undergo a confirmation review by the **Pre-Verifying (Confirming) Official**.

- ❖ This is someone *other than* the Determining Official.
(may be computer software)
- ❖ The Confirming Official reviews **ONLY** the applications selected for verification to ensure the accuracy of the initial determination.
- ❖ The **Confirming Official** must do a confirmation review of each application selected for verification; then sign the application or sign a cover letter to attach to the reviewed applications.
- ❖ This is done prior to contacting households.



33

Prior to any other verification activity, each approved application selected for verification must be reviewed to ensure the initial determination was accurate. Any LEA that conducts a confirmation review of all applications at the time of certification is not required to conduct confirmation reviews prior to verification. The confirmation review must be done by an individual other than the individual who made the initial eligibility determination.

This requirement is waived if the LEA uses a technology based system with a high level of accuracy in processing an initial eligibility determination. The LEA must receive approval through their online CNP application, where they submit their software system as the Confirming Official. If the State agency determines that the technology based system is inadequate, it may require the LEA to conduct a confirmation review of each application selected for verification.

After the Confirming Official has completed a confirmation review of each application selected for verification; they then sign the application or sign a cover letter to attach to the reviewed applications.

This is done prior to contacting households.

STEP 3: CONDUCT A CONFIRMATION REVIEW

LEAs Responsibilities Following a Status Change

[7 CFR 245.6a(e)(1)(i)(A-C)]

No Change in Status	The LEA verifies the application.
Status Change Reduced Price to Free	The LEA: • Makes the increased benefits available immediately; • Notifies the household of the change in benefits; and • Verifies the application.
Status Change Free to Reduced Price	The LEA: • Does not change the child's status; • Verifies the application; • Notifies the household of the correct eligibility status after verification is complete and, if required, send the household a notice of adverse action.
Status Change Free or Reduced Price to Paid	The LEA: • Immediately sends the household a notice of adverse action; • Does not verify the application; • Selects a similar application, such as another error prone application, for verification; • Follows the confirmation review procedures for the selected application.



Here is an overview of the LEA's responsibilities following a status change as the result of a confirmation review. We will discuss procedures if there is no change in status, a status change from reduced price to free, a status change from free to reduced price, or if there is a status change from free or reduced price to paid on the following slides.

Step 3: RESPONSIBILITIES FOLLOWING VERIFICATION

*If the initial determination of the application is **correct**:*

1.

If the initial determination of the application is correct, the SFA proceeds with verification



Step 3: RESPONSIBILITIES FOLLOWING A STATUS CHANGE REDUCED TO FREE

If the initial determination of the application is **incorrect** and status is **changed from reduced to free**, the SFA must:

1. Correct the household's eligibility status
2. Notify the household of the change in benefits
3. Proceed with verification of this application

Step 3: RESPONSIBILITIES FOLLOWING A STATUS CHANGE FREE TO REDUCED

If the initial determination of the application is **incorrect** and status is **changed from free to reduced**, the SFA must:

1.

NOT correct the household's eligibility status

2.

Proceed with verification of this application



Step 3: RESPONSIBILITIES FOLLOWING A STATUS CHANGE FREE OR REDUCED TO PAID

*If the initial determination of the application is **incorrect** and status is **changed to paid**, the SFA must:*

1. Immediately send the household a notice of adverse action
2. **NOT** verify the application
3. Select a similar application for confirmation and verification
4. Follow the confirmation review procedures for the newly selected application



Step 4: BEGIN VERIFYING THE SELECTED APPLICATIONS

Inform Selected Households:

- ❖ A letter must be sent to the households informing them of their selection for verification and of the types of eligibility documentation to be submitted **IN WRITING**.
- ❖ Households are allowed to submit proof of income for any point in time between one month prior to application and the time the verification notice is received.



Once selection procedures are complete, the LEA proceeds with household notification. Requirements for household notification of selection for verification are included at [7 CFR 245.6a\(f\)](#). When a household is selected for verification, the LEA must inform the household in writing of its selection and must provide a list of the documents or other forms of evidence the household must submit to the LEA. When the LEA uses agency records or direct verification to confirm eligibility, a letter or email informing the household of its selection for verification is not required, as verification is complete.

Step 4: BEGIN VERIFYING THE SELECTED APPLICATIONS

SFAs are encouraged to use the prototype verification forms on the [CNP website](#)

To find the forms,

→ Click on 



→ Search by title: “Verification” or tag “Income Verification”

- Verification Notice of Selection (English & Spanish)
- Results of Verification (English & Spanish)
- Verification Tracker for School Use
- Verification Flyers for Households - Submit Documents With Your Smartphone



40

SFAs are encouraged to use the prototype verification forms on the [CNP Resource Library](#) in order to ensure that all required areas are included in the notification.

The household notification letter must include the following:

- An indication that the household was selected for verification.
- If a child is receiving benefits based on income, a list of the types of acceptable information that may be provided to confirm the current income such as pay stubs, award letters from assistance agencies for benefits such as Social Security or SSI, or support payment decrees from court.
- If a child is receiving benefits based on categorical eligibility, an indication the household may provide proof that a child or any household member is receiving benefits under an assistance program or that a child is Other Source Categorically eligible instead of providing income information.
- A warning that information must be provided by a date specified by the LEA and that failure to do so will result in termination of benefits.
- A notice that documentation of income or receipt of assistance may be provided from any point in time between the month prior to application and the time the household is required to provide the income documentation.
- The name of a Determining Official who can answer questions and provide assistance.
- A telephone number the household can call at no cost for assistance.
- The full USDA non-discrimination statement.

What is the difference between Direct Certification and Direct Verification?	
Direct Certification	Direct Verification
Available all year	Available only during Verification (starting Oct. 1)
Conducted monthly during the school year	May use DV before contacting household for documentation
All enrollment must be run through the system	Only students on the applications selected for Verification may be run in the system
Results a "Match" = student and all household members are FREE	Result a "Match" = student and all household members are verified. Eligibility does not change
DCFS provides a file to LDOE (last day of month) who uploads the file to eScholar. eScholar matches DCFS file against student enrollment (Secure ID)	Data comes directly from DCFS file upload



What is Direct Verification?

[7 CFR 245.6a\(g\)](#) permits LEAs to “directly” verify approved applications selected for verification. Direct verification involves using public records from public agencies to verify household income or household participation in an eligible program, helping relieve families of additional paperwork and reducing the gap in meal benefits for eligible children resulting from non-response. Direct Verification may be completed at the State or local level, or through a joint effort at both levels.

LEAs are required to conduct Direct Certification, but are NOT required to conduct Direct Verification. Direct Verification must be conducted prior to contacting the household for documentation.

DIRECTLY VERIFIED APPLICATIONS

If households are selected for verification and later found on an October DC match:

- ❖ The application is directly verified and no additional verification is required
- ❖ The directly verified applications will be reported on the online summary form

* Directly verified applications do **NOT** need to be replaced



If a household is selected for verification and then later found on the October Direct Certification run with appropriate matches, SFAs may consider these apps as being “directly verified” and proceed with verifying the remaining applications in the sample following the usual process. The apps that are “directly verified” will still be logged in the online Verification Summary Form. Please be reminded that when households are found on DC, SFAs should always notify the household if they will be receiving a better status (in writing). SFAs with electronic systems should always update their database as well to show that the children listed on the now DC eligible application are DC free and not SNAP app or income based free.

FOLLOW-UP REQUIREMENT

- ❖ SFA sets the deadline for households to reply to the verification process (cannot be after November 15)
- ❖ SFA must follow-up (*in writing, by phone, or email*) with households who do not (or do not sufficiently) respond by the deadline; households are typically given a small extension with this contact
- ❖ Documentation of each contact must be maintained by the SFA



The National School Lunch Act requires LEAs to conduct verification follow-up activities. To continue the verification process after household notification, the LEA must either determine:

- If the household has submitted adequate information to complete its individual verification activity; or
- If follow-up with the household is needed.

The LEA must make at least 1 attempt to contact the household when the household does not adequately respond to the request for verification. “Non-responders” include no response and incomplete or ambiguous responses that do not permit the LEA to resolve children’s eligibility for free and reduced price meals. The required follow-up attempt may be in writing (by mail or email) or by telephone or text message. The LEA MUST document contact was attempted. Additionally, the LEA must ensure Limited English Proficiency households are provided adequate language assistance and understand the need to response to the verification request.

FOLLOW-UP REQUIREMENT

When following up with households, the LEA:

- ❖ Must inform the household that failure to provide adequate written evidence or failure to designate an adequate collateral contact will result in termination of benefits;
- ❖ Must attempt to obtain the missing written evidence or collateral contact information; and
- ❖ Must contact the household to complete the verification process, if the collateral contact is unwilling or unable to provide the requested information.



When following up with households, the LEA MUST:

- inform the household that failure to provide adequate written evidence or failure to designate an adequate collateral contact will result in termination of benefits;
- attempt to obtain the missing written evidence or collateral contact information; *and*
- contact the household to complete the verification process, if the collateral contact is unwilling or unable to provide the requested information.

COLLATERAL CONTACTS

- ❖ A collateral contact is a person outside of the household who is knowledgeable about the household's circumstances and can confirm a household's income level or participation in an assistance program or Other Source Categorical Eligibility Programs.
- ❖ Collateral contacts include employers, social service agencies, migrant workers' agencies, and religious or civic organizations. The Verifying Official should request a collateral contact only in cases when the household has not been able to provide adequate written evidence.



A collateral contact is a person outside of the household who is knowledgeable about the household's circumstances and can confirm a household's income level or participation in an assistance program or Other Source Categorical Eligibility Programs.

This can include employers, social service agencies, migrant workers' agencies, and religious or civic organizations. The Verifying Official should request a collateral contact only in cases when the household has not been able to provide adequate written evidence.

Acceptable Written Evidence	
Income Eligible	Contains: • The name of the household member • Amount of income received • Frequency received • The date the income was received <i>For example, a pay stub with no dates would be insufficient</i>
Categorically Eligible: Assistance Program	An official letter or notice indicating that the child or any household member is receiving benefits from that program, such as a notice of eligibility A document from an Assistance Program that does not specify the certification period does not meet the documentation for verification <i>For example, the identification cards for SNAP or TANF would be insufficient because they usually do not have an expiration date</i>
Categorically Eligible: Other Source	An official letter, notice, or list from the appropriate State agency, social service agency, program office or coordinator, or court

Here are examples of acceptable written evidence:

Income eligibility that contains

- The name of the household member
- Amount of income received
- Frequency received
- The date the income was received

Categorical eligibility from an assistance program that contains:

- An official letter or notice indicating that the child or any household member is receiving benefits from that program, such as a notice of eligibility
- A document from an Assistance Program that does not specify the certification period does not meet the documentation for verification.

Or Categorical eligibility from another source that contains:

- An official letter, notice, or list from the appropriate State agency, social service agency, program office or coordinator, or court

WHEN IS VERIFICATION COMPLETE?

- ❑ The household submits adequate written evidence that results in no change in status: **considered complete for this household.**
- ❑ The household submits adequate written evidence which indicates that the children should receive either a greater or lesser level of benefits: **considered complete for this household when the notice of adverse action is sent OR household is notified that its benefits will be increased or decreased.**
- ❑ The household indicates, verbally or in writing, that it no longer wishes to receive free or reduced price benefits: **considered complete when the notice of adverse action is sent.**
- ❑ The application provided case numbers and it is determined that no household member is receiving benefits from an Assistance Program: **considered complete when the notice of adverse action is sent.**
- ❑ The household does not respond or fails to provide adequate documentation after the required follow up or the household refuses to cooperate with verification effort: **considered complete when the notice of adverse action is sent.**



When is Verification Complete?

Verification is considered complete when:

1. The household submits adequate written evidence that results in no change in status: At this point, verification is considered complete for this household.
2. The household submits adequate written evidence which indicates that the children should receive either a greater or lesser level of benefits: Verification is considered complete for this household when the notice of adverse action is sent OR household is notified that its benefits will be increased or decreased.
3. The household indicates, verbally or in writing, that it no longer wishes to receive free or reduced price benefits: Verification is considered complete when the notice of adverse action is sent.
4. The application provided case numbers and it is determined that no household member is receiving benefits from an Assistance Program: Verification is considered complete when the notice of adverse action is sent.
5. The household does not respond or fails to provide adequate documentation after the required follow up or the household refuses to cooperate with verification effort: Verification is considered complete when the notice of adverse action is sent.

VERIFICATION RESULTS

If verification results in **decreased or terminated** benefits, the household must be given **10 calendar days** written advance notice of the change. The first day of the 10 calendar day advance notice is the day the notice is sent.

If the household does **not** request a hearing during the 10 calendar days, the reduction or termination of benefits must take place no later than **10 operating days after the 10 calendar day advance notice**.

If the household requests a hearing during the 10 calendar days, the SFA must continue to provide benefits for which the child was originally approved until a hearing is held and a final determination made.

If the Hearing Official rules that benefits must be reduced, this must take place within **10 operating days** after the Hearing Official renders the decision.

If the Hearing Official rules that benefits must be increased, this must take place within **3 operating days** after the Hearing Official renders the decision.



Here is an overview of Verification Results Timeline:

If verification results in **decreased or terminated** benefits, the household must be given **10 calendar days** written advance notice of the change. The first day of the 10 calendar day advance notice is the day the notice is sent.

If the household does **not** request a hearing during the 10 calendar days, the reduction or termination of benefits must take place no later than **10 operating days after the 10 calendar day advance notice**.

However, if the household requests a hearing during the 10 calendar days, the SFA must continue to provide benefits for which the child was originally approved until a hearing is held and a final determination made.

From here, if the Hearing Official rules that benefits must be reduced, this must take place within **10 operating days** after the Hearing Official renders the decision.

OR If the Hearing Official rules that benefits must be increased, this must take place within **3 operating days** after the Hearing Official renders the decision.

If you ever have a question about verification results, please contact the State agency for assistance.

NOTICE OF ADVERSE ACTION

The notice shall advise the household of:

1. The change
2. The reasons for the change
3. Notification of the right to appeal and when the appeal must be filed to ensure continued benefits while awaiting a hearing and decision
4. Instructions on how to appeal
5. The right to re-apply at any time during the school year



When a Notice of Adverse Action is issued, the notice shall advise the household of:

1. The change
2. The reasons for the change
3. Notification of the right to appeal and when the appeal must be filed to ensure continued benefits while awaiting a hearing and decision
4. Instructions on how to appeal
5. The right to re-apply at any time during the school year

Note: If a family's benefits are reduced as a result of verification (because they failed to respond or did not submit sufficient information to substantiate their income) and during the school year the family re-applies, the SFA **must** verify the new application prior to the family being approved for benefits. If the family refuses to provide the required information, free or reduced-price benefits must be denied.

Step 5: SUBMIT RESULTS ON THE VERIFICATION SUMMARY REPORT (FNS-742)

- All SFAs (including RCCIs) participating in the NSLP must complete Section 1 of the report
- SFAs using CEP must also complete the applicable sections of the form

**ALL SFAs are required to submit
Verification Summary Reports annually by January 10th**



50

The final step of the Verification Process is to complete the Verification Summary Report (FNS-742) on the CNP website. This final step will be discussed in greater detail in the Part 2 Verification Process training to be scheduled for later this year. The report will become available to edit mid-November and is due on January 10th annually.

Please note that ALL SFAs participating in the NSLP, including DW CEP and RCCIs, must complete the FNS-742 Verification Report.

Questions?

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