

IMPORTANT INFORMATION

Federal law requires that verification of applications for free and reduced price meals under the National School Lunch Act, School Nutrition Programs be completed by November 15th of each year. This is a process that checks the accuracy of information submitted for a percentage of applications for free and reduced student lunch eligibility. It may include, but is not limited to, the use of cross-check with food stamp eligibility lists, wage stubs, award letters, letters from employers, and third party contacts. The conditions and procedures described in this handbook must be followed in order to ensure accuracy.

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www.maine.gov/education/sfsr1.htm

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EXPLANATION

DEFINITIONS

Error-prone applications are income approved applications that indicate monthly income, within \$100 monthly (or annual income within \$1,200), of the income eligibility limits for free or reduced price school meals.

Nonresponse rate is the percentage of approved household applications for which verification information has not been obtained by an LEA (Local Education Agency).

Verification is confirmation of a percent of eligibility for free and reduced price applications under the National School Lunch Program or Breakfast Program. It MUST include either confirmation of income eligibility or confirmation that the child is included in a currently certified food stamp household or TANF (Temporary Assistance for Needy Families) unit. At State or local discretion, it may also include confirmation of any other information on the application, which is required as a condition of eligibility.

EXEMPTIONS

Verification efforts are not required:

- for children who have been certified under direct certification procedures including children documented as eligible migrant, runaway or homeless;
- for children in (RCCIs) Residential Child Care Institutions, except for applications for any day students attending the institution;
- in schools participating in the Special Milk Program. (NOTE: Schools may choose not to count applications for children in split-session kindergarten programs participating in the Pre-K/K Special Milk Program in meal program schools when determining the verification sample size.);
- in LEAs 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.

GENERAL REQUIREMENTS

Annually, each Local Education Agency (LEA) MUST select and verify a sample of applications approved for benefits.

LEAs operating under the Provision I, II, or III systems are only required to complete the verification process during the base year.

Each application selected for verification must be reviewed by someone other than the approving officer for correctness prior to sending the notices.

A no cost telephone number must be supplied for applicants to call the LEA with questions.

The basic sample size would be the lesser of: 3% of all approved applications (as of October 1 of the school year) selected from “**error-prone**” applications or, 3,000 approved error-prone applications. “Error-prone” applications would be those defined as such under current regulations or alternately, under criteria set by the Secretary.

There are two alternate methods, "random" or "focused" sampling methods. Prior written authorization to use an alternate method is required from the Child Nutrition Services Office.

-their “non-response rate” for the preceding year is less than 20%, or
-they are a local educational agency with more than 20,000 children approved by application as eligible for free or reduced price school meals as of October 1, and their “nonresponse rate” for preceding school year is at least 10% below the “nonresponse rate” for the second preceding school year.

- Alternate 1, random sampling, the sample size is a minimum of 3 percent of the total number of approved applications, selected randomly.
- Alternate 2, focused sampling, the sample size is a minimum of 1 percent of the total number of income approved applications, selected from applications with total household income within \$100 income monthly or \$1,200 annually of the mean eligibility limit for free and reduced price meals; PLUS .5 percent (one half of 1 percent) of the total number of applications that were approved based on categorical eligibility, selected from applications with a food stamp or TANF number.

The LEA MUST complete verification of the minimum required sample size by November 15th. Completion of verification is discussed further on **COMPLETION OF VERIFICATION** section.

Verification **MUST** take place after the application has been approved even when the LEA requires households to submit documentation of eligibility with the application and the initial approval is checked by another person. LEAs may verify no more than the required minimum sample.

The LEA **MUST** complete the verification process for all households that have been notified of their selection for verification and have been asked to submit verification information. For example, if the LEA has a requirement of 5 applications, it cannot select 10 applications on file and notify those households of their selection with the hopes of getting 5 households to respond to fulfill the verification requirement of 5 applications.

If the household does not respond to a verification request for information, the Local Education Agency is required to make at least 1 additional attempt to obtain the necessary verification information from the household. This must be done. It can be a phone call with notes stating person spoken with, date, time and results.

On individual case reviews, it also allows local educational agencies to “decline” to verify up to 5% of their verification sample and replace the declined applications with other approved applications. This is unique for unique situations; the State Agency must be contacted for direction.

NOTE: If any name randomly selected is that of: a family already selected this year, a denied family, a free milk application, or an application completed by a school official for a needy child, and then draw the next application in the file.

SAMPLE SELECTION

ERROR- PRONE SELECTION OF APPLICATIONS:

It is recommended that as the applications are approved the “Error-prone” applications are tagged or separated for purposes of selecting the applications for verification.

1. Determine the actual number of approved applications on file as of October 1st of the current school year.
2. Multiply the number of approved applications on file as of October 1st by 3% (.03) to obtain the number to be selected. Always round fractions or decimals upward to the next whole number in calculating the sample size.
3. Divide the number of approved applications on file by the number to be selected. Round up to the next whole number any fractional or decimal number. This gives the selection interval.
4. Pick a random starting point, from one to selection interval and repeat the selection interval until the required number of applications has been selected.
5. If the LEA does not have enough Error Prone applications to meet the 3% requirement, the remaining applications required will be randomly selected from all the remaining approved applications.

ALTERNATE 1, RANDOM SELECTION OF APPLICATIONS:

1. Determine the actual number of approved applications on file as of October 1st of the current school year.
2. Multiply the number of approved applications on file as of October 1st by 3% (.03) to obtain the number to be selected. Always round fractions or decimals upward to the next whole number in calculating the sample size.
3. Divide the number of approved applications on file by the number to be selected. Round up to the next whole number any fractional or decimal number. This gives the selection interval.

4. Pick a random starting point, from one to selection interval and repeat the selection interval until the required number of applications has been selected.

CASE STUDY OF XYZ ELEMENTARY SCHOOL – ERROR-PRONE AND RANDOM

1. On October 1st, XYZ Elementary School staff found that they had 170 approved applications.
2. They determined that 6 applications had to be randomly selected ($170 \times .03 = 5.10$, rounded up to 6).
3. They found that they needed to pick every 29th application until all 6 sample applications were selected ($170 \div 6 = 28.333$, rounded up to 29).
4. Randomly pick the first application then continue to pick applications 33, 62, 91, 120, 149, and since there are only 170 applications continue counting from the beginning #8.

ALTERNATE 2, FOCUSED SELECTION OF APPLICATIONS:

1. Determine the actual number of approved applications on file as of October 1st of the current school year.
2. Separate the applications into two groups: (1) applications approved with a TANF or food stamp case number; and (2) the applications that were approved on the basis of income.
3. Determine the number of Food Stamp/TANF applications.
4. Multiply the number of Food Stamp/TANF applications by .005 (1/2 %). Then multiply the total number of income approved applications by .01 (1%). This gives the required sample size for each group.
5. From the TANF food stamp group, select the required sample size using any method that is equitable and ensures that the same household is not selected each year.
6. From the group that reported income information select the required sample size from applications with monthly incomes within \$100 or annual income within \$1200 of the income eligibility guidelines.

If there are more applications with monthly income within these limits than are needed to meet the minimum sample size, select a sampling method that is equitable and ensures that the same households will not be selected year after year.

-OR-

If there are not enough applications within the limits to meet the required minimum sample size, complete the sample using those applications with monthly income closest to the eligibility levels, i.e. \$150 followed by \$200, etc.

NOTE: If any name randomly selected is that of: a family already selected this year, a denied family, a free milk application, or an application completed by a school official for a needy child, then draw the next application in the file.

CASE STUDY OF PQR PRIMARY SCHOOL – FOCUSED

1. On October 1st, PQR Primary School had 170 approved applications on file.
2. The applications were separated into two piles: a Food Stamp/TANF pile and an income eligible pile. (Department of Health and Human Services Letters are not included in the count, they are not subject to verification.)
3. There were 23 approved Food Stamp/TANF applications and 147 approved income eligible applications.
4. The staff determined that 1 Food Stamp/TANF application ($23 \times .005 = .115$, rounded to 1 application) and 2 income eligible applications ($147 \times .01 = 1.47$, rounded to 2 applications) had to be selected. Remember that the income eligible sample size is based on income approved applications.
5. The verification official asked another staff member, who had no knowledge of the applications to pick a number from 1 to 23. Number 16 was given so the 16th application in the Food Stamp/TANF pile was selected.
6. From the group that reported income information, select the required sample size from applications with monthly incomes within \$100 or annual income within \$1,200 of the income eligibility guidelines.

Focused sampling targets verification efforts on applications with a high likelihood of containing errors; that is, households providing income information on the application and reporting income just below the maximum eligibility level.

It takes longer to select applications for verification using focused sampling rather than random sampling, but the focused sampling method requires verification of less than half as many applications than if random sampling were used. The reduction in the number of applications that must be verified under focused sampling should more than make up for the extra time spent selecting applications.

Maine Department of Health and Human Services Letters of Notification of Predetermined Eligibility are excluded from verification.

Although the required sample size under error-prone, random and focused sampling is based on the number of approved applications on file as of October 1st, LEAs are urged to begin verification before this date. LEAs may, based on prior year's experience, project the number of approved applications that they anticipate will be on file on October 1st. However, the LEA **MUST** compare this estimate with the actual number of applications on file on October 1st and increase the sample size if the total number of approved applications on file exceeds the estimate.

HOUSEHOLD NOTIFICATION

Each household selected for verification must be sent a notice/letter informing them of their selection and of the types of acceptable information to the Local Education Agency (LEA). The letter/notice MUST include the following:

1. The household has been selected for verification (See “Household Notification of Verification”);
2. The household MUST provide the last four digits of the social security number for each adult household member or indicate that a household member does not possess one (See “Verification Information Update”);
3. The Privacy Act statement (See “Privacy Act Statement”);
4. The types of acceptable information that may be provided to confirm current income (See “Verification Documents”);
5. The household MUST submit documentation of income received during the most recent month that is available. If this monthly amount is not representative, the household should contact the LEA for assistance in determining acceptable documentation (See “Verification Documents”);
6. The household may provide proof that the child is a member of a currently certified food stamp/TANF household instead of providing income information and social security numbers of adult household members (See “Verification Information Update”);
7. The information MUST be provided by the date specified, generally 10 calendar days from date of letter, and that failure to do so will result in termination of benefits (See “Household Notification of Verification”); and
8. The name and no charge telephone number of a school official who can answer questions and provide assistance.

VERIFICATION METHODS

I. Written Evidence - Written evidence is the primary source of eligibility confirmation for all households, including Food Stamp and TANF households that could not be verified through Agency records.

A. Documents of Income

1. Examine documents or signed statements from income sources
 - * Check against names or last four digits of the social security number of adults.
 - * Check dates for most recent month and indication of payment frequency.
2. Verify Gross Income before withholding for FICA, taxes or other Deductions, even garnishments.

To Compute	Yearly Income
From Weekly Income Multiply by	52
From Biweekly " " "	26
From Semimonthly" " "	24
From Monthly " " "	12

3. Include all cash payments such as military housing, subsistence, etc., which are listed separately on military Leave and Earnings Statements; tips and commissions on civilian checks. Military Family Subsistence Supplemental Allowance (FSSA) is excluded from income.

LEAs **cannot** use conversion factors such as 4.33 to convert weekly income or 2.15 to convert bi-weekly income to monthly amounts. Software used must reflect this policy.

B. Documents of Self-Employment Income

1. Examine documents for information on both income and expenses.
 - * Check against names or last four digits of the social security number of adults.
 - * Check dates for most recent information, except that federal income tax information must be the previous year, since verification must be completed before the current year information is available.
2. Verify Net Income from the business or farming operation.
 - * Check the line on Schedule C or the line on Schedule F, that reports “profit or (loss)”.
 - * If information is missing, utilize “Letter to Parents for More Information” to send to parents and request the missing information.

NOTE: Business and/or Farming losses cannot be used to offset income from other sources. Losses are computed as zero income for that individual.

C. Documents of Food Stamp/TANF Eligibility

1. Examine the documents for the following:
 - * the names of every school age child listed on the application for free or reduced price school meals;
 - * the beginning and ending dates of the certification period.

II. Agency Records - A child's eligibility may be confirmed through the use of information maintained by other government agencies to which the LEA or school has legal access. The USDA regulations do not require that households be notified of selection when verification is made through agency records, since the household will not have to provide documents and household cooperation will not be necessary.

A. The LEA may use the DHHS Reference List of Predetermined Eligibility to verify the eligibility of a child on any application in the sample, where a Food Stamp or TANF number was given **for that family**. The list is online and available to the headmaster/superintendent.

B. The LEA may also submit the names and case numbers of children not on the DHHS Reference list to the local food stamp or TANF office. Food stamp/TANF offices are permitted by law to release eligibility information from their files to other Federal assistance programs and federally assisted State programs.

1. When using agency records, the LEA should request information for the most recent month available. (See “Letter to Food Stamp Office” and “Verification of Food Stamp/TANF Receipt”)
2. Households which dispute the validity of information acquired through systems of records **MUST** be given the opportunity to send more recent information through other verification procedures. (See “Household Notification if Verification)

III. Collateral Contacts - A collateral contact is a person outside of the household who is knowledgeable about the household's circumstances and can give confirmation of a household's income or Food Stamp/TANF status.

* The verifying official should request a collateral contact only in cases when the household has not been able to provide adequate written evidence.

* Collateral contacts include employers, social service agencies, and religious or civic organizations.

* The verifying official **MUST** give the household the opportunity to designate the collateral contact. However, the verifying official may select a collateral contact if the household fails to designate one or designates one which is unacceptable to the verifying official. In either case, no contact may be made without first notifying the household and obtaining their permission.

* The LEA can accept information from collateral contacts whether orally or in writing. All collateral contacts are to be documented, dated and initialed.

* If the collateral contact is unwilling or unable to provide the requested information, then the meal benefits must be terminated for failure to respond.

VERIFICATION RESULTS

One of the following four situations will result:

- 1) The household submits the required social security numbers and written evidence of current income that confirms the eligibility determination previously made. Verification is made and the household is notified in writing of continued meal benefits. See sample letter on “Letter to Parents of Verification Completion.”
- 2) The household submits the required social security numbers and written evidence of current income that shows that the household's eligibility should be for either a higher or lower level of benefits than the eligibility determination previously made. Verification indicates a change of status is needed and the household is notified in writing of its rights to a fair hearing, within 10 days. See sample letters of “Letter to Parents Verification Status Change 1”, “Letter to Parents Verification Status Change 2”, “Notice of Hearing Rights and Procedures”, and “Request for Hearing.”
- 3) The household does not respond to the request for income information and/or social security numbers, submits insufficient or obsolete written evidence, or fails to designate a collateral contact or fails to comply, the school officials **MUST** first:

* make a second attempt to contact the household to obtain the missing written evidence and inform the household that failure to comply will result in termination. This contact must be documented.

Then:

* If the household subsequently cooperates, then either 1) or 2) above would apply;

or

* terminate the household for failure to respond. A written notice of benefit termination and fair hearing rights must be sent to the household. (See sample letter “Letter to Parents of Verification Completion, Paid”, “Notice of Hearing Rights and Procedures”, and “Request for Hearing.”)

- 4) The household responds by stating that they no longer need the benefits. (See “Letter to Parents Thank You, Self Denial.”)

IMPLEMENTATION OF RESULTS

A. Notification to the Households

1. All households with children for whom benefits are to be reduced or terminated **MUST** be given 10 days written advance notice of the change.
2. The first day of the 10 days advance notice must be the day the notice is sent to the household.

3. The notice **MUST** advise the household of the following:
 - the change in benefits;
 - the reasons for the change;
 - the right to appeal the decision;
 - that an appeal must be filed within the 10-day advance notice period to ensure continued benefits while awaiting a hearing and decision;
 - instructions on how and when to appeal;
 - hearing procedures; and
 - that the household may reapply for benefits, but the family is still subject to verification

B. Notification to Households: Benefits Increase

- If verification results in higher benefits (e.g., a child who is moved from the reduced price to free category), this change is effective immediately. Parents should be notified through whatever channels the LEA uses to notify the household of approval for benefits.”

C. Notification to the School

1. Each school in the LEA must be notified of all changes in status resulting from verification and the effective date of each change. See “Verification Final Reports to Schools” for a sample notification form.
2. The school’s master list and any coded payment roster, or point of service checklist must be updated to reflect the changes. The status change must be documented on master lists.
3. The person maintaining the school's Daily Record Form and Accountability System must be notified of any changes in numbers eligible for free meals and reduced price meals. Daily edit checks are dependent on these numbers and must be performed as required per federal regulations.
4. Households may reapply for benefits if they have a reduction or termination of benefits based on verification.
5. The new application must be submitted with income documentation or proof of participation in Food Stamp, FDPIR or TANF for the approval process to take place. These are not considered new applications.

COMPLETION OF VERIFICATION

Verification of an individual application is complete when a household's eligibility for the level of benefits for which it was approved is:

- confirmed, or
- a change of status letter has been sent informing the household that benefits will be reduced or increased, or
- a change of status letter has been sent informing the household that benefits will be terminated.

HEARING PROCEDURES

The Local Education Agency **MUST** continue to provide benefits to students from households that appeal a reduction or termination of benefits within the 10 day advance notice period.

The hearing procedure in the Local Education Agency's free and reduced price policy statement **MUST** be followed. See "Notice of Hearing Rights and Procedures."

The hearing official **MUST** be an individual who was not connected with the approval or verification process.

The household may request a school conference prior to a formal hearing. This must not prejudice a latter appeal.

A written record shall be prepared with respect to each hearing, which shall include:

1. date and location;
2. the decision under appeal;
3. any documentary evidence and a summary of any oral testimony presented at the hearing; and
4. the decision and date of the hearing official, including the reasons therefore, and a copy of the notification of the decision of the hearing official to the parties concerned.

Such written record of each hearing shall be preserved for a period of three (3) years and shall be available for examination by the parties concerned or their representative at any reasonable time and place during such period.

VERIFICATION RECORDS

Local Education Authorities **MUST** maintain a description of their verification efforts. The description **MUST** include:

1. a summary of the verification efforts such as the selection process;

2. the total number of applications on file as of October 1st; and
3. the percentage or number of applications verified.

Either directly on the application or elsewhere, the LEA must keep a full record of:

1. dates that notices were sent;
2. notes, with date and contact name, on any contacts made;
3. sources of information or documents used;
4. copy of the information submitted by households whose benefits are reduced or terminated *;
5. all correspondence;
6. reasons for any denial or change of eligibility and the date;
7. written record of all hearings; and
8. signature of the verifying official.

* The actual documentation would be needed for supporting the verification findings, if appealed by the household.

All program records must be retained for three years plus the current year.

LEA'S REPORTING RESPONSIBILITIES






A summary of the results of the verification process must be submitted, on the Federal Verification Report, ("Maine Department of Education Verification Report") online at <http://www.maine.gov/education/forms/childnutrition/agreeappl/efn90.html> by November 20th of the current school year. Failure to correctly complete and submit this form in a timely manner could result in delayed payment of state and federal reimbursements. An email confirmation is sent to the individual filing the report, it is recommended this be printed and filed with required documentation.

TIPS ON MEETING THE VERIFICATION DEADLINES

Verification is an annual requirement; the deadlines are: completion by November 15th under Federal regulations, and reported to the Maine Department of Education by November 20th each school year. The deadline is the same whether it falls on a weekday or weekend. Do not wait for a reminder from the State office to complete the verification process.



Begin verification early, so that the agency records can be used to reduce the need for documentation from families.

-  Allow sufficient time for agencies (e.g., Food Stamp and/or TANF offices) to confirm household eligibility. Thirty days is the minimum a District should allow when using agency records in this process.
-  Mark the date verification is to begin and the deadline for completion on a calendar noting other important dates for follow-up action and deadlines.
-  Ensure that more than one person is aware of the deadline and of the verification requirements and/or assign an alternate verification official. This will help if one of the persons is suddenly unavailable to conduct verification.
-  Develop a written verification plan that includes the methods to be used and the time frames by which each step must be accomplished. The basic plan can be used year after year and can be given to new personnel to help them complete the process more easily in their first year of responsibility for verification.
-  Provide self addressed, stamped envelopes for all return mail from Food Stamp/TANF agency, and from households.

**DEPARTMENT OF EDUCATION
VERIFICATION PROCEDURE FOR MISSING OR LATE REPORTS**

PURPOSE: To provide a consistent plan for completing all missing or late verification reports submitted to the State Agency.

PROCEDURES:

1. Yearly in September the Maine Department of Education, Child Nutrition Services staff will offer verification training.
2.
 - A. November 5 or within two days, reminder notices will be sent out about the verification process.
 - B. November 20 or within two days, list of LEAs missing verification reports submitted to the Team Leader or designee.
 - C. December 1 or within two days, Child Nutrition Services staff will send reminder letters to Superintendents of LEAs without verification reports on file. A list of LEAs receiving letters will be given to the Team Leader or designee.
3. December 10 or within two days, Child Nutrition Services will send a second reminder letter. This letter will state possible actions, such as: unable to file for reimbursement, chance at not being eligible for grants, etc. List forwarded to Team Leader or designee.
4. December 20 or within two days, Child Nutrition Services staff will revoke the LEA's approval permissions to submit a claim for reimbursement. (Remind School LEAs that

after 60 days from the last day of the month a claim cannot be submitted.) Give list to Team Leader and all State Agency Child Nutrition staff.

5. **A.** Weekly lists will be given to the Team Leader or designee every Monday until all late reports are in and correct.
- B.** When the LEA’s verification report is received and correct, the Child Nutrition Office staff will reinstate passwords and permissions within three days.
6. If a LEA is unable to meet the Federal required deadline, the Superintendent must contact the Department of Education, Child Nutrition Services via U.S. mail or electronically and request a waiver for an extension including the following: reason, estimated completion date and actions to be taken to meet deadline next school year.

SAMPLE TIME LINE					
October 1	October 2	October 12	October 22	October 31	November 15
Select applications	Letters mailed to Guardians	Guardian Deadline for response to LEA	Deadline LEA to notify Guardians	Date eligible benefit change to take effect	Verification Report completed and filed on Child Nutrition Services web site

QUESTIONS AND ANSWERS

SAMPLING

1. **The Local Education Agency (LEA) chooses 3 percent of applications for verification, MUST it select 3 percent of the applications from each school in the LEA or is the sample selected from the LEA as a whole?**

LEAs are required to select and verify a sample of their approved free and reduced price applications. The LEA as a whole MUST meet the 3 percent sample. It does not mean that each school has to do 3 percent. The sample may be weighted based on the number of applications or enrollment in that school. Any selection method must ensure that all applications are subject to being sampled.

2. **If my sample size is 4.2 applications, do I verify 4 or 5?**

Partial numbers MUST be rounded up to the next whole number, so you would verify 5.

3. **Can I select more than the 3%?**

In accordance with FNS Memo SP 27-2006 (July 25, 2006): “It is important to note that the NSLA, as revised in 2004, now establishes an exact sample size for routine annual verification activities. LEAs must verify at least as many applications as calculated by the sample formula but may do no more. While the verification sample cannot exceed the statutory limits, LEAs still have an obligation to verify questionable applications (for cause)”.

4. **What should be done if the initial determination is found to be incorrect?**

The Local Education Agency must (1) correct the household’s eligibility status, (2) notify the household of the change, and (3) if the review indicates the household is not eligible for either free or reduced-priced school meals, notify the household of the reason and that the household may reapply with income documentation. If a preliminary review indicates that a household is eligible the Local Education Agency must proceed to verify the application.

5. **What if a child is selected for verification, but then transfers out of the school district before the information can be verified?**

Verification is considered complete when a household’s eligibility for the level of benefits for which it was approved is either confirmed or a change of status letter has been sent. If a child is selected for verification but transfers out of the district before the information can be verified, verification cannot be completed. To meet the minimum verification requirements, a new application **MUST** be selected.

6. **What if there are not enough “error-prone” applications to select from?**

In cases in which there are not enough “error-prone” applications to comply with the options, local educational authorities would be required to randomly select additional applications to fulfill the percentage or number requirement.

PROCESSING

7. **What if I use other Agency records and the Agency does not provide a response before November 15?**

The request for information from Agency records should be made in September or early October. The LEA should follow-up with a telephone call to the Agency in late October and be prepared to send a request for documents letter to each household in early October. Verification must be completed by November 15th.

8. **Am I verifying eligibility at the time of application or current eligibility?**

Verification is intended to establish current eligibility. When written evidence or collateral contacts are the primary sources of information, the LEA MUST require submission of income information for any point in time between the month prior to application and the time the household is required to provide income documentation. When using a system of records, the LEA may choose to verify a recent month and the entire sample may be verified for the same month. Households which dispute the validity of information acquired through systems of records MUST be given the opportunity to produce more recent information.

9. **Do we have to maintain the actual documentation from verification or just the results of verification?**

LEAs must maintain a record of the actual information sent and received for three years. It is important to maintain copies of documents for those households whose benefits are reduced or terminated. This documentation would be needed for supporting the verification findings if appealed by the household.

DOCUMENTING

10. **What items must appear on the documents submitted to confirm income?**

There are no prescribed items which must appear. The adequacy of the documents submitted to support the household's eligibility level must be judged by the verifying official. It is suggested that to verify income information, written evidence contain at least the name of the household member, income received, the frequency it is received, and the date. In addition, a social security number for an adult household member may be provided.

11. **What kind of written evidence is required for verification of a foster child's application?**

School officials should contact the household in which the foster child resides and ask for the name, agency and phone number of the social worker assigned to that child. A phone call to the social worker confirming the child's status as a foster child is acceptable. The school official should, however, document the phone conversation with the social worker (identifying the social worker, agency and phone number, the status of the child). Another approach would be to ask the foster family for a copy of a foster child's payment check (see "Sample Foster Child Check Stub"). If the family is unable to provide such information, a phone call to the placement agency to confirm the child's status and income should be made prior to denying the child for free meals.

12. **How is overtime income counted for the purposes of verification?**

The school official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If the overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income (without overtime).

13. **If applicants are self-employed, can they use their last year's tax return as written evidence on how they determined their projected income?**

Yes. Only the self-employed can use last year's tax return as written evidence for projected income. The use of tax return information by the household is voluntary.

14. **In instances of agriculture-related income, if an applicant is just beginning to sell his/her crops or products, what written evidence could be requested?**

Last year's records or financial ledgers or tax return can be used as an estimate of the current year's income.

14. **Is a court order, which specifies the amount of alimony or child support received adequate confirmation?**

Yes. However, a copy of the check would be better since that is the amount actually received. If the household understands this and still wants to use the court order of what has been ordered to be paid versus what is actually paid, it should be accepted. A collateral statement from an applicant's lawyer that court ordered payments are not being made or made regularly should also be accepted.

15. **How do I verify households that report zero income?**

Households may be requested to submit a signed written statement of how the household provides food, housing, clothing, etc. with no income or, a collateral contact could be requested to confirm the household's circumstances.

REFUSAL TO COOPERATE

16. **What do I do if a household refuses to submit verification information?**

Households who refuse to cooperate with verification efforts are subject to termination of benefits, after at least one additional attempt to obtain information. School officials, however, must give the applicants every opportunity to provide the information, perhaps by providing for the photocopying of important documents which the applicant does not want to relinquish; obtaining clarification of the documents submitted or an explanation of why documents are not being submitted or can't be submitted or lastly the name of someone who could give collateral information.

17. **If a household fails to respond or refuses to cooperate, and I terminate its eligibility, must I select a replacement application?**

No, this would count toward the minimum requirement.

18. **Can households that did not respond be reinstated?**

The household needs to complete a new application giving the current household income. If the income is under the family size and income guidelines the household can be approved for temporary benefits pending the outcome of renewed verification efforts.

APPEAL

19. **If a household disagrees with the verification findings, what must they do?**

When a household disagrees with the school's decision to reduce or terminate its benefits, the household may appeal the change of status. Households continue to receive benefits if they appeal the change of status within the 10-day advance notice period.