






# Verification Reminders SY 2023-24

ARM Section 6 – Verification of Eligibility

## Verification of Eligibility Deadlines and Required Actions:

 October 1, 2023	Count of approved meal applications on file
 October 31, 2023	Direct Verification module in Texas ELMS opens
 November 1, 2023	Count of students for annual Verification Report Verification Report opens – TX-UNPS > Download Forms SNP-123 Verification Report JotForm link
 November 15, 2023	Direct Verification module in Texas ELMS closes
 November 28, 2023	Verification process completed and households notified CE submission of Verification Report JotForm is due

**Required Forms:** [www.squaremeals.org](http://www.squaremeals.org) > NSLP > Eligibility and Verification > Application Verification

- ✓ **Verification Report | Individual Household Form** – Summary of the verification process for each household.
- ✓ **Verification Notification – Selection Letter for Households** – this is required by regulation. Not required for households directly verified.
- ✓ **Verification of Free and Reduced-Price Eligibility | Information for Households** – must be included with the letter to the households selected for verification of eligibility.
- ✓ **Verification Notification Results | Adverse Action or Continuation of Benefits Letter** (Step 4)

## Overview and Actions Prior to Conducting Verification

- Annually, the CE must randomly select and verify a sample of applications approved for benefits. This includes all applications for the CE, not by campus.
- The verification process may begin any time after the CE begins receiving applications. An estimate of applications to be verified can be based on last year's verification numbers. The CE may not verify more applications than are required based on the sampling method.
- CEs will conduct a Texas ELMS match at the end of September to identify any newly enrolled students since the September 5<sup>th</sup> upload. Update Master List to reflect any changes for students identified as Directly Certified (DC) in Texas ELMS; this could reduce the total number of applications counted as of October 1st.
- October 1, 2023, the CE counts the actual number of approved applications on file.
- CEs that utilize computer systems are advised to be certain the computer system has correctly calculated verification numbers. Some systems use normal rounding procedures to round down for decimals less than .5 causing the CE to be short of the verification requirement based on the October 1st count.
- At least one application must be verified.
- When determining the required verification sample size of applications to be verified, round all fractions upward.
- CEs may utilize the form fill *USDA School Food Authority (SFA) Verification Collection Report (FNS-742)* located in the NSLP Administration/Forms section on the [www.squaremeals.org](http://www.squaremeals.org) website to track data that will be entered into the required Verification Report.

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### Verification Report Data

- All CEs will need to count the number of students enrolled as of the last operating day in October. This includes the number of students with approved applications and the number of students directly certified BY EACH CATEGORY.
- The count of students with applications does not apply to sites that participate in CEP, P2 or RCCIs (unless day student applications are processed). CEs that participate in CEP and P2 are required to report the count of students directly certified.
- The Verification Report JotForm will open November 1 and is due Tuesday, November 28, 2023. CEs may begin entering available data any time after the JotForm link is open and complete when the verification results data is available. The link to the Verification Report JotForm will be located in TX-UNPS Download Forms SNP-123.

### Step 1: Establishing the Count of Approved Applications

- October 1, 2023: CEs must count all currently approved applications. Since October 1, 2023 is a Sunday, the count may be taken on Monday, October 2<sup>nd</sup> but must reflect the approved application count as of October 1.
- Applications **INCLUDED** – free income, SNAP /TANF (those with EDG #s), foster (not directly certified), reduced income.
- Students **EXCLUDED** – Children certified under direct certification procedures including children documented Directly Certified as SNAP, TANF, Medicaid Free, Medicaid Reduced (and extended benefit students), Head Start, Early Head Start, Migrant, Homeless/Runaway, or certified Foster; children on RCCI lists; and students on denied applications.

### Step 2: Determining the Sampling Method

- The required sampling method is based on the CE's last verification results. TDA will post the approved sample methods by CE to SquareMeals by the first week of September. A notice will also be included in the NSLP monthly newsletter. However, any CE may choose to use the Standard Sampling Method.
- New CEs or CEs that did not complete verification in SY 22-23 must use Standard (Error Prone) Sampling.

### Sampling Methods:

- **Standard (Error Prone) \*required, if the non-response rate percent is >20%**
  - Standard Sample Size method requires CEs to select 3% of all applications on file October 1 or 3,000 error prone applications (whichever is less), to determine the number of applications to be verified. CEs may not exceed the 3%.
  - Once the number of applications is determined, the selection of applications must first be selected from **error prone** applications, those within \$100 per month (or \$1,200 per year) of the current Income Eligibility Guidelines (IEGs). If there are not enough error prone applications on file, select non error prone applications to complete the sample size.
  - For **manual systems**, it is suggested that error prone applications be identified at time of determination. A colored dot is one way to identify error prone applications. Automated systems should be able to identify error prone applications. Check with your software provider to ensure that this is possible.
- **Alternate 1 (Random) Sample Size Method \*option, if the non-response rate percent is <20%**  
3% or 3,000 (whichever is less) randomly selected from all approved household applications as of October 1.

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- **Alternate 2 (Focused) Sample Size Method \*option, if the non-response rate percent is <20%**  
Sample size equals 1,000 or 1% (whichever is less) of all approved applications, selected from error prone applications plus 500 or .05% (whichever is less) of approved SNAP/TANF applications on file as of October 1, 2023.

### Step 3: Selection of the Household(s) and Activities Prior to Notification

- CEs should utilize the *Verification Sample Size Calculator for Verification* located on the SquareMeals website to determine the number of applications to be selected.
- CEs must randomly select the required number of applications based on the sampling method information above.
- CEs must conduct the Confirmation Review on applications selected for verification. A Confirmation Review is not required if CEs utilizing electronic systems have requested a Technology-Based Confirmation exemption from TDA via TX-UNPS. A new exemption request must be submitted only when the CE changes POS providers.
  - Confirming Official: someone other than the Reviewing Official must review the accuracy of initial eligibility **before** sending out the letter of notification to the household (See Administrator's Reference Manual (ARM), Section 6, Verification for Confirmation Review details).
  - Documentation: Sign/date in the appropriate area on the household application or electronic note.
- NOTE: The CE may elect to replace up to 5% of the applications selected for verification if the household is considered a “fragile” household. Fragile is defined as those households where it is highly probable that they will not respond to verification due to language barriers or life crisis in the household. CEs must randomly select another household that meets the same criteria as the household being replaced. For example, if the household application was error-prone then a new error-prone application should be selected and documentation of why this replacement was made should be recorded.
- If the chosen application(s) are matched through one of the following methods, the application is considered verified and the process is considered complete. The CE does not send the notification letter/instructions to those households. When the CE is **not** able to verify the household through direct verification, or DC on October 5th the CE sends the *Verification Notification – Selection Letter* and *Verification of Free and Reduced-Price Eligibility | Information for Households* to selected households.
  - **Direct Certification** Run on October 5<sup>th</sup> - students identified on the October 5<sup>th</sup> DC match list and students identified in the same household are considered directly verified. The DC list will serve as documentation of direct verification and no further action is needed.
  - **Direct Verification** – upload student names identified for verification into the Texas ELMS Direct Verification module for possible matches **prior to sending out notification letters**. If the CE is able to directly verify eligibility, the CE does **not** have to collect documentation from the household. If the CE is able to directly verify eligibility, the CE will take the following steps to finish the verification:
    - The CE prints the match screen, do not send a letter to the household (verification is complete for these households).
    - The CE includes Direct Verification results on the *Verification Report/Individual Household Form*.

### Verification for Cause

A CE must verify any questionable application that provides conflicting information on a case-by-case basis. Verification for cause may be conducted at any time during the school year.

- The CE will follow the same process using the same prototype notification letters used for required verification when conducting verification for cause.
- The number of applications verified for cause as of November 15 must be reported in addition to the number of applications required for verification.

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### Reasons for Selection of Application for Verification for Cause

Verification for cause is not an automatic process. Any application that is selected to be verified for cause is chosen because it is considered to be a questionable application:

- The CE is unable to confirm a household's participation in a Categorical Assistance Eligible program.
- The CE determines that known or available information is conflicting.
- The CE determines that known or available information indicates a mistake or misrepresentation on the application form.

### Step 4: Validation of Eligibility and Follow-Up

The Verification Official identified in the TX-UNPS application packet must review all documents submitted by the household. 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 documentation.

- Responded—decreased, continued, or increased benefits:
  - Verification is complete.
  - The CE must complete the *Verification Report/Individual Household Form* for each household selected for verification. The Verification Official's signature should be entered on the back of the paper applications and on the bottom of the Verification Report/Individual Household Form.
  - The CE must notify households of results by sending a *Continuation of Benefits Letter* (optional) or *Results/Adverse Action Letter* (required if benefits decrease).
- Non-responding—Follow Up
  - **The CE MUST** follow-up with a second notification prior to termination (maybe via personal contact, phone, email, or letter).
  - The Verification Official's signature should be entered on the back of the paper applications and on the bottom of the Verification Report/Individual Household Form. **The CE MUST** notify households in writing by sending the *Results/Adverse Action* letter (10 calendar day notice).

### Step 5: Recordkeeping/Reporting

- CEs must retain the *Verification Report/Individual Household Form* for each household verified.
- The Verification Report JotForm will open in TX-UNPS on November 1 and is due November 28, 2023.
- The CE must retain records with supporting forms for 5 years (public and charter schools) or 3 years (private and Residential Child Care Institutions).

### Resources

- NSLP Monthly Newsletter providing current updates (sent via e-mail from TDA)
- TDA website: [www.squaremeals.org](http://www.squaremeals.org) NSLP > Eligibility and Verification > Application Verification
- TDA website: [www.squaremeals.org](http://www.squaremeals.org) NSLP > Policy/ARM - Section 3: *Civil Rights and Confidentiality* Section 4: *Determining Eligibility* and Section 6: *Verification of Eligibility*
- TDA website: [www.squaremeals.org](http://www.squaremeals.org) NSLP > Administration/Forms > USDA School Food Authority (SFA) Verification Collection Report – FNS 742
- TDA website: [www.squaremeals.org](http://www.squaremeals.org) NSLP > Training > NSLP > Verification of Eligibility training modules
- Texas ELMS Resources: [www.squaremeals.org](http://www.squaremeals.org) NSLP > Texas ELMS, *Verification Reporting Tips*
- TX-UNPS Download Forms > SNP-123 JotForm required for reporting
- USDA Website: <https://www.fns.usda.gov/cn/eligibility-manual-school-meals> Eligibility Manual for School Meals