

FOOD AND NUTRITION PROCEDURES

Number	D-3
Reviewed	Sept. 2009
Effective	Sept. 2009
Page	1 of 11

Miami-Dade County Public Schools

Subject:	VERIFICATION OF APPROVED FREE AND REDUCED PRICE MEAL APPLICATIONS
For Action By:	PRINCIPALS, DATA INPUT SPECIALISTS, AND FOOD SERVICE ADMINISTRATORS
Refer Questions to:	FOOD SERVICE ADMINISTRATORS DEPARTMENT OF FOOD AND NUTRITION

FEDERAL REGULATIONS

Verification is the confirmation of eligibility for free and reduced price meal benefits under the National School Lunch Program. Verification MUST include confirmation of income eligibility or confirmation that the child is included in a household currently certified to receive Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance to Needy Families (TANF) or Food Distribution Program on Indian Reservation (FDPIR) benefits. **Verification efforts are not required for students who have been directly certified, homeless certified, migrant certified or designated as a runaway youth.** These students are granted automatic eligibility for free meal benefits.

Federal legislation mandates that the verification process be completed by November 15th each year. For the purpose of meeting the minimum federal verification requirement, a sample of error prone applications is selected from the total number of approved applications on file as of October 1st.

The sample of error prone applications will be reviewed for accuracy by the Department of Food and Nutrition prior to notifying households of verification.

Federal law mandates ZERO tolerance for errors in sample size number and demands adherence to the scheduled completion date.

Applications and documentation are confidential and must be treated as such.

SCHOOL RESPONSIBILITY

A. PROCEDURE FOR REVIEW OF VERIFICATION DOCUMENTS

Upon receipt of the Meal Verification List and Notification of Verification Letters, **schools must** access and print the Family Application ([Attachment A](#)) from the Department of Food and Nutrition website. (nutrition.dadeschools.net/verification)

School staff or the Administrative Designee (School Official) responsible for meal applications must ensure that the appropriate verification documents are submitted by the family. Please refer to page 3 of this procedure, *acceptable documents*.

NOTE: The Verification process is time sensitive; encourage households chosen for verification to submit required documents as soon as possible.

FOOD AND NUTRITION PROCEDURES

Number	D-3
Reviewed	Sept. 2009
Effective	Sept. 2009
Page	2 of 11

Miami-Dade County Public Schools

VERIFICATION OF APPROVED FREE AND REDUCED PRICE MEAL APPLICATIONS (continued)

Applications approved by income must include the social security number page, page four (4) of the Notification of Verification Letter ([Attachment B](#)).

The School Official must:

1. Review all verification documents.
2. Attach documents to the Notification of Verification Letter and/or printed application (please do not staple documents).
3. Forward all documents to the Department of Food and Nutrition **immediately**.

All verification documents are to be reviewed for completeness and accuracy **before** sending to the Department of Food and Nutrition, work location 9025, Attention: **Verification**.

Incomplete documents should not be forwarded to the Department of Food and Nutrition. If documents are incomplete or if there are questions concerning the information provided, the household must be contacted either by phone or in writing to request the correct information.

B. VERIFICATION FILES (SCHOOL SITE)

Files must be maintained at each school site for Verification documents/materials as follows:

- Meal Verification List ([Attachment C](#)).
- Notification of Verification Letter.
- Printed copy of application (obtained from the Food and Nutrition Website).
- Copies of verification documents received from household.
- Verification Students with No ISIS Activity Report (first 10 days).
- Verification Status Letter ([Attachment D](#)).
- Meal Verification List Report indicating final verification results (printed from Control-D Web). **A COPY MUST BE GIVEN TO FOOD SERVICE MANAGER.**

Maintaining the above documents will help facilitate the verification process when making inquiries to the Department of Food and Nutrition.

FOOD AND NUTRITION PROCEDURES

Number	D-3
Reviewed	Sept. 2009
Effective	Sept. 2009
Page	3 of 11

Miami-Dade County Public Schools

VERIFICATION OF APPROVED FREE AND REDUCED PRICE MEAL APPLICATIONS (continued)

NOTIFICATION OF SELECTION

- A. After October 1st, the Department of Food and Nutrition and the school site will receive the Meal Verification List and copies of Notification of Verification Letters. **The school must file the Meal Verification List and Letters.** Copies of letters should be attached to printed copies of applications selected for verification. If your school does not receive copies of the Notification of Verification Letters, please contact the Department of Food and Nutrition immediately.

The Department of Food and Nutrition will mail the Notification of Verification Letter to parents/guardians.

- B. Upon receipt of the Notification of Verification Letter, each household has ten (10) operating days from the date printed on the letter to provide requested documentation. Documents must support the eligibility information listed on the application. **Copies of original documents must be attached to the verified application.** Originals should be returned to the household.

SOURCES OF VERIFICATION

- A. **Applications Approved By Income Eligibility:**

Documents must be provided for **EACH INCOME** listed on the application. Verification of income is based on the **gross income amount at the time the application was submitted.** If this information is not available, documents may be submitted from the time of application up to the time of verification. The social security number page, page four (4) of the Notification of Verification Letter, must be returned with the name and social security number of all household members listed in section five of the application, or place an "X" in the box if a household member does not have a social security number. **The completed social security number page, page four (4), must be attached to the verified application.**

The following is a list of *acceptable documents* for verification:

- | | |
|---|--|
| ▶ Food stamp/TANF/FDPIR notice | ▶ Social Security Retirement Benefits |
| ▶ Paycheck stub | ▶ Court Decree (alimony/child support) |
| ▶ Letter from employer | ▶ Disability Award/Compensation |
| ▶ Supplemental Security Income Notice | ▶ Workers' Compensation |
| ▶ Unemployment Compensation Notice | ▶ Veterans Administration Benefits |
| ▶ Tax Return, self-employed only | ▶ Other |

FOOD AND NUTRITION PROCEDURES

Number	D-3
Reviewed	Sept. 2009
Effective	Sept. 2009
Page	4 of 11

Miami-Dade County Public Schools

VERIFICATION OF APPROVED FREE AND REDUCED PRICE MEAL APPLICATIONS (continued)

B. Applications Approved By SNAP/TANF/FDPIR Case Numbers That Have Not Been Approved By Direct Certification:

Documentation must be a **Letter of Eligibility from the Department of Children and Families ([Attachment E](#))** or a letter from the SNAP/TANF/FDPIR office showing the name(s) of the recipient(s), case number, and effective date(s) of benefits. **A SNAP Identification and/or Electronic Benefits Transfer (EBT) Card is NOT acceptable documentation.** Households that cannot provide adequate SNAP/TANF/FDPIR documents may complete a new application providing income documentation.

C. Applications Approved By Foster/Residential Child, Must Choose One Of The Following:

1. School Official must contact the household in which the 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 and the amount of money designated by the agency for the child's personal use is sufficient verification. The phone conversation with the social worker must be documented as follows: name of social worker, agency, phone number, status of the child, and child's personal use income, if applicable.

OR

2. Obtain from the family a copy of written communication between the family and the placement agency in which the status of the child and financial arrangement is stated.

D. Households unable to provide written evidence may provide a collateral contact for the school official to obtain requested information, either orally or in writing. All collateral contacts must be documented, dated and initialed by the School Official.

E. A new application **is not required** if verification information shows changes in income (i.e. paycheck stub shows more or less income than reported on the application).

F. A new application **is required** when a student changes from income eligibility to SNAP/TANF/FDPIR qualifying number or vice versa.

The Department of Food and Nutrition is responsible for updating all verification student activity.

NEGATIVE BENEFIT CHANGES

If adequate documentation is not provided within the first ten (10) operating day period, ITS will send the **Verification Status Letter** to schools. **Schools must make a photocopy and forward one copy to the household.** The letter will allow the household an additional ten (10) operating days to provide documentation before the student's benefits are changed. The second ten (10) operating day period begins on the day the Verification Status letter is sent.

FOOD AND NUTRITION PROCEDURES

Number	D-3
Reviewed	Sept. 2009
Effective	Sept. 2009
Page	5 of 11

Miami-Dade County Public Schools

VERIFICATION OF APPROVED FREE AND REDUCED PRICE MEAL APPLICATIONS (continued)

- A. When updated income reporting results in a negative benefit change, (free to reduced, free or reduced to paid), ISIS will hold the change in suspense for ten (10) days prior to updating the original authorization status. The Verification Status Letter will be generated the same day the new income information is entered into the ISIS approval system. **Schools must make a photocopy and forward one copy to the household.**
- B. A copy of the Verification Status Letter must be attached to the application.
- C. **Any verification student who does not show ISIS activity during the verification period will have his/her meal benefit automatically terminated by ITS at the end of the second 10 operating day period.**
- D. The **school must** notify gifted school sites, alternative education and exceptional education centers of change of benefits as a result of verification, and notify the food service manager at the site or at schools providing meals for the alternative program.

RESPONSIBILITY OF THE DEPARTMENT OF FOOD AND NUTRITION

Centralized Processing/Filing/Completion of Verification Procedure

A **separate** verification file containing only those applications and attached documents of students selected in the error prone application sample must be kept.

- A. Each verified application **MUST** have copies of all verification documents attached, including:
 - Notification of Verification Letter **and** the completed social security number page, page four (4), for the households verified by income.
 - Copies of income or SNAP/TANF/FDPIR documentation or documented collateral contact.
 - Verification Status Letter.
- B. The applications are to be filed by application identification number in ascending order.
- C. Any additional information necessary to indicate the efforts made to meet the verification requirements should be documented.
- D. Each application verified must be completed and initialed by the Verifying Official.
- E. The verification file must contain the completed **Meal Verification List(s)** including the signature of the Verifying Official.
- F. All verification materials must be kept on file at the Department of Food and Nutrition for a period of three (3) years.

FOOD AND NUTRITION PROCEDURES

Number	D-3
Reviewed	Sept. 2009
Effective	Sept. 2009
Page	6 of 11

Miami-Dade County Public Schools

VERIFICATION OF APPROVED FREE AND REDUCED PRICE MEAL APPLICATIONS (continued)

TRANSFER/WITHDRAWAL STUDENTS

ITS must provide the Verifying Official and the school site with a weekly report listing transfer and withdrawn students.

TRANSFER STUDENTS are **required** to complete the verification process.

- **School sites must** add/delete transfer students to the Meal Verification List.

WITHDRAWAL STUDENTS' status is required to be documented on the Meal Verification List (i.e., free to withdrawn or reduced price to withdrawn).

- If a student withdraws within the first ten (10) days of Verification, the Department of Food and Nutrition is responsible for replacing the application with another approved application selected on the same basis.

Both the Transfer and Withdrawal Family Application must remain in the verification file.

VERIFICATION FOR DUE CAUSE

The Food Service Authority may verify any or all questionable applications for due cause at any time during the school year. Directions for verification of households for due cause are the same as for households selected for verification in the sample of error prone applications. However, households selected for verification for due cause who have a negative benefit change will **not** be automatically updated by ITS. These households must be updated by the Department of Food and Nutrition. Negative updates must occur at the end of the second ten (10) operating day period.

Applications verified for due cause must be filed in a separate folder labeled **Due Cause**. These students are **not** part of the Meal Verification List.

RE-APPLICATION FOR PROGRAM BENEFITS

- A. **HOUSEHOLDS THAT HAVE RECEIVED A TERMINATION DUE TO NO RESPONSE MUST SUBMIT CURRENT DOCUMENTATION OF INCOME OR SNAP/TANF/FDPIR ELIGIBILITY WHEN A NEW APPLICATION IS SUBMITTED.**
- B. If **schools** receive a new application with documents, the verification application identification number must be noted on the new application and the information must be forwarded to 9025, Attention: **Verification**.
- C. The Meal Verification List is to document activity during the verification process only and should not include re-application information.

FOOD AND NUTRITION PROCEDURES

Number	D-3
Reviewed	Sept. 2009
Effective	Sept. 2009
Page	7 of 11

Miami-Dade County Public Schools

VERIFICATION OF APPROVED FREE AND REDUCED PRICE MEAL APPLICATIONS (continued)

HEARINGS AND APPEALS

When a household appeals a reduction or termination of benefits within the ten (10) calendar day advance notice period, the Local Educational Agency (LEA) must continue to provide the benefits for which the child was originally approved until a final determination is made. The LEA may continue to claim reimbursement at that level during this period.

When a household does not appeal a reduction or termination of benefits during the ten (10) calendar day advance notice period, or the hearing official rules that benefits must be reduced, the actual reduction or termination of benefits must take place no later than ten (10) operating days after the ten (10) calendar day advance notice period, or ten (10) operating days after the decision by the hearing official.

FAIR HEARING

A. INFORMAL CONFERENCES

Informal conferences may be requested by the principal or administrative designee to obtain additional household information or documentation or by the parents or guardian prior to appealing the decision to the appropriate region office. If necessary, the Department of Food and Nutrition will provide the school with a copy of the application.

This conference provides an opportunity to:

- discuss the application
- present additional information
- obtain an explanation of data submitted on the application

Discussions at such a conference shall not in any way prejudice or diminish the family's right to a fair hearing. Parents are to be notified during the conference of their right to make an appeal to the Region Office, if desired.

B. REGION OFFICE REVIEW

A family may appeal for a Region Office review subsequent to the informal conference. A committee shall be formed to hear the appeal. The family may be represented by an attorney or other person when presenting its appeal. Additionally, the representative is to have an opportunity to examine the documents or evidence that supports the decision under appeal. The hearing should be no more than five (5) days after the appeal is made.

FOOD AND NUTRITION PROCEDURES

Number	D-3
Reviewed	Sept. 2009
Effective	Sept. 2009
Page	8 of 11

Miami-Dade County Public Schools

VERIFICATION OF APPROVED FREE AND REDUCED PRICE MEAL APPLICATIONS (continued)

The administrator will notify the family of a convenient time and place for the hearing to be held. At this hearing, the family is to have an opportunity to present evidence and arguments supporting its position. The decision of this committee shall be based on evidence presented and will be made a part of the official hearing records. These records will include:

- the decision under appeal
- any documentary evidence
- a summary of the hearing
- the decision made by the committee with reasons
- a copy of the notification to the family of the decision made

Written records of this procedure are to be kept on file for a period of three (3) years and are to be made available to the family or its representative during this period.

NONDISCRIMINATION

The letters, application and forms described in this procedure have been developed following Civil Rights requirements and must be used in the administration of the food service program in each school.

FOOD AND NUTRITION PROCEDURES

Number	D-3
Reviewed	Sept. 2009
Effective	Sept. 2009
Page	9 of 11

Miami-Dade County Public Schools

VERIFICATION OF APPROVED FREE AND REDUCED PRICE MEAL APPLICATIONS (continued)

DEFINITIONS

ADULT HOUSEHOLD MEMBER: Any member of a household 21 years of age or older.

COLLATERAL CONTACT: A confirmation of a household's income or SNAP/TANF/FDPIR status by a person outside of the household who is knowledgeable about the household's circumstances. Contacts may include employers, social service agencies, migrant worker's agencies, and religious or civil organizations. A collateral contact should be used only when the household has not been able to provide adequate written evidence. The official may select a collateral contact if the household fails to designate one or designates one which is unacceptable to the official. In either case, no contact may be made without first notifying the household and obtaining their permission. This information does not need to be notarized.

CURRENT DOCUMENTATION: Dated documentation of SNAP/TANF/FDPIR eligibility or dated documentation of household income from the time of application up to the time of verification.

DIRECT CERTIFICATION: The process by which the school district automatically approves students for free meals who are members of a SNAP household and/or receive TANF or FDPIR benefits. This automatic approval is based on electronic information received from Department of Children and Families Services via the Department of Education. Students approved for free meals through direct certification are not required to submit a free and reduced price meal application to the school and are not part of the verification process.

ELECTRONIC BENEFIT TRANSFER (EBT) CARD: The primary method used to issue SNAP benefits nationwide. SNAP households use a debit card to shop for eligible food items at stores authorized by the U.S. Department of Agriculture (USDA). The EBT card number is *not* acceptable documentation for verifying SNAP applications.

ERROR PRONE APPLICATION SAMPLE: Three percent (3.0%) of all applications on file as of October 1st selected from those reporting monthly household income within \$100.00 of the free or reduced price eligibility limit. If the above criteria cannot be met, then a random selection of all Income/SNAP/TANF/FDPIR applications on file as of October 1st can be used to complete the 3.0% sample size.

FIRST TEN (10) OPERATING DAY PERIOD: The ten (10) operating days after the Notification of Verification Letter is sent to the household.

FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATION (FDPIR): Low-income American Indian and non-Indian households that reside on a reservation that contain at least one person who is a member of a Federally-recognized tribe, are eligible to participate in FDPIR. FDPIR is an alternative to the SNAP, because they do not have easy access to SNAP offices or authorized food stores.

FOOD AND NUTRITION PROCEDURES

Number	D-3
Reviewed	Sept. 2009
Effective	Sept. 2009
Page	10 of 11

Miami-Dade County Public Schools

VERIFICATION OF APPROVED FREE AND REDUCED PRICE MEAL APPLICATIONS (continued)

HOMELESS: Students who lack a fixed, regular, and adequate night-time residence. These students are served by programs under the Runaway and Homeless Youth Act.

LOCAL EDUCATIONAL AGENCY: The entity responsible for application, certification, and verification activities for the National School Lunch Program and School Breakfast Program.

MIGRANT: Children of farm workers who have not remained in the district for a continuous 36 month period and have been certified by the Miami-Dade County Public School District's Migrant Office.

NEGATIVE BENEFIT CHANGE: A reduction or termination of meal benefits. Eligibility changes from free to reduced price, free to denied, or reduced to denied

RUNAWAY YOUTH: Students who no longer reside in their parental/guardian residence. These students are served by programs under the Runaway and Homeless Youth Act.

SCHOOL OFFICIAL: Any school staff member or administrative designee that is responsible for the school site verification process.

SECOND TEN (10) OPERATING DAY PERIOD: The ten (10) operating days after the Verification Status Letter is sent to the household.

VERIFYING OFFICIAL: The Department of Food and Nutrition or administrative designee responsible for the district verification process.

WRITTEN EVIDENCE: The primary source (documentation) of eligibility confirmation for all households: pay stubs from employers, award letters from welfare departments or other government agencies, or other documentation that proves household eligibility for meal benefits.

FOOD AND NUTRITION PROCEDURES

Number	D-3
Reviewed	Sept. 2009
Effective	Sept. 2009
Page	11 of 11

Miami-Dade County Public Schools

INDEX FOR SCHOOL FOOD AND NUTRITION PROCEDURE D-3

	<u>Page</u>
Federal Regulations	1
School Responsibility for Free and Reduced Price Meal Verification	1-2
Notification of Selection	3
Sources of Verification	3-4
Negative Benefit Changes	4-5
Responsibility of the Department of Food and Nutrition	5
Transfer/Withdrawal Students	6
Verification for Due Cause	6
Re-application for Program Benefits.....	6
Hearings and Appeals.....	7
Fair Hearing	7-8
Non-Discrimination.....	8
Definitions	9-10