Requirements for an Improvement Plan for Certification and Verification

An Improvement Plan for Certification and Verification is required if the School Food Authority (SFA) reported both of the following for Verification for School Year 2024-2025:

(1) Less than 80% of households failed to respond to the request for additional income information from the applications selected for the verification sample.

(2) Over 20% of the households that provided additional income information from the applications selected for the verification sample were changed to paid status.

The Improvement Plan must contain all actions required by The Child Nutrition and WIC Reauthorization Act of 2004 (P.L. 108-265) and should include one or both optional actions set forth by the law.

Required actions to help maintain benefits for eligible students:

Households often need assistance gathering data to qualify for benefits. Establish a toll-free or local telephone number that is free of charge for the household to call for assistance with verification. An e-mail address may also be included. However, not all households have access to the internet.

- All approved household applications selected for verification must be reviewed for accuracy to ensure that initial eligibility determinations are correct. The review must be done by an individual other than the individual making the initial determination. *The requirement for a confirmation review is waived if the SFA is using a technology-based solution that demonstrates a high level of accuracy in processing initial determinations.*

- If the confirmation review finds that the initial determination was incorrect, the SFA must:

  (1) Correct the household eligibility status, and (2) notify the household of the change. If the review indicates the household is not eligible for either free or reduced meals, the household must be notified of the reason and informed that the household may reapply with income documentation.

- Verification follow-up activities are required by SFAs and must be documented. A specific person within the SFA must be identified to families/households as being able to directly assist in completing verification.

- The SFA must follow-up if a household cannot obtain assistance during the initial call. If the household fails to respond to the initial request for verification information, the SFA must make at least one attempt to obtain necessary verification. The attempt may be through the mail, by telephone, by e-mail, or

through personal contact. All attempts and results must be documented by the SFA. If follow-up attempt(s) fail, the household benefits must be terminated through a written notice of adverse action.

- Provide households with Limited English Proficiency meaningful access to information in a manner that is easily understood. The United States Department of Agriculture Food and Nutrition Service website provides translated applications, application instructions, and a parent letter/FAQ. The I-speak resource document is available to help identify the primary language of the household. These resources are available at USDA School Meals Translated Applications.

- SFAs, public and nonpublic, must directly certify children without further application who are members of households receiving assistance under the Supplemental Nutrition Assistance Program, Temporary Assistance to Needy Families, Medicaid Free, and foster children as eligible for free school meals. Medicaid Reduced-price directly certified students are eligible for reduced-price meals. The Direct Certification Report is available via the Center of Educational Performance and Information Michigan Student Data System.

- SFAs verifying income eligibility for free and reduced-price meals must allow households to provide documentation of income for any point in time between the months prior to application and the time the household is required to provide income documentation. The Implementation Memorandum is available at Verification of Income Eligibility - Reauthorization 2004 Implementation Memo SP-5.

The direct link to the Verification Activities – Reauthorization 2004 Implementation Memo SP-13 is Verification Activities – Reauthorization 2004 Implementation Memo SP-13

- This memorandum provides information about implementing requirements concerning confirmation activities, individual review of selected applications, and follow-up in relation to verification of households' eligibility for free or reduced-price meals.

Optional activities for SFAs that may lower the non-response rate and prevent eligible students from losing benefits:

- The SFA, on individual review, may remove up to 5% of applications in the selected sample if factors such as household stability and communication difficulties may interfere with verification. Any application removed from the sample must be replaced with another application approved on the same basis.

- The SFA may contract with a third party to assist with the required follow-up activity. Any third party is subject to confidentiality requirements outlined in current regulations.

If your school district's name is on the **Schools Required to Submit an Improvement Plan for Certification and Verification** list, you must submit the Improvement Plan to the Michigan Department of Education by November 15, 2025.