

STATE OF MICHIGAN DEPARTMENT OF EDUCATION LANSING

RICK SNYDER GOVERNOR BRIAN J. WHISTON STATE SUPERINTENDENT

FOOD SERVICE

ADMINISTRATIVE MEMO NO. 8 SCHOOL YEAR 2017-2018

SUBJECT: Verification of Eligibility for School Meals

DATE: September 29, 2017

Verification is the confirmation of eligibility for free and reduced-price school meals under the National School Lunch Program (NSLP) and School Breakfast Program (SBP). Annually, each School Food Authority (SFA) must select and verify a sample of applications approved for meal benefits. The verification sample must be selected from households that have submitted an approved Free and Reduced-Price School Meals Family Application as of October 1, 2017. The deadline for completing Verification of Eligibility for School Meals is November 15, 2017.

Verification is not required for children approved through direct certification with Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance to Needy Families (TANF), foster children, Medicaid free and Medicaid reduced-price. Children directly certified through other programs, including Food Distribution Program on Indian Reservations (FDPIR), children that are documented as eligible migrant, runaway or homeless, and children participating in Head Start or Pre-K Even Start, are not included in the application pool or subject to verification. The SFAs participating in the Community Eligibility Provision (CEP) must complete verification for those school sites that are not participating in CEP.

The Steps to Complete Verification include links to the documents required to complete the verification process and can be found at The Michigan Department of Education School Nutrition website in the following sections:

- What's New
- Eligibility Certification and Verification under Guidance

The United States Department of Agriculture (USDA) recently released guidance in <u>policy</u> <u>memorandum SP 42-2017</u> that stated SFAs now have the option to begin verification activities before October 1. Verification must still be based on a school's sample size as of October 1 each school year; however, regulations allow SFAs to begin verification once they begin the application approval process for the current school year and have approved applications on file.

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For some SFAs, particularly those expecting large verification sample sizes, starting earlier than October 1 may ease the administrative burden associated with the verification process by distributing tasks and responsibilities over a longer period. In practice, conducting verification on a rolling basis (e.g., weekly or monthly) helps SFAs mitigate a possible rush of document processing and follow-up communications that may occur when sampling and household outreach occur at a single point in time.

Please note that all existing statutory and regulatory requirements continue to apply when using this approach, but the timing and sampling process is tailored to accommodate the extended timeframe during which verification is being conducted. The minimum requirements for follow-up with the change, reduction, or termination of benefit notices still apply regardless of when the verification process begins. These requirements include one follow-up attempt to contact non-responding households and a 10-day advance notification of a reduction or termination of benefits.

The USDA policy memo has an <u>attachment</u>ⁱⁱⁱ that provides direction to SFAs choosing to perform verification on a rolling basis to ensure all existing requirements regarding sampling method and sample size are met.

All SFAs must report verification activities and outcomes to the Michigan Department of Education (MDE) annually. The results of verification are reported in the School Food Authority Verification Collection Report (SFA-VCR). The web-based report can be accessed through the Michigan Nutrition Data System^{iv} (MiND).

The only person(s) that will be able to access and certify the SFA-VCR are the primary and secondary contacts listed in the Michigan Electronic Grants System Plus (MEGS+) 2018 School Nutrition Application in the MiND Security Agreement section.

Please note the verification results reporting will open in December 2017. The target date for opening the SFA-VCR is December 5, 2017. The SFA-VCR must be submitted to MDE by February 1, 2018.

Questions regarding this Administrative Policy may be directed to Lisa Taylor, Consultant, by email at browntaylorl@michigan.gov or the School Nutrition Programs Unit at MDE-SchoolNutrition@michigan.gov.

¹ http://www.michigan.gov/mde/0,4615,7-140-66254_50144---,00.html

ii https://www.fns.usda.gov/school-meals/beginning-verification-october-1-guidance-local-educational-agencies

https://www.fns.usda.gov/school-meals/beginning-verification-october-1-guidance-local-educational-agencies

iv http://mdoe.state.mi.us/mind/