



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
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**Administrative Policy No. 14
SCHOOL YEAR 2016-2017**

SUBJECT: Independent Review of School Meal Applications

DATE: June 30, 2017

The final rule for *The Independent Review of Applications Required by the Healthy, Hunger-Free Kids Act of 2010* was published in the Federal Register on February 6, 2014. Section 304 of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 requires Local Education Agencies (LEAs) that demonstrate high levels of, or a high risk for, administrative error associated with certification, verification, and other administrative processes to conduct an independent review of the initial eligibility determinations for free and reduced-price school meal applications for accuracy prior to notifying households of eligibility.

Schools are required to conduct an independent review of all applications if there is high error rate (greater than 5%) or a high risk for error associated with certification and benefit issuance during the Administrative Review.

The independent review must be conducted by an individual or entity that did not make the original eligibility determination. This individual or entity is not required to be an employee of the LEA but must be trained to make application determinations. The second independent review of applications must be completed before the household is notified of eligibility. Households should still be notified of the child's eligibility determination within 10 operating days of receiving the application.

The independent review of applications requires a re-evaluation of the eligibility determination made by the original determining official, based on the information provided by the household on the application. The independent review must determine if the application is complete. This includes:

- The signature of an adult household member
- The last four digits of a social security number (or indication of "none")
- Names of all household members including the student
- Income information

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- ✓ Income amount for each household member (household members without income, including children, is indicated as zero)
- ✓ Income source
- ✓ Income frequency
- ✓ Categorical eligibility if applicable

The independent review must confirm the applications were correctly approved based on current income eligibility guidelines or categorical eligibility determination. The master list or roster of student names must also correctly indicate the student eligibility determination.

Electronic systems used for eligibility determination are not exempt from the independent review of applications. In situations where certification errors are caused by incorrect data entry in the electronic data system, data entry for all applications should be reviewed to ensure the information was correctly entered into the electronic system.

School district results of the independent review are to be reported on the Michigan Department of Education School Nutrition Programs Local Educational Agency (LEA) Second Review of Applications form. The completed form must be returned to the Michigan Department of Education School Nutrition Programs by fax to 517-241-3885, Attention: Lisa Taylor or scanned and emailed to browntaylorl@michigan.gov. The due date is November 15, 2017.

The list of schools required to conduct an independent review of applications for school year 2017-2018 are attached to this memo. Additional information about the independent second review requirement is available at the following link: [Q&As Related to the Independent Review of Applications](#)ⁱ

ⁱ <http://www.fns.usda.gov/qas-related-independent-review-applications>