

Steps to the Verification Process starting October 1:

Step 1: Count all **applications** (not students) received – both paper and electronic - that were determined as federally qualifying for free or reduced.

- Those eligible for State 225 are not included in this count.

Step 2: Multiply the number of applications by 3%. If the number ends up as a decimal point (i.e., fraction), the number is rounded up. (In other words, you cannot verify 1.89 applications; you need to verify 2.)

- Do not verify any more than the required 3% of applications unless an application should be ‘verified for cause’. See information on Verification for Cause at the end.

Step 3. Choose the application(s) that must be verified randomly from those that are error-prone. Error-prone means that the income the family reported on the application is within \$1,200 annually of going to the next level of eligibility. See the bottom of your Income Eligibility Guidelines chart to find the ranges of error-prone incomes reported as monthly, biweekly, etc.

Step 4. A second person must review the original calculations of determination and sign the application as the ‘Confirmation Review’.

- **No Change to Determination:** If the confirmation review shows that the determination was correct, continue with the verification process.
- **Determination changes from Reduced to Free:** If the confirmation review shows that the family should have received better benefits (was reduced but should have been free), change the status of the student immediately, notify the household and continue with verification.
- **Determination Changes from Free to Reduced:** If the confirmation review shows that the family should not have been free, but should be at the reduced level, do NOT change the students status, continue the verification process and notify the family of the correct eligibility after verification is done.
- **Determination Changes from Free or Reduced to Paid:** If the confirmation review shows that the family should not have received free or reduced price meals at all, send the family a notice of ‘adverse action’ and give them 10 days to respond. Discontinue the process of verification on this application and go back to Step 3 to start verification on a new application.

Step 5. Send the household a notice of verification including all of the information they will need to complete verification of their income. Request documentation within 10-14 days.

Step 6. Receive the documentation of the household(s) as evidence to corroborate the income noted on the application.

- Check that all income reported on the application has documentation and
- The documentation shows the correct income was reported.
- A second notice is required to any household who has not sent in documentation by the school's timeline.

Step 7. Complete verification by:

- a. Notifying the parent of the outcome of the verification process.
- b. Reporting the verification findings in ND Foods starting on November 15.

Verifying Applications “For Cause” – Strengthening Program Integrity

Federal regulations (7 CFR 245.6a(c)(7)) require schools to verify any **questionable application** and encourage case-by-case review when a school is aware of additional household income or members not reported. This process, known as verification for cause, protects the integrity of the free and reduced-price meal program.

How Verification for Cause Differs from Regular Verification

- **Regular Verification:** Each year, a random sample (typically 3% of approved applications) is reviewed starting Oct. 1, and ending by Nov. 15. The results are reported on the FNS 742 “School Food Authority (SFA) Verification Collection Report” form in ND Foods.
- **Verification for Cause:** Initiated at any time of year when an application appears questionable or incomplete. Unlike random selection, it is triggered by specific concerns about accuracy or good-faith certification.

Common Triggers for Verification for Cause

The school should establish internal procedures for describing the circumstances that will initiate the verification for cause action. These may include:

- Applications reporting \$0 income for the entire household.
- SNAP case numbers do not appear on the direct certification list.
- Missing household members or income sources.

- Reported income is inconsistent with seasonal or annual work patterns.
- Applications from district employees that do not align with salary records (per [FNS Memo SP 13-2012](#)). PLEASE contact the district legal counsel prior to undertaking verification where concerns with staff income misrepresentation have been raised.

Procedure for Verification for Cause

- Review the application for discrepancies prior to certifying students for benefits. Remember that an incomplete application may not be determined. A complete application will list all children and adults in the household, all income for each household member, the last four digits of the adult submitting the application, and the signature of the adult certifying that the information provided is true and correct.
- Follow up with households on questionable and incomplete information.
- If discrepancies are found, the determining official should:
 - Seek clarification in order to make a determination in a timely manner.
 - Deny the application with an explanation.
 - Approve the application and initiate 'Verification for Cause'.
- If verification is necessary for integrity concerns, initiate the verification for cause after the application has been approved. A second staff member must confirm the initial determination and sign the application under the determining official's signature.
- A 'Notice of Selection for Verification' letter is sent to the household requesting documentation within 10–14 days.
- A second follow-up attempt is required if no response is received.
- Eligibility is confirmed, changed, or denied based on documentation, or denied if no documentation is provided. A follow-up letter communicates the outcome.

During this process, students continue to receive benefits as determined by the original application until verification is complete, including any appeal period.

Encouraged Best Practice

The [Eligibility Manual for School Meals](#) (p. 99–100) strongly encourages contacting the household first to clarify questionable information before initiating verification for cause. In many cases, a simple phone call resolves discrepancies without requiring formal verification.