

FOOD AND NUTRITION PROCEDURES

Miami-Dade County Public Schools



Subject: **VERIFICATION OF APPROVED FREE AND REDUCED PRICE MEAL
APPLICATIONS**

FEDERAL REGULATIONS

Verification is the confirmation of eligibility for free and reduced price meal benefits under the National School Lunch Program and School Breakfast 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, foster certified, homeless certified, migrant certified, designated as a runaway youth or Head Start/Even Start.** These students are automatically granted free meal benefits.

Federal legislation mandates that the verification process be completed by November 15th. 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 (if October 1st falls on a weekend, then the selection is made on the next operating) .

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 SITE RESPONSIBILITIES

A. Notification Process

After October 1st, the Department of Food and Nutrition will generate the Meal Verification List and send to schools. **The school must maintain the Meal Verification List on file.** The Department of Food and Nutrition will print verification applications ([Attachment A](#)) and distribute to school sites.

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The Department of Food and Nutrition and school sites will receive Notification of Verification Letters. School site copies of letters should be maintained in a verification file. **The Department of Food and Nutrition will mail the Notification of Verification Letter to households** ([Attachment 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.

B. Procedure for Review of Verification Documents

Documents must support the eligibility information listed on the application. **Copies** of original documents must be attached to the verified application. **One set of copies are to be maintained for the school site's verification file and one set forwarded to the Department of Food and Nutrition.** Originals should be returned to the household.

School official responsible for meal applications must ensure that the appropriate verification documents are submitted by the household.

C. Sources Of Verification

1. 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 one month prior to the time of application, up to the time of verification or any time thereafter.

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

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



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2. 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** 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.

3. Households Unable to Provide Documentation

Households unable to provide written evidence may provide a collateral contact for the school official to obtain requested information, either orally or in writing. No contact may be made without first notifying the household and obtaining the household's permission. All collateral contacts must be documented, dated and initialed by the school official.

4. When A New Application Is Required

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

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

D. Forwarding Documentation to the Department of Food and Nutrition

As households submit documentation, the school official must:

1. Review verification documents
2. Write application identification number on all documents
3. Make copies of verification documents, including the printed verified application
4. Paperclip the above documents together



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5. 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: **Meal Benefits Department**. The Department of Food and Nutrition is responsible for updating all verification student activity in DSIS.

Incomplete documentation packets should NOT be forwarded to the Department of Food and Nutrition. If documents are incomplete, documents missing (e.g. missing proof of an income listed on the application) or if there are questions concerning the information provided, the household must be contacted either by phone or in writing to obtain the correct information prior to forwarding to the Department of Food and Nutrition.

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

E. Transfer/Withdrawal Students

Transfer students are **required** to complete the verification process.

1. Sending school sites should do the following:
 - a. Note transfer status on the Meal Verification List
 - b. Maintain family application in the school verification file
2. Receiving school sites should do the following:
 - a. Add transfer students to the Meal Verification List.
 - b. Contact sending school to obtain family application and supporting documentation, if available.
 - c. Maintain family application and documentation in the school verification file.

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F. Negative Benefit Changes

If adequate documentation is not provided within the first ten (10) operating day period, or if income reporting results in a negative benefit change, ITS will send the **Verification Status Letter** to schools. **Schools must make a photocopy and forward one copy to the household.** If the negative benefit change is a result of inadequate documentation, a letter indicating ten (10) calendar days will be provided in order for documentation to be submitted before student meal benefits are changed. The ten (10) calendar day period begins on the day the letter is sent.

1. When updated income reporting results in a negative benefit change, (free to reduced or free/reduced to paid), DSIS will hold the change in suspense for ten (10) calendar days prior to updating the verified eligibility status. The Verification Status Letter will be generated the same day the new income information is entered into the DSIS approval system.
2. Forward Verification Status Letter to household.
3. A copy of the Verification Status Letter must be filed with the verified application.
4. **Any verification student who does not show DSIS activity during the verification period will have his/her meal benefit automatically terminated by ITS at the end of the second ten (10) calendar day period.**
5. The school should 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.



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G. Verification Files (School Site)

Files should be maintained at each school site for verification documents/materials as follows:

- Meal Verification List ([Attachment C](#))
- Printed copy of application received from Department of Food and Nutrition
- Copies of verification documents received from household
- Verification Students with No DSIS Activity Report (after 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.

H. Access to Verification Reports

To notify students with status updates in a timely manner, school sites should access Control-D Web Viewer for all verification reports and letters.

I. Re-Application for Program Benefits

1. Households (that have been terminated due to no response) must submit current documentation of income or SNAP/TANF/FDPIR eligibility whenever a new application is submitted.
2. If a school site receives a new application with documents, the verification application identification number must be noted on the new application. All supporting documents are to be forwarded to: Location 9025, Attention: Meal Benefits Department.
3. Re-application results/status should not be noted on the Meal Verification List.



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CONFIDENTIALITY

Release of information regarding meal application status may only be released to a parent/legal guardian with proper photo identification (valid driver's license, state identification, Passport, etc....).

RESPONSIBILITY OF THE DEPARTMENT OF FOOD AND NUTRITION

A. Centralized Processing/Filing/Completion of Verification Procedure

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

1. Each verified application **MUST** have copies of all verification documents attached, including:
 - Notification of Verification Letter (electronic file)
 - Copies of income, SNAP/TANF/FDPIR documentation or documented collateral contact
 - Change of Verification Status Letter (electronic file)
2. Applications are to be filed by application identification number in ascending order.
3. Any additional information necessary to indicate the efforts made to meet the verification requirements must be documented.
4. Each application verified must be completed and initialed by the Verifying Official.
5. The verification file must contain the completed Meal Verification List(s) including the signature of the Verifying Official.
6. All verification documentation must be kept on file (hard copy or electronically) at the Department of Food and Nutrition for a period of three (3) years.



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B. Transfer/Withdrawal Students

ITS must provide the Verifying Official with a cumulative, weekly report listing transfer and withdrawal students.

1. Transfer Students are **required** to complete the verification process.
 - The Department of Food and Nutrition will notify school sites of incoming transfer students.
2. Withdrawal Students
 - The Department of Food and Nutrition is to document the student's status on the Meal Verification List (i.e., free to withdrawn or reduced price to withdrawn).
 - If a student withdraws before verification is complete, the Department of Food and Nutrition is responsible for replacing the application with another approved application selected based on the same criteria.

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. Guidelines 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 not occur prior to the ten (10) calendar day grace 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.

HEARINGS AND APPEALS

When a household appeals a negative change 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



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made. The LEA may continue to claim reimbursement at that level during this period.

When a household does not appeal negative change/termination of benefits during the ten (10) calendar day advance notice period, negative change/termination of benefits must take place no later than ten (10) calendar days after the ten (10) operating day advance notice period.

When a hearing official rules that benefits must be reduced, the actual negative change or termination of benefits must take place no later than ten (10) calendar days after the ten (10) operating day advance notice period, or ten (10) calendar days after the decision by the hearing official.

FAIR HEARING

A. Informal Conferences

Informal conferences may be requested by the principal/administrative designee to obtain additional household information or documentation. A parent/guardian may also request an informal conference 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 household's right to a fair hearing. Parents/guardians are to be notified during the conference of their right to make an appeal to the Region Office, if desired.

B. Formal Appeal

A family may initiate a formal appeal to the Director of Operations subsequent to the informal discussion. The Director of Operations will notify the family of a convenient time and place for the appeal meeting. At this appeal, the family will have an opportunity to present evidence and arguments supporting its position. The decision of the Director of Operations shall be based on the evidence presented and other existing documentation. A summary of the

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meeting and pertinent documents shall be kept on file for a period of three (3) years and are to be made available to the family 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.

A nondiscrimination poster developed by the USDA must be placed in a prominent place in each cafeteria and must remain there all year.

A brief summary of Civil Rights requirements:

1. There must not be any form of discrimination against, physical segregation of, or overt identification of any student with regard to his/her inability to pay the full price of a meal.
2. The names of students eligible to receive free or reduced price meals shall not be published, posted, or announced in any manner, except for confidential record keeping.

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 verifying official may select a collateral contact if the household fails to designate one or designates one which is unacceptable. 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 one month prior to application up to the time of verification or anytime thereafter.

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Direct Certification: The process by which electronic information received from Department of Children and Families Services via the Florida Department of Agriculture and Consumer Services is provided to school districts, through data matching and other mechanisms, to identify eligible children and automatically enroll them for free school meals. Children that

become directly certified already receive SNAP/TANF/FDPIR benefits. 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 subject to 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) 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.

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.

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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) Day Period: The ten (10) calendar days after the Verification Status Letter is sent to the household.

Verifying Official: The administrative director/administrative designee of the Department of Food and Nutrition responsible for the district's 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.

For Action By: Principals, Data Input Specialists, and Food Service Managers

Refer Questions to: Department of Food and Nutrition

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