

## Double-Checking the Original Approval of Applications Selected for Verification

Before notifying households that they have been selected for verification, a school must double-check that the Applications for Educational Benefits selected for verification were originally approved correctly for free or reduced-price meal benefits. The applications must be checked by a different person than the official who originally approved the applications. If a school food authority uses a computerized system to approve applications, it should apply for a waiver from this requirement as described below.

Program regulations (7 CFR 245.6a(e)(1)(i)) provide:

*(e) Activities prior to household notification—(1) Confirmation of a household's initial eligibility.  
(i) Prior to conducting any other verification activity, an individual, other than the individual who made the initial eligibility determination, shall review for accuracy each approved application selected for verification to ensure that the initial determination was correct. If the initial determination was correct, the local educational agency shall verify the approved application. If the initial determination was incorrect, the local educational agency must:*

*(A) If the eligibility status changes from reduced price to free, make the increased benefits immediately available and notify the household of the change in benefits; the local educational agency will then verify the application;*

*(B) If the eligibility status changes from free to reduced price, first verify the application and then notify the household of the correct eligibility status after verification is completed and, if required, send the household a notice of adverse action in accordance with paragraph (j) of this section; or*

*(C) If the eligibility status changes from free or reduced price to paid, send the household a notice of adverse action in accordance with paragraph (j) of this section and do not conduct verification on this application and select a similar application (for example, another error-prone application) to replace it.*

Additional details about this requirement are provided in the U.S. Department of Agriculture (USDA) memorandum on *Verification Confirmation Reviews – Reauthorization 2004: Implementation Memo-SP 18*. [View the USDA memo](#).

## Waiver for Schools Using Computerized Systems

A school food authority that uses a computerized system to approve Applications for Educational Benefits may apply to the Minnesota Department of Education (MDE) for a waiver from the requirement to double-check the original approval of applications selected for verification.

Program regulations (7 CFR 245.6a(e)(1)(ii)) provide:

*(ii) The requirements in paragraph (e)(1)(i) of this section are waived if the local educational agency is using a technology-based system that demonstrates a high level of accuracy in processing an initial eligibility determination based on the income eligibility guidelines for the National School Lunch Program. Any local educational agency that conducts a confirmation*

*review of all applications at the time of certification meets this requirement. The State agency may request documentation to support the accuracy of the local educational agency's system. If the State agency determines that the technology-based system is inadequate, it may require that the local educational agency conduct a confirmation review of each application selected for verification.*

To apply for this waiver, a school food authority completes the attached form - *Application for Waiver from the Requirement to Double-Check Applications before Conducting Verification*. Fax the completed waiver form to 651-582-8501 or email to [mde.fns@state.mn.us](mailto:mde.fns@state.mn.us).

## Application for Waiver from the Requirement to Double-Check Applications before Conducting Verification

Section 105 of the Child Nutrition and Women, Infants and Children (WIC) Reauthorization Act of 2004 provides:

(E) Preliminary Review - (i) Review for Accuracy

(I) In General – Prior to conducting any other verification activity for approved household applications selected for verification, the local educational agency shall ensure that the initial eligibility determination for each approved household application is reviewed for accuracy by an individual other than the individual making the initial eligibility determination, unless otherwise determined by the Secretary.

(II) Waiver – The requirements of subclause (I) shall be waived for a local educational agency if the local educational agency is using a technology-based solution that demonstrates a high level of accuracy, to the satisfaction of the Secretary, in processing an initial eligibility determination in accordance with the income eligibility guidelines of the school lunch program.

Instructions: To apply for the waiver, fill in the requested information and e-mail to [mde.fns@state.mn.us](mailto:mde.fns@state.mn.us). You will receive an e-mail response regarding approval of your application for the waiver.

Local Educational Agency (LEA) Applying for Waiver: \_\_\_\_\_

Cyber-Linked Interactive Child Nutrition System (CLiCS) Sponsor Identification Number:

\_\_\_\_\_

Our LEA certifies to the following:

1. Our LEA uses a computerized system with a standard eligibility software designed to accurately determine the approval of students for free and reduced price meals based on reported household size and income and current U. S. Department of Agriculture (USDA) income guidelines.

Our LEA uses this software: \_\_\_\_\_ Version: \_\_\_\_\_

2. The determination of eligibility for all of our applications is determined in the computerized system, i.e., not manually with a calculator and then entered into the computerized system, except as described below.

3. If any eligibility determinations have been or will be determined manually, we have described here the process by which manually approved applications will be tracked and double-checked before proceeding with verification. **Please describe.**

Name of Person submitting this waiver request and certification:

\_\_\_\_\_

Title: \_\_\_\_\_

Phone: \_\_\_\_\_

Minnesota Department of Education Approval: \_\_\_\_\_ Date: \_\_\_\_\_