

Module 3—Verification

If a Residential Child Care Institution (RCCI) has a school and if students from the community attend the school (these students are considered day students), the RCCI must complete this section. While RCCIs without day students do not need to complete the verification process, they must complete the verification report that is due annually on January 27 in the Child Nutrition Information and Payment System (CNIPS).

Target Audience

- Child nutrition director
- Staff assigned to the verification process

Estimated Time Required: 30 minutes

Contents

1. [Definition and Description of the Verification Process](#)
2. [Verification Steps and Dates](#)
3. [Verification Sampling Methods](#)
4. [Qualifications for Alternate Sample Method](#)
5. [Making Substitutions in the Verification Sample](#)
6. [Verification for Cause](#)
7. [Verification Documentation](#)
8. [Acceptable Documentation](#)
9. [Direct Verification Option](#)
10. [Verification Follow Up](#)
11. [Possible Verification Results](#)
12. [U.S. Department of Agriculture \(USDA\) Requirements for Verification](#)
13. [Agency Documentation](#)

[Requirements](#)

14. [Verification Requirements for Provision Schools](#)
15. [Verification Report and Resources](#)
16. [Resources](#)

Learning Objectives

- Develop an understanding of the steps and dates involved in the verification process
- Define the term **error prone** (EP) application
- Define **nonresponse** rate and compare how the nonresponse rate affects the criteria for alternate sample methods
- Calculate verification sample size using Basic/Standard Method, Alternate One (Random) Method, and Alternate Two (Focused) Method
- Describe four potential results of the verification process and the dates involved in implementing these results
- State where to find the verification report and who is required to fill out this report

1. Definition and Description of the Verification Process

Verification is the annual, mandatory process that confirms the eligibility of a sample of completed household meal eligibility applications for free and reduced-price meals (FRPM) under the National School Lunch Program (NSLP) and School Breakfast Program (SBP).

Based on information households submit on meal applications (including qualified case numbers), sponsors conducting verification must confirm:

- Income eligibility, or
- The categorical eligibility of a child in a household currently certified to receive benefits from assistance programs.
 - CalFresh (formerly known as Food Stamps and federally known as Supplemental Nutrition Assistance Program [SNAP])
 - California Work Opportunity and Responsibility to Kids (CalWORKs) (federally known as Temporary Assistance for Needy Families [TANF])
 - Food Distribution Program on Indian Reservations (FDPIR)

Verification is **not** required for students who qualify for free meals **and** who do not submit meal applications. An example is students who are directly certified (see Module 2—eligibility for a detailed description of direct certification). Eligibility for free meals is based on documentation obtained from CalFresh, CalWORKs, or FDPIR officials, from the county and/or state direct certification, or from other source categorically eligible programs, such as eligible homeless, runaway, migrant, or foster children, and children participating in Head Start/Even Start Programs.

Verification is **not** required for:

- Provision 2 and 3 schools in nonbase years when applications are not collected
- Schools participating in the Community Eligibility Provision (CEP)

Note: Remember, the more students you directly certify, the fewer the applications; therefore, the fewer you need to verify!

2. Verification Steps and Dates

Follow the steps below for the verification process:

1. Count the number of approved household applications on file as of October 1. Count the number of paper applications, not the number of children on an application (a multi-child application is one application).

School Nutrition Program (SNP) Module 3
SNP Online Training 2016–17 Page 2

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2. Determine which sampling method to use for the verification process:
 - Basic/standard sample size or
 - Alternate sample size options (local educational agency [LEA] must meet criteria):
 - Alternate One (formerly known as Alternate Random Sampling Method)
 - Alternate Two (formerly known as Alternate Focused Method)

NOTE: LEAs must qualify each year for the alternate sample sizes. See page 7 for how to qualify to use an alternate sample size.

3. Determine the total number of applications to verify. The LEA can utilize the **Worksheet to Determine Verification Sample Size** as a tool to assist in this process. To locate the worksheet, visit the California Department of Education (CDE) Verification Materials Web page at <http://www.cde.ca.gov/ls/nu/sn/verification.asp>.

NOTE: LEAs cannot choose to verify 100 percent of approved applications for FRPMs and one cannot verify more or less than the required number of applications determined by their sample size.

4. Select sample based on the verification method you choose.
5. Conduct confirmation reviews—confirm eligibility for all applications chosen for verification prior to notification of households of their selection. A person different from the individual initially certifying the applications must conduct the confirmation review. This requirement is waived if the school food authority (SFA) uses a technology-based system that demonstrates a high level of accuracy in processing an initial eligibility determination. Further, any SFA that conducts a confirmation review of all applications at the time of certification is not required to conduct confirmation reviews prior to verification. See page 85 of the USDA 2016 Eligibility Manual for School Meals for required actions if the eligibility status changes because of the confirmation reviews.

Note: If confirmation of eligibility is required, a different person than the original person approving eligibility must conduct it.

6. Send notices to families to request documentation of income or applicable documentation of eligibility. The letter must provide a list of acceptable documentation, the Use of Information Statement, a deadline for submission, name of SFA official who can answer questions and provide assistance, a no-cost to the household telephone number, and an explanation that failure to provide information will result in termination of benefits. Save a copy of the actual dated letter sent to each household.

7. Analyze information submitted, determine outcome, and make any required changes as outlined in the next steps.
8. Document results for each household you verify, including a copy of all communications, and the SFA calculation of household income, when appropriate.
9. Determine and document which households did not respond to the initial request.
10. Send a second request for documentation of eligibility to those households that did not respond to the initial request or submitted insufficient or obsolete written evidence, does not designate collateral contacts, or collateral contacts are unable or unwilling to provide the requested evidence. The second request may be sent by letter, e-mail, or phone, but documentation must be kept regardless of the type of contact.
11. If the household does not respond to the second request, send a termination notice giving 10 calendar days' advance notice. Send the letter on the first day of the 10-day notice. The termination letter must include appeal rights. The letter may be sent by postal service or to the e-mail address of a parent or guardian. The household must appeal within the 10 calendar day advance notice period. If the household appeals, the LEA must continue to provide the original meal benefits to the child until the LEA resolves the appeal.
12. Notify households of decreases to eligibility giving 10 calendar days' advance notice of status change and notice to appeal within the 10 calendar day deadline.
13. Complete verification process no later than **November 15**.
14. Make changes to eligibility status in your system **no later than** 10 operating days after the 10 calendar day advance notice period, or 10 operating days after the decision by the hearing official.
15. **Note that the required dates for LEAs to determine the number of applications on file for verification and to report the number of students' eligible for FRPMs to CDE are different. LEAs must select their verification samples based on the number of applications on file as of October 1.** LEAs are to report the counts of students eligible for free and reduced-price (F/RP) benefits required for the verification report as of the last operating day in October and report the counts of applications as of October 1.

For instructions, refer to the CDE Verification Reporting Web page at <http://www.cde.ca.gov/ls/nu/sn/verification.asp>. The CDE will send annual e-mails informing sponsors that verification reports must be filed by **January 27** of each year.

3. Verification Sampling Methods

Standard (Basic) Sample Size Method

LEAs must use the Standard (Basic) Sample Size Method, using error prone (EP) applications,

School Nutrition Program (SNP) Module 3
SNP Online Training 2016–17 Page 4

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unless qualified for Alternate Sample Methods. LEAs must demonstrate how they qualify to use an alternate sample size each school year.

EP applications indicate a total household income within \$100 below the F/RP monthly income eligibility limits or \$1,200 below the annual free and reduced eligibility guidelines for that household size listed on the federal Income Eligibility Guidelines.

Verify the least of 3 percent or 3,000 of **all** approved applications, choosing only from EP applications. A sponsor may verify **no more than 3 percent** of total applications.

However, a sponsor may verify additional applications **for cause** during the verification time or any other time during the year. These are not part of the 3 percent sample size.

Do not count questionable applications verified **for cause** in the sample population for the annual process. The verification report that is due on January 27 has a separate category to report the number of applications verified for cause.

Identify EP applications using the **EP check box** on the application form. Computer software may be able to identify EP applications automatically (make sure the computer software is set correctly for identifying EP applications).

Determining Standard (Basic) Sample Sizes Example

1. Count the total number of approved F/RP and categorical applications on file.

Example: **3,245** applications submitted

2. Multiply the number of applications by 3 percent to determine the number of EP applications to verify.

Example: **$3,245 \times 0.03$ (3%) = 97.35**

3. Round **up** all fractions to the next whole number.

Example: **97.35 is rounded up to 98.00**

4. Compare the 98 applications calculated to 3,000 maximum to determine which is the lesser.

Example: **98 is less than 3,000, so 98 is the amount to be verified.**

5. Verify the **98** applications selected from EP applications.

If there is not enough EP applications to meet the total number needed for the verification sample, make up the difference by randomly selecting the remainder from the total F/RP income and categorical applications.

To identify EP applications easily, file them separately or flag them after determining eligibility.

Alternate Sample Size Methods

Alternate One (formerly known as Alternate Random Sampling Method)

The sample size equals the lesser of:

- 3,000 of all applications selected at random from applications approved by the LEA as of October 1 of the school year
- Three percent of all applications selected at random from applications approved by the LEA as of October 1 of the school year

Determining Alternate One Sample Sizes

The least of 3 percent or 3,000 approved applications sampled from all applications at random (not just EP):

1. Count the total number of approved F/RP and categorical applications on file. For example, if **5,000** applications are on file, multiply the number of applications by 3 percent to determine the number of applications to be verified.

Example: **5,000 x 0.03 (3%) =150**

2. Compare the 150 calculated to 3,000 to determine which is the lesser.

Example: **150 applications is the lesser**

Remember to round **up** all fractions to the next whole number.

3. Select the applications to be verified from all approved applications.

Alternate Two (formerly known as Alternate Focused Sampling Method)

The sample size equals the lesser of the sum of:

- 1,000 of all applications approved by the LEA as of October 1 of the school year, selected from EP applications, **or** 1 percent of all applications approved by the LEA as of October 1 of the school year, selected from EP applications

Plus the lesser of:

- 500 applications approved by the LEA as of October 1 of the school year that provide a case number in lieu of income information; and
- One-half of 1 percent of applications approved by the LEA as of October 1 of the school year that provide a case number in lieu of income information

Determining Alternate Two Sample Sizes

The lesser of 1 percent or 1,000 all approved applications sampled from EP applications plus the lesser of .5 percent or 500 from applications approved using case file numbers.

1. Count the total number of approved F/RP and categorical applications on file:

- For example **5,000** applications are on file. Multiply the number of all approved F/RP applications by 1 percent to determine how many **EP applications** to verify:
Example: **5,000 x 0.01 (1%) = 50**
- 2. Compare the 50 calculated to 1,000 of all **EP** applications to determine which is less
- 3. Count the number of categorical applications with approved case file numbers. Multiply the number of categorical applications with approved case file numbers by .5 percent to determine how many **categorical** applications to verify:
Example: **1000 x .005 (.5%) = 5**
- 4. Compare the 5 calculated to 500 of approved categorical applications to determine which is less
In this example, the LEA would verify a total of 55 applications
- 5. Remember to round **up** all fractions to the next whole number

Note for RCCIs: At least one application must be verified if a **day student** has an application for free or reduced-price meals.

For assistance in selecting the best verification method, complete the Worksheet to Determine Verification Sample Size located on the CDE Web page at <http://www.cde.ca.gov/ls/nu/sn/documents/verifsamplewksht.doc>

4. Qualifications for Alternate Sample Method

There are two ways an LEA may annually qualify to use an alternate sample size based on nonresponse rates.

Lowered Nonresponse Rate

An LEA may use an alternate sample method if the **nonresponse rate** for the preceding school year as of November 15 is less than 20 percent.

Example using prior year verification information:

- 100 applications chosen for verification
- 18 nonresponses
- $18/100 = 18$ percent nonresponse rate
- District may use an alternate sample size in the following school year because 18 percent is less than a 20 percent nonresponse rate

Improved Nonresponse Rate

An LEA with more than 20,000 students approved for FRPMs by eligibility application as of October 1 and the **nonresponse rate** for the preceding school year as of November 15 is at least 10 percent below the **nonresponse rate** for the second preceding year.

The following is an example of how an LEA may qualify for an alternate sample method based on an improved nonresponse rate:

Year 1: School Year (SY) 2013–14

- The LEA had 21,000 children approved for FRPM benefits based on a total of 6,000 approved applications; therefore, the LEA must verify 180 household applications (3 percent of 6,000)
 - Of those 180 households, 45 households failed to respond to verification requests, which results in a **nonresponse rate of 25 percent** ($45 \div 180 \times 100$)
- The LEA must improve the 25 percent nonresponse rate by at least 10 percent
 - The improvement rate is calculated by multiplying the nonresponse rate by 10 percent which is $0.25 \times 0.10 \times 100 = 2.5$ percent
 - Therefore, Year 2 nonresponse rate needs to be less than 22.5 percent to indicate a 10 percent or greater improvement. (25 percent nonresponse rate minus 2.5 percent improvement rate = 22.5 percent)

Year 2: SY 2014–15

- The LEA had 6,000 approved applications, so the sample size is 180 (3 percent of 6,000)
- The number of nonrespondents was reduced to 40 which is a **nonresponse rate of 22.2 percent** ($40 \div 180 \times 100$)
- The next step is to calculate the level of improvement between Year 1 and Year 2
- Since 22.2 percent is less than the minimum nonresponse rate of 22.5 percent, there is more than a 10 percent improvement
- The LEA is qualified to use an alternate sample size for SY 2015–16

Year 3: SY 2015–16

The LEA may choose to use one of the alternate sample sizes for its verification activities.

Nonresponse Rate

Nonresponse rate is the percentage of approved household applications selected for verification as of October 1 for which the LEA did not obtain verification information by November 15.

Nonresponses include:

- The household does not respond after receiving the initial request for verification
- The LEA attempts follow-up when:
 - The household does not contact the LEA.
 - The household responds to the initial attempt but provides incomplete information, and the LEA is unable to determine if the eligibility determination was correct.
 - The household responds to the initial request but fails to provide the LEA with documents or is otherwise unable to provide appropriate documentation.

Activity Self-check for Sampling Methods

The Disney Park School District (DPSD) has the following statistics:

- 5,000 total enrollment
 - 2,000 F/RP approved applications composed of:
 - 1,500 household student applications by income
 - 500 categorical student applications (with case numbers)
 - 980 direct certified students
 - 50 EP applications
 - 2 approved applications verified for cause
 - 17 percent nonresponse rate the previous year as of November 15
1. Does this district meet the criteria for the Alternate Sample Size options? Yes No
2. How many applications would DPSD verify?

Basic/Standard Method _____

Alternate One (Random) Method _____

Alternate Two (Focused) Method _____

3. Which verification method would be best for DPSD to use?

Basic/Standard Method
Alternate One (Random) Method
Alternate Two (Focused) Method

4. Why did you choose this method?

Activity Self-check Answer Page

1. Does this school district meet the criteria for the Alternate Sample Size options?

Yes (they have less than a 20 percent nonresponse rate the previous year)
 No

2. How many applications would DPSD verify:

Basic/Standard Method $2,000 \times .03 = 60$ (50 EP—10 from general application pool)

Alternate One (Random) Method $2,000 \times .03 = 60$ (from all applications)

Alternate Two (Focused) Method $2,000 \times .01 = 20$ (20 from EP applications) $500 \times .005 = 2.5$ (three from categorical application pool)

3. Which verification method would be best for DPSD to use?

Basic/Standard Method
Alternate One (Random) Method
 Alternate Two (Focused) Method

4. Why did you choose this method?

The number of the applications to verify for the Alternate Two (Focused) Method is less than either the Basic/Standard Method or the Alternate One (Random) Method

5. Making Substitutions in the Verification Sample

Prior to notifying households of the verification selection, the LEA may determine that a household application should be substituted for another, if the LEA believes that the household would be unable to satisfactorily respond to the verification request.

- LEAs may replace up to 5 percent of applications selected for verification with other applications selected on the same basis (e.g., EP replaces EP).
- LEAs may pull another application for verification and confirm its accuracy before notifying the household of selection.

This procedure does not apply to households that have already been contacted by letter or by phone regarding the verification process.

6. Verification for Cause

The LEA has an obligation to verify all questionable applications (**verification for cause**). This effort cannot delay the approval of applications. If an application is complete and indicates that the child is eligible for F/RP benefits, the LEA must approve the application. Only after the determination of eligibility has been made may the LEA begin the verification process. Determining officials are strongly encouraged to contact the household during the certification process to clarify any information that is unclear or questionable before certifying the application and proceeding with verification for cause.

- To verify an approved application for cause, the LEA must send the household a letter explaining that it must submit verification of eligibility information with the application for continued eligibility. The verification letter may be sent at the same time as a notice of eligibility.
- Any household who fails to submit requested information on the date specified by the LEA or who submits verification information that does not support the initial determination of eligibility must be sent a notice of adverse action.
- Once the LEA requests that households provide documentation for cause, the LEA must complete the verification process for these households.
- If applications are submitted for **mixed households**, which include children who are eligible based on income and others based on other source categorical eligibility, these applications are subject to verification and are included in the verification sample.
- Verification for cause must not be used to automatically verify the households of all district employees whose children are certified for FRPMs. From the list of children approved for FRPMs, an LEA could identify children of school district employees and use available LEA salary information available to them to identify questionable applications and then conduct verification for cause on those questionable applications.

- The Food and Nutrition Service (FNS) supports use of verification for cause where appropriate as a method for LEAs to address integrity concerns.
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7. Verification Documentation

- Documentation of income can be provided for any point in time between the month prior to the application and the time the household is required to provide income documentation.
 - For example, for an application completed on September 15, the documentation required by November 15 may be income documentation from August, September, or October.
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8. Acceptable Documentation

The following is acceptable documentation to use for verification:

- Written evidence such as pay stubs, warrants, award letters from assistance programs, collateral contacts (may be from several sources that give similar information regarding the family resources), and agency records from other public agencies that administer social services or welfare programs.
 - Use the **Verification List** form located on CDE Web page at <http://www.cde.ca.gov/ls/nu/sn/documents/veriflist.doc> to verify information from public agencies for multiple applicants (this form may be used for direct verification). To locate the worksheet, visit the CDE Verification Materials Web page at <http://www.cde.ca.gov/ls/nu/sn/verification.asp>.
 - Timeframe documentation can be any point in time between the month prior to the initial submission of the application and the time verification is required.
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9. Direct Verification Option

Direct verification is the optional use of data from CalFresh, FDPIR, and CalWORKs to confirm eligibility. This option reduces the burden on families by using alternate sources of information for verification. Direct verification can be used only to verify categorically eligible applications, which include:

- CalFresh (formerly known as Food Stamps and federally known as SNAP)
- CalWORKs (TANF)
- FDPIR

Do not accept Medi-Cal data for direct verification.

- Information from county social services offices may be used to verify eligibility rather than contacting the family for program benefit information.
- Information for direct verification must be no older than 180 days prior to the date of the F/RP application.

10. Verification Follow Up

At least one additional attempt to contact the household—by mail, telephone, or e-mail—is required if initial verification request resulted in a nonresponse.

- LEAs may wish to contact families more than one additional time to encourage families to submit verification documentation.
- The LEA must document any attempts at contacting the households and the results.
- Each district must provide all households with a telephone number to call for verification assistance. This number must be free to all households.
- Follow-up may be contracted to a third party (e.g., community group); however, all California confidentiality requirements (see Module 2—Eligibility—California confidentiality requirements) must be met, and eligibility determinations cannot be shared with the third party.
- The third party may answer questions, assist with possible language barriers and submitting required documents, but cannot evaluate verification documents.

Inability to verify eligibility status after the follow-up attempt(s) is considered a nonresponse and will result in termination of benefits and notification sent to the household. If the household does not respond, verification is considered complete for this household when notice of adverse action is sent.

11. Possible Verification Results

The following are potential results from the verification process:

- No change
- Increase in benefits
- Reduction of benefits
- Termination of benefits

Note: Apply verification results to all children (except those determined to be other source categorically eligible) in the household if the household is determined to be ineligible through the verification process.

If benefits are...

- Increased (from reduced-price meal to free meal category):
 - The change is effective immediately and implemented within three operating days.
- Reduced or terminated (for example, from free meal to reduced-price meal category or reduced-price meal to paid meal category or free meal to paid meal category):
 - The household must be given 10 calendar days advance written notice of appeal rights.
 - If the household appeals within the 10 calendar days advance notice period, their benefits will continue during the appeal process.
 - If the household does not appeal, benefits can be reduced or terminated effective the day after the end of the 10 day advanced notice, but must take place no later than 10 operating days after the end of the 10 calendar day advanced notice period.

Households that reapply (after benefits are reduced or terminated as a result of verification):

- Households may reapply for benefits at any time during the school year; however, they are not considered new applications.
- If the household is terminated and reapplies during the same school year, the household is required to provide income documentation or proof of participation in categorical programs at the time of reapplication.

12. USDA Requirements for Verification

Complete verification process for all households selected for review. Use the following tools to assist with verification process:

- Access the **Verification Documentation of Households Applying for FRPMs** Worksheet. To locate the worksheet, visit the CDE Verification Materials Web page at <http://www.cde.ca.gov/ls/nu/sn/verification.asp>.
- Access the **Verification Results/Findings by Individual Student** Worksheet to assist with completing the required Verification Report through CNIPS located on the CDE Web page at <http://www.cde.ca.gov/ls/nu/sn/documents/verifresultlist.doc>.

13. Agency Documentation Requirements

The following documents must be maintained for three years plus the current year:

- Method of application selection for verification process
- Number of applications on file as of October 1
- Number of applications chosen for verification process
- Correspondence and proof of eligibility
- Follow-up attempts and results
- Noted reasons for (and date of) benefit changes
- Record of extra efforts to fulfill requirements
- Title and signature of verifying official
- Appeal documentation

14. Verification Requirements for Provision Schools

Note: Districts participating in Provision 1 and/or Provisions 2 and 3 schools that are in their base year must complete the verification process.

All schools on provisions must complete the verification report that is due on January 27.

Keep verification documents on file for the entire provision cycle including all extensions plus three years.

Provision 1

- Verification is required for all applications during the first year.
- Verification is required for new applications during the second year of the two-year cycle of the provision.

Provisions 2 and 3

- Verification process is required only during the base year.
- The verification report is required annually for schools in base year and nonbase years.

Community Eligibility Provision

The verification process is not required for schools participating in the CEP, as long as the LEA has implemented the CEP by October 1st of the current school year. However, the verification report is still required annually.

Note: Schools on CEP are required to complete that annual verification report. If a district has provision sites, the district must complete Section 2 of the verification report.

15. Verification Report and Resources

The annual verification report does not apply to special milk, state meal, Seamless Summer Feeding Option, or any School Nutrition Program (SNP) other than the NSLP and SBP.

NSLP and SBP sponsors, including RCCIs without day students, must submit the **annual** verification report in CNIPS. Districts that do not collect applications and are not required to complete verification activities must only complete the identified parts of the report.

The verification report contains information about sites collecting FRPM applications, site enrollment, eligibility information, and results of verification.

The verification report is due annually by January 27.

Completing the Verification Report in CNIPS

Instructions:

1. Access the verification report through the CNIPS Web site at <https://www.cnips.ca.gov>
2. Login to your CNIPS account
3. Select **Applications** from the dark blue tool bar at the top of your screen
4. Select **Verification Report** from the item list: View Verification Report will display
5. Complete the report by entering data into all applicable fields completely and correctly
6. Select **Save**
7. If **Saved with errors** is displayed, select **Edit**, make changes, and select **Save**

After the report has been submitted without errors, the Nutrition Services Division staff will be able to review the document.

16. Resources

For links to all information, forms, etc., regarding Verification, visit the CDE Verification Materials Web page at <http://www.cde.ca.gov/ls/nu/sn/verification.asp>.

For detailed instructions for completing the Verification Report, visit the USDA Release of the New SFA Verification Collection Report Web page at <http://www.fns.usda.gov/release-new-school-food-authority-verification-collection-report>.

The 2016 Eligibility Manual for School Meals is located on the USDA Web page at <http://www.fns.usda.gov/2016-edition-eligibility-manual-school-meals>.

The Verification Quick Reference Guide located on the SNP Primer Web page at http://www.calpronet-sj.org/pdf_snp/Verification.pdf.

Contact Information

The SNP county specialist and child nutrition consultant (CNC) contact list is located in the CNIPS Download Forms section, Form ID Caseload. You can also call 800-952-5609, Option 2, to be directed to your SNP specialist or CNC.

This module provides the following Professional Standards:

Key Area: Administration (3000)

Key Topic: Free and Reduced-price Meal Benefits (3100)

Learning Objective: Verification of Meal Benefits (3110)

Instructional Minutes=30