



State of Arizona  
**Department of Education**

**Tom Horne**  
Superintendent of  
Public Instruction

**CN# 14-06**

**MEMORANDUM**

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**To:** School Health & Nutrition Program Sponsors

**From:** Mary Szafranski, Deputy Associate Superintendent  
Arizona Department of Education, Health & Nutrition Services  
Holly Mueller, Program Director  
Arizona Department of Education, School Health & Nutrition Programs

**Date:** October 7, 2005

**RE:** General Follow-up Provisions – Reauthorization 2004

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The following memo addresses the following issues related to the Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265):

- Direct Certification and paper applications
- Ability to decline verification of certain applications
- Completion of applications by Local Education Agency (LEA) officials

**What does an LEA do when there is a Direct Certification match and a household application?**

- When an LEA has documentation of a Direct Certification match as well as a household application submitted on behalf of the child, the LEA should disregard the application. The Direct Certification match takes precedence over the application submitted by the household.

**Note: The household application must be maintained on file with the Direct Certification match.**

**Who decides whether an LEA may substitute up to 5 percent of applications selected for verification?**

- In memo CN# 47-05 it was stated that “LEAs may elect to substitute up to 5 percent of applications selected for verification and replace them with different applications to be verified.” The LEA makes the decision to utilize this option.

**Note: The LEA may not use substitution to reduce the overall number of applications they verify.**

**What type of information might an LEA official use to complete a household application on behalf of a child?**

- Currently, LEA officials are allowed to complete a household application on behalf of a child if they have information that the household is eligible for free or reduced-price meals. This information might include personal knowledge of household circumstances or it might be information from a school counselor or a community official.

If you have questions or concerns regarding this memo, please contact your assigned School Health & Nutrition Program Specialist at 602-542-8700.