

#### State of Arizona Department of Education

# HNS# 17-2014

# MEMORANDUM

To: Sponsors of the National School Lunch Program
From: Mary Szafranski, Associate Superintendent Arizona Department of Education, Health & Nutrition Services
Date: November 13, 2014
RE: Second Review of Applications Reporting Requirements and Guidance for School Year (SY) 2014-2015

This memo serves to notify selected Local Education Agencies (LEA) that the second review of applications results must be reported to the Arizona Department of Education (ADE) by February 1, 2015 via the Second Review Report in CNP Verification accessed through Common Logon.

# What is the Independent Review of applications?

The Healthy, Hunger-Free Kids Act (HHFKA) included several provisions to help increase effectiveness and integrity in Child Nutrition Programs. As part of an effort to decrease certification errors during the eligibility determination process, section 304 of the HHFKA requires that certain local education agencies (LEAs) conduct a second, independent review of applications for free and reduced price meal benefits before eligibility determinations are made.

# Which LEAs are required to conduct a second review of applications?

Beginning in SY 2014-2015, LEAs that demonstrate high levels of, or a high risk for administrative error associated with certification and benefit issuance are required to conduct a second review of applications. Refer to the "LEA Selection Criteria" section below for approaches to determine 'high risk' LEAs.

# What does a second review of applications look like?

A second review of applications requires a re-evaluation of the eligibility determination made by the original determining official, based on the information provided by the household on the applications. The second review must determine whether the applications is complete, i.e., the

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application contains the signature of an adult household member, the last four digits of a social security number (or an indication of "none"), names of all household members including the student for whom application is made, income amount (received by each household member identified by the individual who receives it), income source, income frequency or categorical information, if applicable. The second review must also confirm the applications were correctly approved based on current income eligibility guidelines or categorical eligibility information, as applicable, and the master list of roster of student names correctly records the student's eligibility.

### Who must conduct the second review of applications?

The second review must be conducted by an independent individual or entity that did not make the original eligibility determination. This individual or entity is not required to be an employee of the LEA but must be trained on how to make application determinations.

## How quickly must a selected LEA conduct the second review of applications?

The second review of applications must be done before the household is notified of eligibility and must not result in the delay of an eligibility determination.

## What are the reporting requirements for LEAs

LEAs subject to the second review of applications are required to submit to their State agency an annual report, detailing the number of free and reduced price applications subject to a second review, the number and percentage of reviewed applications for which the eligibility determination was changed and a summary of the type of changes that were made. The information reported to the State agency must be as of October 31<sup>st</sup>. This means LEAs will only need to report on applications for the current school year that have been reviewed on or before October 31<sup>st</sup>, a date consistent with already existing reporting requirements. LEAs required to conduct a second review of applications are still required to notify households of the child's eligibility determination within 10 operating days of receiving the application.

## Begin Second Review Report and submit to ADE.

Best Practice: November 1

## Second Review of Applications Report Due

Date: No later than February 1

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

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