

# ACCESS AND REIMBURSEMENT

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Eligibility Determination

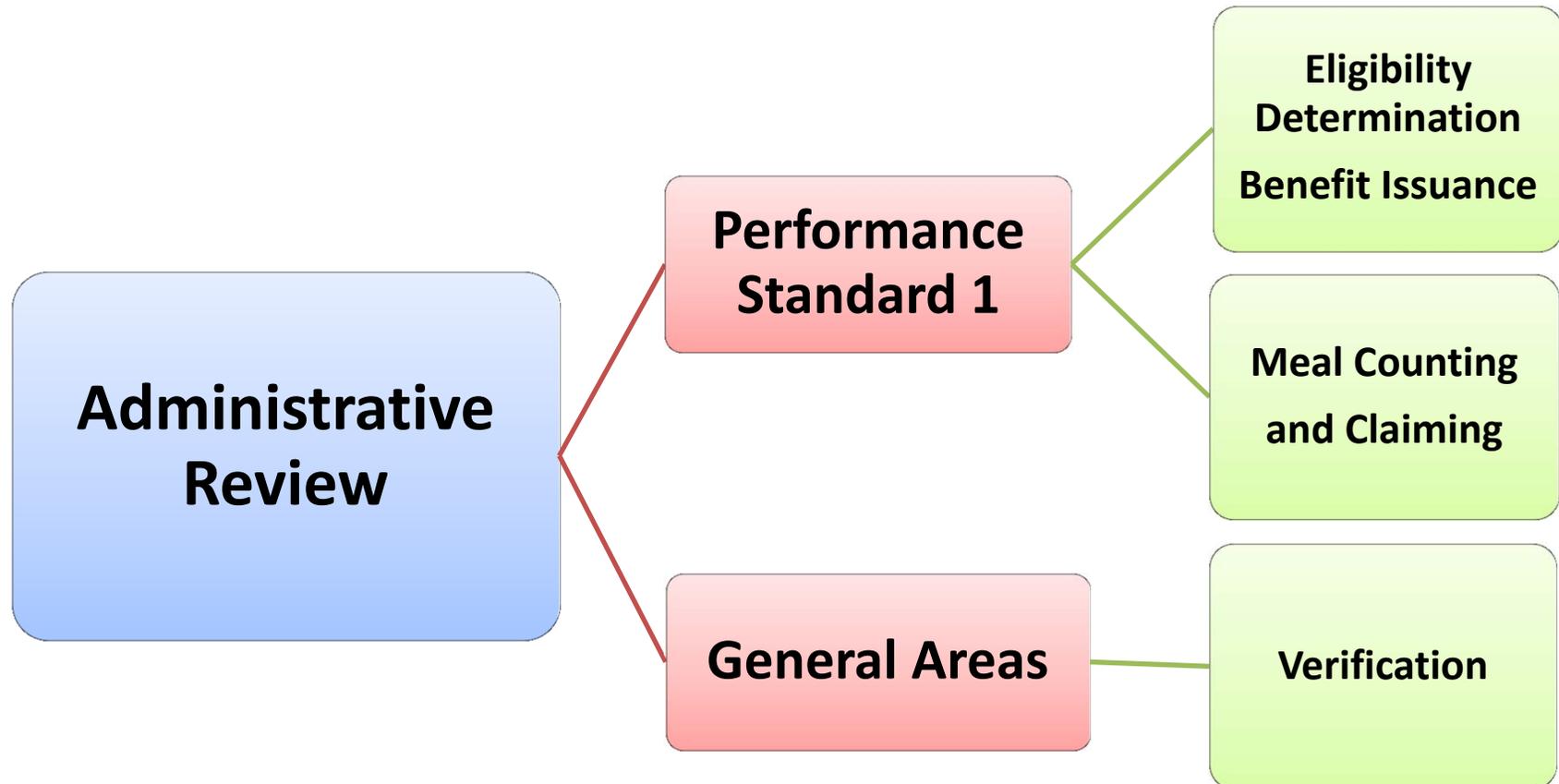
Benefit Issuance

Direct Certification

Verification

Meal Counting, Claiming and Reimbursement

# Access and Reimbursement Overview



# The Administrative Review Process

Off-Site Assessment Tool

*Evaluation Questions*



On-Site Review

*Validation Questions*

# Access and Reimbursement

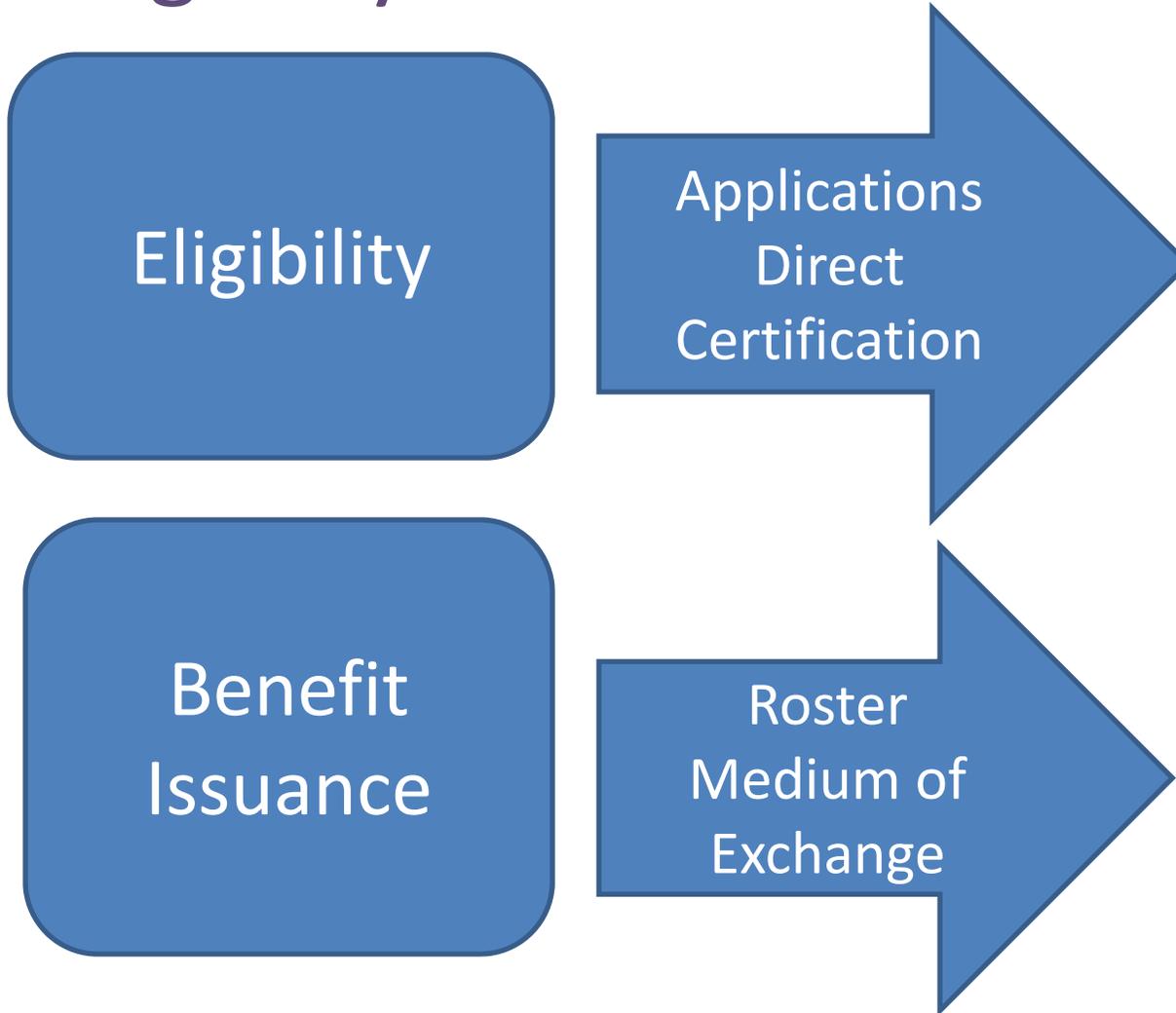
## SFA Level

- Certification of Eligibility
- Benefit Issuance
- Eligibility Determination
- Direct Certification
- Verification

## SFA & Site Level

- Meal Counting and Claiming
  - Site level (actual)
  - SFA level (consolidation)

# Eligibility → Benefit Issuance



# Why review benefits and eligibility?

- Ensure program integrity
- Validate SFA regulatory compliance

# Eligibility and Benefits Issuance



- Determining official
- Access to applications
- Frequency of updates to the POS

# Eligibility and Benefits Issuance

Need information about:

- How student was certified for benefits
- Issuance of benefits
- Updates to System
- Transfer of benefits
- Back-up system

# Eligibility

- Other items that will be assessed:
  - Conversion factors and income guidelines
  - Carryover/Roll-over from previous year
  - Length of time for application processing
  - Household notification

## Benefit Issuance

SFA-wide Benefit Issuance List must include:

- Free and reduced-price eligible students
- Name, School Name, Certification Method, Verification
- Point of Service List

## Selecting Applications for Review

- Upload consolidated list of eligible students via a secure portal
- Instructions provided prior to review

# Validating Student Eligibility

Reviewer must examine:

- Student Application Documentation
- Verification Documentation



# Validating Benefit Issuance

## Eligibility Status

- The correct eligibility status for each student
- SFA Count of Reviewed Students vs. SA Count of Reviewed Students

## Benefit Issuance

- Prevention of Overt Identification
- POS Benefit Issuance Document
- Benefit Issuance Updates
- Wrong categories = Errors

# Second Party Review of Applications

- Required by HHFKA 2010
- Must conduct in 2015-16
- Procedures
- Record keeping

# Reviewing Denied Applications

- Minimum of 10 and up to 100%
- Notification of denial
  - Reason
  - Appeal Rights and Instructions
  - Family may reapply

The image shows a document titled "NOTIFICATION OF DENIAL" from the Department of Anthropology. The document is mostly obscured by a large, semi-transparent red prohibition sign (a circle with a diagonal slash). The visible text includes a header, a paragraph of introductory text, and several sections with headings such as "Reason for Denial", "Appeal Rights and Instructions", and "Family may reapply". The document also contains various fields for names, addresses, and dates, as well as a footer with contact information.

## Eligibility and Benefits Issuance: Common Findings

**FINDING:** Reimbursement claimed for student meals when there is no approved application on file.

# Eligibility and Benefits Issuance: Common Findings

**FINDING:** Data entry error results in incorrect eligibility status.

## Eligibility and Benefits Issuance: Common Findings

**FINDING:** Application processed as an income application but required information is missing.

## Eligibility and Benefits Issuance: Common Findings

**FINDING:** Application is processed as an Income Application, but incorrect income is used to determine eligibility.

## Eligibility and Benefits Issuance: Common Findings

**FINDING:** Confidential eligibility information is released for unauthorized purposes or without prior consent.

## Eligibility and Benefits Issuance: Common Findings

**FINDING:** Student eligibility status is not updated in Point Of Sale (POS) or roster.

## Eligibility and Benefits Issuance: Corrective Action

- Required for Findings/Errors
- Must be applied SFA system-wide
- Formal response required from SFA

# Eligibility and Benefits Issuance: Fiscal Action

Why?

- Applications missing information
- Incorrect eligibility determinations or status
- Benefit Issuance errors
- Failure to update verified applications

How far back?

- Potentially to original date of eligibility

# Questions?



## Verification

- Confirmation of eligibility for free and reduced-price meals
- Required when eligibility is determined by application

## Verification: Why review?

- Ensure program integrity
- Validate SFA regulatory compliance

## Verification: Evaluation

- Evaluation of Verification Summary Report (FNS 742 Report)
- Sample Size
- Reporting accuracy

## Verification: Reviewer Needs

- Verification position titles
- Description of verification process
- Continuing education documentation
- Electronic system access



## Verification: Determining Compliance

- Number of verified applications
- Accurately calculated sample size
- Verified correct number of applications
- Replaced applications accurately
- Confirmation reviews were conducted correctly



## Verification: Determining Compliance

Reviewer selects all verified applications for additional review.

# Verification: Determining Compliance

Reviewer selects all verified applications for additional review.



## Verification: Additional Evaluation

- Notification letters met FNS requirements
- Household follow-up attempts were made
- Notice of adverse action met FNS requirements
- Eligibility status changes were timely
- Verification process completed by November 15

## Verification: For Cause Responses

- Included in the non-response rate
- May impact verification method for upcoming year.

# Verification

- Technical Assistance
- Corrective Action
- Fiscal Action required only if errors in:
  - Initial eligibility determination
  - Post verification

## Common Findings

- Verification process did not begin on October 1.
- Verification process did not end by November 15.
- Verification did not take place at all.

## Common Findings

- Application selected for DC student
- Incorrect verification method used
- Misunderstanding of the sample size
- Verification software language inconsistent with USDA resulting in selection of incorrect method

## Common Findings

- Sample pool number not rounded up
- Inadequate applications verified

Remember: the exact number selected be verified. For example, if the verification selection pool is 25.01 applications, the SFA must select 26 applications to be verified.

## Common Findings

- Applications selected for verification were not confirmed as correct before sending letters to the selected households.

## Common Verification Errors

- Only one attempt made to collect the verification information.
- Documentation was not maintained for the second attempt.
- A student withdraws during the verification process and the process cannot be completed, the SFA must select another “similar” application in its place.

## Common Verification Errors

- After the verification process has ended, households that re-apply which were originally found eligible for free or reduced-price meal benefits, did not provide another application with current income or proof of FNS.

## Common Verification Errors

- Updated software, which may include verification updates, is not obtained or installed.

# Questions?



## Meal Counting, Claiming, & Reimbursement

- Meal counts and claims accurate by category
- Meals counted, consolidated, and recorded correctly
- Meals accurately reported and claimed for reimbursement

# Meal Counting, Claiming, & Reimbursement

- Electronic vs. Manual System
- Standard Operating Procedures
- Point of Service
- Back-up System
- Continuing Education



# Meal Counting, Claiming, & Reimbursement

Considerations during the review:

- Attendance Adjusted Eligibles
- Electronic Meal Counting System
- Alternative Points of Service
- Duplicative Meals



## Meal Counting, Claiming, & Reimbursement



- Accurate daily count of reimbursable meals at POS
- Count by category
- Without overt identification

# Meal Counting, Claiming, & Reimbursement

## Edit Checks:

- Required by USDA
- Conducted daily at site level
- Conducted monthly at SFA level
- Resolve discrepancies before filing reimbursement claim



# Meal Counting, Claiming, & Reimbursement

## Observations for Review Period:

- Procedures for totaling meal counts
- Process for consolidation and reimbursement



## Meal Counting, Claiming, & Reimbursement

Confirmation for:

- Compliance with the SA/SFA Annual Agreement
- Accurate claim consolidation



# Meal Counting, Claiming, & Reimbursement

## Site level validation:

- No overt Identification
- Accurate meal count by category
- No excessive overrides



## Meal Counting, Claiming, & Reimbursement

### Site level validation:

- Meal count comparison to review period
- Meal count comparison to approved number by category
- Meal count comparison to attendance adjusted eligible
- Questionable patterns
- School meal counts comparison to SFA reimbursement claim
- Determination of need for fiscal action

## Common Findings

- Each service line does not provide an accurate count by eligibility category at the POS.
- Meal counts are incorrectly combined and consolidated or not done daily.
- There are patterns in the meal counts for the review period which appear questionable.
- Effective edit checks are not conducted as required.

# Errors: Two Types

Systemic



Non-Systemic



# Meal Counting and Claiming Errors

## Systemic



- Errors will result in fiscal action
- CA is required
- Follow up from SA is required

## Non-Systemic



- Errors may result in fiscal action
- CA may be required
- Follow up from SA is optional

# Errors Requiring Fiscal Action

## Meal Count Combining Errors

- Difference between incorrect and correct meals

## Counting Errors

- Meal counts do not equal number of eligible meals
- Meal counts by category exceed number eligible
- Second and/or ineligible meals were counted

# Questions?

