

Commissioner's Memo

4/24/2017

## Web-Based Free and Reduced Price Meal Applications

### Memo Information

Memo Number **CNU-17-048**

Memo Date 4/24/2017

Memo Type Regulatory

Unit Child Nutrition

Regulatory Authority USDA Memo SP-10-2007; 7 CFR 245.6; USDA Eligibility Manual for School Meals

Response Required NO

Attention Superintendents; Principals; General Business Manager

### Primary Contact Information

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### Memo Text

#### **Co-op Directors, Child Nutrition Directors, IT Personnel**

The purpose of this memo is to provide information to School Food Authorities (SFAs) regarding the availability of web-based Free and Reduced Price (F/RP) meal applications for the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) as well as the requirements that must be met to use web-based (on-line) F/RP meal applications.

Please keep in mind that SFAs are allowed to publish the printed version of the F/RP Meal application on the district's web-site without pre-approval from Arkansas Department of Education, Child Nutrition Unit (ADE CNU). If the SFA makes any changes to the ADE CNU published prototype for the F/RP meal application, the changes to the prototype must be approved in advance of publication by ADE CNU. Providing a link for households to print a paper application is different from a web-based F/RP meal application in that the household prints the application, completes it and submits it to the SFA. With web-based F/RP meal application the household enters information into the application based on prompts and questions asked in the system.

SFAs often have point of service (POS) software that has the capability of providing web-based F/RP meal applications. In addition to this resource, the United States Department of Agriculture (USDA) has published a prototype web-based F/RP application that SFAs may use at no charge to the SFA. The SFA would have the district's technology personnel work to ensure the program was set up appropriately

for the school district's needs. Please see the following for more information on this exciting opportunity: <https://www.fns.usda.gov/school-meals/web-based-prototype-application>

The link above includes a web based interactive demonstration of USDA's web-based F/RP application program, the open source code the district technology personnel would need to use to make the application workable for the district, Q&A Guidance to using the application program, as well as the guide to USDA's prototype web-based application. Also included on this page is USDA contact information for the district to use when including this web-based application for the determination of meal benefit status for students.

ADE CNU does not have resources to assist district technology personnel in setting up this web-based meal application other than those provided by USDA on this website.

\*The use of web-based student meal applications and acceptance of electronic submissions requires SFAs ensure compliance with regard to:

1. Security issues surrounding student and parent confidentiality and data protection,
2. Family Educational Rights and Privacy Act (FERPA),
3. Personal Identifiable Information (PII), i.e. social security numbers,
4. Security issues regarding scanned documents/data storage according to state/federal requirements, and Disposal of original documents containing FERPA and PII data.

Web-based Household Free and Reduced-Price (F/RP) Meal Applications:

For Local Education Agencies (LEAs) to accept electronic submissions for purposes of certifying students for free or reduced-price meal status the LEA must:

### **Local Policies and Procedures**

1. Establish or review for compliance local policies and procedures covering the five (5) areas listed above\*. To implement local systems based on applicable United States Department of Agriculture (USDA) and US Department of Education (DOE) applicable laws and regulations as well as ADE CNU guidance for the use, data maintenance, and retrieval of web-based school meal applications and electronic transactions for federal child nutrition programs. [See USDA SP-10-2007](#) Memo: Update on Electronic Transactions in the Child Nutrition Programs, Questions/Answers, Definitions and Resources

### **Security and Legal Sufficiency of Web-Based Documents**

2. Ensure before procurement of computer software for acceptance of web-based applications that the software has the legal sufficiency of the information and any signature on the application. Whether an SFA uses the Electronic Signature or a combination of paper-based and electronic documents, all documents electronic or paper, must be legally binding. [See Checklist to Ensure Electronic Records Are Legally Binding](#). Encryption of data must start when parent or guardian enters any data on the computer screen. Simply enabling HTTPS/SSL ensures communication between the web browser and the web server is secure but it does not provide authentication security. [See Security Issues Checklist](#).

## Approval of Addendum

3. Submit the Web-Based Meal Application Addendum to the SFA Agreement and Policy Statement for approval by ADE CNU. SFAs cannot require web-based applications in order for a household to receive benefits. Paper F/RP Meal Applications must still be available to all households.

## Content Approval for Web-Based Meal Application

4. Submit the link to the Web-Based Meal Application that will be completed by parents or guardians for approval by ADE CNU. All content for web-based F/RP Meal Application must have prior approval from the state agency, ADE CNU. If the content varies from the state agency proto-type application approved by USDA, then the SFA must submit the specific content of the web-based application for prior approval by the ADE CNU. This must be provided when requesting to amend the Agreement and Policy Statement between the Arkansas Department of Education and the local education agency. In the event the web-based application content has not been approved by ADE CNU prior to being posted on the internet, all eligibility statuses approved by the SFA based on the unapproved web-based application will be void. The household will be required to re-submit the application after approval by ADE CNU. During the transition time the eligibility status for the student will be paid, not free or reduced-price for Claims for Reimbursement submitted to ADE CNU.

## Maintenance of Web-Based Records

5. The SFA must have a written plan and procedure for “Security and Disposal Plan for Web-Based Documents” which ensures maintenance of support documentation for distribution of federal and state funds. [See Electronic Record Keeping Checklist.](#)

## Procurement of Software

6. Maintain documentation that computer software (if applicable) has been purchased using open and free competition regardless of dollar threshold for purchase. USDA Food and Nutrition Services (FNS) and ADE CNU will not approve software packages for the purpose of F/RP meal applications, however ADE CNU must approve the individual SFA’s web-based F/RP prior to use by the SFA. Should a software vendor imply such approval from ADE CNU the SFAs are instructed to inform both FNS and ADE CNU of this violation immediately.

## Security Level 2 for Signatures

7. United States Department of Agriculture (USDA) Specific Requirements:

According to the attached [USDA Guidance Memo SP-10-2007](#), SFAs must have the capability to provide a Level 2 authenticity security for electronic signatures in place for acceptance of web-based F/RP Meal Applications. SFAs, not the software companies, have the responsibility for the Level 2 Authenticity Security for electronic signatures required for securing student meal benefits.

For State Cyber Security Guidance please refer to the following link:  
<http://www.dis.arkansas.gov/security/Pages/default.aspx> .

For The National Institute of Standards and Technology (NIST) Guidance referenced by USDA for Level 2 Security please refer to the following link:  
<http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-63-2.pdf>

## Checklist for content of web-based F/RP meal application materials

8. Attached to this memo is a checklist the SFA should use to ensure that all federally required information is included in the F/RP meal application materials supplied to households.

In summary for an SFA to accept web-based applications the SFA must:

1. Complete and submit addendum to state agency (ADE CNU).
2. Submit link to web-based application to ADE CNU Area Specialist for review and approval prior to publication.
3. The SFA must have Level 2 Security and Data Disposal Plan for web-based documents. In addition the SFA must have a written plan for security, backup and disposal of web-based on-line documents. This plan will be reviewed by ADE CNU as part of Administrative Review process.
4. Web-based F/RP meal applications cannot be accepted by SFA until Addendum is approved and signed by Suzanne Davidson, Director ADE CNU.

### Child Nutrition Program Questions:

With regard to questions concerning the Web-Based F/RP Meal Application Addendum and/or Approval of Web-Based Household Meal Application content prior to posting the application, please call 501-324-9502 and ask for the Area Specialist assigned to the SFA, Karen Franklin or Nancy Dill, Assistant Directors for Program Operations.

Attachment:

[USDA Guidance Memo SP-10-2007](#)

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### Attachments

- [CNU-17-048--Addendum\\_On-line\\_Meal\\_Application\\_2017-18.pdf](#)
- [CNU-17-048--Checklist\\_Electronic\\_Record\\_Keeping.pdf](#)
- [CNU-17-048--LEA\\_Electronic\\_System\\_Security\\_Checklist.pdf](#)
- [CNU-17-048--School\\_Meal\\_Application\\_Guidelines\\_from\\_Eligibility\\_Manual\\_for\\_School\\_Meals\\_2016-17.pdf](#)
- [CNU-17-048--SP-10-2007\\_Update\\_on\\_Electronic\\_Transactions\\_in\\_the\\_CNP.pdf](#)
- [CNU-17-048--Webased\\_FRP\\_Meal\\_Application\\_checklist.pdf](#)