CRITERIA AND PROCEDURE	
BROAD SUBJECT: General Administration	NO: GA-02-02
TITLE: Web-based Meal Applications	**EFFECTIVE DATE:** **June 13, 2009** **Revised June 19, 2015** **Revised May 18, 2017** **Revised May 25, 2018**

PURPOSE OF THIS CRITERIA/PROCEDURE

Many households in Georgia have access to the Internet. Even households who do not own a computer can access the Internet in places such as public libraries. Processing applications electronically may reduce the amount of handling to process and approve the application. This could reduce the amount of time required as well as the overall costs. The purpose of this Criteria and Procedure is to provide additional guidance to Local Education Agencies (LEAs) who want to make the application and supporting materials available electronically so that they can benefit from the efficiencies that technology can provide.

KEY TERMS AND DEFINITIONS

Authenticate: Assure the identity of the user. With electronic signatures, that would include the use of passwords or personal identification numbers (PINs).

Electronic signature: A sound, symbol or process attached to or associated with a document that is executed or adopted by a person with the intent to sign the document. Different electronic signatures might include digitized signatures, biometrics, passwords, personal URL address, PINs, smart cards and "I agree" buttons.

State agency: Georgia Department of Education

CRITERIA AND/OR PROCEDURES

1. Local Education Agencies (LEAs) must have the capability to provide legally binding electronic signatures per State regulations (Georgia Electronic Signatures Law)and local regulation. When LEAs have the capability to provide legally binding electronic signatures, there is no requirement to collect hard copies of the application with the actual signature.

2. LEAs should review local laws and are encouraged to seek local counsel on the use of electronic signatures.

3. LEAs must review and follow guidance provided by United States Department of Agriculture Food and Nutrition Service. Guidance includes but is not limited to the Eligibility Manual for School Meals, FNS Instruction 113-1 as well as USDA FNS Policy memos. Guidance documents from other Federal agencies are also helpful and are identified in USDA FNS Policy SP10-2007.

4. LEAs cannot convert totally to an electronic system and force applicants to submit a web-based meal application. LEAs must be able to provide paper household applications, even if they have an electronic application process.

5. LEAs may request additional information on all type applications (paper and Web-based), if it could provide a benefit to the applicant. However, there must be a system which ensures that if the additional information is not provided by the applicant, the application will still be certified as eligible. For example, the web application must designate what fields are required and what fields are not.

6. LEAs must ensure that applications (web-based or hyperlink) are accessible to on-line persons with limited English proficiency as well as persons with disabilities.

7. Alternative means are available for people with disabilities who are unable to use computers to access information, programs, and services that are normally provided on Web-based systems.

8. Records must be complete, uniform, easily understood, and easily accessible. Develop a security process for approved staff members who will be processing information. Include any contractual arrangement for outsourcing of management or storage functions, if that is applicable in the LEA.

9. Develop plans for retaining data in accordance with the record keeping requirements for a minimum of five years plus the current year. The meal application should be preserved in a useable format. Once software is outdated, the data should be recoverable. Ensure that passwords and encryption codes are preserved to maintain access to archived information.

10. Develop plans for disposing of the information, while ensuring that it is confidential but available to those who need it. Address how changes in staffing and or outdated software will be accommodated.

11. Design secure electronic systems to guard against data corruption, equipment failures, hardware and software problems and storage media deterioration.

12. The LEA should have written internal procedures that address:

    a. processing web-based applications
    b. back-up measures
    c. unauthorized access and security risks
    d. confidentiality, including who has access to the information and why
    e. authentication of identity of all people, both inside and outside of the local agency
    f. record retention and storage

13. LEAs are encouraged to use an electronic application with as comprehensive a set of integrity and accessible features as the FNS Web-Based Prototype Application. See the Guide to USDA's Web-Based Prototype Application for additional information (https://www.fns.usda.gov/school-meals/web-based-prototype-application).

14. LEAs are responsible for assuring that any automated certification and verification processes meet all regulatory requirements and policies, including the calculation of household income when multiple frequencies are reported.

15. LEAs must obtain written permission from the state agency to use a web-based meal application. The attached checklist must be completed and submitted annually to the state agency along with the request to use web-based meal applications

AUTHORITY – FEDERAL

Eligibility Manual for School Meals, USDA, July 18, 2017

FNS Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities, November 8, 2005

USDA FNS Policy Memo SP 10-2007, Update on Electronic Transactions in Child Nutrition Programs, May 1, 2007

USDA FNS Policy Memo SP 50-2011, Free and Reduced-Price Meal Application-Requests for Additional Information

USDA FNS Policy Memo SP 33-2015, Revised Prototype Free and Reduced Price Application Materials: Policy Changes and Design Overview

USDA FNS Policy Memo SP 37-2016, Meaningful Access for Persons with Limited English Proficiency in the School Meal Programs: Guidance and Q&As

USDA Guidance to Federal Financial Assistance Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Persons with Limited English Proficiency, 79 Fed. Reg. 70771, (Nov. 28, 2014) (USDA LEP Policy Guidance

USDA FNS Policy Memo SP43-2016(v.2), Ensuring Access to Free and Reduced Price School Meals for Low-Income Students - Revised

USDA FNS Policy Memo SP 09-2018, Reducing School Meal Certification Error through Improved Online Application Design

Guide to USDA's Web-Based Prototype Application https://www.fns.usda.gov/school-meals/web-based-prototype-application

DOJ Civil Rights Division, Disability Rights Section: Accessibility of State and Local Government Websites to People with Disabilities

School System Name:_____**School Year**_____

This checklist must be submitted **annually** to your school nutrition consultant. Please keep a copy for your system's files. It is the school system's responsibility to ensure that procedures comply with federal, state and local regulations. An annual review will ensure that this level of compliance is obtained.

Application Requirements	Yes	No
Web pages evaluated to determine accessibility for individuals with disabilities		
Contains the information required of all complete applications as outlined in the *Eligibility Manual for School Meals*		
Includes the Use of Information statement in exact words as found in the most current Eligibility Manual		
Includes an attesting statement at the point of signature		
Allows self-identification of ethnicity before race The minimum designations for ethnicity are: 1. Hispanic or Latino 2. Not Hispanic or Latino		
Allows for self-identification of **all** racial categories that apply The minimum designations for race are: 1. American Indian or Alaskan Native 2. Asian 3. Black or African American 4. Native Hawaiian or Other Pacific Island 5. White		
Notifies the household of the following: • provision of ethnicity and race data is voluntary • provides the appropriate reason for collecting this data • visual identification of ethnicity and race will be made if they decline to self-identify		
Provides a space to identify the case number of any household member who receives benefits from Assistance Programs (SNAP and TANF)		
Includes a question or data field to indicate a child's migrant, runaway, foster, or homeless status		
Includes the full USDA Nondiscrimination Statement or a hyperlink to it in English and Spanish		
Incomplete responses to an income field or any other required field prevent the applicant from progressing or making a submission. *In these cases, it is also recommended to include error or warning messages that indicate what information is missing, and if possible, direct the applicant to fields where that information must be submitted.*		

Requires confirmation of a total number of household members or ensures a clear opportunity to report all household members is given		
Only income applications require the last four digits of an adult household member's Social Security Number or lack thereof		
Contains multilingual hyperlinks: (a) that lead to a translated notice that informs individuals with LEP and individuals with disabilities about how they may request free language assistance or auxiliary aids and services if they need assistance completing the application (b) that lead to a translated version of the application		
Allows submission of the application when additional information fields are not completed. *The system may ask for additional information such birthdate, grade, school name or student id. The applicant must still be able to advance through and submit the application without completing those fields.*		
Meets all disclosure restrictions		
Allows for a legally binding electronic signature		
Households have the option to submit a paper application		

Submitted by:_____School Nutrition Director

Date: _____

Received/reviewed by: _____Title: _____

Date: _____