# Superintendent’s Memo #129-19


**COMMONWEALTH of VIRGINIA
Department of Education**

DATE: May 31, 2019

TO: Division Superintendents

FROM: James F. Lane, Ed.D., Superintendent of Public Instruction

## SUBJECT: Web-Based Application Requirements for School Nutrition Programs

The purpose of this memo is to inform Local Education Agencies (LEAs) of a new state requirement regarding the administration of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) by the School Food Authority (SFA). HB 2400 was passed by the 2019 General Assembly, which amended § 22.1-207.2:1 of the *Code of Virginia* to require each local school board that collects information to determine eligibility for participation in the NSLP and SBP to establish and post prominently on its website a web-based application. The SFA must also continue to make available a paper-based application. The effective date is July 1, 2019, for this legislation. Options that can be utilized to comply with the legislation include the U.S. Department of Agriculture (USDA) web-based prototype application, digitizing an existing paper-based application, or utilizing the point of service (POS) system currently in use by the SFA.

## Federal Regulation

Federal Regulations found at 7 CFR §246.6(a)(1) require SFAs that participate in NSLP and SBP to provide a form that permits a household to apply for free or reduced price benefits. The regulation requires that the application be clear and simple in design and to the maximum extent practicable, in a language that parents and guardians can understand. SFAs must ensure that all parents have access to the application.

## What this means for LEAs?

The state law regarding web-based applications becomes effective on July 1, 2019. The LEA is responsible to ensure the SFA complies with the legislation. It is suggested that the SFA work with their current Point of Sale (POS) software vendor and their technology staff to develop an online application. The USDA web-based application is open source software and can be customized for use by any SFA. SFAs with division-wide community eligibility or those administering only the Special Milk Program do not need a web-based application.

## Why a web-based application?

A web-based application provides an additional avenue for parents to complete the free and reduced meal application. There are many benefits to using a web-based application. Through a detailed study, the USDA determined that one in five applicants was certified into the wrong benefit category or denied benefits due to applicant mistakes and administrative processing errors. In order to mitigate errors, the USDA developed a web-based prototype application that:

* Provides a structured interview to guide applications through the process with greater certainty;
* Provides user-tested design standards to improve readability and comprehension;
* Uses integrated help features to make findings answers as simple as possible; and
* Uses a validation check to ensure accuracy and completeness of the application.

The USDA web-based application is an example of how an electronic platform can increase access and improve the integrity of the data. Online applications have the potential to reduce or eliminate calculating and processing errors and while providing families a more user-friendly way to apply for benefits. This reduces the burden and risk at both the household and the local school division.

## The USDA web-based prototype application

The USDA prototype was developed using an “open source” code, allowing free usage and copy without charge. The web-based application is available for download from the USDA website. It will require some initial investment before it is ready for an SFA to use. The cost will vary depending on a number of factors, including any systems that are already in place, and access to and capabilities of information technology resources. If the SFA already has a vendor for the application process, the code and design can be used to customize the application. The USDA web-based prototype application contains generic information and a minimal number of elements so that it can be customized.

## Prototype Limitations

The prototype is not a USDA-hosted national application. Hosting this or any other online application remains a SFA responsibility. The prototype does not create a database, save the application information, or include any database management tools. It is the responsibility of the SFAs to set up and maintain their own online systems and to ensure the security of the personal information submitted by households on their applications. The web-based prototype application is not the type of “app” that can be downloaded from an “app store” onto a mobile device. The prototype application does not make eligibility determinations. The process of determining eligibility and making certification decisions remains the responsibility of the SFA.

## Costs for the online application

The USDA prototype application is available at no cost. Additional associated costs would be associated with the customization. At a minimum, the prototype application will need to be connected to a secure school district dataset that will save the information that households submit through individual applications. Ideally, it would also be integrated into complementary systems, such as the student information system, verification sampling software, and meal counting and claiming, to provide the full benefits of an integrated online system. For SFAs with these systems already in place, or with information technology resources to establish these systems, the cost of adopting the prototype may be low. SFAs can use nonfederal funds or the nonprofit school food service account to cover the costs associated with setting up or modifying an online application.

## Where can I find the application?

The application, *Guide to USDA’s Web-Based Prototype Application*, and Q&As for USDA’s Web-Based Prototype Application can be found on the [USDA Website.](https://www.fns.usda.gov/school-meals/web-based-prototype-application)

If you have questions, please contact the Regional School Nutrition Program Specialist assigned to your division, or Dr. Sandy Curwood, Director, Office of School Nutrition Programs, at (804) 225-2074 or sandra.curwood@doe.virginia.gov.

### JFL/SCC/bdb