

Considerations When Implementing Online Web-based Applications

As districts adopt more sophisticated application certification systems, local educational agencies (LEAs) must have measures in place to ensure that a computerized free and reduced-price meal/milk application (i.e., a web-based application) and supporting materials comply with the U.S. Department of Agriculture (USDA) regulations. This includes ensuring that non-required information (e.g., date of birth, school, grade, student ID, etc.) do **not** block the parent/guardian from completing the application if they choose not to fill out these specific areas.

Additionally, since most software companies provide services nationally, company templates for web-based applications often include some information that may not be relevant to Connecticut. Therefore, it is imperative that LEAs review the web-based application prior to implementation to ensure that it complies with all requirements.

To assist in this process, please refer to the questions and considerations below. For more information, see [USDA Memo SP 50-2011](#), [CACFP 27-2011](#), and [SFSP 20-2011: Free and Reduced Price Meal Applications – Requests for Additional Information](#), the USDA's [Eligibility Manual for School Meals](#), and the Connecticut State Department of Education's (CSDE) website, [Eligibility for Free and Reduced-price Meals and Milk in School Nutrition Programs](#).

Important Questions to Ask

- Who is the designated person responsible for overseeing and testing the web-based application process within the district?
- Is the CSDE's letter, [Sample Parent/Guardian Letter: Frequently Asked Questions about Free and Reduced-price School Meals](#), provided at the beginning of the web-based application? **Note:** Parents/guardians must be able to review this information as part of the process for applying for meal benefits.
- Are the instructions "How to Apply for Free and Reduced-price School Meals" (pages 3 and 4 of the [Application for Free and Reduced-price School Meals or Free Milk](#)) provided?
- Does the information letter inform the household how to access the system in order to apply for benefits, and also explain to the household how to obtain and submit a paper application?
- Are the following updated and provided?
 - The reduced-price income guidelines for school meals (or the free income guidelines for Special Milk Program applications).
 - The Children's Racial and Ethnic Identities section.
 - The parent certification statement found before the signature (i.e., "I certify (promise)...").

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- The Richard B. Russell National School Lunch Act and USDA nondiscrimination statement.
- Did the district test the web-based process to ensure that it is operating correctly? For example:
- Complete “mock” applications with the following household circumstances:
 - SNAP benefits
 - TFA benefits
 - Homeless/runaway
 - Head Start
 - Foster child
 - No income
 - Income
 - Complete a “mock” application for a mixed household (e.g., a household that has a foster child and a child that is not a foster child).
 - Complete a “mock” application by checking off that someone in the household is receiving SNAP or TFA benefits and then entering a case number.
- What happens if a household does not:
- provide the non-required information that the district has selected to request (e.g., date of birth, school, grade, student ID, email, phone, middle initial, address, etc.)?
 - complete the last four digits of the social security number or check the “no social security box”?
 - provide an adult signature?
- Does the web-based application have language that does not pertain to Connecticut? For example:
- **Migrant:** Connecticut does not have a Migrant Education Program.
 - **Permission to share Medicaid data** (LEAs do not need permission to use Medicaid data since Connecticut participates in the USDA Medicaid Demonstration Grant and eligibility through Medicaid is done via direct certification.
 - **FDPIR:** Connecticut does not have a Food Distribution Program on Indian Reservations.
 - **FITAP:** Connecticut does not have a Family Independence Temporary Assistance Program.
 - **TANF:** TANF is a federal term. Connecticut uses the term “TFA” (Temporary Family Assistance).

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Additional Considerations

- How accessible are the free and reduced-price materials on the district's website? For example, how many clicks does it take to get to the free and reduced-price materials?
 - To test the system, have someone that is not familiar with the website try to find the application materials.

- Does the district's web-based application accommodate English Learners?
 - **Note:** USDA defines Limited English Proficiency (LEP) as a limited ability to read, speak, write, or understand English. LEAs, schools, and other entities that receive federal financial assistance, including reimbursements for meals from USDA, must take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency. Refer to [USDA Memo SP 37-2016: Meaningful Access for Persons with Limited English Proficiency in the School Meal Programs: Guidance and Q&As](#).
 - To find out the racial and ethnic enrollment data for your district, go to the CSDE's [EdSight](#) website and click on "Overview," then "Profiles and Performance Reports." The CSDE's [English Learners](#) website also has valuable information. **Note:** The six most dominant languages (other than English) in Connecticut are Spanish, Arabic, Mandarin Chinese, Haitian Creole, Polish, and Portuguese.

- Are the instructions on how to access the application materials (in a language other than English) provided in that particular foreign language?

- Are taglines used to assist English Learners if they have questions? For more information regarding taglines, refer to the CSDE's handout, [Taglines and Providing Meaningful Access to the Child Nutrition Programs](#), and the CSDE's form, [Sample Taglines Form](#).

- Are all of the web-based and other free and reduced-price forms on the district's website updated for the upcoming school year?

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For more information, see the USDA's *Eligibility Manual for School Meals* and the Connecticut State Department of Education's (CSDE) [Eligibility for Free and Reduced-price Meals and Milk in School Nutrition Programs](#) webpage, or contact the [school nutrition programs staff](#) in the CSDE Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at <https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/FreeRed/WebBasedApps.pdf>.

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To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [How to File a Complaint](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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