

Child Nutrition Programs Required Records Reminders

**Provided by the Texas Department of Agriculture
Food & Nutrition Division**

The Texas Department of Agriculture (TDA), Food and Nutrition Division has compiled this resource document, *Child Nutrition Program Required Records Reminders*, to assist SFA's in organizing required data to meet program guidelines and prepare for the Coordinated Review Effort (CRE). Included are key area reminders and examples of forms and information required to be maintained by all SFA's implementing the National School Lunch, Breakfast and Snack programs. Tabs are provided to organize data in a complete, easy to find manner. The reminders will be updated yearly to reflect TDA and United States Department of Agriculture (USDA) policy changes and requirements.

Our services are provided through the Texas Department of Agriculture's Food and Nutrition Program funded by the U.S. Department of Agriculture, Food & Nutrition Division.

In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.

To file a complaint of discrimination, write: USDA, Director, Office of Adjudication and Compliance, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 260-1026, (866) 632-9992 (toll free), or (202) 401-0216 (TDD). USDA is an equal opportunity provider and employer.

The Texas Department of Agriculture wishes to recognize Education Service Center Regions IV, VII and XVI for their outstanding contributions to this reminder binder.

General CRE Information

- The following information is a general overview of the information that the compliance monitor will need during the CRE.
- Also included under this tab is the School Selection Worksheet that will need to be completed and faxed to the compliance monitor conducting your review.
- The School Selection Worksheet is used by the monitor to determine if any of the schools in your School Food Authority (SFA) meet the USDA criteria for selecting which schools to review during the CRE.
- Complete the Self-Assessment Tool (SAT) in the ARM to ensure your CRE will be a success.

Refer to Section 23 of the ARM for more detailed information.

CRE Review Areas

Critical Areas of Review

1. Performance Standard One—Certification/Counting/Claiming
 - Lunches claimed for reimbursement are served only to children eligible for free, reduced price, and paid lunches, and are counted, recorded, consolidated, and reported through a system, which consistently yields correct claims.
 - Applications, Rosters, Point of Service System, Daily Record, Edit Checks, Reimbursement Claim, Categorical Eligibility

2. Performance Standard Two—Meal Components
 - Lunches claimed for reimbursement by the SFA contain food items/components as required by program regulations.
 - Food Production Records, Nutrient Analysis, meeting minimum portions or nutrient standards. Menus planned menus served, age/grade groups, completed & accurate records.

General Areas of Review

- Implementation of Free and Reduced Price Policy Statement
- Public Announcement
- Verification
- Overt Identification
- Complete & Sufficient Food Production Records
- Monitoring Responsibilities/Accuclaim
- OVS
- Proper Postings and Non-Discrimination Statements of Program Materials
- Child Nutrition (CN) Labels/Product Analysis
- Complaint Policy
- Separation of Children
- Reporting and Record Keeping
- Financial/Procurement
- After School Snack Program
- Wellness/HAACP Programs
- Student-Parent Involvement
- Health Inspections
- Civil Rights Training

Other Areas of Review

- Exclusive Beverage Contract
- FMNV/TPSNP Policy

School Selection Process for Reviews

The minimum number of schools to be reviewed on the first review is contained in the following table:

Number of Schools in the SFA's Minimum Number of Schools to be reviewed

1 to 5

6 to 10

11 to 20

21 to 40

41 to 60

61 to 80

81 to 100

101 or more¹²*plus 5% of number over 100.

*Fractions must be rounded to the nearest whole number.

The Claim for Reimbursement and the Schedule A will be used to determine the school selection. All schools with a free average daily participation (ADP) of 100 or more and a free participation factor of 100% or more but not less than the minimum number of schools required must be reviewed.

If applying the above criteria does not result in the selection of the minimum number of schools to be reviewed, the following criteria must be used to generate a selection pool.

- Elementary schools (grades K-8) with a free ADP (Number Free Eligible) of 100 or more and a free participation factor of 97% or more.
- Secondary schools (grades 9-12) with a free ADP (Number Free Eligible) of 100 or more and a free participation factor of 77% or more.
- Combination schools (some grades from both the elementary and secondary schools) with a free ADP (Number Free Eligible) of 100 or more and a free participation factor of 87% or more.

If the pool has fewer schools than the minimum number of schools required to be reviewed, select all schools in the pool. In addition, choose the remaining number to be reviewed from the remainder of schools in the SFA. This can be accomplished by selecting the remaining schools based on the following criteria:

- Alternative schools, satellite schools and/or charter schools
- Low participating schools
- Recommendations or requests from the CNP Director
- Findings from the on-site visits or the claims review process
- Identical or very similar claiming patterns
- Large changes in free lunch counts
- Any school in which the daily meal counts appear questionable

When satellite schools are selected for review, the food production records from the central kitchen will be reviewed for required menu items for the review period.

Records needed by TDA for CRE at School/Site

The records, data, and information listed below are needed at the time of the entrance conference/CRE Review. Additional records and/or copies of documents may be requested during the review(s).

The month to be reviewed will be the most recent month for which a reimbursement claim has been submitted to the State Office.

Records needed from Child Nutrition Department

- **Copy of the current approved agreement, and free and reduced-price policy statement (Attachments A, B, K)**
- **Applications readily retrievable**
- **Schools may not change menu patterns within 3 months of an updated review.**
- **Media release**
- **Direct certification documentation (All SFA's must use direct certification starting 08-09.)**
- **CN Labels, Product Analysis Statement, or current menu analysis**
- **Documentation for 23 grams of fat per item served during the review month or day of review**
- **Documentation of Accuclaim process – Daily Record for SFA & schools for review month**
- **Last claim submitted for reimbursement**
- **Data used in consolidating the Claim for Reimbursement**
- **Most current completed verification documentation – SFA summary and verification record for each application (May be from prior year if review prior to Nov 1)**
- **On-site monitoring reviews, if more than one feeding site (May be from prior year if prior to Feb 1)**
- **Copy of Exclusive Beverage Contract and amendments, if applicable**
- **Financial Summary (completely filled out; provide supporting documentation)**
- **Expenditure and revenue records**
- **Bidding documentation**
- **Documentation of clean air and water act, certification of lobbying, debarment and suspension statement**
- **Payroll data for Child Nutrition Employees**
- **If Provision 2, the % of eligibles claimed by campus as established in base year. Listing of new school sites establishing base year %'s. (May be from prior year)**
All Provision 2 Base Year Documentation accessible for Day of Review.
- **Documentation kept for student-parent involvement**
- **Enrollment at each school**
- **Temporary application approval policy documented**
- **Discrimination complaint procedure documentation**
- **HACCP procedures documented**
- **Wellness program documented**

- **Civil Rights Training documentation**
- **Food Service Management Company Records**

Records needed at School Level

- **Copy of the school calendar, indicating the days on which lunches and/or breakfasts were served at the review schools**
- **All free, reduced price and denied meal applications**
- **Benefit issuance documents (i.e. Up-to-date roster, master list, or checklist)**
- **Monthly menus**
- **All applicable letters sent to households**
- **Production records for month of review and day of review. Nutrition Analysis/CN Labels/Product Analysis/Recipes.**
- **A current roster from the Point of Service/Transaction Detail List**
- **Documentation kept for 3 event day exemptions for all schools in the SFA**
- **Current health inspections**
- **Current enrollment for month of review, and up to day of review**
- **Updated homeless and migrant list, if applicable**
- **All applicable postings displayed**

Records needed by ESC for SMI at School/Site

One week's lunch menus for each grade/age level served for one school under the jurisdiction of a SFA will be reviewed. If your school is a breakfast only school, one week's menus for each grade/age level served for one school under the jurisdiction of a school SFA will be reviewed. Records needed include:

- Menus for the week being reviewed
- Menus for the review month
- Complete production records for the review week. The Food Production Records required form can be found at www.agr.state.tx.us/foodnutrition/forms or contact your ESC.
- All standardized recipes used for the review week including USDA as well as local recipes.
- Manufacturer's nutrition information of processed foods used during the review week.
- Actual number of extra sales items, adult meals, and condiments served that week which is part of the production records.
- Printout of analysis using approved USDA software, if following Nutrient Standard or Assisted Nutrient Standard Menu Planning

Contact your ESC Child Nutrition Program Specialist for further information. Your ESC Child Nutrition Program Specialist will contact you by letter when SMI is to be conducted.

SFA _____ COUNTY DISTRICT NUMBER _____

ESC NUMBER _____ TDA COMPLIANCE MONITOR _____

SCHOOL SELECTION WORKSHEET

A. Type	B. School Name	C. Campus Number	D. Number Serving Days	E. Number Free Eligible	F. Number Free Claimed	G. Number ADP (F) ÷ (D)	H. ADP % (G) ÷ (E)	I. Number Reduced Eligible	J. Reason for Selection	K. SBP	L. After School Snacks

INSTRUCTIONS ON REVERSE SIDE

INSTRUCTIONS FOR THE SCHOOL SELECTION WORKSHEET

At top right, enter the county-district number, region number and the name of the TDA monitor for the CRE.

Below SCHOOL SELECTION WORKSHEET enter the name of the SFA and the month and year used to complete the form.

In column A, indicate the type of school for each campus listed in Column B; E (elementary) for grades PK-8, S (secondary) for grades 9-12, C (combination) any combination of E and S.

In column B, list the names of all of the participating schools in the SFA.

In column C, enter the campus number.

In column D, enter the number of serving days in the review month.

In column E, enter the number of free eligible for each school for the month.

In column F, enter the number of free meals claimed for the month.

In column G, calculate free ADP by dividing the number free claimed in column F by the number of serving days in column D.

In column H, determine the percent free participation by dividing the free ADP in column G by the number of free eligible in column E and multiplying the result by 100.

In column I, enter the number of reduced eligible for each school for the review month. The TDA reviewer will complete column J.

In column K, indicate with an "X" those schools participating in the School Breakfast Program.

In column L, indicate with an "X" those schools participating in the After School Snack Program.

If your SFA has more than two schools listed on the School Selection Worksheet, please fax to the compliance monitor assigned to conduct your review at least 3 weeks prior to date of review.

Policy Statement

- Each cafeteria site should have a copy of the SFA Application Agreement Attachment B that is on file with TDA.
- Amendments should be faxed to the TDA Compliance Unit, 1-800-909-8573 for approval prior to implementing. A signed copy will be mailed to you to keep on file. Revised Attachment A and K forms will be posted on the www.squaremeals.org website.
- Policy Statements must be updated by October 15, annually.
- Attachment A:
 1. Designation of Hearing Official
 2. Designation of Determining Official(s)
 3. Designation of Verifying Official
- Attachment B: Meal Count/Collection Procedure(s). Each feeding site must be listed and procedures identified. If you offer Breakfast in the Classroom, After School Snack Program and ISS meals include your counting and claiming procedures for those situations.
- Attachment K: Menu Planning Systems. SFA's must request approval prior to changing their Menu Planning System. The Menu Planning System cannot be changed less than 90 days prior to a CRE visit. SFA's requesting approval for Assisted Nutrient Standard Menu Planning system must submit application to the state for review in addition to an amendment. The packets are available at www.squaremeals.org and ready for downloading by the SFA.
- Certificate of Authority – Form FND-101.

Refer to Section 2 of the ARM for more detailed information.

SFA Name _____ Co.-Dist. # _____ ESC# _____

Amendment to Policy Statement for Free and Reduced-Price Meals

Amending the Policy Statement

Should it become necessary to amend the policy statement regarding the reviewing official, hearing official or collection procedure, please duplicate and complete in full (not just the line that changed) Attachments A and B and submit to the state office by October 15, annually for approval prior to implementation.

The _____, is amending its current
School SFA

state-approved Free and Reduced-Price Policy Statement with the following changes and/or additions:

_____ Attachment A:

1. Designation of New Hearing Official (amendment attached)
2. Designation of New Reviewing Official (amendment attached)
3. Designation of New Verifying Official (amendment attached)

_____ Attachment B: Revisions in Collection Procedures (amendment attached)

_____ Attachment K: Menu Planning System (copy attached)

Attachments C-J: TDA provides annually and cannot be amended.

Signature: _____
Signature of Authorized Representative/Superintendent Date & Telephone Number

Printed Name of Authorized Representative: _____
Print Name of Authorized Representative/Superintendent

Signature of TDA Official

Date

SFA Name _____ Co.-Dist.# _____ ESC _____

Policy Statement for Free and Reduced-Price Meals
Attachment A: Designation of Hearing, Reviewing and Verifying Officials

Instructions: Update this attachment only when necessary.

The _____ designates
as:

School SFA Name

1. Hearing Official, _____
Title of Responsible Individual

This person shall ensure that all required provisions of the appeal process are followed as outlined on Section G of this policy statement.

The hearing official must be someone not involved in making the determination under appeal or any previous conference. It is recommended that the hearing official hold a position at a higher administrative level than the reviewing official(s). The hearing official and reviewing/verifying official(s) cannot be the same individual.

2. Reviewing Official(s), _____
Title of Responsible Individual

Title of Responsible Individual

This person reviews applications and makes eligibility determinations. This official will use the criteria outlined in this policy to determine which individual students are eligible for free and reduced-price meals.

3. Verifying Official, _____
Title of Responsible Individual

This person verifies the eligibility of applicant households in accordance with program regulations and maintains annual records as follows: (1) a summary of the verification efforts which includes the selection methods used; (2) the total number of applications on file by October 1; and (3) the percentage or number of applications verified.

4. Amendments: A blank copy of this attachment may be used to amend the policy statement if there ever is a need to change one or more of the above designated officials. Complete the following and forward a copy to the state office for approval.

Print Name of Authorized Representative/Supt.

Signature of Authorized Representative/Supt.

Date

Approved by: _____
Signature of TDA Official

Date

SFA Name _____ Co.-Dist.# _____ ESC _____

Policy Statement for Free and Reduced-Price Meals
Attachment B: Meal Count/Collection Procedure(s)

1. The following meal count/collection procedure is used for (check one or all as appropriate):
 Breakfast Lunch and/or Snack in the following schools (separate list may be attached):

2. _____
Name of School *Name of School* *Name of School*

3. All approved meal count/collection procedures must include a method for prepayment and/or post billing (charging). Charging is seldom recommended. The provision for allowing for prepayment and/or charging should make free and reduced-price meal recipients appear as students who prepay full price (or charge).

Check one of the following:

- Full and reduced-price meal payments can be made by students or parents in advance in a designated area away from the cafeteria serving line on a daily, weekly or monthly basis. Students receiving free meal benefits appear to be prepaying for meals. (Charging may or may not be allowed.)
- Full and reduced-price meals can be charged. Parents are billed and may mail in payment or students and a parent may pay in a designated area away from the cafeteria serving line. Care is taken that neither the billing nor the payment process identifies those who pay nothing. Students receiving free meal benefits appear to be charging meals.
- Full and reduced-price meal payments can be made electronically but students may still be allowed to pay cash and receive change at the point of service.

4. The option of prepayment (and/or charging) of meals should be routinely publicized. This may be done by using methods such as posting signs, making public announcements, including the information in printed material, etc. Some SFA's offer incentives for prepayment options when cash is also accepted on the serving line.

Check one or more of the following:

The ability for students and/or parents to prepay (or charge) is routinely advertised:

- In the letter to parents (Notice/Letter to Households) sent home with the application at the beginning of each school year.
- In an announcement made over the school's public address system.
- In a newspaper/newsletter article/Web site.
- By a posted notice (sign) displayed in the cafeteria area.

5. All approved meal count/collection procedures must include a medium of exchange that is issued to students for obtaining a meal. Students receiving free meals must be issued the identical medium of exchange as those students prepaying (or charging) full or reduced-price meals. The systems for coding, distributing and collecting the medium of exchange must ensure that students receiving free and reduced-price meal benefits are not overtly identified. A common area and method for distributing and collecting the medium of exchange must be used for all three categories.

Check one of the following. If more than one box is checked, grades or campuses must be designated. All students receiving free, reduced-price and paid meals and those prepaying will be issued:

- A verbal identifier to be used on the serving line in exchange for the meal. A number or the student's name are the most commonly used verbal identifiers.
- A coded ticket or token.
- A coded I.D. card.
- A coded automated tab.
- A coded bar line card for scanning.
- A coded number for use on a keypad.
- Another individual identifier (thumb print, etc.)

6. The medium of exchange for free and prepaid (or charged) reduced-price and full-price meals must be identical except for the code. Color-coding by category or single-symbol coding using obvious identifiers such as F, R and P is prohibited.

Check one of the following:

Medium of exchange should be coded in the following manner:

- Coding series. Example: Free-1 through 1,999, Reduced price-2,000 through 3,999, Full price-4,000 and above.
- Coding by number. Example: Number ending in 0, an odd or even number.
- Coding by variation. Example: Variations in signature, placement of date or ticket distributor such as Mary Smith, Mary J. Smith and M. Smith.
- Coding by subtle differences. Example: Differences in printing such as capital letter, period, spacing of a line or differences in underlining.
- Coding by number digits. Example: 4 digits for free, 5 digits reduced-price and 6 digits for full price.
- Coded by bar line for scanning.
- Coded number used on a keypad.

7. All approved meal count/collection procedures must include a point-of-service count of reimbursable meals by category. Teacher roll counts, unverified morning meal counts, the number of tickets sold/issued, head counts, tray counts and counts obtained by “backing into” the numbers of meals served are not point-of-service counts.

Check one of the following:

- The cashier is stationed at the end of the serving line, determines the meal selected is reimbursable and counts the meal by category.
- The cashier is stationed at the beginning of the serving line and a monitor is stationed at the end of the line to verify that each meal selected is reimbursable. If a student selects a non-reimbursable meal, a system is in place for removing that meal from the proper category of the count of meals claimed for reimbursement.
- Other. An alternate method must be individually written using the guidelines in step 9e.

8. It is understood that in addition to prepaid (or charged) meals, some cash meals may also be sold and counted. Meals paid for in cash on the line may be counted in a different manner than those prepaid (or charged). These meals may be tallied, counted mechanically, recorded on a cash register, etc. However the medium of exchange for students receiving free, prepaid reduced-price and prepaid full-price meals must be collected and counted in exactly the same manner.

Check one of the following:

a. When students receiving free, prepaid reduced-price or prepaid full-price meals pass the cashier, they:

- Call out their number and the cashier strikes it from a numbered sheet. The count by category is taken from the numbered sheet.
- Call out their name and the cashier checks the name off a coded roster. The count is taken from the roster by category.
- Present a coded ticket/token and it is collected. The count is taken from the tickets/tokens.
- Present a ticket and all tickets are marked in some manner and returned to the student. Simultaneously, the count by category is tallied, mechanically counted, recorded on a cash register, etc.
- Present an automated tab card. The card is mechanically cut and a count by category is simultaneously taken.
- Present a bar line card. The card is scanned and a count is simultaneously taken.
- Punch in number on keypad. As number is entered, the count by category is simultaneously taken.
- Other.

b. When students pay cash for their reduced-price and/or full-price meals and those meals are counted in a manner different from what is described above, please describe the method used for counting.

9. By using steps 1-8 as outlined on the preceding pages, it is possible to describe most meal count/collection procedures used throughout the state. If an alternate method is used, it must be individually written. Care should be taken to include all necessary information as outlined below:

- a. How can meals be prepaid or charged?
- b. How is the system for prepayment and charging advertised?
- c. What medium of exchange will be issued to students receiving free or prepaid (or charged) reduced-price or full-price meals?
- d. How will the medium of exchange be coded?
- e. Where is the count by category taken? The count by category must be at the point-of service where it is determined that reimbursable students selected meals. When using classroom counts, the school must develop a system for a child coming to school late, leaving early or not selecting a reimbursable meal. The school should retain written documentation as proof that the needed changes are being made.

Approved by TDA Official

Date

SFA Name _____ Co.-Dist.# _____ ESC _____

Policy Statement for Free and Reduced-Price Meals Attachment K: Menu Planning System

Schools may not change Menu Planning Systems within three months of an anticipated CRE.

The U. S. Department of Agriculture has provided Menu Planning Options to meet nutrient standards as outlined in the School Meals Initiative for Healthy Students. Each school SFA must select one or more Menu Planning System(s) for use in its Child Nutrition Programs.

Menu Requirements Definitions

Traditional Food Based Menu Planning—This option requires that the menus served meet the nutrient standards as well as the patterns but does not require that nutrient analyses of the menus be performed at the local level. The traditional offer versus serve procedures are used with this option.

Enhanced Food Based Menu Planning—The quantities of the fruit/vegetable and grain/bread components are increased. This option requires that the menus served meet the nutrient standards as well as the patterns but does not require that nutrient analyses of the menus be performed at the local level. The traditional offer versus serve procedures are used with this option.

Nutrient Standard Menu Planning—The SFA is required to conduct nutrient analyses of the menus; offer at least one entree, one side dish and milk. If offer versus serve is implemented, students must select an entree and at least one other item and decline no more than two menu items if the meal is claimed.

Assisted Nutrient Standard Menu Planning—Same as Nutrient Standard Menu Planning except an outside entity conducts the nutrient analyses of the menus. Requires state office approval before implementation.

■ **Alternate Approach**— SFA's developing an alternate approach must contact the state office for information.

1. The SFA may choose to select one Menu Planning System for all schools in the SFA.
2. The SFA may choose to select different Menu Planning Systems by school level (for example, all elementary, all middle, and all high schools).
3. The SFA may choose to pilot different Menu Planning Systems on selected campuses. Attach an additional page, listing the exceptions and identifying the Menu Planning System by campus.

Check the appropriate space below. Different Menu Planning Systems may be selected for breakfast and lunch. Each SFA must attach a copy of this form to its current Policy Statement and return it to the state office prior to implementing change.

Menu Planning Systems	All Schools		All Elementary		All Middle Schools		All High Schools	
	Breakfast	Lunch	Breakfast	Lunch	Breakfast	Lunch	Breakfast	Lunch
Traditional Food Based Menu Planning								
Enhanced Food Based Menu Planning								
Nutrient Standard Menu Planning								
Assisted Nutrient Standard Menu Planning								
Alternate Approach								

Signature of Authorized Representative/Supt. _____

Date _____

Signature of TDA Official _____

Date _____

Media Release

- A public announcement of the free lunch program is required. Prior to or during the first week of school, a public release must be sent to the local news media. If SFA's must submit the announcement to a newspaper requesting free publication, it is the newspaper's decision whether to publish the information or not. The SFA **must retain confirmation** that the announcement was submitted (ex. fax transmittal).
- A **copy of the letter to households, application, and complete income guidelines** must be submitted to the local news media.
- A sample Media Release can be found in the ARM and following this tab. Read the sample carefully and address the blank lines before mailing to the newspaper. SFA's must ensure that the current non-discrimination statement is used.

Refer to Section 2 of the ARM for more detailed information.

Prototype Media Release for Free and Reduced-Price Meals

Make appropriate changes as applicable to reflect the programs operated. Attach a copy of the current eligibility guidelines.

_____ today announced its policy for providing free and reduced-price meals for
SFA
Students served under the _____.

Insert National School Lunch Program and/or School Breakfast Program

Each school or the central office has a copy of the policy, which may be reviewed by any interested party.

The household size and income criteria identified with this medial release will be used to determine eligibility for free and reduced-price benefits. Students from households whose income is at or below the levels shown are eligible for free or reduced-price meals. Foster students who are the legal responsibility of a welfare agency or court may also be eligible for benefits regardless of the income of the household with whom they reside. Eligibility for the foster student is based on the student's income.

Application forms are being distributed to all households with a letter informing households of the availability of free and reduced-price meals for their students. Applications are also available at each school. To apply for free and reduced-price meals, households must fill out the application and return it to the school. Applications may be submitted anytime during the school year. The information households provide on the application will be used for the purpose of determining eligibility and verification of data. Applications may be verified by the school officials at any time during the school year.

Children in households receiving Special Nutrition Assistance Program (SNAP) benefits (formerly the Food Stamp Program) or Temporary Assistance for Needy Families (TANF) may receive a letter from the SFA certifying students as free eligible. No further action is required from the household when the household receives this letter unless some students living in the household are not listed on the letter from the SFA. All household that do not receive a letter from the SFA certifying household students as eligible for free or reduced-price benefits will need to complete an application. For school officials to determine eligibility for free and reduced-price benefits, households receiving Food Stamps or TANF must only list a student's name and the household SNAP or TANF case or Eligibility Group number. An adult household member must sign the application.

Households that do not list a SNAP/TANF case number must list the names of all household members, the amount and source of the income received by each household member, and the Social

Security number of the adult household member who signs the application. If the adult who signs the application does not have a Social Security number, the household member must indicate that a Social Security number is not available by writing the word "None," "No Number," or some indication that the person does not have a Social Security number. An adult household member must sign the application.

Under the provisions of the free and reduced-price meal policy, _____ will review
Title of reviewing officials

applications and determine eligibility. Parents or guardians dissatisfied with the ruling of the official may wish to discuss the decision with the reviewing official on an informal basis. Parents wishing to make a formal appeal for a hearing on the decision may make a request either orally or in writing to

Title, address, phone number of the hearing official

If a household member becomes unemployed or if the household size increases, the household should contact the school. Such changes may allow students of the household eligible for benefits if the household's income falls at or below the levels shown above.

In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.

To file a complaint of discrimination, write: USDA, Director, Office of Adjudication and Compliance, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 260-1026, (866) 632-9992 (toll free), or (202) 401-0216 (TDD). USDA is an equal opportunity provider and employer.

Prototype Letters

- The Texas Department of Agriculture (TDA) Food and Nutrition Division will post the application packet on our website (www.squaremeals.org) in late spring each year. SFAs must use the current year application posted on the website. Do not reformat or use software generated forms, unless the software form is identical to the prototype. The only change allowed is to copy the form on SFA letterhead, being careful not to omit any information.
- SFAs wanting to utilize Web-based Applications must contact TDA to receive approval prior to implementation.
- SFAs utilizing Scanned Applications must submit a sample of their application to TDA for review prior to implementation. TDA will review the application and advise if changes are needed. TDA does not approve SFA scanned applications and it is still the responsibility of the SFAs to ensure that all required fields are captured in their scanned application. The sample income on the TDA prototype application is not required to appear on a scanned application.
- New applications may **not** be distributed to households before **July 1** for a new school year.
- Once approved, an application will be valid for the entire school year. Households are no longer required to report a change in income once their application is approved. In addition, if a student withdraws then returns to the SFA, an approved application can be reinstated anytime during the school year.
- Prototype letters for notifying households are found in Section 4 and Section 6 of the ARM and on the TDA website.
- Attachments to the Policy Statement that need to be maintained:

Attachment C: Media Release

Attachment D: Income Eligibility Guidelines

Attachment E: Notice/Letter to Households

Attachment G: Notice/Letter to Households for Approval/Denial of Benefits

Attachment I: Notice/Letter of Selection Verification

Attachment J: Notice/Letters of Predetermined Eligibility

Certificate of Authority

Refer to Section 2 and Section 4 of the ARM for more detailed information.

Notification of Predetermined Eligibility (Direct Certification)

Date:

Dear Parent or Guardian:

Our records indicate that the child/children listed below live in your household and is/are eligible for free school lunch, breakfast and snack. This child/These children will automatically receive free meals beginning immediately. We hope this will make it easier for your child/children to take part in school meals. Also, this child/children may qualify for free or low-cost children's health insurance. For more information, please call toll-free (877) 543-7669.

Child/Children's Name(s) School Name

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

At the beginning of the school year a letter to parents and an application for free and reduced-price meals are distributed to each household. Do not fill out or return an application for the child/children listed above. **However, an application must be completed and returned to the school for any child/children living in the same household but not listed above.**

If you do not want the free meals for your child/children or if you have any questions about this program, please contact:

Name - Title

Address

Telephone

(Signature of Reviewing Official)

In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.

To file a complaint of discrimination, write: USDA, Director, Office of Adjudication and Compliance, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 260-1026, (866) 632-9992 (toll free), or (202) 401-0216 (TDD). USDA is an equal opportunity provider and employer.

Notification of Predetermined Eligibility (Head Start)

Date:

Dear Parent or Guardian:

Our records indicate that the Head Start child listed below lives in your household and is eligible for free school lunch, breakfast and snack. This child will automatically receive free meals beginning immediately. We hope this will make it easier for your child to take part in the school nutrition programs.

Child's Name School Name

At the beginning of the school year a letter to parents and an application for free and reduced-price meals are distributed to each household. Do not fill out or return an application for the Head Start child listed above.

If you do not want the free meals for your child/children, or if you have any questions about this program please contact:

Name - Title

Address

Telephone

(Signature of Authorized Representative)

In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.

To file a complaint of discrimination, write: USDA, Director, Office of Adjudication and Compliance, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 260-1026, (866) 632-9992 (toll free), or (202) 401-0216 (TDD). USDA is an equal opportunity provider and employer.

Notification of Predetermined Eligibility (Migrant)

Date:

Dear Parent or Guardian:

Our records indicate that the child/children listed below live in your household and is/are eligible for free school lunch, breakfast and snack due to your family's migrant status. This child/These children will automatically receive free meals beginning immediately. We hope this will make it easier for your child to take part in the school nutrition programs.

Child/Children's Name(s) School Name

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

At the beginning of the school year a letter to parents and an application for free and reduced-price meals are distributed to each household. Do not fill out or return an application for the child/children listed above. However, an application must be completed and returned to the school for any child/children living in the same household but not listed above.

If you do not want the free meals for your child/children or if you have any questions about this program please contact:

Name - Title

Address

Telephone

(Signature of Reviewing Official)

In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.

To file a complaint of discrimination, write: USDA, Director, Office of Adjudication and Compliance, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 260-1026, (866) 632-9992 (toll free), or (202) 401-0216 (TDD). USDA is an equal opportunity provider and employer.

Letter to Household of Approval/Denial of Benefits

Child(ren)'s Name(s): _____

School _____ Teacher/Grade _____

Date _____

Dear _____:

Your application for free and reduced-price meals for your child(ren) has been:

_____ Approved for free meals.

_____ Approved for reduced-price meals at _____ cents for lunch, _____ cents for breakfast and _____ cents for snacks served at the after school snack program.

_____ Temporarily approved for (insert free or reduced-price) meals until (insert date).

Denied for the following reason(s):

_____ Income over the allowable amount.

_____ Incomplete application. Complete the following information:

If you do not agree with the decision, you may discuss it with (insert name and phone number of the SFA reviewing official). You also have a right to a fair hearing. To request a fair hearing, call or write the following official:

Name and Title: _____

Address: _____

Phone: _____

You may reapply for benefits at any time during the school year. If you are not eligible now but have a decrease in household income, become unemployed, have an increase in household size or qualify for TANF or food stamps, you may fill out another application at that time.

Sincerely,

Reviewing Official

In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.

To file a complaint of discrimination, write: USDA, Director, Office of Adjudication and Compliance, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 260-1026, (866) 632-9992 (toll free), or (202) 401-0216 (TDD). USDA is an equal opportunity provider and employer.

Direct Certification List

- Direct Certification (DC) data for the school year will be available in CNPIMS for the entire school year. Students listed on the DC list may enroll anytime during the school year and still be considered categorically free by DC. TDA will update the DC list quarterly. The updates will provide additions only. Existing students should remain on DC. The students on this list come from HHSC's lists from the previous spring. Those students are compared to PEIMS information at TEA for the previous October. That is why the DC list shows last year's grade level. TEA's most recent information on PEIMS is from the last October. This full, updated list for the new school year will be released to the SFA's in July on CNPIMS annually.
- Beginning in the 2008-2009 school year, **all** LEAs are required to download the complete DC list. Print and keep the original on file. A second copy should be downloaded and edited as needed. The LEA is required to maintain and edit the DC list throughout the school year. **The DC list is good all school year, no matter when a student enrolls. Write the date that the letter of predetermination was mailed to these households directly on the working list being maintained. This list should be updated with withdrawn or newly enrolled information, as well.**
- LEAs must mail a Letter of Predetermination to households in their LEA at the beginning of the new school year.
- The LEA should cross match the DC list with the LEA's enrollment information to identify students on the DC list that are no longer enrolled in the LEA. Maintain corrections on the working copy of your DC list or another document printed from an automated system that tracks DC students.
- TDA will issue quarterly updates in October, January and April each year. The updates will be only those students that have been enrolled with HHSC's programs in the last quarter. All of the students that are on these lists are added as categorically eligible to the LEA's rosters. No students are deleted from the initial lists. All students that are on the July list AND those students that are on subsequent lists are now categorically eligible to receive benefits. This information is still compared to PEIMS information at TEA from the previous October so grade levels will still be incorrect for those students that passed to the next grade this year until the April update is issued. The process starts over again in July of each year.
- LEAs may share DC lists with other LEAs, as students move from LEA to LEA. The students will be eligible to receive the benefits for the entire school year regardless of where they are enrolled. A copy of the DC list showing the eligible students may be faxed to the new LEA. Other students should be blacked out or covered in some manner so as not to lost confidentiality.
- If students withdraw from the LEA, the LEA should document on the DC list that the student withdrew or did not enroll in the new school year. However, if a student is on the DC list and withdraws but does not re-enroll at the beginning of the school year and then returns to the LEA later in the school year, the student is eligible for benefits based on the DC list, no matter when or how long they have been gone from the LEA.

- Siblings cannot be added to the Direct Certification list. If siblings are not included on the DC list the LEA must ask the household to complete an application. Eligibility for application siblings is based on the application. One household could have students with different eligibility due to DC and application benefits.

Preetermined Eligible Submitting an Application:

- If all students in the household are on the DC list and an application is submitted with a SNAP/TANF number or income qualifying the household for free, the DC list takes precedence and the LEA should disregard the application. The LEA must still file the application but note on the application that students qualify by DC list.
- If an application with income or a SNAP/TANF number lists students on the DC list and also students not on the DC list, the benefits are issued through the DC list for those on the DC list and benefits for other students are based on whether the household still has a SNAP/TANF number or not. The household size and income are used to determine benefits if the household is not longer receiving SNAP/TANF. The LEA should contact with the household in these situations.
- If a household gives a SNAP number or TANF number and income on the same application, the application is approved based on the SNAP/TANF number regardless of the amount of income. There is no need to contact the household.

Example of Direct Certification List

TEXAS DEPARTMENT OF AGRICULTURE DIRECT CERTIFICATION FOR NATIONAL SCHOOL LUNCH 2007 - 2008										
LAST NAME	FIRST NAME	MIDDLE NAME	STUDENT ID	BIRTHDATE	SEX	GRADE	ADDRESS	CITY	STATE	ZIP
SMITH	JOHN	JAY	12345678	10-22-1998	M	4	222 WELSH ST	NORTH	TX	76621
*GOMEZ	AIMEE	DAWN	12345678	07-03-1990	F	12	182 MOON ST	WEST	TX	76621
JONES	DREW	MARK	12345678	04-18-1996	M	6	886 WAY DR	SOUTH	TX	76621
BECK	NEIL	GENE	12345678	01-22-1994	M	8	346 FARM LN	EAST	TX	76621
<div style="border: 1px solid black; padding: 5px; display: inline-block;"> <p>Pre-determined letter sent 8/2/08 * = graduated from SFA</p> </div>										

Refer to Section 4 of the ARM for more detailed information.

Master Roster of Eligibility

- LEAs must maintain a current list of students who qualify for free and reduced benefits. This list is called a roster.
- The roster list of free and reduced eligibility is derived from the applications and other sources of eligibility (categorically eligible lists such as the DC list, migrant list, Head Start list, homeless list)
- As new applications and DC update lists are received or present applications are updated, this list of eligible students must be updated.
- Good communication between the reviewing official and the LEA child nutrition personnel is important to keep the list current with new students and withdrawals.
- The Master Roster is a listing of all students and their approved categories. The list must include at a minimum:
 - Child's name
 - Eligibility status
 - Date approved
 - Date denoting any change such as withdrawn or changed eligibility
- All changes must be dated and initialed by the person making the changes.
- LEAs must supply Master Rosters that match applications and categorically eligible lists for each site to be reviewed during a CRE. The total of students on LEAs' lists of Free, Reduced, Homeless, Runaway, Migrant and DC should match the total number of students on the Master Roster.

Refer to Section 7 of the ARM for more detailed information.

Daily Record of Participation

(Accuclaim or Edit Check)

- SFAs using automated systems will need to provide participation reports for the review period and for the day of review.
- The Daily Record Form is located in the ARM and a sample is included behind this tab. A completed example is also found in the ARM.
- An excel spreadsheet can be found at www.squaremeals.org for SFAs not using an electronic POS system. Click on the Forms section.
- The accuclaim/edit check tests on the Daily Participation Record should be performed daily.
- The Daily Record of Participation serves as supporting documentation for the reimbursement claims.
- The person completing the form should have daily contact with the Application Processor to be sure the form reflects the correct number of students approved for free and reduced priced meals.
- AccuClaim/edit checks are required only for lunch unless the SFA is a breakfast only SFA. If the SFA is breakfast only, then the accuclaim/edit checks are required for that meal.
- TDA has developed a specific Daily Record of Participation for Provision 2 schools.

Refer to Section 7 of the ARM for more detailed information.

Copy of daily record from the ARM goes here.

Steps in Performing Accuclaim Edit Checks

Using the Daily Record of Participation Form (or a similar locally-developed form) perform the following edit checks for each feeding site:

Step 1 — Compare the daily number of free and reduced-price lunches claimed against the number of students currently approved for free and reduced-price meals. Free and reduced-price meals may not be claimed in excess of the number of students approved for such benefits.

Step 2 — Divide the daily number of paid, reduced-price and free meals claimed by the number approved for each category to obtain the percent participation for each category. Compare this percentage to the attendance factor.

Whenever the number of paid, reduced-price or free meals claimed exceed the estimated percent in attendance; the attendance records should be evaluated to determine the maximum number of students by category that were present at school. The number of meals claimed by category should not exceed the number of students in attendance by category unless the school can document through other means that its meal counts are correct.

Document any changes made to the daily count and compare the daily number of paid, reduced-price and free lunches claimed against the number of students eligible times the attendance factor.

Possible Problems With Edit Checks

The personnel performing the edit checks should be aware of other indications of possible problems. Some items to watch for are as follows:

- Patterns of numbers, repetition of numbers or constant counts by category,
- Identical counts for breakfast and lunch,
- 100 percent participation (and % greater than attendance factor),
- Category count exceeding number of students eligible for free and reduced-price meals.

Edit checks should be performed each month on a daily basis. Adjustments or modifications may be done on a weekly basis. When discrepancies are found or potential problems are suspected, they should be resolved through further investigation. Any findings should be documented (with attendance records, etc.) and kept with the school's daily record of meals claimed.

Daily Record of Income

- Student and adult income must be recorded daily. Adults should be separated by those that pay for meals and those that may receive their meals due to administration of the programs.
- SFA systems will need to provide detailed income reports for the review period and the day of review.
- The ARM contains a suggested form for the Daily Record of Income for SFAs and includes instructions for completing. Samples are also included in this tab.
- SFAs must have some method for documenting food service related expenditures and revenue.
- A Record of Program Expenditures form can be found in the ARM with instructions for completing the form. Samples are also included in this tab.
- All SFA business managers and child nutrition directors should be familiar with Section 14 of the ARM.

Refer to Section 14 of the ARM for more detailed information.

Copy of daily record of Income from the ARM goes here.

- **Instructions for Completing Daily Record of Income**

This form is designed to help you keep the daily record of CN income as required by the National School Lunch and Breakfast Programs Agreements. Current State Board of Education policies require that public schools maintain these records for five years. USDA policies require that private and RCCIs maintain these records for three years. Use these instructions in preparing this form:

School Lunch Program

Column 1: *From Pupils (Reimbursable Meals)*—Enter the total amount received for all reimbursable lunches served to pupils. Include income from both full and reduced-price meals.

Column 2: *From Pupils (Other)*—Enter all other income received from pupils for the program during lunch. Include snack bar and a la carte proceeds.

Column 3: *From Adults*—Enter the total income from the sale of all food and extra milk to adults during lunch. Include income from professional and nonprofessional personnel, as well as visiting adults.

Column 4: *Other Income*—Enter the total amounts received into the School Lunch Program from all other sources. Do not include reimbursement from the National School Lunch Program, which is to be reported at the bottom of the page.

Column 5: *Total Income*—Enter the sum of Columns 1 through 4.

School Breakfast Program

Column 6: *From Pupils*—Enter the total income received for all breakfasts served to pupils. Include income from both full and reduced-price meals.

Column 7: *From Adults*—Enter the total income from the sale of all food and milk to adults during breakfast. Include income from professional and nonprofessional personnel, as well as visiting adults.

Column 8: *Other Income*—Enter the total amount received into the School Breakfast Program from all other sources. Do not include federal reimbursement from the School Breakfast Program, which is to be reported at the bottom of the page.

Column 9: *% Total Income*—Enter the sum of Columns 6 through 8.

Column 10: For local use.

Column 11: *Total Cash Income*—Enter the combined total income for all programs. Add Columns 5, 9, and 10.

Column 12: *Total Bank Deposits*—Enter the deposits made into the CN account.

Federal Reimbursement (Bottom of Form)—Enter, by program, reimbursement(s) received for the National School Lunch and School Breakfast Programs and date(s) received.

Total Income (Bottom of Form)—Enter the total income for each program and the total income for all programs, Columns 5, 9, 10, and 11.

Financial Summary

- A Financial Summary form will be sent to the SFA in the CRE date announcement packet approximately one month prior to the CRE visit. Please complete the form and have it ready for the reviewer, along with all supporting documentation.
- The following documentation should be available for the reviewer:
 - Daily deposit slips and posting to child nutrition account
 - Record of revenue
 - Record of expenditures
 - Invoices paid with child nutrition funds
 - Payroll and benefits documentation for employees paid from child nutrition funds
 - Bid documentation for items purchased with child nutrition funds
 - Copy of bid
 - Award list with pricing
 - Formal advertising (at a minimum – 2 consecutive days for 2 weeks in a circulated newspaper)
 - General Ledger
- To maintain the nonprofit status of the National School Lunch and Child Nutrition (CN) Programs, the fund balance or net cash resources of the CN account should not exceed three month's average expenditures. If an excess balance should occur, the SFA must immediately take steps to reduce the balance or have an acceptable plan for using surplus revenues. The plan should be such that the balance would be reduced within a year. The plan **must be submitted** to the Texas Department of Agriculture, Food and Nutrition Division and documentation of approval must be maintained and available for the CRE review.
- All expenditures that meet or exceed **\$5,000** must be approved by TDA. The letter of request should detail what the purchase is for and whom it is being purchased from. Request letters must be sent to:

Operations Director
Texas Department of Agriculture
Food and Nutrition Division
1700 N. Congress Avenue, 10th Floor
Austin, TX 78701

**Refer to samples on the following pages or
Section 14 of the ARM for more detailed
information.**

CHILD NUTRITION FINANCIAL SUMMARY

SFA NAME: _____ CO/DIST# _____

Provide supporting documentation from the general ledger to support this summary during the CRE.

Fund Type: Special Revenue General Fund Enterprise Complete this column

1. What was the cash/ investments balance for the child nutrition program as of August 31 of the last fiscal school year?	
2. What was the cash/ investments balance for the child nutrition program as of September 1 of this fiscal school year?	
3. Does the current net cash resources balance exceed more than an average of three-months of operating costs? ____ yes ____no If yes, indicate amount. Net Cash Resources = Current Assets minus Current Liabilities. What were the total expenditures for the Child Nutrition Fund for the previous fiscal year? _____ How many months in the SFA's school year	
4. Did the SFA's general operating fund supplement the child nutrition program at the close of the last school year? _____ yes _____ no If yes, indicate amount.	
5. What were the child nutrition cash balances for each month of the prior school year?	
6. Did the child nutrition fund earn interest during the last school year? _____ yes _____no If yes, indicate amount. Was the interest posted to the child nutrition fund? _____yes _____no	
7. Is rent or a usage fee of SFA owned buildings charged to the child nutrition fund? _____ yes _____ no If yes, indicate amount.	
8. Is anyone who does not work directly for the child nutrition department paid from child nutrition funds? _____ yes _____ no If yes, list employees.	
9. Were the state matching funds (last received) posted to the child nutrition fund? _____ yes _____ no Indicate amount posted.	
10. Does the SFA have an exclusive beverage contract? _____ yes _____ no	
11. Is child nutrition included in the exclusive beverage contract? _____ yes _____ no If yes, was the correct pro-rated share of revenue reimbursed to the food service account? yes _____ no _____ Indicate amount reimbursed.	
12. Are SFA employees, other than those employed by the child nutrition program, allowed to eat meals/snacks free of charge or below the actual cost of the meal? _____ yes _____no If yes, does a separate line item show how the food service account was reimbursed to offset these costs? _____ yes _____ no Indicate amount subsidized.	

During the CRE, documentation for the above questions, as well as the following items pertaining to the child nutrition funds, will be reviewed:

- Daily deposit slips and posting to the general ledger of the child nutrition income
- Record of revenue
- Record of expenditures
- Invoices paid through the child nutrition funds from the review month
- Payroll and benefits documentation for employees paid from child nutrition funds
- Bidding documentation for items purchased with child nutrition funds
- Copy of bid
- Award list with current pricing of items purchased by SFA
- Formal advertising

Plan for Reducing Excessive Operating Balance

Co.-District Number: _____ Date: _____

SFA Name: _____ ESC: _____

Address: _____

City/State: _____ Zip: _____

Telephone Number (____) _____

The above named school SFA hereby submits the following plan to reduce the excessive operating foodservice balance. This plan will be completed by _____, 20____.

Current Operating Balance: \$ _____

Average Monthly Expenditure: \$ _____

Briefly Outline Plan:

(If additional space is needed attach another page.)

(Signature of Authorized Representative)

(Printed Name of Authorized Representative)

(OFFICIAL USE ONLY)

APPROVED

DENIED _____

(Signature of Texas Department of Agriculture Official)

Instructions for Completing Record of Program Expenditure

This form is designed to help you keep the records of Child Nutrition (CN) expenses as required by your National School Lunch and School Breakfast Programs Agreements. State Board of Education policies require that public schools maintain these records for a period of five years. USDA requires that private and RCCIs maintain these records for a period of three years.

Column 1: Date — Enter the date of each payment.

Column 2: Payee — Enter the name of the person or company to whom each payment is made.

Column 3: Check Number — Enter the number of each check or, in the case of a cash payment, enter the word “cash.”

Column 4: Amount of Check or Cash — Enter the amount of each check or cash payment. In the case of a cash payment, enter the amount of the payment and write “cash” in Column 3. (Note: Secure a signed receipt for each cash payment.)

Column 5, 6 and 7:

- *Expenditures* — The sum of these three columns must equal Column 4.
- *Food* — Enter the amount of each payment, or portion thereof, expended solely for food. Food includes milk and all other items purchased for consumption.
- *Labor* — Enter the amount of each payment, or portion thereof, expended for labor in connection with your foodservice program.
- *Other* — Enter the amount of each payment, or portion thereof, expended for all other items not covered in Columns 5 and 6.

Column 8: Explanation of Other Expenditures — Give a brief explanation of those expenditures listed in Column 7.

- Note: Funds used from other than the regular CN account should, first, be deposited into the CN account and then disbursed from this account.

Processing Applications

- Applications must be reviewed and an eligibility determination made within 10-operating days of receipt of the application. The reviewing official should date-stamp the application with the date the LEA official actually received the application as applications could be turned into someone other than CN.
- It is the LEA's responsibility to review all applications to determine if the household submitted a complete application. The household should be contacted or the application returned if required information is not provided or the information is unclear. Questionable applications should not be approved. All households must be notified of their eligibility status, denied households must be notified in writing. A sample notification letter is provided in the ARM.
- All applications must be kept on file for a minimum of 5-years (3-years for private and RCCIs). During a CRE the current year's applications for schools selected will be reviewed.
- Applications must be signed by the reviewing official and should indicate the date each application is approved for benefits and the level of benefit. Automated systems determining eligibility must have the batch signed by the reviewing official. The reviewing official must be a LEA employee and cannot be a FSMC employee.
- LEA's with automated systems must have the ability to generate a daily listing (master roster) of all eligible students, the basis of approval (income, categorical), the eligibility status, the date of approval and other significant dates, such as withdrawal and re-entry. The reviewing official must sign a listing of the applications approved by batch (daily, weekly). The batch should be run at least weekly.
- Children in households receiving Supplemental Nutrition Assistance Program (SNAP) benefits (formerly the Food Stamp Program) or TANF can get free meals regardless of your income. There is no need to contact the household.
- Once approved an application is valid for the entire school year. Households are no longer required to report increases in income or to complete a new application. Withdrawals may be reinstated upon return without submitting a new application. Students withdrawing in the preceding year and returning within the first 30 operating days of the current school year may retain their benefits for the first 30 operating days.
- TIER numbers are not acceptable for eligibility determination. Only case numbers or SNAP/TANF Eligibility Determination Group (EDG) numbers with 9-digits beginning any number between 0 and 6, or any 8-digit number that does not begin with 0 or a letter may be accepted to determine eligibility.

Denied

- Households denied benefits must be given written notification of the denial. The notification must advise the household of:
 - The reason for the denial of benefits
 - The right to appeal
 - Instructions on how to appeal
 - A statement that households may reapply for free and reduced-price benefits at any time during the school year

- The reviewing official must record on denied applications the following information:
 - Reasons for denial
 - Date of denial
 - Date denial notice is sent
 - Name of the reviewing official

Temporary Free

- Each LEA should have a written policy for handling temporary approval of an application. A copy of the policy should be available to reviewer during the CRE. Your ESC can help you in establishing a Temporary Policy that meets the needs of your LEA.
- If no income is listed on the application and the no income box is not marked, the determining official should contact the household for additional information. If the determining official is unable to contact the household, the application must be denied because it is incomplete.
- The initial time frame for a temporary approval can be up to 45 calendar days from the first approval date and every **30-calendar days** thereafter. At the end of the 45 days, the LEA must re-evaluate the household's situation and should contact the household to determine if circumstances have changed. If the situation, at the end of the temporary time frame, remains the same the LEA may either continue the temporary eligibility for another interval (30 days) or make the approval valid for the remainder of the school year plus the first 30 operating days of the next school year. After each contact with the household, the LEA should document the contact and action taken as a result of the contact. Notice of adverse action is not required when the temporary approval expires.

Status Change and Withdrawn

- LEA officials must maintain accurate records of status change and withdrawal of students receiving free and reduced-price benefits. The Master Roster should reflect all changes and should include the date and the category to which the changes are made. For those LEAs that have automated systems, this information may be maintained in a computer instead of being noted on the application.
- If a student withdraws from an LEA and returns **anytime during the school year**, the LEA can reactivate that student's status without securing another application.
- When a student withdraws from the LEA the household application should be pulled from the free or reduced-price category and placed in a Withdrawn file. The date of withdrawal should be noted on the application and the Master Roster should be changed to reflect the withdrawal.
- LEAs using scanned applications should note on the original image any withdrawn students and date of withdrawal.
- Automated systems that track withdrawals should maintain a current list of withdrawn students noting the date withdrawn.

Refer to Section 4 of the ARM for more detailed information on eligibility.

Verification

- Annually, the LEA must randomly select and verify a selection of applications approved for benefits. This includes all applications for the LEA, not by campus site.
- Categorically eligible households, DC, Head Start, Even Start, Migrant, Runaway, and Homeless are exempt from verification. Denied applications are exempt from verification.
- The verification process may begin anytime after the LEA begins receiving applications. An estimate of applications to be verified can be based on last year's numbers. On October 1, a count of the actual number of approved applications on file must be made to determine if enough applications have been selected. If necessary, additional applications must be selected. Round all fractions upward. LEAs that utilize computer systems are advised to be certain the computer system has correctly calculated verification numbers. Some systems use normal rounding procedures, causing the LEA to be short of the verification requirement based on the October 1 count.
- The LEA may elect to replace up to 5% of the applications selected for verification if the household is considered a "fragile" household. Fragile is defined as those households where it is highly probable that they will not respond to verification due to language barriers or life crisis in the household. LEAs are in the best position to know the personal circumstances of households in their areas and so the election to replace applications is left to LEA level.

Step One – Determining Sample Size

- **Basic** (Error Prone) verification requires LEA's to select 3% of all applications on file October 1 or 3,000 (whichever is less), to determine the number of applications to be verified. LEAs may not exceed the 3%. Once the number of applications is determined, the selection of applications must come from **error prone applications** – those within \$100 of the monthly or \$1,200 of the annual guidelines. For manual systems it is suggested that error prone applications be identified in at time of determination. A colored dot is one way to identify error prone applications. Automated systems should be able to identify error prone applications. Check with your software provider to ensure that this is possible.
- LEA's may select an alternative sampling method if they meet one of two conditions.
 - **Condition #1** - If the non-response rate for the preceding school year is less than 20%, then an alternative sampling (Random or Focused Sampling) may be used. Non-response rate is defined as *the percentage of applications selected for verification for which the LEA has not obtained verification information*. Calculate the non-response rate by dividing the number of non-responsive households by the number of households selected and notified for selection.
 - **Condition #2** – LEAs that have more than 20,000 students approved by application that meet at least one of the following sub-conditions.
 - a. Students that are categorically eligible through direct certification, homeless, migrant, runaway, Head Start, Even Start are not included in the 20,000 approved students, or
 - b. The non-response rate for last year's verification was at least 10% below the non-response rate for the preceding school year.

Alternative Sampling Methods

- **Random Sampling** – 3% or 3,000 (whichever is less) randomly selected from approved applications of October 1 regardless of income reported.

- **Focused Sampling** – 1% of applications or 1,000 (whichever is less) randomly selected from approved error prone applications and .5% or 500 applications (whichever is less) randomly selected from approved SNAP/TANF applications as of October 1.
- Sampling worksheets are located in the ARM section 6.

Step Two - Confirmation Review

- Prior to any Verification an official, other than the official who made the eligibility determination, must review each approved application selected for Verification to ensure that the initial determination was accurate. The Confirming Official must sign the bottom of each application once the application has been re-checked. Batch may be used for electronic systems.
- The requirement for a confirmation review may be waived if:
 - The LEA uses an accurate technology-based automated system, and
 - The state office gives approval after confirming that the automated system is accurate.
 LEAs must submit a letter to TDA to request a waiver. Provide the name of the system in the waiver request. TDA will review past CREs conducted and approve accordingly. The waiver will be applicable as long as the same electronic eligibility determination system is used.

Step Three – Notify Households

- Once the sample size of household applications have been selected the LEA must send a letter to the family requesting the following information:
 - Statement that the household has been selected for verification;
 - Request for Social Security numbers for each adult household member 21 years of age or older or indicate that adult household members do not have a Social Security number;
 - Request for documentation of income received for a full month during any time period from when the household submitted the application until verification notification.
 - Include the Privacy Act statement
 - Provide the types of acceptable information that may be provided to confirm income.
 - Four weeks of income from any consecutive four weeks may be provided to support the application.

Step Four – Verification Record

- The Verification Official must review all documents submitted by the households for income verification and use the “Verification Record” form, in the ARM, for each selected application.

Step Five – Follow Up

- The LEA must designate a Follow-Up Official. At least one attempt to reach all households that do not respond to verification must be made. That attempt can be by mail, telephone, e-mail or personal contact. The Follow-Up Official’s signature and the date of follow-up must be recorded on the application.

Step Six – Completion of Verification

- Verification of selected applications must be completed by November 15. Households must be notified of change in eligibility. When verification results in a reduction or termination of benefits, households must be sent a written adverse action notice 10-calendar days prior to the change. The adverse action notice must include:
 - Reasons for the change;
 - That an appeal must be filed within the 10-calendar day notice period;
 - Instructions on how to appeal;
 - That the household may reapply for benefits but will have to submit income information upon reapplication.

- SNAP/TANF households may submit proof of participation in those program or complete an income application and provide documentation of income and Social Security numbers for all adult household members.
- USDA requires LEAs to report results of verification to TDA annually. LEAs report verification in CNPIMS and may begin entering SFA Verification Summary information November 15.

Refer to Section 6 of the ARM for more detailed information.

SFA LETTERHEAD

(Example of Confirmation Review Waiver)

DATE

Director for Compliance Monitoring
Texas Department of Agriculture
Food and Nutrition Division
P. O. Box 12847
Austin, Texas 78701

Dear ,

NAME OF SFA Child Nutrition Program requests that the requirement for a Confirmation Review prior to verification be waived. Accurate free and reduced eligibility is determined using NAME OF SYSTEM software system. This system has been utilized in this SFA since YEAR SYSTEM WAS PURCHASED.

Thank you for your consideration. We look forward to your response.

Sincerely,

NAME OF CHILD NUTRITION ADMINISTRATOR TITLE OF CHILD NUTRITION ADMINISTRATOR

Letter to Households of Selection for Verification of Eligibility

(Student's Name)

(School) (Date)

Dear _____:

This letter requires that you send information or contact _____ by _____.
(Official's Name) (Date)

Your child's application has been selected as part of a review to make sure only eligible students receive free or reduced-price meal benefits.

You must send either (1) papers that show that you get SNAP/TANF for your child or (2) the names and Social Security number of each adult household member on the enclosed sheet and papers that show your household's total monthly income.

We have enclosed information that shows the kinds of papers that you may use to prove that you now get food stamps or TANF for your child or to show your household's income. If possible, do not send original papers. If you do send original documents, they will be sent back to you only if you ask.

If you do not send information that proves your child is eligible to receive free or reduced-price meal benefits by _____, these meal benefits will be stopped.
(Above Date)

If you have any questions, or if you need any help, please call: _____
at _____ (Name)
(Telephone Number)

If you do not hear from us by _____, free or reduced-price meals will continue without change.
(Date)

Thank you for your cooperation in this matter.

Sincerely,

Enclosures: Verification Information for Free and Reduced-Price Meals
Request for Social Security Numbers

"In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.

To file a complaint of discrimination, write USDA, Director, Office Adjudication and Compliance, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer."

Verification Information for Free and Reduced-Price Meals

Food Stamp/TANF Households: If you receive SNAP or TANF for your child, send only documentation that shows your household is receiving SNAP/TANF. No other information is required. Documentation needed:

- SNAP/TANF certification notice showing the dates of the certification period;
- Letter from the SNAP or TANF office stating that you now receive SNAP/TANF;
- ATP Card (Authorization to participate).

If your child was approved for free meals because you put a SNAP/TANF case number on your child's form but you no longer get SNAP/TANF for your child and you want to continue school meal benefits: complete another meal benefit form with income information for everyone in your household, write the name and the Social Security number of each adult household member on the form or on another piece of paper, and send pay stubs or other papers that show your current income.

Households that do not receive SNAP/TANF: If you do not receive SNAP or TANF for your child, write the name and Social Security number for each adult household member in the spaces below and send copies of information or papers that show your household's **current** income. Current income is the amount of money your household received last month.

Names of Adult Household Members

1 _____
2 _____
3 _____
4 _____
5 _____

Social Security Numbers

____/____/____-____-____
____/____/____-____-____
____/____/____-____-____
____/____/____-____-____
____/____/____-____-____

The papers you send in must show: the amount of the income received, the name of the person who received it, the date the income was received and how often the income is received. To show the amount of money your household received last month, send copies of the following:

- **Earnings/wages/salary for each job:** current paycheck stubs that show how often it is received; current pay envelope that shows how often it is received; letter from employer stating gross wages and how often they are paid; business or farming papers, such as ledger or tax books.
- **Social Security/pensions/retirement:** Social Security retirement benefit letter; statement of benefits received; pension award notice.
- **Unemployment compensation/disability or worker's compensation:** notice of eligibility from State Employment Security Office; check stub; letter from Worker's Compensation.
- **Temporary Assistance for Needy Families (TANF):** benefit letter from TANF Office
- **Child support/alimony:** court decree; agreement; copies of checks received.
- **All other income:** If you have other forms of income (such as rental income), send information or papers that show the amount of income received, how often it is received, and the date received.
- **No income:** If you have no income, send a brief note explaining how you provide food, clothing and housing for your household, and when you expect an income.

Privacy Act Statement: This explains how we will use the information you give us.

The Richard B. Russell National School Lunch Act requires the information on this application. You do not have to give the information, but if you do not, we cannot approve your child for free or reduced price meals. You must include the social security number of the adult household member who signs the application. The social security number is not required when you apply on behalf of a foster child or you list a Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) Program or Food Distribution Program on Indian Reservations (FDPIR) case number or other FDPIR identifier for your child or when you indicate that the adult household member signing the application does not have a social security number. We will use your information to determine if your child is eligible for free or reduced price meals, and for administration and enforcement of the lunch and breakfast programs. We MAY share your eligibility information with education, health, and nutrition programs to help them evaluate, fund, or determine benefits for their programs, auditors for program reviews, and law enforcement officials to help them look into violations of program rules.

Please contact _____ if you have any questions.

Letter Household May Have Employer Complete Statement of Earnings

This statement is to confirm that _____ received the following amount of (Name of Employee) gross income before deductions for taxes, social security insurance, etc. \$ _____

- weekly
- every two weeks
- twice a month
- monthly
- other _____

Please state the date of the paycheck listed above _____.

Signature of Employer

Date

Address

Telephone Number

Letter Household May Have Social Security Office Complete Social Security and/or Supplemental Security Income (SSI)

This statement is to confirm that _____ received the following Social Security
(Name of Claimant)
\$ _____ or SSI income \$ _____ for the month of _____.

Signature of Official _____

Date _____

Address _____

Telephone Number _____

Letter Household May Have SNAP/TANF Office Complete Statement of SNAP/TANF Benefits

(Name of Child) _____

(Name of Parent/Guardian) _____

This statement is to confirm that the child named above is currently certified to receive SNAP or TANF benefits. The household's case number is _____.

Signature of SNAP/TANF Official

Date _____

Address _____

Telephone _____

Number _____

Letter to the SNAP/TANF Office From the LEA

Date

Dear :

The receipt of SNAP/TANF automatically qualifies children for free school meals. The regulations for the Supplemental Nutrition Assistance Program (SNAP) and the Temporary Assistance for Needy Families (TANF) Program permit SNAP and TANF Offices to release eligibility information to administrators of the National School Lunch and School Breakfast Programs to ensure that only eligible children receive free meal benefits.

Enclosed is a listing of approved free meal applicants who have been selected for verification and who have indicated that the child for whom application was made now receives SNAP and/or TANF benefits. On the enclosed listing, please indicate if these household members are currently participating in the SNAP and/or TANF Program. This information will be used only to confirm the approved applicant's eligibility for free meal benefits.

Your return of the listing by _____ will be appreciated. A self-addressed return envelope is also enclosed for your convenience. If you have any questions or need additional information, please contact _____ at telephone number _____.

Sincerely,

Signature

Date

Address

Telephone Number

Enclosure (Verification Form—SNAP/TANF Recipients)

Letter of Verification Results and Adverse Action For Income Households
(Note: Make changes as applicable for the School Breakfast Program)

Child(ren)'s Name(s): _____

School: _____ Date: _____

Dear _____:

We have completed verification of your child(ren)'s eligibility for school meals.

Starting on (10 calendar days from the date sent) your child(ren)'s eligibility for meal benefits will be:

_____ Changed from free to reduced-price because your income is over the allowable amount. The reduced-price charge is _____ cents for lunch, _____ cents for breakfast, and _____ cents for snacks.

_____ Stopped for the following reason(s): _____ your income is over the allowable amount for free or reduced-price meals; _____ you did not provide proof of current eligibility. The following information is missing:

Starting immediately your child(ren)'s eligibility for meal benefits will be: _____ Changed from reduced-price to free because your income is within the free meal eligibility limits. Your child(ren) will receive meals at no cost.

If you are not eligible for benefits now but have a decrease in household income, become unemployed or have an increase in the size of your household, you may fill out an application at that time to reapply for benefits.

If you do not agree with this decision you may discuss it with: _____ (verifying official). You also have the right to a fair hearing. If you request a hearing by 10 calendar days from the date sent, your child(ren) will continue to receive free or reduced-price meals until the decision of the hearing official is made. You may request a fair hearing by calling or writing the following official:

Name _____
Address _____
Telephone Number _____

Sincerely,

"In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.

"In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability. To file a complaint of discrimination, write USDA, Director, Office Adjudication and Compliance, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer."

Letter of Adverse Action for SNAP/TANF Households

Dear _____:

Date: _____

We have completed verification of your child(ren)'s eligibility for school meals. Available records show that your household is not getting SNAP/TANF at this time.

To continue school meal benefits for your child:

- (1) complete a new application with income information;
- (2) write the name and Social Security number of each adult household member on the attached sheet of paper; and
- (3) send in papers that show your household's current income.

Your child's free school meal benefits will be stopped on (insert 10 calendar days from the above date) unless we receive this information. Any continued free or reduced-price meals will depend on your current household income. If you do not agree with the decision, you may discuss it with (verifying official) by calling (telephone number).

You also have a right to a fair hearing. This can be done by calling or writing the following official:

Name: *(Insert hearing official's information.)*

Address:

Telephone Number:

If you request a hearing by (insert 10 calendar days from the date sent), your child will continue to receive free meals until the hearing official's decision is made.

If you are not eligible for benefits now but your household circumstances change, you may fill out an application at that time and reapply for benefits.

Very truly yours,

(Insert verification official's name.)

Enclosures: Free and Reduced-Price Application; Form for Social Security Numbers; Verification Information for Free and Reduced-Price Meals

"In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.

To file a complaint of discrimination, write USDA, Director, Office Adjudication and Compliance, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer."

Notification of Continuation of Benefits as a Result of Verification (Optional)

Date: _____

Dear _____:

Thank you for cooperating with the _____ in its verification
(Name of LEA)
of eligibility for school meal benefits. The materials you have sent are sufficient for us to verify that your child is eligible for the meal benefits he or she is receiving.

We appreciate your cooperation and support during this process. If you have any questions concerning our program, please feel free to contact our office.

Sincerely,

Signature of Verification Official

“In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.

“In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability. To file a complaint of discrimination, write USDA, Director, Office Adjudication and Compliance, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer.”

Verification Record

Household Name: _____

Total Number of Household Members: _____

Total Number of Enrolled Students: _____

Date Selected: _____

Response Due: _____

Second Notice Sent: _____

Date Reduction/Termination Notice Sent: _____

Selection Method:

- Basic (Error Prone)
- Focused
- Random
- 100%
- Other: _____

- SNAP/TANF Household
- SNAP/TANF Office
- ATP Card
- Agency Records Not Confirmed:
- Other: _____
- Eligibility not confirmed

Income Household

- Confirmed: Monthly Income: \$ _____
- Wage Stubs (Gross Monthly Income)
- Notice of Eligibility
- Written Documents
- Collateral Contacts
- Other: _____

Verification Result:

- No Change
- Reduced to Free
- Free to Reduced
- Ineligible

Reason for Change:

- High Income Refused to Cooperate SNAP/TANF Eligibility Not Confirmed Other

(Signature of Verifying Official)

(Date)

Social Security numbers of additional household members whose eligibility was determined by income may be listed below:

Household Member SS#

EXAMPLE ONLY

LEA VERIFICATION SUMMARY

Complete #1-11 by November 15, sign and date.

Enter on-line through CNPIMS, and maintain on file for review purposes. On February 16, complete #12 and submit electronically to TDA through CNPIMS.

County District Number: _____ LEA Name: _____

Type of SFA: Public School Year: _____

<input type="radio"/> Exempt due to Hurricane	<input type="radio"/> Provision 2 Base Year	<input type="radio"/> Provision 2 Non Base Year
I. Enrollment Information (Pre-Verification)		
1. Type of Free/Reduced Application Used: Household		
NOTE: #2-3, column A below will automatically be completed in CNPIMS by TDA using the SFA's Schedule A. Complete only #2-3, column B if one or more schools in your SFA are establishing a Provision 2 Base Year.	A. Total	B. Provision 2 Schools WHICH ARE NOT OPERATING A BASE YEAR
2. Number of schools operating the NSLP and/or SBP		
3. Number of enrolled students with access to the NSLP (or SBP for SBP only schools)		

Application and Eligibility Information (Pre-Verification)	A.	B.
	# of Students	# of Approved Applications
Number of Approved Applications on File as of October 1		
4. Total Free Eligible Reported – Sum of #4-1 through 4-4 (Automatically calculated in CNPIMS when saved)		
4-1. # approved as FREE ELIGIBLE who are not subject to verification (directly certified, homeless liaison list, income-eligible Head Start, pre-K Even Start, migrant, non-applicants approved by local officials)		
4-2. # approved as FREE ELIGIBLE based on SNAP/TANF case number submitted on an application (Categorically Eligible)		
4-3. # approved as FREE ELIGIBLE based on income/household size information submitted on an application (Income Eligible)		
4-4. # FREE ELIGIBLES reported for Provision 2 Schools WHICH ARE NOT OPERATING A BASE YEAR		
5. Total REDUCED PRICE ELIGIBLES reported		
5-1. # REDUCED PRICE ELIGIBLES reported for Provision 2 Schools WHICH ARE NOT OPERATING A BASE YEAR		
6. Type of Verification Used:	Basic	Random
	Focused	No Verification Performed
a. Total Number of All Applications Verified: % Verified (6a ÷ Oct. 1 count):		
b. Total Number of Students Verified: _____	count taken from applications verified	
c. Number of Applications Verified for Cause: _____	# of students verified for cause:	
d. Total Number of Income Applications verified: _____	% Verified (6d ÷ [4-3B+5B]):	
e. Total Number of SNAP/TANF Applications verified: _____	% Verified (6e ÷ 4-2B):	
f. Total Number of Applications that did not respond to verification:		
g. Total % of Applications that did not respond to verification (6f ÷ 6a): %		

LEA VERIFICATION SUMMARY (continued)

II. Results of Verification by Application Type					
Number of Applications Verified Items 7-11 are required and are reported as of the date of completion of the verification process (no later than November 15). Item 12 is reported as of February 15.		A. FREE ELIGIBLE based on SNAP/TANF Application (Categorically Eligible)	B. FREE ELIGIBLE based on Income/Household Size Application (Income Eligible)	C. REDUCED PRICE ELIGIBLE	D. TOTALS (Column A+B+C)
7. No Change	# of applications				
	# of students				
8. Responded, Changed to Free	# of applications				
	# of students				
9. Responded, Changed to Reduced	# of applications				
	# of students				
10. Responded, Changed to Paid	# of applications				
	# of students				
11. Did not Respond	# of applications				
	# of students				

The process of verification must be completed by November 15, annually. The summary information may be entered into CNPIMS after November 15, but must be updated if the LEA had households that were terminated from the programs due to verification and were re-approved for program benefits.

Signature of Verifying Official Title of Verifying Official Date verification completed

Item #12- Report as of February 15.				
From the verified applications reported in #7-11 above, record those that reapplied and were re-approved on or before February 15. Then go into CNPIMS, enter this information and submit this report electronically to TDA on or before March 1.		A. FREE ELIGIBLE based on SNAP /TANF Application (Categorically Eligible)	B. FREE ELIGIBLE based on Income/Household Size Application (Income Eligible)	C. REDUCED PRICE ELIGIBLE
12. Reapplied and re-approved on or before Feb.15.	# of applications			
	# of students			

Signature of Verifying Official Title of Verifying Official Final date submitted

On-Site Reviews

- SFAs with more than one feeding site must perform an On-site review of the meal counting and recording procedures in each school cafeteria prior to February 1, annually.
- The director, supervisor or a manager from a different site must conduct each On-Site Reviews.
- The On-Site School Review form can be found in Section 7 of the ARM. A corrective action plan should be recorded on the form for any areas out of compliance.
- The SFA must conduct a follow-up On-site review within 45-days if errors were noted during the first review to determine that the corrective action resolved the non-compliance areas.
- It is the responsibility of the Child Nutrition Director to maintain compliance with the regulations every year the SFA's cafeterias are in operation.

Refer to Section 7 of the ARM for detailed information.

Snack Reviews

- Snack programs must be reviewed twice a year. The first review should take place within the first **four** weeks after the program begins and then later in the year. See Review Form in Section 10 of the ARM.
- A list of school sites participating in the snack program must be provided to the SFA personnel conducting the snack reviews. Snacks must be checked for all sites on the SFA's Schedule A in CNPIMS).
- Complete and accurate records must be maintained.
- If all snacks are claimed free, documentation that the site is located in an area served by a school in which at least 50-percent of the enrolled students are eligible for free or reduced-price meals must be maintained.
- All other sites must maintain documentation of free and reduced price eligibility for all students claimed for snacks (applications or DC list).
- An enrollment roster documenting each student's daily attendance must be maintained for all snack programs.
- Daily snack counts must be maintained.
- Total numbers of snacks served are counted for free sites.
- Count snacks by eligibility for non-area eligible sites.
- Food production records must be maintained as well as product information for documentation of compliance with meal pattern requirements. A weekly food production record may be used.
- Reminder: sweets may not be offered more than twice per week and the fruit/vegetable/juice component must be 6 ounces.

Refer to Section 10 of the ARM for detailed information.

Procurement/Contracts

- The SFA should use competitive procurement procedures on purchases of \$25,000 or more.
- The SFA should purchase items as awarded. Invoices showing delivered product pricing match list of awarded products.
- SFA contracts over \$100,000 should include a statement requiring each responsive bidder to include a certificate of debarment and suspension.
- USDA requires SFAs to comply with the Clean Air and Water Act in contracts that exceed \$100,000. The verbiage required to be included in bids for the prospective vendors to complete can be found in Section 17 of the ARM.
- A Certificate Regarding Lobbying is required to be on file for those companies entering into a contract exceeding \$100,000 in federal funds. See Section 17 of the ARM.
- Buy American Provision –SFAs are required to purchase domestically grown and processed foods, to the maximum extent practicable. Purchases made in accordance with the Buy American Provision must still follow the applicable procurement rules calling for free and open competition. SFAs must ensure that **all** procurements using funds from the nonprofit SFA Child Nutrition account comply with the Buy American provisions. This includes foods that are sold to students as a la carte food items.
- The SFA is required to request information on trans fats to be included in the bid packet. SFAs must provide documentation of efforts to reduce the purchase of trans fat products as compared to the previous year.

Refer to Section 17 of the ARM for detailed information.

Exclusive Beverage Contracts

- SFAs that have entered into Exclusive Beverage Contracts with vendors must meet all regulatory requirements as they pertain to these contracts.
- If any nonprofit CN products are purchased via the exclusive contract, then all Federal procurement requirements must be met. Reference 7CFR 210.21; 7 CFT 3016; and OMB Circular A-102, Attachment O.
- Additionally, if nonprofit CN products are included in the contract, any rebates, commissions, scholarship fund contributions, or any other payments back to the SFA of SFA related organizations, must be reimbursed to the nonprofit Child Nutrition account on a prorated basis.
- SFAs with existing contracts in place that include CN products must reimburse the Child Nutrition account it's pro-rata share for the current and subsequent school years and maintain appropriate documentation supporting the established pro-rata share. The law was effective in 1999, so contracts that extend back to 1999 must award CN their share if applicable.
- If an SFA has entered into an Exclusive Beverage Contract, a worksheet to calculate CN pro-rata share must be completed by the SFA and available for the TDA monitor the day of the CRE review. This form can be found in Section 20 of the ARM.
- A copy of the Exclusive Beverage Contract and other applicable documents must also be provided to the reviewer during the CRE.

Refer to Sections 17 and 20 of the ARM for detailed information.

Sample Form to Calculate Food Service Pro-rata Share of Exclusive Beverage Contract for School Year _____

SFA Name: _____ Co.-Dist. No. _____

Authority: The information requested in this form is required for Texas Department of Agriculture (TDA) compliance monitoring activities, in accordance with 7 CFR 210.14 and OMB Circular A-87, Attachment A, and OMB circulars A-102 and A-110.

Complete this form if your SFA has an exclusive beverage contract that also requires participation by the SFA's Child Nutrition (CN) department. This information will be reviewed by the TDA Food and Nutrition Division to determine SFA compliance with federal regulations. Federal regulations require that the CN department receive a specific percentage (a pro-rata share) of all payments made to the SFA by the vendor under the exclusive beverage contract.

1. \$ _____ Total contributions of cash and other assets received by the SFA under the exclusive beverage contract, as described below:
 - a. All cash payments including but not limited to the following: lump sum payments, scholarship fund amounts, student attendance incentives, any sales promotion bonuses, sponsorship fee values, and other cash payments, and
 - b. Fair market value of donated items including but not limited to the following: software packages received, sports-related items, computer equipment, athletic incentives such as scoreboards, all other supplies and/or equipment.

2. \$ _____ Total purchases (revenue) by students and/or staff, and SFA purchases and sales (including CN program) under the exclusive beverage contract. Include the following:
 - a. All products; carbonated and noncarbonated beverages, approved cups, carbon dioxide, dispensing equipment, other food products, menu boards, etc. purchased, or vended SFA-wide.

3. \$ _____ Total purchases (or sales) by CN Program under contract. Include the following:
 - a. The total amount of CN purchases under the contract in the SFA, including concessions, CN monthly purchases relevant to the contract. Refer to SFA contract.

4. Total Purchased by CN (#3) = _____ % (Pro-rata share % to CN Program)

5. Total Purchased by School SFA (#2) _____ % x \$ _____ = \$ _____
Pro-rata dollar amount owed to CN Program

Submit documentation showing the transfer of the pro-rata share of funds to the SFA's CN account. Acceptable documentation such as bank statements, copies of canceled checks, or records of accounting transfer should be attached to this form.

In accordance with federal regulations, CN is entitled to its pro-rata share of all payments to the SFA in addition to the CN sales and commissions. The SFA must show a clear audit trail with supporting documentation. This documentation must be kept on file in the SFA (do not send to TDA).

Date _____

Food Production Records

- Complete and accurate food production records should be kept of all meal types served and claimed for reimbursement.
- Prototypes of the various food production records are available in the ARM.
- All columns, except the comment column, are required. Although the SFA is not required to use the prototype food production records available, all information from the prototypes must be on SFA created documents.
- Meals served to students and claimed for reimbursement must include all components or menu items in sufficient quantity prior to the point of service to meet requirements.
- Schools must offer milk in a variety of fat contents during lunch meal service, and the choices may, but do not have to be, flavored or lactose-free choices.
- USDA requires that Offer vs. Serve be implemented for senior high school students, grades 9 – 12. Offer vs. Serve is not required for RCCIs.
- Schools preparing foods for satellite feeding sites must prepare a Receiving Kitchen Food Production Record for each feeding site as well as a Central Kitchen Food Production Record.
- One of the most common CRE findings are food production record findings. Food production records document the meal served and support the claim for reimbursement.

Refer to Sections 8 and 9 of the ARM for detailed information.

CN Labels/Product Analysis

- Labels and product analysis sheets should be on file for products used and purchased that contribute to a reimbursable meal at SFAs using a Food Based Menu Planning system.
- All CN labeled products that are federally approved and have a CN logo and carry a warranty. If an SFA participating in the Child Nutrition Program purchases such a product and uses it according to the manufacturer's directions, the institution will not have an audit claim filed against it for that CN labeled product for noncompliance with the meal pattern requirements. Copies of all CN labels used in the SFA should be maintained.
- Product analysis sheets should be maintained for all products that do not have a CN label. A product analysis sheet contains a statement that clearly identifies the contribution that the product makes toward the CN meal pattern requirements. This statement is based on formulation and/or laboratory testing and is signed by a high-ranking official in the company. **A product analysis sheet carries no USDA warranty or guarantee.** A sample Product Analysis sheet can be found in Section 9 of the ARM. The product analysis must contain all of the information given in the ARM to be accepted by TDA.
- Nutrient Fact Information, from all products served, is necessary for the School Meals Initiative (SMI) Review, and to enter information for the Nutrient Standard Menu Planning System.
- All SFAs, regardless of Menu Planning System must provide documentation of fat content of products to meet 23 grams of fat maximum per Texas Public School Nutrition Policy.

Nutrient Facts Label

Nutrition Facts Serving Size 2 waffles (78 gm s) Servings per container 48																						
Amount per serving Calories 180 Calories from fat 36																						
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">% of Daily Value</td> <td style="width: 50%;">Total Fat 4 gm 6%</td> <td style="width: 50%;">Saturated Fat 1 gm 5%</td> </tr> <tr> <td></td> <td>Cholesterol 0 gm 0%</td> <td>Sodium 570 gm 24%</td> </tr> <tr> <td></td> <td>Total Carbohydrate 31 gm 10%</td> <td>Dietary Fiber 1 gm 4%</td> </tr> <tr> <td></td> <td>Sugars 2 gm</td> <td>Protein 4 gm</td> </tr> <tr> <td></td> <td>Vitam in C 0%</td> <td>Vitam in A 0%</td> </tr> <tr> <td></td> <td>Calcium 0%</td> <td>Iron 15%</td> </tr> <tr> <td></td> <td>Thiam in 35%</td> <td></td> </tr> </table>		% of Daily Value	Total Fat 4 gm 6%	Saturated Fat 1 gm 5%		Cholesterol 0 gm 0%	Sodium 570 gm 24%		Total Carbohydrate 31 gm 10%	Dietary Fiber 1 gm 4%		Sugars 2 gm	Protein 4 gm		Vitam in C 0%	Vitam in A 0%		Calcium 0%	Iron 15%		Thiam in 35%	
% of Daily Value	Total Fat 4 gm 6%	Saturated Fat 1 gm 5%																				
	Cholesterol 0 gm 0%	Sodium 570 gm 24%																				
	Total Carbohydrate 31 gm 10%	Dietary Fiber 1 gm 4%																				
	Sugars 2 gm	Protein 4 gm																				
	Vitam in C 0%	Vitam in A 0%																				
	Calcium 0%	Iron 15%																				
	Thiam in 35%																					

Refer to Section 9 of the ARM for detailed information.

Example of a Product Analysis Form

This product analysis form is an example of one that provides information to assist the purchaser in determining the extent a meat product is purported to contribute to the meal pattern requirement.

Product Name: Code No.:

Manufacturer:

Case/Pack/Count/Portion Size:

List Variety(ies) and Cuts of Meat Used in Product:

Total Weight Per Portion of Uncooked Product:

Weight of Raw Meat Per Portion (List each variety separately):

Percent of Fat in Raw Meat (List fat in each variety separately):

Weight/Measure (as appropriate) of Meat Alternates (specify):

* Source (e.g., soy, peanut), Type (e.g., flour, isolate, concentrate), and percent of protein in VPP as purchased:

* Weight of Dry VPP in One Portion of Product:

* Weight of Water (Liquid) to Fully Hydrate Dry VPP in One Portion of Product:

Total Weight Per Portion of Product As Purchased:

I certify that the above information is true and correct, and that a ounce serving of the above product (ready for serving) contains ounces of cooked lean meat/meat alternate when prepared according to directions.

I further certify that any VPP used in this product is authorized as an alternate food in the Child Nutrition Programs and its use conforms to Food and Nutrition Service regulations (7 CFR Part S 210, 225 OR 226, Appendix A).

SIGNATURE

TITLE

PRINTED NAME

DATE

*This information is needed if a creditable vegetable protein product (VPP) is used in the product and counted toward meeting the meat/meat alternate requirement.

Example of Advertising Literature

XYZ Food Products, 1200 Nowhere St., Anywhere, USA 00000

New School Lunch Products

- *Fully Cooked Charbroiled Beef Pattie* (Product Code 0000)

Ingredients: Beef, Water, Fortified Textured Soy Protein Concentrate, Seasoning
Cooked Portion Size: 2.68 oz. Case Pack: 40 pcs - 6.7 lb case

- *Fully Cooked Charbroiled Pork Pattie* (Product Code 0000)

Ingredients: Pork, Water, Fortified Textured Soy Protein Concentrate, Seasonings
Cooked Portion Size: 2.65 oz. Case Pack: 45 pcs - 7.45 lb case

Preparation Instructions: (From frozen state), Conventional Oven: Preheat oven to 375° F. Cook for 50 minutes. Convection Oven: Preheat oven to 350° F. Cook for 35 minutes.

Benefits

- Meet all FNS requirements. Provide 2 oz. of equivalent cooked lean meat for school lunch.
 - Convenient Packaging.
 - Easy Handling and Preparation.
 - Reduced Sodium.
-

This advertising literature contains questionable information.

This advertising literature not only contains questionable information but also lacks necessary information to determine the product's contribution toward meal pattern requirements.

Questionable Information

The ingredient statement lists beef, not ground beef. This means that the patties could contain partially defatted chopped beef and/or meat by-products. The fat level is not restricted to a 30% maximum level as with ground beef.

1. *This fact sheet claims that the products described provide 2 ounces equivalent cooked lean meat for school lunch programs. The reader has no way of making this determination.*
2. *This fact sheet contains no certification statement.*
3. *A high-ranking company official did not sign this fact sheet.*

Information Needed in Order to Determine the Product's Meal Pattern Contribution

1. *Weight of raw portion.*
2. *Percent fat of the raw meat.*
3. *Weight of raw meat.*
4. *Amount of dry VPP in the product if the product contains VPP.*
5. *Proper hydration instructions and certification that the VPP used is authorized as an alternate food in the child nutrition programs and meets USDA-FNS requirements.*

SMI Review

- A copy of the latest SMI Review, Corrective Action Plan, and documentation that the Corrective Action Plan was implemented should be available for the CRE reviewer.
- If you do not have one on file please contact your ESC for a copy of your SMI.
- All SFAs are encouraged to contact their ESC prior to the SMI review and request technical assistance.

Refer to Section 24 of the ARM for detailed information.

Civil Rights Compliance

- The current nondiscrimination poster should be displayed in a prominent place in the serving area and where applications are processed.
- The nondiscrimination statement and procedure for filing civil rights complaints should be printed on all program materials and on websites.
- All CN employees must be trained on Civil Rights each school year. Documentation of attendance should be maintained by the SFA for all employees. Sign in sheets and/or certificates of attendance are acceptable forms of documentation to be provided for the CRE review.
- It is recommended the SFA develop and put in writing established procedures to receive complaints alleging discrimination concerning the CN programs. The SFA process should include accepting a completed Discrimination Complaint form and forwarding the form to the CN Director who forwards the complaint to TDA. TDA will then forward the complaint to USDA.
- A discrimination complaint form can be found in Section 19 of the ARM. All complaints, written or verbal shall be accepted by the SFA and forwarded to TDA Food and Nutrition Division.
- Separation of students based on gender is not allowable by USDA Civil Rights regulations. CN should work with campus principals and administrators to ensure compliance.

Refer to Section 19 of the ARM for detailed information.

(Example of a Complaint Form)
Discrimination Complaint Form

Complainant Name: _____

Complainant Address: _____

Complainant telephone number: _____

List other ways to contact the Complainant: _____

Name and address of person(s) or organizations you are filing a complaint against:

Tell what incidents happened that made you feel you had been discriminated against and the dates they occurred.

State on what basis you feel discrimination exists (race, color, national origin, sex, age, or disability). List names, titles, and addresses of persons who may have knowledge of the actions given in number 6 above.

Name:

Title:

Address:

Date:

All complaints, written or verbal, shall be accepted by the SFA and forwarded to the Food and Nutrition Division, Texas Department of Agriculture.

(SFA Name)

(Example of an SFA policy on discrimination complaints, this is only an example)

Policy for Handling Discrimination Complaints

Policy: All cafeterias will display the updated nondiscrimination poster in a prominent location for public viewing in the serving area.

Procedures: The cafeteria manager or unit supervisor will:

1. Listen to parent complaints or concerns, try to answer questions, and provide them with a discrimination complaint form to be completed.
2. The completed form will be forwarded to the SFA Child Nutrition Director.

Procedures: The Child Nutrition Director will:

1. Forward the discrimination complaint form to the Food and Nutrition Division of the Texas Department of Agriculture at:

Food and Nutrition Division
P.O. Box 12847
Austin, TX 78711

2. Texas Department of Agriculture will forward information to USDA.

Student-Parent Involvement

- Regulations require that each school campus document activities that promote student parent involvement in the National School Lunch Program. The Involvement activities are left to the discretion of the individual school campus.
- Section 19 of the ARM lists some suggested activities and a form for documenting student-parent involvement.
- Completed documentation for each site in the SFA should be available during the CRE.

Refer to Section 19 of the ARM for detailed information.

Student-Parent Involvement Activity Form
(Example of a school student-parent involvement form)

Return completed form to the SFA Child Nutrition office.

School:

Date:

Date of Activity:

Description of Activity:

Number of Students/Parents Involved in Activity:

Circle Group Type: Students Parents

Comments:

Date Received in SFA CN Office:

Completed by:

Hazardous Analysis Critical Control Point (HACCP) Food Safety Program and Local Wellness Policy (LWP)

- SFAs are required to implement a food safety program for the preparation and service of school meals served to students in the school year beginning July 1, 2005.
- The program must be based on HACCP principles and conform to guidance issued by the USDA.
- Compliance monitors will review the HACCP Plan on site, observe practices, and review monitoring forms. Monitoring logs need to be kept on file for at least one year.
- HACCP training must be performed at each site, every year. Documentation of training must be kept on file in the SFA.
- To help combat childhood obesity, Congress passed a law requiring each SFA participating in USDA's school meals programs to establish a Local Wellness Policy by the beginning of school year 2006-07. The law requires SFAs to develop a policy that addresses the growing problem of childhood obesity.
- SFAs were required to set goals for nutrition education, physical activity and other school-based activities that are designed to promote student wellness in a manner that the SFA determines is appropriate.
- All SFAs must implement their Board Approved Local Wellness Policy. Compliance monitors will review documentation of activities identified by the SFA to implement their policy.
- CN contracts for vendors or caterers should include a requirement for vendors or caterers to provide their HACCP Plan when submitting a proposal for catered meals.

**Refer to Section 18 of the ARM for detailed information on
HACCP and Section 19 for detailed information on Wellness.**

Texas Public School Nutrition Policy

- The Texas Public School Nutrition Policy (TPSNP) became effective August 1, 2004. To ensure compliance with the policy all CN staff and school administrators should be notified of policy updates.
- A calendar, memo, or list of dates for campus wide events to be exempt from the TPSNP should be maintained and available for the CRE compliance monitor. The exemptions apply to the entire campus, not each different grade level. Each campus may designate up to 3 days per school year.
- It is suggested that a list of a la carte items and appropriate supporting nutrient facts and/or analysis be maintained and available for review.
- A conversion chart for fried potato products should be available to document cooked ounce weight compared to cooked cup weight for these products. Fried potato products cannot be served in quantities greater than 3 ounces per serving. Additionally, students may only take or purchase one serving of fried potato products at a time.
- A copy of any contracts for snack vending operated by CN should be available for review.
- A request for information on trans fats must be included in the bid packet. SFAs must show documentation that they have reduced the purchase of products with trans fats from the previous school year.
- High Schools may not serve or provide access for students to FMNV and all other forms of candy at anytime anywhere on school premises until the end of the last scheduled class. This includes candy bars and packaged candies.
- The TDA will aggressively enforce and diligently monitor this policy to ensure continued compliance.
- TDA may disallow all meal reimbursement for up to **four weeks** if the SFA is found in violation of the policy.
- Refer to www.squaremeals.org to review the policy in its entirety.

Refer to Section 20 of the ARM for detailed information.