DATE: June 10, 2015

TO: Local Education Agency (LEA)

FROM: Patti Harding, Administrative Consultant
Bureau of Nutrition and Health Services
515-281-4754 or patti.harding@iowa.gov

SUBJECT: 2015-2016 School Meal Programs Information

This memorandum provides the Local Education Agency (LEA)/School Food Authority (SFA) with important information in several areas for the 2015-2016 school year. Periodically check the Bureau of Nutrition and Health Services web site below for updates at https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/monthly-memos-updates-schools.

Documents identified in this memorandum can be accessed via the Bureau's National School Lunch web site under "Resources for Administrators" at https://www.educateiowa.gov/pk-12/nutrition-programs/national-school-lunch-program or in the Download Forms section of the IowaCNP.

Other sources for program regulations, policy, legislation and guidance material are on the USDA web sites at http://www.fns.usda.gov/cnd/governance/policy.htm and http://www.fns.usda.gov/school-meals/policy.

LEAs will complete the application packet on IowaCNP and it will be available in the next 2-3 weeks. IowaCNP can be found at https://cnp.ed.iowa.gov/cnp/**.** For new personnel that require access to IowaCNP the Authorized Representative will need to complete and sign the IowaCNP access request form and email it to IDOE.Nutrition@iowa.gov. The form with instructions is available on IowaCNP in Download Forms – NSLP 001. Selected information from the FY15 organization and site applications have auto-filled some sections of the FY16 applications. Please review all questions of the application packet and update as necessary. The Bureau utilizes the email addresses for the Authorized Representative and Food Service Director listed in the IowaCNP system for all correspondence. Please confirm they are current and accurate.

Meal Price Amounts

USDA determines the reduced price meal amount. The LEA is not allowed to charge

more than the amount established by USDA but may charge less. The maximum amounts that may be charged for **reduced price meals** in 2015-2016 are: Lunch 40 cents/Breakfast 30 cents/Snack 15 cents.

1. **IOWA ELIGIBILITY APPLICATION DOCUMENTS**
   The Child Nutrition Programs monitored by the Bureau of Nutrition and Health Services will use one application for all of the nutrition programs it administers. We encourage parents to complete one application and provide copies of the same application to other Child Nutrition Programs in which their children participate. The Iowa Eligibility Application, parent letter (School Meal Program/Residential Child Care Institutions/Special Milk Program), instructions to parents on how to complete the application are posted under "Resources for Administrators" at https://www.educateiowa.gov/pk-12/nutrition-programs/national-school-lunch-program or in the Download Forms section of the IowaCNP. Also, in the Download Forms are instructions for school officials on how to approve the application. If you revise the form or offer it on-line, you must submit it to the Bureau for approval.

•**INCOME ELIGIBILITY GUIDELINES (IEGs)**
The Income Eligibility Guidelines updated for 2015-2016 are posted under "Resources for Administrators" at https://www.educateiowa.gov/pk-12/nutrition-programs/national-school-lunch-program or in the Download Forms section of the IowaCNP.

•**WAIVER STATEMENT**
For the convenience of LEAs, a space has been left on the reverse side of the Iowa Eligibility Application for the LEA's fee waiver statement and the required signatures. A simple waiver statement that may be used is in the box below and is posted under "Resources for Administrators" at https://www.educateiowa.gov/pk-12/nutrition-programs/national-school-lunch-program or in the Download Forms section of the IowaCNP.

Waiver Statement

If your child(ren) qualifies for free or reduced price meals, you may also be eligible for other benefits. One of these benefits is (**must be specific**)(eg**.** book fees, band fees, drivers education). If you sign this waiver, your child(ren) will be considered for a full or partial waiver of (**list your specific fees**). I understand that I will be releasing information that will show that I applied for free and reduced price school meals for my child(ren). I give up my rights to confidentiality for waiver of school fees ONLY.

I certify that I am the parent/guardian of the child(ren) for whom application is being made.
Signature of Parent/guardian _____Date _____

YOU DO NOT HAVE TO COMPLETE THIS WAIVER TO GET FREE OR REDUCED PRICE SCHOOL MEALS.

LEAs may use the space on the reverse side of the application to insert their own

waiver statements. LEAs are responsible to meet all requirements for waivers whether the simple waiver statement provided is used or a waiver statement that has been developed by the LEA is used. LEAs that choose to utilize this space for their waivers, and that is the only change, are NOT required to submit the application for approval from the State agency prior to use. LEAs are NOT required to use this method to gather signatures of parents who wish to request their meal eligibility be shared for the purpose of the waiver of book and other fees. LEAs that choose not to use this space for their fee waivers must leave the space blank.

•**APPLICATIONS IN OTHER LANGUAGES:** The Iowa Eligibility Application (and related documents) were translated into Spanish and will be posted on the web page in mid-June. They will also be available in the Download Forms section of the IowaCNP. The application materials and other communications with households concerning eligibility determination must be, to the maximum extent practicable, in a language that parents and guardians can understand. LEAs are encouraged to provide households with assistance in completing applications through the use of personnel proficient in foreign languages. The USDA web site at http://www.fns.usda.gov/cnd/Application/translatedapps.html has a prototype application and materials translated into a number of languages.
Although the USDA translated applications are in a different format from the Iowa Eligibility Application they should be used when needed to ensure potential participants can readily apply for benefits. If you use a language version from the USDA site, be sure to download the USDA's English version as a reference for the non-English application.

•**USDA Eligibility Guidance for School Meals Manual**
USDA plans to have the updated Eligibility Guidance for School Meals Manual for FY16 available in late June. It will be located at http://www.fns.usda.gov/school-meals/guidance-and-resources. **This guidance is an excellent resource and should be utilized fully when processing the Iowa Eligibility Applications at the beginning of school as well as throughout the year.** This guidance manual covers commonly asked questions on determining eligibility and the verification process.

2. **DISCLOSURE REQUIREMENTS FOR CHILD NUTRITION PROGRAMS**
Section 9(b)(6) of the Richard B. Russell National School Lunch Act (NSLA) (42 U.S.C. 1758(b)(6)) delineates the restrictions on the disclosure and use of information obtained from an application for free and reduced price meals, as well as the criminal penalties for improper release of information. Note that while the law discusses applications, the disclosure requirements also apply to information obtained through the direct certification process. We recommend that LEAs and, as applicable, CACFP institutions, sponsoring organizations and family day care home providers and SFSP sponsoring organizations, cite the law when responding to requests for release of information. The Eligibility Manual for School Meals, August, 2014, edition provides specific guidance on applying the statutory and regulatory requirements. A convenient source of information is the manual's "Disclosure Chart"

(page 71) which briefly outlines various types of requestors and any restrictions on receipt of information. An updated manual for FY16 will be published soon by USDA.

3. **PUBLIC RELEASE**
The public release for 2015-2016 will be sent to newspapers via Medialink. The Public Release is posted in the Download Forms section of the IowaCNP. Contact your local newspaper to confirm that they subscribe to this service. If your local newspaper does not subscribe, the LEA must send them a copy. LEAs must give the public release to local employment offices and major employers contemplating or experiencing large layoffs.

4. **IOWA ELIGIBILITY APPLICATION – 2015-2016 TRAINING**
The State Agency has decided to hold off on changing the income eligibility application until SY2016-17. The slightly revised forms for SY2015-16 will be posted on IowaCNP in the next week or two. A webinar is planned on **July 13 from 1:30-3:30PM and repeated again on July 21 from 1:30-3:30PM.** This training will cover the Iowa Eligibility Application, Direct Certification, E-Lookup, ***hawk-i,*** and an introduction to the Verification Process. This webinar will be recorded so that you can view the materials at a later date if you have a conflict on July 13 and 21. Please register for one of the webinars on the DE web site. For the July 13 webinar register at https://www.educateiowa.gov/event/iowa-eligibility-application-and-approval-training-schools-webinar-1 and for the July 21 webinar at https://www.educateiowa.gov/event/iowa-eligibility-application-and-approval-training-schools-webinar-2 . If you have any problems in registering or have further questions, contact Janelle Loney at Janell.Loney@iowa.gov or 515-281-5356. Participants that register will receive a required link to join the webinar prior to the webinar.

5. **COMPUTERIZED PROCESSING OF THE IOWA ELIGIBILITY APPLICATION**
Remember to update the Income Guidelines in the computerized system used by the LEA. LEAs that utilize a software program to determine a household's eligibility for free or reduced price meals must ensure that it is performing correctly and is meeting all USDA requirements. While USDA supports local efforts to automate the certification process, they do not evaluate or recommend any software used in this process. There are no federal specifications for vendors and USDA does not approve or endorse any of the software programs performing this function. Ultimately the LEA is responsible for assuring that the certification process meets all regulatory requirements and policies for application processing and approval. Further, the Department of Education (DE) does not certify that software available from any vendor processes and determines eligibility for free and reduced price meals correctly. Thus, LEAs that are using the certification component from a **Student Reporting in Iowa (SRI) (replaces Project EASIER)** software vendor must assure the software used is performing correctly and is meeting all requirements.

6. **DIRECT CERTIFICATION (DC) FOR FREE MEALS**
A new pathway to access the Direct Certification (DC) list and ELook Up was

implemented in July, 2014. Access to the DC lists will be available through the Department's Iowa Education Portal. This is the same access point as the USDA Foods ordering system. If you have developed an A&A Account for that purpose you will not need to acquire a new account or log in.

NEW in FY16 – Migrant Student List added as option on Direct Certification
Schools will have access to a list of migrant students in their school. The list will be posted twice a month along with the other lists.

- **ALL LEAs** will have access to information about individual children using the ELookUp system. This system may also be used as a method to directly verify students for benefits. The ELookUp system is accessed in the same manner as the Direct Certification lists.

- Direct certification is a procedure to automatically qualify foster children and children from Food Assistance and Family Investment Program (FIP) households for free meals. For PUBLIC LEAs and NON-PUBLIC LEAs making reports to SRI, school enrollment records from SRI are compared to records from the Department of Human Services (DHS). Downloadable lists of children who are exact matches ("Students in Last SRI submission") and siblings of children who are exact matches ("Potential Students Found in District") will be available to public LEAs and non-public LEAs submitting information to **SRI**. The children identified during this process are eligible to receive free meal benefits. LEAs will have access only to the list of children in their district/school.

- Households of students who are not identified during the electronic direct certification process will receive a Free Lunch Notice letter from DHS similar to letters provided in years past. A sample of this letter is located in the Download Forms section of the IowaCNP. Children who are matched electronically and available to LEAs through the downloadable lists will NOT receive a letter from DHS. **Please note: Students who are identified with a "Free Lunch Notice" letter from DHS are automatically eligible for free meals. Siblings and/or other children attending school and residing in the household may have their name added to the DHS letter. LEAs need not check the accuracy or validity of the letters using ELookUp.**

- Some households that are newly approved for Food Assistance, FIP, or are a foster child may not be included in the file for the month in which they first qualify, depending on the time of month the household is approved for benefits. These households will need to complete the Iowa Eligibility Application as has been the process in past years and report their ten digit Food Assistance case number or FIP case number to receive benefits immediately. THE NUMBER ON THE FIP OR EBT CARD IS NOT THE CASE NUMBER. The format for a correct case number is EITHER A00000-00-0-0 or 000000-00-0-0. The first character can be either a letter or a number.

Special Note: Applications for free meals based on a Food Assistance or FIP number should be approved at face value if the number appears to be valid and is in the correct format. LEAs need not check the accuracy or validity of the numbers using ELookUp.

- LEAs are required to notify households that they have been approved for free meals based on direct certification and to give households the opportunity to decline free meal benefits. A single prototype notification letter that may be used for all households regardless of the method the household has qualified for meal benefits has been developed and is available to LEAs in the Download Forms section of IowaCNP. Students may receive benefits immediately. Instructions to households about declining benefits are included on the letter. Benefits must be terminated immediately if households decline benefits.

- The age range of children in the direct certification process, both electronic direct certification and the letter-based system, includes ages 0-20 years. LEAs operating preschools or child care programs may use this process to identify children in these programs.

- The Direct Certification households must be provided information on ***hawk-i*** and have the opportunity to indicate they do not want their name or eligibility shared with ***hawk-i*** or Medicaid. The ***hawk-i*** waiver is on the back of the electronic direct certification notification letter and the DHS Free Lunch Notice. **Questions on Direct Certification or eligibility applications may be directed to Deb Linderblood at Deb.Linderblood@iowa.gov or your area consultant.**

7. **ICAVES–Iowa Certification And Verification Excel Spreadsheet**
This tool is designed to assist LEAs in the eligibility determination and verification selection of households applying for meal benefits. ICAVES 2015-2016 will be located in the Download Forms section of the IowaCNP in mid-June.

8. **VERIFICATION**
Verification is confirmation of eligibility for free and reduced price meals under the National School Lunch Program and School Breakfast Program. To facilitate the Verification process, LEAs will want to sort applications as they are processed. Depending on the method of sample selection, the applications will be sorted differently. A webinar covering the verification process for schools are scheduled for September 15th and 22th from 1:30-3:00PM. This training will cover the Verification Process; sorting applications, determining sample selection, notification and receiving information from families, deadlines and recording results on IowaCNP. Please register for this webinar on the DE calendar at the links below.

Sept. 15 - Verification Training for Child Nutrition Programs Webinar
https://www.educateiowa.gov/event/verification-training-child-nutrition-programs-webinar-0

Sept. 22 - Verification Training for Child Nutrition Programs Webinar
https://www.educateiowa.gov/event/verification-training-child-nutrition-programs-webinar

Some of you will be invited to this training because the school district/school was identified as having a verification problem with last year's verification process.

FY16: Verification Collection Report

The Verification Collection Report was changed in 2014 to capture additional information which will impact how the LEA tracks students eligible for free and reduced price meals. The LEA will need to report the following:

A. Students **directly certified** through the Food Assistance (FA).
B. Students **directly certified** through other programs: Include those directly certified through Family Investment Program (FIP), those documented as homeless, migrant, runaway, foster, Head Start, Pre-K Even Start, or non-applicant but approved by local officials.
C. Students certified categorically **FREE** eligible through DHS Free Lunch Notice letter method.
D. Approved as categorically **FREE** Eligible: Based on those providing documentation (e.g. a case number for Food Assistance or FIP).
E. Approved as **FREE** eligible: Based on household size and income information.
F. Approved as **REDUCED PRICE** eligible: Based on household size and income information.

The Verification Collection Report webinar is on October 12 for public and on-public schools and for on October 26 for Residential Child Care Institutions (RCCIs). Register for the webinar at the links below.
Oct. 12 - Verification Collection Report – Public and Non-public Schools Webinar
https://www.educateiowa.gov/event/verification-collection-report-public-and-non-public-schools-webinar
Oct 26. - Verification Collection Report for RCCIs Webinar
https://www.educateiowa.gov/event/verification-collection-report-rccis-webinar

9. **HOMELESS CHILD OR RUNAWAY CHILD**

The LEA's homeless liaison may complete an application on behalf of a homeless or runaway student or send a letter to the person responsible for making the eligibility determination stating that the student is homeless or a runaway. The letter or application must be signed by the liaison. An official from a homeless shelter may send a letter to the LEA identifying that the student(s) is/are residing at the shelter. Documentation to substantiate free meal eligibility must include the child's name or a list of names, effective date(s), and the signature of the local homeless liaison or the director of the shelter or transitional housing project. This documentation is acceptable in lieu of a completed application. The homeless child remains eligible

for free meal benefits for the entire school year regardless of where he/she is living. Special Note: Categorical eligibility based on homeless status does not extend to other children in the household.

10. **MIGRANT CHILD**

One of the changes as a result of Public Law 108-265 was a provision making migrant children "categorically eligible" for free meal benefits. The household does not need to complete an Iowa Eligibility Application for their children to receive free meals. Migrant students will be eligible automatically to receive free meals based on their determination as a "migrant" student. For the purpose of this categorically eligible provision, the term "migrant child" means a child who meets the definition in Sec.1309(2) of Title I, Part C of the Elementary and Secondary Education Act, that is, one who has been identified and documented as an eligible migrant child by Susan Selby, the State Migrant Education Program consultant. As a result of this provision, the Certificate of Eligibility (COE) will be sent directly to Susan Selby at the

Department of Education (DE). She will review the information and send a response to the district. Susan can be reached at:

Susan Selby, Consultant, Migrant Education
Susan.Selby@iowa.gov or 515-281-4732

After the LEA receives confirmation of "migrant child" status, the local district official will send written notice to the individual responsible for the free and reduced price meal determination. The notice must include a statement that the State Migrant Coordinator has identified them as a "migrant child". Eligibility determination for migrant children must be made each school year. Eligibility is year long. There is the potential that the confirmation of migrant status will come after school has started. USDA suggests that the LEA determine who best knows the child's situation and have that person indicate that the child is migrant. The identified LEA official will complete an application on the child's behalf or establish a list indicating which children are migrant and send it to the person responsible for making the meal eligibility determination. The school's identified LEA official must base the decision on concrete information that will support such determination. If the child's status is not confirmed by the State Migrant Coordinator, the LEA eligibility is no longer valid. In this situation, the LEA must take steps to advise the household of the change by issuing a notice of adverse action and inform the household that it can reapply for benefits. The household will not be required to make restitution to the LEA. To ensure that migrant children continue to receive meal benefits, LEAs are encouraged to share eligibility information when migrant children move to another district.

Special Note: If the student has been identified as migrant on the direct certification download, written notification from the LEA Migrant Liaison is not required. Categorical eligibility based on migrant status does not extend to other children in the household.

11. ***hawk-i*/MEDICAID SECTION**
Public LEAs **are required** and non-public LEAs are encouraged to release the names of students eligible for free and reduced price to the ***hawk-i*** program annually. The list shall not include names of students whose parents/guardians have requested that the information not be released. The parent/guardian, not any household adult, must sign the ***hawk-i***/Medicaid Information section if they do not want their children's names released.

- LEAs will have from **August 1, 2015, to January 31, 2016,** to submit names;
- Information on how to electronically submit names is posted in the Download Forms section of the IowaCNP.
- All written references to ***hawk-i*** should be in italic font, lower case, and bold

12. **REIMBURSEMENT RATES 2015-2016**
Federal reimbursement rates are not available yet. They will be posted on the Bureau web site and in the Download Forms section of IowaCNP when available. At this time, State reimbursement rates will be the same in 2015-2016 as in the previous year.

13. **MERGING DISTRICTS or NON-PUBLIC SCHOOLS into SYSTEMS**
Districts and non-public schools that have merged or consolidated into a new entity effective July 1 of the current year must complete an application on IowaCNP. Merging and consolidating of districts and non-public schools requires changes in the IowaCNP before the application for the new district or non-public system may be submitted. Contact Ellen Miller at Ellen.miller@iowa.gov.

14. **2015-2016 SFA/SITE APPLICATIONS DUE August 7, 2015.**
The SFA and Site applications for FY16 in the IowaCNP system will be open in early June. Please carefully review the information and submit by August 7, 2015.

15. **PRESCHOOL PROGRAMS**
Children attending an LEA sponsored preschool or a preschool operating in a school building may participate in the School Breakfast Program and National School Lunch Program (NSLP) or the Child and Adult Care Food Program (CACFP). If the LEA is serving preschool children under NSLP they must utilize the meal pattern (https://www.educateiowa.gov/pk-12/nutrition-programs/child-adult-care-food-programs/child-care-center) used for CACFP as required by the Healthy Hunger Free Kids Act (HHFKA). Contact your area consultant if you have questions.

16. **AFTERSCHOOL SNACK PROGRAM**
LEAs interested in starting a new Afterschool Snack Program must contact Patti Harding at patti.harding@iowa.gov prior to completing the Site Application. An Afterschool Snack Agreement Addendum located in the Download Forms section of the IowaCNP must be completed and submitted to the State Agency before serving snacks to receive reimbursement. LEAs must review the Afterschool Snack Handbook

which describes in detail the meal pattern and provides sample menus and a daily food production record. It is essential that students are served a reimbursable snack. Menus and daily food production records are required and must be on file to document that program regulations were met. **USDA requires that the LEA complete a review of the program twice a year with the first review taking place within the first four weeks of operation**. The Afterschool Snack Program handbook, Self Monitoring Form for On-site Reviews, participation record and food production record are located in the Download Forms section of the IowaCNP. Questions concerning program operation may be directed to your area consultant.

17. **SPECIAL MILK PROGRAM**
LEAs that operate a half-day kindergarten program or preschool program where the children do not have access to the School Breakfast Program or National School Lunch Program may participate in the Special Milk Program. The parent letter and income guidelines, eligibility application and instructions are available in the Download Forms of IowaCNP.

18. **USDA's Smart Snack**
USDA's Smart Snack resources: http://www.fns.usda.gov/school-meals/smart-snacks-school. Make sure to check out the issue briefs. They provide great summaries of the standards. Iowa's Healthy Kids Act nutrition standards have been revised and as of June 4, 2014 align with the Smart Snack nutrition standards.

19. **CIVIL RIGHTS COMPLAINTS**
The LEA is responsible for forwarding to the State Agency the following information, as it relates to any verbal or written complaints regarding Civil Rights violations received by the school:
    a. Name, address, telephone number, or other means of contacting the complainant;
    b. Specific location and name of the entity delivering program service or benefit;
    c. Nature of incident which led complainant to feel discrimination was present;
    d. Basis on which complainant feels discrimination exists;
    e. Name/ titles of persons who may have knowledge of discriminating action;
    f. Dates during which the alleged discrimination occurred or duration of such action.

Reminder: Annual training in civil rights is required for all front-line staff and supervisors of front-line staff. LEAs must maintain on file the agenda and attendance list for the annual training. There is a PowerPoint presentation and manual on the Bureau web site (below) to assist LEAs in meeting their responsibilities for civil rights training and compliance.
https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/civil-rights-training. Please review the USDA guidance on Civil Rights Laws, Regulations, Executive Orders located at
http://www.fns.usda.gov/cr/crregulation.htm.

20. **ON-SITE REVIEW MONITORING CHECKLIST**
USDA On-site Review Monitoring Form 7 CFR Part 210.8(a)(1) requires LEAs to establish internal controls which ensure the accuracy of lunch counts prior to the submission of the monthly Claim for Reimbursement. The internal controls must include an on-site review of the lunch counting and claiming system employed by each school (as defined in 7 CFR Part 210.2) approved to participate in the National School Lunch Program within the jurisdiction of the LEA. LEAs with only one school are not required to conduct such on-site reviews for their approved school but it is highly encouraged. USDA provided a checklist for the LEAs to use as a resource when conducting on-site reviews. The checklist assesses meal counting and claiming procedures, system accuracy, and point of service. Complete the On-site Review Monitoring Checklist and keep on file with your Child Nutrition Program paperwork. If you have a contract with a FSMC, this responsibility cannot be delegated to them. The On-Site Review Monitoring is located in the Download Forms section of the IowaCNP. The On-Site Review Monitoring must be completed by February 1.

21. **ETHNIC/RACIAL DISTRIBUTION FORM**
LEAs are required to keep a summary of ethnic/racial background of all applicants who have applied to receive free and reduced price meal benefits. This record is to be continually updated throughout the year and maintained on file with the completed free and reduced price meals applications. The Ethnic/Racial Form is located in the Download Forms section of the IowaCNP system. Instructions are included on the form.

22. **ASSURANCE STATEMENT FORM**
The Assurance Statements for sharing information for Carl D. Perkins Vocational and Technical Act of 1998, the Title I or National Assessment of Educational Progress and No Child Left Behind are combined on one form. **If the free and reduced price meal eligibility information is shared with any of these programs, the Assurance Statement Form must be completed and on file. Completion of this form allows for the release of the information to the designated individuals.** Schools/districts are not required to mail this form into the Bureau of Nutrition and Health Services. The Assurance Statement is located in the Download Forms section of IowaCNP.

23. **MEAL REIMBURSEMENT CLAIM**
LEAs must submit an original claim within 60 days of the claim month and a revised claim within 90 days of the claim month via the IowaCNP web system. Claims must be submitted by 3:00PM on the 15th of each month to be processed during that cycle. If the 15th is on a weekend or holiday the claim must be submitted by 3:00PM the next business day. Please contact Jill Corsbie at Jill.Corsbie@iowa.gov or (515-281-4755) for assistance with submitting an original or revised claim.

24. **INTERNAL CONTROLS - EDIT RECORD**

The LEA shall establish internal controls which ensure the accuracy of breakfast/lunch counts prior to the submission of the monthly claim. At a minimum, these internal controls shall include:

- comparisons of daily free, reduced price and paid meal counts for breakfast and lunch against the number of students eligible for free, reduced price and paid meals to ensure meals are not claimed in excess;
- a system to following up on those meal counts that suggest the likelihood of counting problems.

The Edit Record for Meal Counts in the Download Forms section or a similar form must be used to ensure accuracy of meal counts. **LEAs that utilize a computerized point-of-service system must ensure internal controls are in place and monitored by the LEA to meet this requirement.**

25. **CATALOG OF FEDERAL DOMESTIC ASSISTANCE (CFDA) NUMBERS**

The Bureau is required to provide our subrecipients with CFDA numbers for the U.S. Department of Agriculture programs we monitor. The following is a list of the CFDA numbers and their respective programs.

CFDA #	Source Code	Program
10.555	4553	National School Lunch Program
10.555	4553	After School Snack Program
10.553	4552	School Breakfast Program
10.556	4555	Special Milk Program
10.564	4559	Nutrition Education Program
10.558	4554	Child and Adult Care Food Program
10.559	4556	Summer Food Service Program
10.550	4591	Food Distribution Program (USDA Foods)
10.582	4557	Fresh Fruit and Vegetable Program
10.574	4558	Team Nutrition Grants

This information will be useful to auditors when you have an audit. All program participants that expend over $750,000 in federal financial assistance from all sources are required to have an A-133 audit annually.

26. **PROCUREMENT**

USDA Federal Regulations require that all procurement (purchasing of food or non-food products or services) be done in a manner that ensures **open and free competition**. Whether the procurement is done formally or informally, securing and documenting the results of the competitive process are requirements. If for some reason it is not possible to secure competitive pricing, those attempts must be documented as part of a sole source competitive process. All expenditures using the non-profit school food service funds are subject to these requirements. Further, *public organizations must follow the most restrictive of local, state, or federal law/rules*. The current USDA regulations require that to purchase items costing more than $150,000 in

the aggregate (or total) a formal purchasing method must be used. Most public school districts have a local procurement policy with a much lower threshold and that policy would then apply and govern the procurement method to be used, formal versus informal.

State rules relative to the School Breakfast and Lunch Program read as follow: 281-58.8(283A) Procurement. A school board, the authorities in charge of a nonpublic school and each other eligible provider participating in the program shall adopt a policy on the procurement of goods and services used in the administration of the program. If an issue is not covered in the policy, the school district, the authorities in charge of the nonpublic school and each other eligible provider shall follow the appropriate federal regulation. *USDA regulations allow private non-profit organizations* to follow federal rules, even when the federal rules are less restrictive than the organization's own rules. **Special note:** Compliance with USDA federal, state and local requirements for procurement must be followed for a purchase to be an allowable expenditure from the non-profit school food service fund. It is the LEA's responsibility to be sure all procurement using the nonprofit school food service account is in compliance. Contact your area consultant if you desired additional information or assistance in USDA procurement regulations and procedures. Your comments are welcome and can be directed to Patti Harding at 515-281-4754 or e-mail at **patti.harding@iowa.gov.**

27. **Resources**

The National Food Service Management Institute (NFSMI) was authorized by Congress permanently in 1994. The mission of NFSMI is to provide information and services that promote the continuous improvement of child nutrition programs. NFSMI offers print materials, available for free downloading, webinars, online courses, as well as workshops and other types of technical assistance. NFSMI web page is located at http://www.nfsmi.org/. The National Food Service Management Institute (NFSMI) will soon change to Institute of Child Nutrition.