

## CRITERIA AND PROCEDURE

**BROAD SUBJECT: GENERAL ADMINISTRATION**

**NO: GA-02-02**

**TITLE: Web-based Meal Applications**

**EFFECTIVE DATE:  
June 13, 2009**

### PURPOSE OF THIS CRITERIA/PROCEDURE –

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

### KEY TERMS AND DEFINITIONS –

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

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

**State agency:** Georgia Department of Education

## **CRITERIA AND/OR PROCEDURES –**

1. Local Education Agencies (LEAs) must have the capability to provide legally binding electronic signatures per State and local regulation.
2. LEAs must review local laws and seek local counsel on the use of electronic signatures. Seek input from LEA's technology staff.
3. LEAs must review guidance documents provided by Federal agencies, as outlined in Appendix E of the *Eligibility Manual For School Meals*.
4. LEAs are not required to accept online meal applications from households.
5. LEAs must obtain written approval from the state agency and their local superintendent or board of education in order to use web-based meal applications. The attached checklist must be completed and submitted annually to the state agency along with the request to use web-based meal applications.
6. LEAs cannot convert totally to an electronic system and force applicants to submit a web-based meal application. LEAs must be able to provide paper household applications, even if they have an electronic application process.
7. If LEAs have the capability to provide legally binding electronic signatures, there is no requirement to collect hard copies of the application with the actual signature.
8. Records must be complete, uniform, easily understood, and easily accessible. Develop a security process for approved staff members who will be processing information. Include any contractual arrangement for outsourcing of management or storage functions, if that is applicable in the LEA.
9. Develop plans for retaining data in accordance with the record keeping requirements for a minimum of five years plus the current year.
10. Develop plans for disposing of the information, while ensuring that it is confidential but available to those who need it. Address how changes in staffing and or outdated software will be accommodated.
11. Design secure electronic systems to guard against data corruption, equipment failures, hardware and software problems and storage media deterioration.
12. Develop annual training for the LEA's staff processor; maintain records for audit/review.
13. Ensure that passwords and encryption codes are preserved to maintain access to archived information.
14. Address the above issues in written internal procedures for the LEA.
15. Approval will be granted to LEAs on a case-by-case basis, after onsite visits are completed.

## **AUTHORITY – FEDERAL**

Food and Nutrition Service, USDA, *Eligibility Manual For School Meals*, 2008  
USDA Policy Memorandum SP 10-2007 *Update on Electronic Transactions in Child Nutrition Programs*

## Web-based School Nutrition Applications Checklist

School System Name \_\_\_\_\_ Date \_\_\_\_\_

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

	<b>Yes</b>	<b>No</b>
<ul style="list-style-type: none"> <li>❖ Do you have written internal procedures for processing web-based applications for school meals? (Please attach a copy of the procedures.) Procedures should address:               <ul style="list-style-type: none"> <li>• Conversions steps to make this process available</li> <li>• Contingency plan to address unauthorized access and security risks</li> <li>• Confidentiality, including who has access to the information and why</li> <li>• Description of how identity of all people, both inside and outside of the local agency, will be authenticated. Include how passwords, PINs and encryption codes will be preserved to maintain access to archived information.</li> </ul> </li> <li>❖ Implementation and training. Include records that will be retained to reveal how the transaction was processed.</li> <li>❖ Legal risks</li> <li>❖ Back-up procedures</li> <li>❖ Periodic review, evaluation and update</li> <li>❖ Record retention and storage, including a description of how information will be made accessible to reviewers and auditors</li> </ul>		
<ul style="list-style-type: none"> <li>❖ Has the process been reviewed and approved by your local technology staff and the Board's attorney? (Attach documentation.)</li> </ul>		
<ul style="list-style-type: none"> <li>❖ Do you have the capability to provide for legally binding electronic signatures? (If this is not included in your procedures, please attach an explanation.)</li> </ul>		
<ul style="list-style-type: none"> <li>❖ Are households able to submit a paper application?</li> </ul>		
<ul style="list-style-type: none"> <li>❖ Has the process been reviewed to ensure that it accommodates any new School Nutrition Program requirements?</li> </ul>		

❖ Do your electronic records contain, at a minimum: <ul style="list-style-type: none"> <li>• Date and time of transaction</li> <li>• Identity and location of each person who transmitted information</li> <li>• Confirmation from the system that the transaction was received</li> <li>• Complete contents of the transaction</li> <li>• Complete instructions and terms of the agreement and confirmation that these were made available to the person submitting the information</li> <li>• Certification that the person submitting the information is legally bound by the terms of the transaction and that they agree to be held accountable for the information provided</li> <li>• Certification that the information is true and accurate</li> <li>• Mechanism to prove that the transaction was not altered</li> </ul>		
❖ Is your system reliable so that the document is always preserved in a useable format?		
❖ Will you be able to recover the data once the software is outdated?		

References:

*Eligibility Manual for School Meals*, USDA, January 2008.

Submitted by: \_\_\_\_\_  
(School Nutrition Director)

Received and reviewed by: \_\_\_\_\_

Date: \_\_\_\_\_