



# Online Applications Guide

A Practical Guide for  
Selecting an Online Application  
for Free or Reduced-Price  
School Meals

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# Introduction

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## 1 Why a Guide on Selecting a School Meals Online Application?

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A well-designed online application can help school districts increase participation in school meal programs by simplifying the application process for district staff and families alike. It can also streamline program operations and strengthen program integrity.

This guide is designed for school district staff and others knowledgeable about the school meal programs. Whether a district is shopping for an online application for the first time, considering upgrading its current application, or looking for a new product to replace what it's already using, this guide is intended to provide school districts with key information about their options. It includes practical tips, checklists, and questions to inform the decision-making process. With these tools, school districts will be better positioned to find a solution that meets the needs of their staff and families.

### What is a school meals online application?

This guide focuses on choices for school districts to consider when providing a means for families to apply electronically for free or reduced-price school meals. The “school meals online application,” or just an “online application,” will generally be available to families over the Internet through any standard web browser. School districts may also choose to make the online application accessible on a mobile device or through an app. As used in this guide, the term “online application” does not refer to a paper application that school districts post on the Internet for families to download, print, and submit by mail or fax. Instead, it refers to a set of questions that families can complete entirely online with the resulting information compiled and submitted electronically for processing as a formal application for free or reduced-price school meals. The Food and Nutrition Service (FNS) sometimes uses the term “electronic application” to refer to the same concept.

## 2 What This Guide Will Help School Districts Do

- Understand the benefits of a well-designed online application;
- Identify important choices to consider before selecting or designing an online application tool;
- Ask vendors key questions about their product offerings;
- Consider the features to include in online applications; and
- Solicit strong proposals.

## 3 Benefits of an Online Application for Free or Reduced-Price School Meals

**The school meal programs support children’s healthy development and help to ensure that low-income students have access to adequate nutrition.**

The process of applying for free or reduced-price school meals and the application itself are the gateway to these benefits. Typically school districts send home a one-page paper application, which families complete without assistance. The school or district then manually processes the paper applications, determines each student’s eligibility, and communicates the decision to families.

In contrast to many other means-tested programs, there are no eligibility workers dedicated to helping parents navigate the application form or process. Thus, it is particularly important that applications are easy to use, provide clear directions, and avoid steps that might deter eligible families from applying.

The United States Department of Agriculture’s Food and Nutrition Service (FNS), which oversees the school meal programs, has developed a prototype paper application. States or school districts may use the prototype, adapt it, or develop their own application that meets program rules. In many school districts across the country, families continue to use a paper application. But online applications are becoming more widely available and FNS recognizes the importance of online applications in making it easier for families to apply.<sup>1</sup> Eligibility for free or reduced-price school meals is relatively

### Benefits of an Online Application for Families

**Less confusion** – Can automatically skip unnecessary questions, reduce need for family to read information not relevant to them, and make the application more simple and straightforward. Can offer help text as needed, including a glossary of terms, pop-up or hover text, and hyperlinks to additional information or translated materials.

**More privacy** – Can prevent personal information from being left in public view or passed through multiple hands at the school and district level.

**More accurate results** – Can prevent data entry errors (such as entering words when numbers are requested), reduce inaccuracies caused by handwriting, and make data-matching easier.

straightforward, making a user-friendly online application an achievable goal for states and school districts.<sup>2</sup>

FNS is in the process of developing a prototype online application. To inform that process, the agency hosted a challenge,<sup>3</sup> asking participants to transform the paper application into a simple online application that school districts can make available to families. Based on lessons learned from the challenge, the prototype will provide school districts and vendors with a model online application.

Working from examples like the prototype or an existing application, school districts can decide what they want in a school meals online application. Whether they are considering using an online application for the first time or making improvements to their current offering, carefully choosing the application's features can help ensure all families whose children are eligible for free or reduced-price school meals can access them easily, while simultaneously reducing the administrative and resource burden on school districts and schools. While procuring or developing an online application requires an initial investment, over time online applications may reduce staff time and other costs associated with processing paper applications.

### Benefits of an Online Application for School Districts

**Less time and lower costs** – Can reduce time spent entering data, scanning paper applications, and calculating income and reduce costs associated with copying and mailing applications.

**More accurate and faster results** – Can lessen the need to read or interpret handwriting, prevent data entry errors by staff, reduce the potential for incomplete applications requiring follow-up, and may be able to pre-populate data for renewals each year.

**More integration and automation with other systems** – Can integrate with school level student data, point-of-service system, meal purchasing, and other program tools.

## Online Applications in Context

An online application is just one of many tools that school districts may use in the administration of school meal programs. School districts may already have information technology in place to manage direct certification, paper applications, point-of-service transactions, menu planning, meal purchasing, and/or student information systems. School districts may want to integrate an online application with these systems and/or find a single technology solution that supports more than one of these needs. For example, a school district may want to have a highly automated way of:

- Collecting student information system data;
- Matching student information system data against data from other programs for direct certification purposes;
- Merging paper and online applications into a single system for staff processing;
- Matching applications against direct certification data to avoid duplication;
- Coordinating direct certification records with the point-of-service system to ensure that students have timely and accurate access to free and reduced-price meals; and
- Using data from the point-of-service system about food purchases to inform menu planning and meal ordering.

Costs will be a factor that each school district will want to consider when deciding whether to adopt an online application and whether a stand-alone product or a more comprehensive system makes more sense. This guide is intended to help school districts weigh the tradeoffs involved in the choices they make and consider their online application options in the context of their other school meal program systems and needs.



# Important Choices for School Districts to Consider

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School districts have different online application needs and priorities, depending in part on what other information technology they already have in place and the funding available to them. This section identifies key considerations that may help school districts determine what will work best for their staff, their schools, and their families.

This section will help school districts identify some important considerations about...

- 1 Capabilities That Are Important to the District
- 2 Functionalities for Efficiency and Accuracy
- 3 Tailoring the Tool
- 4 Managing and Adapting the Tool Over Time



## 1 Capabilities That Are Important to the District

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**Does the district have tools or programs already in place (such as an online school student information system) that might be linked to the online application for school meals?**

### Considerations:

Does the school district have tools for other nutrition services (**point-of-service** or meal ordering) or student information systems that might link to application data?

#### If yes

Ask the current vendor if they offer an existing online application module that helps families apply for free or reduced-price school meals.

- Find out if the module is an add-on to the system the district already has.
- Inquire about their plans to update or modify their online application module based on the upcoming FNS prototype.
- Determine if there is a **commercial off-the-shelf (COTS)** solution from a different vendor that can integrate with the district's existing school meal systems.
- Compare tools from other vendors to what the current vendor is offering.

#### If no

- Research vendors and learn about their online application tools.
- If a highly customized solution is needed, the district may want to consider creating its own online application and/or set of tools.

Some school districts use one of the special provisions, like the Community Eligibility Provision (CEP), for some but not all schools. Districts that use more than one claiming method will want to ensure that their online application tool works in combination with systems used for schools that do not collect applications.

 GLOSSARY

**Point-of-service (POS)** systems keep track of business at the point where the transaction occurs. For the school meal programs, students interact with the point-of-service system when they get their breakfast or lunch. Point-of-service software programs can track a number of items, including payments, food restrictions, and certification for free or reduced-price school meals.

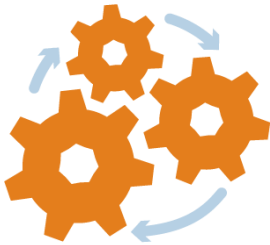
**Commercial off-the-shelf (COTS)** is a standard hardware or software product that is pre-designed for a specific function. COTS products are often more affordable than fully customized products. While generally a complete product, some COTS products may offer certain flexibility for customization.

 DID YOU KNOW?

USDA's **Administrative Review and Training (ART)** Grants can be used to support development or procurement of an online application.

## 2 Functionalities for Efficiency and Accuracy

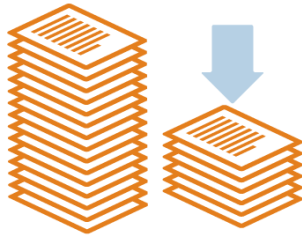
Decide what tool functionality is needed to help reduce staff time and ensure students are enrolled efficiently and accurately.



### Automate administrative tasks such as:

- Calculating household income based on data entered through the online application and comparing it to FNS eligibility rules;
- Generating a customizable approval/denial letter;
- Communicating eligibility status instantly to the POS system;
- Producing customizable lists of applications by building, grade, eligibility, or other factors; and
- Identifying students who elect to have information shared with other programs (such as fee waivers).

**EXAMPLE:** Some online application tools are able to review the information entered and compare it to school meal program eligibility rules to screen for eligibility. The **District of Columbia Public Schools**, which conduct second reviews of all applications, use such a tool. Once an application is submitted online, the tool makes a preliminary eligibility determination, then sends the application to a queue for the school district to review manually. The staff reviews the data entered by the family, confirms the eligibility determination, and communicates the decision to the family. The district no longer needs two staff members to manually make an eligibility determination for each application, relying instead on the software for the preliminary determination.



### Reduce workload at the start of the school year:

- Automatically carry over eligibility from the prior year for up to 30 operating days and automatically update the category once a new eligibility determination is made.
- Pre-populate applications for the new school year, which FNS encourages districts to do for data other than income data.<sup>4</sup>
- Generate letters for children who have been directly certified.
- Automatically export application status (submitted, incomplete, declined benefits, etc.) and eligibility status to the student information system.
- Enable staff to enter notes into the system.
- Give staff case management capabilities to keep track of the status of each application and any necessary follow-up activities.
- Record and track changes to the application.

**EXAMPLE:** Online applications have allowed **West Virginia** school districts to start providing meal benefits within 24 hours of receiving an application. Staff no longer have to make time-consuming calls to families to follow up on incomplete or illegible information. Applications that meet all the eligibility criteria can be automatically approved as soon as the application is submitted. The online application system also automatically identifies students on applications that have already been directly certified for free meals so the school district staff can extend the direct certification to other children in the household. Together these features reduce the number of days it takes to start providing meal benefits — which increases federal reimbursements — and districts no longer need to hire temporary personnel at the start of the school year to process applications.



### Simplify processing of paper applications:

- Help process paper applications once data has been manually entered.
- Read data from scanned paper applications using **optical character recognition technology** and incorporate that data into the same electronic system as data collected online.



### Communicate with families promptly and effectively:

- Tell families when the application is complete.
- Alert families when the application is approved or denied.
- Send follow-up questions when necessary.
- Generate other notices in multiple languages based on the household language of choice, as needed.
- Inform families about summer meal options at the end of the school year.



### Strengthen data reporting and analytic tools:

- Generate reports that fulfill FNS requirements (such as the Verification Collection Report, form FNS-742).
- Allow staff to track denials and reasons for denial.
- Track the history of incomplete or denied applications, including the reasons an application is incomplete or denied.
- Maintain a list of withdrawn or deleted applications.
- Store archived applications per USDA guidelines and allow easy access to the archive.
- Integrate **analytic tools** to help the school district monitor the school meal programs, evaluate performance, and understand how to improve over time.

## GLOSSARY

**Optical character recognition technology** can read the information on a scanned paper application and convert it into text that can be edited online, reducing the need for staff to manually enter data from paper applications into their systems.

**Analytic tools** capture, monitor, and help to make sense of data patterns to help with decision-making. An online application might include analytic tools to help school districts track information such as how many applications are submitted, how many are denied and why, demographics of applicants, how long it takes to complete the application, which questions are prone to data entry errors or being left blank, and patterns in processing time and when follow up is required.

## DID YOU KNOW?

**An online application that automates administrative tasks reduces chances for error.** For school year 2014-2015, about 98.1 percent of students who submitted school meal applications were certified correctly based on the information they provided on the application. At a rate of 1.9 percent, administrative certification error was lower than in the previous ten years, during which the rate ranged from 2.0 to 3.9 percent. Nonetheless, when USDA examined overall certification error (including misreporting by households), administrative errors accounted for about one-third of certification errors. Ensuring accurate determinations based on the information provided on applications would substantially reduce overall certification error.<sup>a</sup>

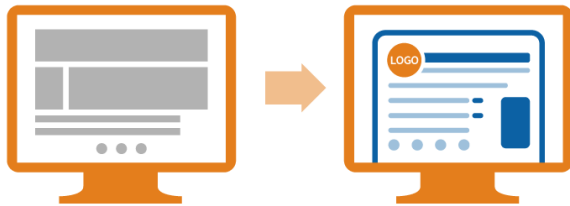
<sup>a</sup> *Regional Office Review of Applications (RORA) for School Meals 2015, Final Report, July 2016, Department of Agriculture, Food and Nutrition Service, <http://www.fns.usda.gov/sites/default/files/ops/RORA2015.pdf> and *Program Error in the National School Lunch Program and School Breakfast Program: Findings from the Second Access, Participation, Eligibility and Certification Study (APEC II)*, May 2015, Department of Agriculture, Food and Nutrition Service, <http://www.fns.usda.gov/sites/default/files/ops/RORA2015.pdf>.*

A 2015 FNS Direct Certification Improvement Study<sup>b</sup> found that **direct certification performance improved significantly when school districts customized approval letters** to alert families that if one child in the household is eligible through receipt of Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families cash assistance (TANF) benefits, all other children in the household enrolled in the same school district automatically qualify for free school meals.

<sup>b</sup> *The National School Lunch Program Direct Certification Improvement Study: Practices and Performance Report*, Department of Agriculture, Food and Nutrition Service, Office of Policy Support, January 2015, <http://www.fns.usda.gov/national-school-lunch-program-direct-certification-study-state-practices-and-performance-report>.

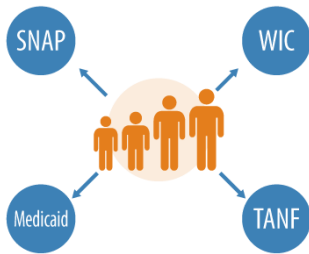
### 3 Tailoring the Tool

Consider whether the online application tool will have a look that is specific to the district.



- Include district logos or graphics embedded in the online application.
- Add other customizable design elements so the online application looks like it is part of an overall school district website or theme, which might help families feel more comfortable providing sensitive information.

Determine whether the district wants to be able to customize the content of the online application.



#### Customize language:

Does the district want to be able to customize or change language? For example, school districts may want to use their state's name for the Supplemental Nutrition Assistance Program (for example, Wisconsin's SNAP program is called "FoodShare Wisconsin"<sup>5</sup>).

#### Connect families to other programs:

Does the district want to be able to add additional content to the online application, such as a school district contact for further questions or follow-up, links to applications or information about other public benefits (such as SNAP, WIC, Medicaid, or TANF), or a request for permission to share data with other programs or services (such as textbook or transportation discounts)?

#### Make changes:

Does the district want to be able to make changes to the tool based on feedback from families and others?

## 4 Managing and Adapting the Tool Over Time

To what degree do school district staff want to be able to make changes to the tool themselves versus relying on the vendor?



OR



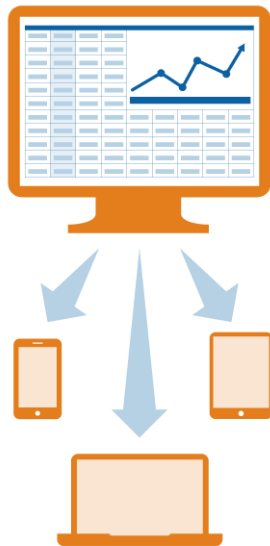
### Considerations:

Who will be responsible for keeping the online application updated over time – the school district or the vendor?

- Updating the income eligibility standards each year
- Monitoring other federal or state changes to program rules that affect the application and making timely and appropriate changes to the tool

What systems or agreements need to be in place to ensure the vendor will be responsible for maintenance, support, and improvement? What are the costs for such services?

What will happen to the data?



### Considerations:

What data does the school district staff need to be able to access, review, edit, import, export, or otherwise control?

- Do district staff want to access the system from more than one station or from different devices (mobile versus desktop)?
- Do district staff want access to the data so they can use it to manually look up student information?
- Will staff have authority to override inaccurate data?
- Who in the district will have access to the information?
- How will the district ensure that information submitted is kept secure?
- Will data be available to appropriate staff in a timely manner?





# Important Questions to Ask Vendors

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School districts have many online application options, ranging from purchasing or customizing an “off-the-shelf” tool to building their own custom solution. This section identifies key questions that school districts can ask potential vendors to help compare their options and weigh tradeoffs.

This section will help school districts talk with prospective vendors about how the application tool...

- 1** Meets the Needs of Families
  - a) Reflects families’ feedback
  - b) Keeps things simple and helps avoid errors
  - c) Works on all the devices families use
- 2** Helps School Districts Meet Relevant Federal and State Requirements

## 1 Meets the Needs of Families: a) Reflects families' feedback

An online application tool can only be successful for families, schools, and school districts if families actually use it, which depends in large part on how well it meets their needs. Vendors have many mechanisms for ensuring that their tools work well for families. The following questions can help school districts learn about how a prospective vendor designed their tools and how the vendor monitors performance from the point of view of the families who use it.

### Was the tool design and development informed by research and testing with families who are likely to apply for free or reduced-price school meals?



**Did the vendor gather families' input?** Did they ask what families would find useful and/or observe them learning about and applying for school meal programs?

**Did the vendor have families try the tool as it was being designed?** How were the findings incorporated into the final tool?

**Has the final tool been tested with families?** Has it been tested in multiple languages? What were the results?

### Is there built-in capacity to monitor performance so improvements can be made over time?



**Does the vendor collect performance data such as:**

- Number of applications started but not completed?
- Common places where the application was abandoned?
- Which questions applicants spent the most time on?
- Average time to complete an application?
- Most and least commonly visited pages or help content?
- Common data entry errors?
- Whether the application is used for other activities, such as connecting applicants to additional public programs?

**What performance data can the vendor share?**

## Is there built-in functionality that allows families to provide feedback?



### Is there a customer survey?

- Is it offered to all site visitors or a sample? If a sample only, how is the sample determined?
- How are results collected and used?

### Is there a comment, complaint, or customer service feature?

- Who monitors the feedback and follows up when necessary?
- What results have been found so far?

### What kinds of specific feedback have families provided and how has the vendor responded?

#### DID YOU KNOW?

There are many ways to **integrate families' perspectives early and often during the tool design and development process** to ensure it functions in a way that meets prospective and current beneficiaries' needs.

The private sector uses this development model, known as “user-centered design” or “human-centered design,” to produce products and tools that work well for consumers. This approach saves time and financial resources. Studies indicate that unnecessary costs occur when problems are discovered mid-stream or after products are introduced in the market because they were designed without adequate feedback from end-users.<sup>a</sup> The federal government has started to incorporate a user-centered design approach in development of some of its websites and other online tools.<sup>b</sup>

There are a variety of different methods for integrating end-user feedback into the development process. The methods that vendors might use include:

- **Card sorting** with prospective or current beneficiaries, which allows the vendor to ask them to rank the types of functions and attributes they would like to see in a tool.
- **Focus groups**, which bring together a small group of prospective or current beneficiaries to talk together about the features and functions they would benefit from having in a tool and what some of the barriers are in using an online tool to apply for benefits.
- **One-on-one interviews** with prospective and current beneficiaries, which can provide the opportunity for the vendor to both ask questions of the individuals, and also to observe the individual using a prototype or “draft” to learn how users experience the tool in real-time.

<sup>a</sup> S. Weinschenk, “Usability: A Business Case,” Human Factors International, 2005, <http://bit.ly/1UfvteM>.

<sup>b</sup> “Creating a User-Centered Approach in Government,” <http://www.usability.gov>.

## 1 Meets the Needs of Families: b) Keeps things simple and helps avoid errors

A well-designed online application tool is dynamic and straightforward. School districts will want to know about some of the ways the tool is programmed to make it a positive experience for families.

### Does the tool ask families only those questions necessary for determining eligibility?



- Does the tool use answers from earlier questions to automatically populate later questions so that families do not have to repeatedly enter the same data?
- Does the tool use **dynamic questioning**, automatically adjusting subsequent questions, based on previously entered data, to skip questions that become unnecessary?
- Does the tool *require* responses only to questions necessary to make an eligibility determination, in accordance with program rules, making it easier to apply and protecting families' privacy?<sup>6</sup>
- Does the tool mark any additional questions as optional, such as address, gender, or birthday?



- Does the tool *treat* required and optional questions differently?
  - Are questions clearly and correctly marked as required or optional?
  - Can an applicant proceed and submit the application if an optional question is left blank?
  - Does a message appear if a required question is left blank to explain that an eligibility determination cannot be made without the information?
  - Does the tool allow families to provide the smallest number of data elements required to submit an application to begin the process, while strongly encouraging families to complete the application through the use of pop-up prompts and similar techniques?

 GLOSSARY

**Dynamic questioning** (sometimes referred to as *skip patterns* or *skip logic*) enables parts of a page to be updated based on responses to one or more questions on the same or previous pages.

 DID YOU KNOW?

**By automatically skipping questions that families do not need to answer, an online application can simplify the application process.** For example, some students are automatically eligible for free or reduced-price school meals and do not need to provide income information. Students in a household that is eligible for Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) cash assistance, or Food Distribution Program on Indian Reservations (FDPIR) benefits are automatically eligible for free school meals. Students in foster care or who qualify as homeless, runaway, or migrant youth are also automatically eligible for free school meals.<sup>a</sup> Ideally these students are directly certified. But if they are not, the family can complete an application.

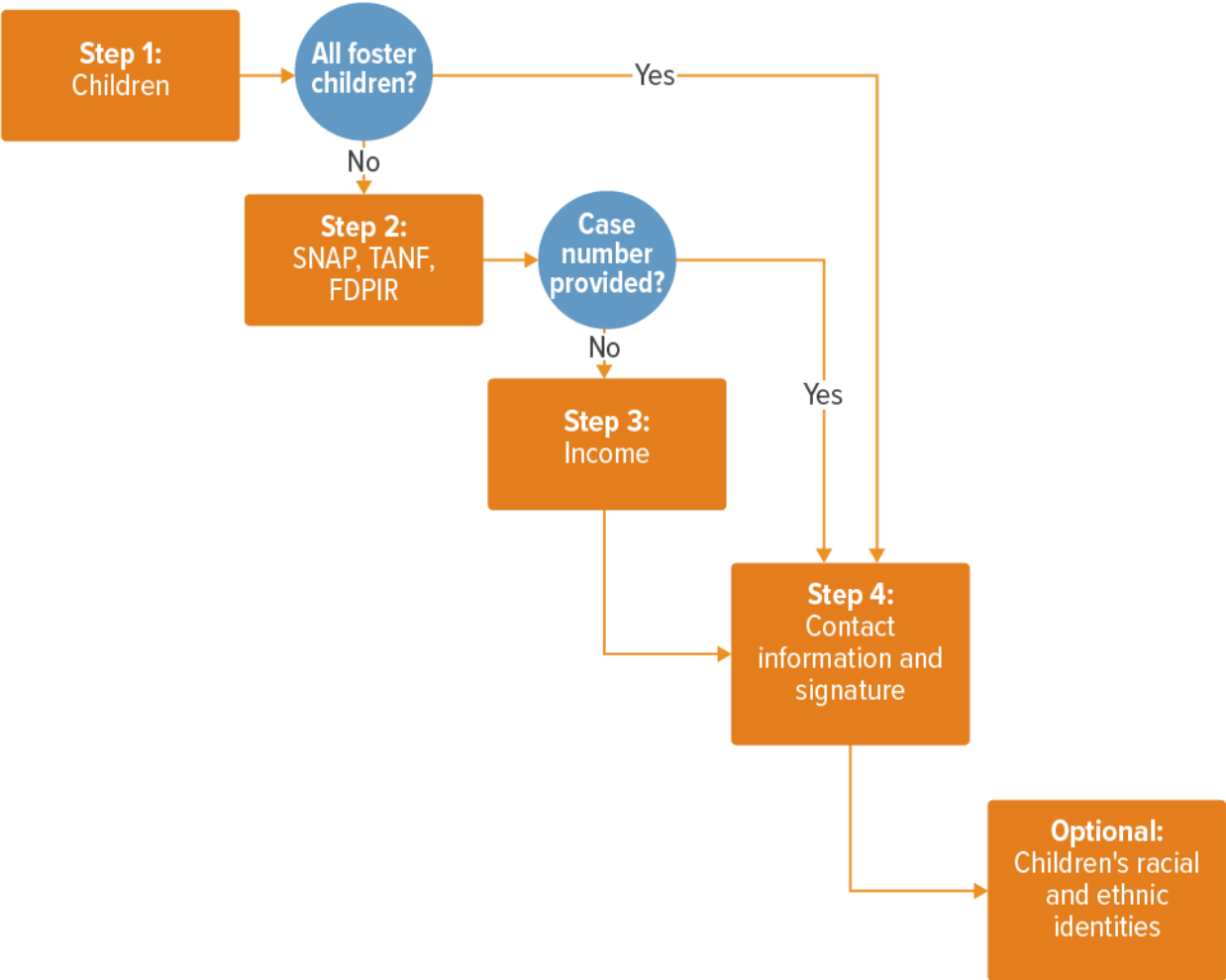
Once families receiving SNAP or TANF provide a case number for anyone in the household on the application, no further information about their household size or their income is necessary to determine their eligibility. The family can provide just contact information and a signature. The instructions for the paper application explain these rules.<sup>b</sup> But this can be confusing for families, so often they fill out the entire application to make sure it is complete.

An online application can make these and similar rules much easier for families to follow by automatically skipping unnecessary questions. For example, an online application that asks questions about SNAP or TANF at the beginning can be programmed to automatically skip additional questions if an applicant provides a case number. Figure 1 shows a sample type of skip pattern for an application.

<sup>a</sup> Foster care status can be self-declared and no further documentation is required. School districts can establish processes so that appropriate officials, like a homeless liaison, can provide lists of categorically eligible children to school nutrition staff so they can be automatically enrolled. When a family indicates on an application that a child qualifies as a homeless, runaway, or migrant youth, the school district can check with an appropriate official to document the status so the child can be automatically enrolled or to help connect the child to services.

<sup>b</sup> Instructions for the free and reduced-price school meal paper application are available at <http://www.fns.usda.gov/sites/default/files/cn/SP34-2016a4.docx>.

Figure 1: Skip Patterns in the Prototype Paper Application



## Does the tool include shortcuts to help families provide information more easily and accurately?



- Does the tool provide guidance and help to families around potentially confusing data entry?
  - Customized to family's situation (for example, be sure the tool doesn't ask for further information about additional adults in a one-parent family)
  - A guided interview
  - **Confirmation prompts**
  - Plain language



- Does the tool ask simple questions for reporting income that don't require families to do math?



- Does the tool provide readily accessible explanations or prompts in the questions to explain who counts as a household member and which sources of income to list?
- Does the tool automatically check for errors and prompt families to correct them, which can help to avoid common mistakes?
  - Auto-complete address information: Does the tool auto-complete city and state based on zip code and check if the address is within the school district?
  - Error checks: Does the tool include simple error checks, such as checks to ensure that all required questions on a page have been answered and dates, telephone numbers, and other information with a standard format conform to that format? Can it "flag" an application that is likely to include an error at the point of processing?

 GLOSSARY

**Confirmation prompts** are used like a stop sign to signal to the user when they may be making a mistake. For example, when they attempt to close the tool before they submit the application, a pop-up might say “Would you like to complete and submit the application before you leave?”

 DID YOU KNOW?

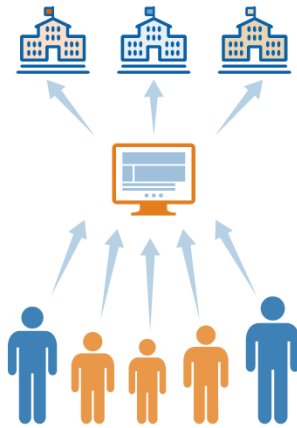
**Income questions can be among the most confusing for families to answer.** Requiring answers in a standard format, such as a “monthly income” or “annual income,” may add to the challenge. It may be easier for some families to provide an hourly wage and the hours they work per day, week, or month. Tools that offer flexible options that allow families to enter the information they have – and then the tool itself takes that information and performs any necessary calculations behind the scenes – can make it easier for families to provide complete and accurate information. Confusion about income questions can lead to errors. The vast majority of certification errors are a result of income reporting errors, like missing income sources or reporting incorrect amounts. Nearly half of the families that misreported income also incorrectly reported household size. These kinds of reporting errors resulted in undercertification nearly as often as overcertification (45 percent result in undercertification, while 55 percent result in overcertification). An application that guides families through a series of questions to elicit accurate information about income and household size will help improve program integrity and ensure that children get the benefits for which they qualify.<sup>a</sup>

**Determining who in the “family” or “household” should be included on a school meal application is also not easy to understand.** The rules are different in every public benefit program. The school meal programs include everyone living under the same roof who share expenses as part of the “household,” regardless of whether they are related. Families may forget to include children in the home who are not in school, like babies or college-aged siblings, or relatives who live with them, like a grandparent or cousin. Reporting all members who live with the children applying for benefits can ensure an accurate eligibility determination.

<sup>a</sup> *Program Error in the National School Lunch Program and School Breakfast Program: Findings from the Second Access, Participation, Eligibility and Certification Study (APEC II)*, May 2015, Department of Agriculture, Food and Nutrition Service, <http://www.fns.usda.gov/sites/default/files/ops/RORA2015.pdf>.



## Can a family complete a single application for all their children?



- Does the online application tool accept information for all children in the household, even if they attend different schools *in the same school district*?
- Does the tool allow families the opportunity to fill out a single application for all children in the household, *regardless of where they attend school*?
  - Does the tool allow families with children attending school in different districts to submit a single application that is shared with the relevant districts?
  - Does the tool allow communication between districts to transfer eligibility when students change districts mid-year?
  - Does the tool provide the ability for eligibility to be determined at the state level and offer school districts access to data relevant only to their student population?
  - Can the tool be adapted for use at the state level, where the state centralizes direct certification and application processing for all schools?



- If not, does the tool have a mechanism to flag children from the same household who attend school in different school districts?
  - Can the tool export data to be shared with other school districts, with permission and when appropriate?
  - Does the tool have the ability to be custom programmed with a link embedded in the application to the applications of different school districts in the state?

### DID YOU KNOW?

Children who transfer from a school offering universal school meals (under Provision 2, Provision 3, or the Community Eligibility Provision) must now be provided with free meals for up to ten operating days (or until a new eligibility determination is made, whichever occurs first) when they transfer to a non-universal school in the same school district. No later than July 1, 2019, they will have to be provided with free meals for up to ten operating days if they transfer to a non-universal school in another district. States also have the discretion to provide free meals to such students for up to 30 operating days or until a new eligibility determination is made.<sup>a</sup>

<sup>a</sup> See 7 C.F.R. § 245.9(l).

## 1 Meets the Needs of Families: c) Works on all the devices families use

Because low-income families often lack adequate broadband access in their homes, many families who apply for school meals online may use mobile devices such as tablets and smartphones. A well-designed online application will automatically adjust to the type of device on which it is being viewed. Tools that facilitate use on a number of different devices may be important to the school district. In addition, applicants may use a public computer (for example, at the school or at a local library) and an application that includes prompts to close windows will help protect their privacy.



**Can families view and use the online application tool on mobile devices, in addition to desktop browsers?**

- Does the layout of the online application automatically resize to fit a smaller smartphone or tablet screen, known as “**responsive design**”?
- Do interactive features such as scrolling or hover content work on a touch screen?



**Does the online tool work on programs that are typically available on public computers?**



## LOOKING AHEAD

### Mobile apps

**Smartphones may be the most accessible way low-income households can use the Internet.**<sup>7</sup>

With families increasingly relying on smartphones, school districts might want to ask vendors about their plans for mobile apps.

#### Considerations:

- Does the app include the user-friendly features described elsewhere in this guide?
- Does the app offer any additional features, such as uploading photos of relevant documents, if selected for verification?
- Can families use the mobile app without an active Internet connection to reduce data usage? For example, can families enter application data offline and then connect to the Internet to submit the completed application?
- Can the app be used on different kinds of mobile devices?
- Can families use the app for other school meal purposes, such as viewing menus or depositing funds into a school meals account?
- What kind of privacy and security features does the mobile app include?



## GLOSSARY

**Responsive design** allows the online application format to automatically adjust to the types of devices on which it is being viewed.



## DID YOU KNOW?

**The use of mobile devices as the primary means to access the Internet has increased exponentially over time.** A recent study from the National Telecommunications and Infrastructure Administration found that the number of American households that use the Internet only through their mobile devices doubled between 2013 and 2015 (from 10 to 20 percent). The share of *low-income* families that used only mobile devices during that period was even higher, at 29 percent.<sup>a</sup>

<sup>a</sup> G. McHenry, "Evolving Technologies Change the Nature of Internet Use," National Telecommunications and Infrastructure Administration blog, April 19, 2016, <https://www.ntia.doc.gov/blog/2016/evolving-technologies-change-nature-internet-use>.

## 2 Helps School Districts Meet Relevant Federal and State Requirements

School districts will want to ensure that any online application they offer families meets all appropriate legal standards, which may include not only school meal program rules, but other state and federal requirements that apply to school districts. This section identifies a sample of key topics that school districts can discuss with their vendors, but school districts will need to carefully consider all applicable requirements when selecting an online application tool.



### How does the tool incorporate free and reduced-price school meal program rules?

- Is the information it provides, such as information about what income to count, accurate?
- Does it correctly address potentially complex situations, such as families with foster children, households that are homeless, families with children in multiple schools or school districts, and students with income?
- Will the vendor automatically update the application to reflect annual changes in income eligibility limits or changes in other program rules?
- Does it offer help to school districts to comply with program requirements? Such as:
  - Ensuring continued benefits when a student moves to another school within the district;<sup>8</sup>
  - Ensuring that children in the same household receive consistent results, even if they attend different schools in the same school district;<sup>9</sup>
  - Providing categorical eligibility for students who qualify;<sup>10</sup>
  - Compiling data to meet reporting requirements;<sup>11</sup>
  - Generating data and records for administrative reviews;<sup>12</sup>
  - Selecting applications for verification;<sup>13</sup> and
  - Ensuring student confidentiality.<sup>14</sup>

**EXAMPLE:** To ensure all **California** families can benefit from online applications for free or reduced-price school meals, the state passed legislation<sup>a</sup> in 2015 that established requirements. Districts that choose to offer an online application must:

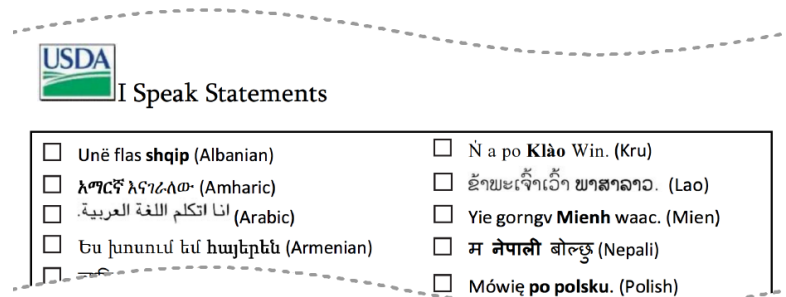
- Include a link to the USDA website with translated school meal applications and accept translated applications if received;
- Require completion of only those questions necessary to determine eligibility;
- Provide clear instructions for families that are homeless or migrant;
- Comply with privacy and disclosure protections;
- Abstain from requiring registration prior to submitting an application; and
- Include links to online applications or websites for SNAP, Medicaid and the state Health Care Exchange, WIC, and summer meal programs.

<sup>a</sup> Senate Bill 708, amending Section 49557 of the California Education Code,  
[http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201520160SB708](http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB708).



### Does the tool ensure accessibility for all families?

- Ensures readability for parents with limited literacy.<sup>15</sup> The federal government has published guidance, examples, tips, and other resources on how to make communications with the public clear and understandable.<sup>16</sup>
- Provides options at the beginning of the application to adapt it for users needing additional services, such as audio voice-overs or large fonts, as required.
- Ensures that the application and other online materials meet software and website requirements under Section 508 of the Americans with Disabilities Act (ADA).<sup>17</sup>
- Offers the online application in languages other than English, and for those languages not available online, provides easy-to-find, translated hyperlinks to the USDA paper application in 49 other languages. USDA’s “I Speak Statements” form is an example of a tool that can be used to identify the primary language of non-English speakers.<sup>18</sup>



### How does the tool protect families’ privacy and keep their information secure?

- What mechanisms does the vendor use to protect families’ information entered online?
- Can the vendor assure the school district that the online application tool meets privacy and security requirements under local, state, and federal laws?
- Does the tool have protections in place that allow district staff to only see the data that they need to see (“**role-based access**”)? For example, if the staff person who handles claims needs access to the system, s/he would be able to see or print a list that includes a child’s eligibility status. If a teacher needs a list

to check off who ate breakfast in the classroom, the child's eligibility status would remain confidential.

- Does the tool provide the school district with the ability to audit/monitor for unauthorized access and disclosure?
- Does the tool have security protocols to protect against cyber-threats and accidental breaches?
- Does the tool describe the privacy policies, including providing clear language about how the information families enter will be used; how it will be protected from improper access, use, and disclosure; and families' privacy options?
- Does the tool refrain from requiring families to waive any privacy or other rights in order to complete the application process?

## GLOSSARY

**Role-based access** permits specific staff to see only the types of information that are required for them to perform their job.

## DID YOU KNOW?

**The Americans with Disabilities Act Section 508 has accessibility standards that are specific to electronic and information technology.** The standards are far-reaching and cover a range of website and IT systems. While the standards are clear, there are a variety of ways that IT designers can meet the standards. The United States Access Board is primarily responsible for developing the standards. In early 2015, they released a proposed updated rule, recommending the United States adopt international standards for web content accessibility (the Web Content Accessibility Guidelines, or WCAG) and taking into consideration the greater use of smartphones and other mobile technologies. Comments were due in May 2015, but as of the publication date of this guide, the rules have not been updated.

Examples of current accessibility requirements include:

- All information conveyed with color must also be conveyed without color.<sup>a</sup>
- When a website uses animation, the information must also be available in at least one non-animation mode.<sup>b</sup>
- Flashing or blinking text must be within a specified frequency range.<sup>c</sup>
- An online form must allow people who use assistive technology to access the information and functionality required to complete and submit the form.<sup>d</sup>

For concrete examples and best practices about how to adapt websites or software to meet accessibility standards, see the Social Security Administration’s Accessibility Best Practices Library.<sup>e</sup>

<sup>a</sup> 36 C.F.R. §1194.22(c). Of note, the Architectural Barrier and Compliance Board issued a proposed rule updating Section 508’s electronic and information technology standards in February 2015, with comments due May 2015. As of this date, the new rules have not been adopted.

<sup>b</sup> 36 C.F.R. §1194.21(h).

<sup>c</sup> 36 C.F.R. §1194.21(k).

<sup>d</sup> 36 C.F.R. §1194.22(n).

<sup>e</sup> Social Security Administration’s Accessibility Best Practices Library available at <https://www.ssa.gov/accessibility/bpl/default.htm?category=forms>.

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**The new FNS paper application prototype is meant to be accessible to all families.** It was designed and tested “to improve clarity with the goals of reducing errors and simplifying the application for households,” in particular Limited English Proficient (LEP) households.<sup>f</sup> FNS also plans to make the new prototype online application available in the same 49 languages as the paper prototype.

While districts are not required to make online application tools available in all languages, they must ensure that their applications and related materials (the parent letter, instructions, and notices) are available in a language that an LEP household can understand.<sup>g</sup> To that end, there are important features for LEP applicants that districts will want to ask vendors about, including:

- Is the tool fully functional in languages other than English? Which ones?
- At the very beginning, does the online application
  - Help families understand their options for accessing information and assistance in their primary language?
  - Provide easy-to-find hyperlinks to the USDA prototype paper application translated into other languages?
  - Include a way for families to identify their primary language for written and verbal communication?
- If the school district provides its own written translations of the application, does the tool have the capacity to use the district’s translated text in the online application?

<sup>f</sup> “Ensuring Access to Free and Reduced Price School Meals for Low-Income Students,” SP 43-2016, Food and Nutrition Service, Department of Agriculture, June 30, 2016, <http://www.fns.usda.gov/sites/default/files/cn/SP43-2016os.pdf>.

<sup>g</sup> “Meaningful Access for Persons with Limited English Proficiency (LEP) in the School Meal Programs: Guidance and Q&As,” Food and Nutrition Service, Department of Agriculture, May 25, 2016, <http://www.fns.usda.gov/sites/default/files/cn/SP37-2016os.pdf>.



## Consider a tool that can help with direct certification<sup>19</sup>

An online application can make it easy to...



- Identify applications that include students who have already been directly certified so a duplicative certification is not completed.
- Identify additional students in the same household as students who have already been directly certified so they can be directly certified by extension.<sup>20</sup>

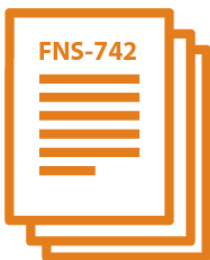
### LOOKING AHEAD

## Direct Certification

Would the district like to further automate the district's direct certification process in the future?

If yes, look for a tool that has or will have the capacity to...

- Automatically match online applicants against a district's **direct certification** list to directly certify students.
- Directly certify pending applications to catch families who have recently enrolled in a program that confers direct certification or transferred from another school since the most recent direct certification match.
- Help families find their case numbers or other identifying information through a look-up with SNAP or TANF data that would allow them to skip many of the questions.



## Decide whether the district wants a tool that can help with verification

An online application can make it easy to...

- Automate verification sampling, consistent with FNS rules;
- Generate verification notices, including “first notice,” “second notice,” and “adverse notice”;
- Carry the verification notification history in the application account screen;
- Produce a printable list of verification responses; and
- Adjust eligibility as needed based on verification results. Generate reports that fulfill FNS reporting requirements for the Verification Collection Report (FNS-742).

**EXAMPLE:** West Virginia's online application system supports aspects of the verification process. For example, it identifies applications from households that did not respond and requires documentation of eligibility before approving a new application.



## LOOKING AHEAD

### Verification

- Does the vendor have any plans to upgrade their tool to allow families to upload documents when necessary?
  - The tool could allow families to set up an online account and upload a document or to submit a picture of the document through a mobile app. Families selected for **verification** that the school district cannot directly verify may be asked to provide documentation of their eligibility status. In addition to allowing families to submit verifying documents by mail and in person, a school district could use its online application tool to allow families to submit documents electronically.
- Could the school district use the tool to conduct **direct verification** electronically by matching data from applications selected for verification against data from other programs?
- Could the tool assist a family in submitting a new application with documentation or in filing an appeal if benefits are terminated during verification?




## GLOSSARY

**Direct certification** allows school districts to match their student information system lists against SNAP, TANF, Medicaid, FDPIR, or foster care data to find entries that appear in both and automatically enroll children for free or reduced-price meals. Children who are identified by an appropriate official as being in foster care, homeless, migrant, or runaway can be automatically enrolled based on a list provided by the appropriate official.

**Verification** is the process by which school districts confirm the eligibility of children on a sample of up to 3 percent of approved school meal applications.

**Direct verification** allows school districts to match data on students selected for verification against data from programs that are used for direct certification to verify eligibility without contacting the household.

 DID YOU KNOW?

**Direct certification allows school districts to match their student roster against other data to automatically enroll children for free or reduced-price meals based on receipt of other public benefits.** Using direct certification eliminates the need for families to apply for free or reduced-price school meals altogether. The district automatically enrolls students determined eligible through the data match. School districts are required to match their students against data from SNAP and most also match against data from TANF. Selected states are participating in a demonstration project that allows direct certification for free or reduced-price meals using Medicaid data.<sup>a</sup> A recent FNS study<sup>b</sup> indicated that data matching with other programs can improve direct certification performance, though it may also require greater security protections. For example, some states match with data from the foster care system, but the foster care system has more stringent privacy and security protections.

<sup>a</sup> *Request for Applications to Participate in New Demonstrations to Evaluate Direct Certification with Medicaid*, Department of Agriculture, <http://www.fns.usda.gov/request-applications-participate-new-demonstrations-evaluate-direct-certification-medicaid>.

<sup>b</sup> *The National School Lunch Program Direct Certification Improvement Study: Practices and Performance Report*. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, January 2015, <http://www.fns.usda.gov/sites/default/files/ops/NSLPDirectCertificationStatePractices.pdf>.

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**Probabilistic matching can help improve direct certification results.** Data fields with inconsistent information are common – due to, for example, transposed digits (in a Social Security Number or birth date), long or uncommon names, or nicknames (for example, “Joseph” on a SNAP application and “Joe” on school registration forms). Probabilistic matching looks at additional data elements that are already in the system to develop a probability that the entries in each data source are the same person. The more data elements that align, the more likely there is a match. A number of vendors offer tools that do probabilistic matching and some school districts have designed their own tools to help increase direct certification performance.

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**When conducting verification, eligibility can be directly verified by contacting an appropriate agency or official to confirm participation in a program that confers categorical eligibility,** such as TANF cash assistance. If eligibility is not directly verified, the school district contacts the household so the household can provide documentation of eligibility, such as a pay stub. If the household does not respond, the children cannot receive free or reduced-price meals unless the family reapplies with documentation. In the fall of 2014, 38 percent of the households selected for verification did not respond. FNS is using behavioral research findings to revise the prototype verification notice and submission method to make it more user-friendly and hassle-free, with the goal of increasing the share of households contacted for verification that respond.



# Important Features to Include in Online Applications

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A well-designed online application is inviting and easy to use. This section identifies key characteristics for school districts to keep in mind when reviewing their online application options.

This section will help school districts assess whether the online application is...

**1** Friendly and Inviting to *All* Prospective Applicants

**2** Easy to Use

**3** Flexible

## 1 Friendly and Inviting to All Prospective Applicants

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Review the online application and see if it has the following attributes:



- Clear and simple design.
- Good visual cues.
- Strong graphics, visually inviting.
- Language that is welcoming and/or personalizes the application process, such as by using a person's name when asking for details about that person.
- Text that provides reassurances for applicants and their families (such as immigrants).
- Text that addresses the needs of all different kinds of families who might be applying.
- Audio voice-overs to assist people with Limited English Proficiency (LEP) and visually impaired users.
- Text and functions that are compliant with the Americans with Disabilities Act (ADA) requirements.
- Information about alternative ways to apply, such as links to printable versions of the paper application in multiple languages and instructions on how to submit the completed form in person, by mail, or electronically.

## 2 Easy to Use

It is not just the visuals that need to be compelling. If the application is confusing or hard to use, families will not complete the process. An online application can help families complete the process easily by offering the following:



- ✓ Introductory text, including a list of documents or information they will need to complete the application.
- ✓ Video with instructions.
- ✓ **Visual aids.**
- ✓ Clear directions.
- ✓ Navigation cues, user prompts, and/or a progress bar.
- ✓ Help text, pop-up features, **FAQs**, definitions/glossary, and/or **tool tips**.
- ✓ Explanatory text to cue or guide the user as to what's coming next and why.
- ✓ Hyperlinks to further information.
- ✓ A 6th-grade readability level.
- ✓ Only a few questions per page.
- ✓ Contact information to district or school personnel where families can follow up with additional questions.

Sometimes users will need to be able to talk to someone about their questions. Contact information may include details such as whether and when people are available to answer questions online, by telephone, or in person.

### 3 Flexible

**There are user-friendly functions that make applications more valuable to both families and school districts. When scrolling through the screens, does the application allow families to:**



- Go back to a previous screen and change an answer without losing information that's been entered, preferably using the browser's "back" button rather than a button embedded in the application.
- Save an incomplete application — so families can stop, get more information, and return to the application without losing their previous answers.
- Obtain a summary of information and edit it.
- Print or save a completed application for their own records.
- Receive an automatic confirmation e-mail letting the family know the application was successfully submitted.
- Check the status of their application or choose to receive notifications as the application moves through the process.
- Set up an online account, which would allow them to reapply, see status information, view communications from the school district, etc.
- Upload documents, if selected for verification.
- Submit updated information if they believe they have become eligible during the school year (for example, if household income decreases or a baby is born).
- Type less by pre-populating selected fields based on a previous application or other student records.

 GLOSSARY

**Visual aids** can give users clear examples of what information is needed and where to find it. For example, when asking for a SNAP case number, an online application can include a pop-up graphic showing a sample picture of a SNAP notice with the case number circled to show where it can be found.

**Frequently Asked Questions** (FAQs) are important to help users understand what is being asked of them in the application. They can be compiled into a single resource and/or the most relevant FAQs can appear automatically on the page where the question is most relevant.

**Tool tips** are helpful content displayed when the user hovers over or clicks on a particular word or graphic. This approach allows users to find what they need when they need it, without adding too much clutter that can distract users' attention from their main task.





# Soliciting Strong Proposals

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States and school districts will likely use their formal procurement process to select contractors or vendors to fulfill some or all of their online application needs. A well-designed Request for Proposals (RFPs) is key to successful procurement.

This guide is intended to help states and school districts produce RFPs that yield high-quality proposals and enable effective decision-making. While procurement officials will be crucial in developing standard procurement parameters, answers to the questions explored in this guide will help to specify unique content needed for procurement of an online school meal application.

Throughout the process with the vendor, and before district staff sit down to draft a formal RFP, there are strategies districts might want to use to promote a productive client/vendor relationship. For example:

- **Project Manager:** Assign a dedicated person from the district as the individual who will be the key contact for the vendor.
- **Document:** Keep track of the process from the beginning, identifying expectations at the outset, keeping notes from formal and informal interactions, tracking timelines, agreements, etc.
- **Coordinate and clearly define roles of staff working on behalf of the district:** Articulate responsibilities internally and communicate those roles and responsibilities clearly to the vendor.

An RFP will describe the scope of the work requested in the procurement of an online application. The scope of work will be unique to each district, depending in large part on their decisions regarding considerations raised in this guide. To the extent that a particular feature is not immediately feasible, the RFP can ask about the ability to add the feature in the future. District staff will want to work with their procurement teams to devise RFP specification language that addresses the district's decisions.

The items identified in the checklist below can be added to any RFP developed by the school district to ensure vendors respond to and address the questions school districts will have regarding the online application specifications – the usability features, the functionality and programming of the tool, and conformity with legal requirements – to assure districts that the tool will work well for both district staff and families alike. Some items appear more than once when they are relevant to multiple sections. Each district can review the list below and incorporate as an appendix or into the body of the RFP those features from the list that they desire in their online application tool. The Appendix provides some examples of RFPs from a variety of districts across the country.

### RFP Checklist (example)

Specifications	Yes	No	Notes
<b>General (pages 4 to 10)</b>			
Reflects recommendations in FNS' prototype (forthcoming)	Y	N	
Integrates with other school nutrition systems/software currently in use	Y	N	
<b>Efficiency and Accuracy (pages 11 to 14)</b>			
Calculates household income	Y	N	
Generates notices related to eligibility	Y	N	
Communicates eligibility status to other systems	Y	N	
Produces customized lists of applications by building, eligibility, or other factors	Y	N	
Identifies students who elect to have information shared with other programs	Y	N	
Automatically carries over eligibility from the prior year	Y	N	
Pre-populates applications for the new school year	Y	N	
Generates letters to those directly certified	Y	N	
Allows staff to export data to student information system	Y	N	
Allows for case management	Y	N	
Records and tracks changes	Y	N	
Scans paper applications and integrates data	Y	N	

Important Features to Include in Online Applications

Specifications	Yes	No	Notes
<b>Household Communications (page 13)</b>			
Alerts families of application status	Y	N	
Generates customized household letters in multiple languages based on the household language of choice	Y	N	
Informs families about summer meal options at the end of the school year	Y	N	
<b>Data Reporting and Analysis (page 13)</b>			
Generates reports that fulfill FNS requirements (such as the Verification Collection Report, form FNS-742)	Y	N	
Tracks history of incomplete or denied applications, including reasons	Y	N	
Stores archived applications	Y	N	
Integrates analytic tools	Y	N	
<b>Management and Adaptation Over Time (pages 15 to 16)</b>			
Customizable to add graphics, language, content, or links to applications or notices	Y	N	
Updated annually to reflect current eligibility standards	Y	N	
Updated as needed to incorporate rule changes	Y	N	
Maintained, supported, and improved by vendor	Y	N	
District staff are able to edit and control the data and ensure information is kept secure	Y	N	
Data will be available to appropriate staff in a timely manner	Y	N	
<b>Usability Testing, Data Monitoring, and Feedback (pages 17 to 19)</b>			
Worked with families to consider usability during the design and development stage	Y	N	

## Important Features to Include in Online Applications

Specifications	Yes	No	Notes
Tested tool with families	Y	N	
Collects performance data and reports it to district	Y	N	
Offers a customer survey, comment, or complaint feature	Y	N	
Monitors consumer feedback and follows up	Y	N	
<b>Household Simplifications (pages 20 to 25)</b>			
Uses answers to initial questions to pre-populate later questions	Y	N	
Programmed for dynamic questioning, skip patterns/skip logic	Y	N	
Marks and treats “required” and “optional” questions differently	Y	N	
Asks simple income questions that don’t require families to do math	Y	N	
Clearly explains who counts as a household member and which sources of income to list	Y	N	
Automatically checks for errors and prompts families to correct them	Y	N	
Auto-completes city and state based on zip code and checks if the address is within the school district	Y	N	
Includes error checks and flags applications likely to include errors before submission	Y	N	
Accepts information for all children in the household	Y	N	
Flags children from the same household who attend school in different districts	Y	N	
Exports data to be shared with other school districts	Y	N	

## Important Features to Include in Online Applications

Specifications	Yes	No	Notes
Includes links to the applications of other school districts in the state	Y	N	
Allows families to fill out a single application for all children in the household regardless of where they attend school	Y	N	
Allows communication between districts to transfer eligibility mid-year	Y	N	
<b>Compatibility (pages 26 to 27)</b>			
Reformats to fit a smaller smartphone or tablet screen through responsive design	Y	N	
Features work on a touch screen	Y	N	
Offers a mobile app with all the features of the website	Y	N	
Mobile app offers additional features, such as uploading photos of relevant	Y	N	
Mobile app can be used without an active Internet connection	Y	N	
Offers privacy and security features unique to a mobile app	Y	N	
Works on programs that are typically available on public computers	Y	N	
<b>Facilitates Compliance (pages 28 to 32)</b>			
Accurately addresses all rules of the school meal programs	Y	N	
Ensures continued benefits when a student moves to another school within the district	Y	N	
Ensures consistent results for all children in the same household	Y	N	
Provides categorical eligibility for students who qualify	Y	N	
Compiles data to meet FNS reporting requirements	Y	N	

## Important Features to Include in Online Applications

Specifications	Yes	No	Notes
Generates data and records for administrative reviews	Y	N	
Ensures student confidentiality	Y	N	
Selects applications for verification	Y	N	
Readable for parents with limited literacy	Y	N	
Adapts the application for users needing additional services, such as audio voice-overs or large fonts	Y	N	
Meets software and website requirements under Section 508 of the Americans with Disabilities Act (ADA)	Y	N	
Offers the online application in languages other than English and provides links to USDA translations for other languages	Y	N	
Includes mechanisms to protect families' information entered online	Y	N	
Meets privacy and security requirements under local, state, and federal laws	Y	N	
Allows staff to see only the data they need to see ("role-based access")	Y	N	
Audits and monitors for unauthorized access and disclosure	Y	N	
Provides security protocols to protect against cyber-threats and accidental breaches	Y	N	
Describes the privacy policies, including providing clear language about how the information families enter will be used; how it will be protected from improper access, use, and disclosure; and families' privacy options	Y	N	
Refrains from requiring families to waive any privacy or other rights	Y	N	

## Important Features to Include in Online Applications

Specifications	Yes	No	Notes
<b>Direct Certification (page 33 and 35)</b>			
Extends direct certification to additional children in the household of a student directly certified based on SNAP or TANF data	Y	N	
Matches applicants against the direct certification list	Y	N	
Matches applicants against data from other programs	Y	N	
Helps families find case numbers or other information from programs that confer categorical eligibility	Y	N	
<b>Verification (pages 33 to 35)</b>			
Selects verification sample consistent with FNS rules	Y	N	
Generates verification notices	Y	N	
Maintains the verification history	Y	N	
Adjusts eligibility based on verification results	Y	N	
Allows uploads of documents	Y	N	
Matches data from applications selected for verification against data from other programs and directly verifies them if possible	Y	N	
<b>Accessible to All Prospective Applicants (pages 36 to 37)</b>			
Clear and simple design	Y	N	
Good visual cues	Y	N	
Strong graphics, visually inviting	Y	N	
Welcoming and/or personalized language	Y	N	

## Important Features to Include in Online Applications

Specifications	Yes	No	Notes
Text that addresses the needs of all different kinds of families	Y	N	
Audio voice-overs for Limited English Proficient (LEP) and visually impaired users	Y	N	
Text and functions that are compliant with ADA requirements	Y	N	
Information about alternative ways to apply	Y	N	
<b>Easy to Use (pages 38 and 40)</b>			
Introductory text, including a list of documents or information applicants will need to complete the application	Y	N	
Video with instructions	Y	N	
Visual aids	Y	N	
Clear directions	Y	N	
Navigation cues, user prompts, and/or a progress bar	Y	N	
Help text, pop-up features, FAQs, definitions/glossary, and/or tool tips	Y	N	
Explanatory text to cue or guide the user	Y	N	
Hyperlinks to further information	Y	N	
Readability level no higher than 6th grade	Y	N	
Only a few questions per page	Y	N	
Contact information for help	Y	N	



## Important Features to Include in Online Applications

Specifications	Yes	No	Notes
<b>Flexible (page 39)</b>			
Applicant can go back to a previous screen without losing information	Y	N	
Saves an incomplete application	Y	N	
Provides summary to family for review and editing	Y	N	
Applicant can print or save a completed application	Y	N	
Provides an automatic confirmation upon submission	Y	N	
Applicant can check the status of the application	Y	N	
Applicant can set up an online account to reapply, see status, view communications, etc.	Y	N	
Applicant can upload documents if selected for verification	Y	N	
Applicant can submit updated information throughout the year	Y	N	
Pre-populates an application the following year	Y	N	

# Conclusion

Online school meal applications can be a powerful tool for improving access to free or reduced-price school meals while making the application process more efficient and accurate, which strengthens program integrity. When selecting an online application, school districts have many factors to consider to ensure that their selection meets their needs and works well for families. This guide can help school districts assess how to integrate an online application into their school meal programs, prioritize the features they want the online application to include, discover important information about the online applications they are considering, and review key characteristics that help make an online application easy for families to use. Having considered these issues, school districts will be better positioned for successful procurement and implementation of an online application that helps them meet their goals.

## Appendix Procurement Resources

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### Food and Nutrition Service Materials on Procurement

#### [FNS Handbook 901, Section 6.0 \(Procurement\) \(May 2015\)](#)

FNS provides a section in its 2015 Handbook focused exclusively on procurement. As stated, the section is meant as a guideline for states, not a “definitive step-by-step guide to procurement.” The section is not state-specific. While the Handbook is intended to serve as a guidance for state agencies supporting the Supplemental Nutritional Assistance Program (SNAP) and Special Supplemental Nutrition Program for Women Infants and Children (WIC), the procurement chapter is broadly applicable. It provides guidance on key RFP components, including three components that this guide can particularly help to inform:

- The **introduction and overview**, describing the major objectives of the desired online application;
- The **statement of work**, describing the requirements for what the online application system should do; and
- The **evaluation of proposals and contract award**, describing the methods and criteria that will be used to evaluate submitted proposals.

#### [FNS Guidance Referring to a Draft Tool for Procurement \(June 30, 2016\)](#)

Written for state agencies, the guidance references a newly developed Local Agency Procurement Review Tool for agencies to use to assess their school districts’ procurement processes. The draft tool has been introduced as a pilot in a number of states but is not yet publicly available. In the meantime, a November 2015 guidance provides questions states can use to assess school district procurement (available below).

#### [FNS Guidance on Local Agency Procurement Reviews \(November 2015\)](#)

Written for state agencies, this guidance provides a series of questions agencies can use to assess their school districts’ procurement methods. For school districts, the questions identified in the guidance can help ensure that their procurement processes meet federal standards.

### Examples of Requests for Proposals (RFPs)

While there is no perfect RFP that incorporates all the features related to online applications discussed in this guide, there are examples of how different school districts have addressed online applications within RFPs for point-of-sale contracting. Each of the examples below approaches the specification or requirements sections differently – for example, some include

specifications in the body of the RFP, while others include as an appendix. Some include the requirements in narrative text; others include a chart or table of features. None, however, provide the level of detail and scope that is addressed in this guide.

- [Francis Howell \(Missouri\)](#)
- [Hays Unified \(Kansas\)](#)
- [Marlboro \(South Carolina\)](#)
- [Modesto \(California\)](#)

## Other Resources

### [Procurement Resource Abstract \(IJIS Institute\)](#)

Posted on the Integrated Justice Information Systems Institute (IJIS) website, this document provides a copy of a draft FNS model procurement white paper, which focused on RFP language dealing with SNAP and WIC eligibility certification systems. According to IJIS, for the white paper, “FNS consulted with the information system vendor community to provide leading practices in this Model RFP Guidance. The Guidance is intended to assist States with clearly defining the scope of work, deliverables, and performance expectations, with emphasis on areas where FNS observed that States struggle.”

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<sup>1</sup> *Ensuring Access to Free and Reduced Price School Meals for Low-Income Students*, SP 43-2016, Food and Nutrition Service, Department of Agriculture, June 30, 2016, <http://www.fns.usda.gov/sites/default/files/cn/SP43-2016os.pdf>.

<sup>2</sup> This guide uses “school districts” or “districts” to refer to Local Educational Agencies (LEAs).

<sup>3</sup> Department of Agriculture. *E.A.T. School Lunch UX Challenge*, January 2016, <http://lunchux.devpost.com/>.

<sup>4</sup> Department of Agriculture, *Memo SP 43-2016 (v.2), Ensuring Access to Free and Reduced Price School Meals for Low-Income Students – Revised*, August 10, 2016, <http://www.fns.usda.gov/sites/default/files/cn/SP43-2016v2os.pdf>.

<sup>5</sup> *SNAP Online: A Review of State Government SNAP Websites*, Center on Budget and Policy Priorities, updated March 25 2016, <http://www.cbpp.org/research/food-assistance/snap-online-a-review-of-state-government-snap-websites>.

<sup>6</sup> Under program rules, the information asked on applications “shall be limited to that required to demonstrate that the household does, or does not, meet the eligibility criteria for free or reduced price meals...” (7 C.F.R. 245.6(a)(1)) The required elements are explained in the rules. (See 7 C.F.R. 245.6(a)).

<sup>7</sup> *Home Broadband 2015*, Pew Research Center, December 15, 2015, <http://www.pewinternet.org/2015/12/21/home-broadband-2015/>. White House Report on the Digital Divide, July 2015, [www.whitehouse.gov/sites/default/files/wh\\_digital\\_divide\\_issue\\_brief.pdf](http://www.whitehouse.gov/sites/default/files/wh_digital_divide_issue_brief.pdf).

<sup>8</sup> 7 C.F.R. §245.6(a)(4).

<sup>9</sup> 7 C.F.R. §245.6(a)(1).

<sup>10</sup> 7 C.F.R. §245.2 and §245.6(c)(5).

<sup>11</sup> 7 C.F.R. §245.6a(h).

<sup>12</sup> 7 C.F.R. §210.18.

<sup>13</sup> 7 C.F.R. §245.6a(c).

<sup>14</sup> 7 C.F.R. 245.6(f)-(j).

<sup>15</sup> Federal Plain Language Guidelines,

<http://www.plainlanguage.gov/howto/guidelines/FederalPLGuidelines/index.cfm>, cited in *Meaningful Access for Persons with Limited English Proficiency (LEP) in the School Meal Programs: Guidance and Q&As*, Department of Agriculture, Food and Nutrition Service, May 25, 2016, <http://www.fns.usda.gov/sites/default/files/cn/SP37-2016os.pdf>.

<sup>16</sup> These materials are available at plainlanguage.gov.

<sup>17</sup> 36 C.F.R. §1194 et, seq.

<sup>18</sup> USDA's "I Speak Statements" are available at <http://www.fns.usda.gov/sites/default/files/cnd/Ispeak.pdf>.

<sup>19</sup> *Improving Direct Certification Will Help More Low-income Children Receive School Meals*, Center on Budget and Policy Priorities and Food Research and Action Center, July 25, 2014, <http://www.cbpp.org/research/improving-direct-certification-will-help-more-low-income-children-receive-school-meals>.

<sup>20</sup> *Extending Categorical Eligibility to Additional Children in a Household*, Department of Agriculture, Food and Nutrition Service, August 27, 2009, [http://www.fns.usda.gov/sites/default/files/SP\\_38-2009\\_os.pdf](http://www.fns.usda.gov/sites/default/files/SP_38-2009_os.pdf) and *Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household*, Department of Agriculture, Food and Nutrition Service, May 3, 2010, [http://www.fns.usda.gov/sites/default/files/SP\\_38-2009\\_os.pdf](http://www.fns.usda.gov/sites/default/files/SP_38-2009_os.pdf).