Off-Site Questions	
100.	Does the SFA meet one of the following criteria: ☐ SFA-wide Special Provision Non-Base Year (Provision 2/3) ☐ RCCI, **without** day students ☐ SFA-wide Community Eligibility Provision Note: If one of the above is checked, skip questions 101 – 205 and proceed to question 300. If the SFA does not meet one of the above criteria answer the following questions (101-205).
101.	Who is the determining official for certifying household applications? (Names and/or position titles): **Tips:** Each Sponsor must have a person designated for determining eligibility for free or reduced-price school meals.
102.	a. Does the SFA use an electronic applications approval system or a manual **application approval system**? If a combination of electronic and manual is used check both boxes. b. Does the SFA use an electronic benefit issuance system or a manual **benefit issuance system**? If a combination of electronic and manual check both boxes. **Tips:** ☐ *Electronic application system* means household applications are submitted through a web-based or scanned application system. The system has limited to virtually no manual data entry by the SFA. Records are kept at the SFA electronically. All direct certification matches at the SFA level are completed with a computer match. ☐ *Manual application system* means household applications are submitted to the SFA. SFA completes eligibility determination and direct certification matches and enters data manually into a system and/or keeps written records. Hard copy records are kept on file at the SFA. o If the SFA has implemented an electronic system, but one or more aspects of the application processing is conducted manually (e.g., applications are submitted online and SFA staff processes paper applications) *the reviewer will consider it a manual/combination system*. This includes instances where staff enters paper applications into an electronic system for determinations.
103.	At the beginning of the school year, how is benefit status handled for children who have not submitted an application for the current school year? **Tips:** Carryover: For up to 30 operating days (operating day is defined as a day a reimbursable meal is served) into the new school year, or until a new eligibility determination is made (whichever comes first) an individual student's free or reduced-price eligibility status from the previous year will continue within the same SFA. This applies to any type of eligibility and to newly enrolled/transfer students from households with approved applications/directly certified on file from the previous year.

104.	**If the SFA has an electronic application approval system,** answer the below questions, if not proceed to the next question. a. How are records maintained and for how long? b. Describe the backup to the electronic-based approval system. c. List the method used to obtain household signature. **Tips:** The Sponsor must describe how long electronic records are kept in the application approval system. Certification documents (free and reduced applications, direct certification matchlists etc.) must be kept for 5 years after the date of certification or until audited. Special provision schools must retain base year direct certification data and applications for up to 9 years. Each Sponsor must have a manual back up process for accepting and approving meal applications. Each electronic system must have a method for obtaining household signatures required to process meal applications.
105.	How long does the applications approval take from the date the SFA receives the application from the household? **Tips:** An eligibility determination must be made, notification sent, and the status implemented within 10 operating days of the receipt of the application. Whenever possible, applications should be processed immediately.
106.	Within the SFA, who has access to the applications within the system? (Names and/or position titles) **Tips:** The Sponsor must have a list of names and titles of individuals who have access to eligibility information. Sponsors must obtain parental consent for disclosing eligibility information in most cases. More information here: https://www.cde.state.co.us/nutrition/disclosurereference.
107.	a. When and how are households notified of students' certified eligibility? **Tips:** Households must be notified, either in writing (postal mail or email) or verbally of their eligibility status within 10 operating days of receipt of the application. Determining officials must record: o Approval date o Eligibility status o Sign or initial This information may be recorded manually or within the benefit issuance system. b. How are denied households notified? **Tips:** Households with students who are denied meal benefits must receive prompt, **written** (postal mail or email) notification of the denial. Sponsors using an automated telephone information system must also give written notification of denial. The notification must include:

	☐ Reason for denial of benefits ☐ Right to appeal ☐ Instructions on how to appeal ☐ Ability to re-apply for free and reduced-price benefits at any time during the school year ☐ Non-discrimination statement Notice of denial is not required if the household fails to reapply during the carryover period.	
108.	Who is the hearing official? (Name and/or position title): **Tips:** The Hearing Official ensures all required provisions of the appeal process are followed as outlined in the Free and Reduced Policy Statement. The Hearing Official must be someone not involved in making the determination under appeal and must hold a higher administrative level than the determining and verifying officials and cannot be the same as the determining or verifying official.	
109.	Who at the SFA receives the direct certification documents from the state or local agency, and who is responsible for issuing and updating the benefit list? **Tips:** List the appropriate school staff receiving assistance program information below. This includes staff accessing the DC system and liaisons.	

Program	Name/title of person receiving DC documents from SA	Name/title of person issuing direct certification benefits to students
SNAP		
TANF		
FDPIR		
Homeless		
Migrant		
Foster Children		
Head Start		
Even Start		

110.	Does the SFA use the direct certification notification letter provided by the State agency?
	
	If no, does the letter contain all required information, and is it approved by the State agency? (**Obtain a copy of the letter used**.)
	
	Comments:
	
	Tips: The Sponsor must notify households, **in writing** (postal mail or email), they have been directly certified. The notification must include:
	    o The student is eligible for free school meals without further application
	    o Free school meals can be extended to all students in the household and how to notify the Sponsor of any additional students in the household not listed on the notification
	    o How the household can notify the Sponsor if they do not wish to receive free school meals	

	○ Use of Information Statement ○ Non-Discrimination Statement	
111.	What is the SFA's procedure for extending free or reduced school meal eligibility to all children who are members of a household in which one person in that household is receiving SNAP, TANF, Medicaid or FDPIR benefits? **Tips**: Sponsors can use the following resources to extend eligibility: ☐ Direct Certification system ☐ District records – same address ☐ Free and reduced applications ☐ Extend eligibility to additional household members' form Extended Eligibility is required to be documented with original directly certified student, extended student, date, and official's signature/initials.	
112.	Does the benefit issuance system identify how eligibility was determined? (e.g., through application, direct certification, etc.) **Tips:** The benefit issuance system (e.g., free and reduced-price software system) must identify how an eligibility determination was made including direct certification, migrant, homeless, foster, Head Start, application, etc.	
113.	a. Who has access to the benefit issuance system and/or documentation? b. What safeguards are in place to ensure that only authorized individuals have access to the benefit issuance system and/or documentation? **Tips:** Sponsor must have a list of names and titles of individuals who have access to the benefit issuance system. It is highly encouraged to have a limited number of individuals accessing or using benefit issuance documentation. Those that have access should have knowledge of the disclosure requirements.	
114.	How are benefits issued and distributed to students? (e.g., via electronic system with code numbers for students, ticket system) **Tips:** Sponsor must have a system in place to distribute meal benefits to students and record if the student has a free, reduced-price, or paid status. Any meal cards, tickets, tokens, or other methods to obtain reimbursable meals cannot be coded or colored in a manner that would overtly identify free and reduced-price eligible children. In addition, Sponsor must take steps to assure that rosters, computer-screens or other equipment used at the point of service cannot be viewed by anyone not needing the information, especially students.	
115.	How are eligibility determinations transferred to the benefit issuance document? **Tips:** Describe how eligibility determinations are entered into the benefit issuance document (or system) and if this is a manual or electronic process. Sponsors must have a system in place to accurately transfer eligibility to the benefit issuance document.	
116.	How are benefit issuance document(s) transferred to the point of service system? **Tips:** Describe how the benefit status is transferred to the point of service system and if this is a manual or electronic process. Sponsors must have a system in place to accurately transfer benefit status to the point of service.	

117.	How are eligibility status updates made to the point of service benefit issuance document(s)? **Tips:** Describe how eligibility status updates are made to the point of service and if this is a manual or electronic process.	
118.	How frequently are updates made to the point of service benefit issuance document(s)? **Tips:** Describe the process of how often updates are made to the point of service benefit issuance documents(s).	
119.	Does the benefit issuance document indicate the date the eligibility status changes were made? **Tips:** Sponsor must show if the benefit issuance document tracks the date changes were made in the system.	
120.	How and when are the following changes made to the point of service benefit issuance document: a) new students b) transfer students c) withdrawn students d) 30-day carryover of prior eligibility **Tips:** Updates to the point of service must include new students, transfer students, withdrawn students and carryover status if applicable. Updates should be made as soon as possible.	
121.	a. Is there a backup system for updating benefit issuance document(s)? b. If yes, describe the backup system for updating benefit issuance document(s). **Tips:** Sponsor must have a backup system for updating the benefit issuance documents. For manual systems, the backup should include more than one person trained on the benefit issuance process. For online systems, there must be a backup process.	

On-Site Questions
If the SFA is implementing CEP SFA wide skip questions 124-215 and proceed to question 314.

124.	a. Determine if the SFA conducted an independent review of applications according to FNS requirements. If NO, explain in the Comments section. b. Determine if the SFA completed and submitted the FNS-874 (Local Educational Agency Second Review of Applications Report) according to FNS requirements. If NO, explain in the Comments section.

	Tips: Sponsors with a benefit issuance error rate of between 5-10% during an administrative review are required to complete an independent review of applications (IRA).

125.	For RCCIs with NO day students and no applications on file, does the SFA have the correct eligibility documentation available for residential students?
	
	Tips: Each child *residing* in an RCCI is considered a household of one and automatically eligible for free school meals. An eligibility documentation sheet can be used for all children residing in the RCCI. The documentation sheet must be signed by an appropriate official and must include:
	
	    o Child's name
	    o Any personal income received by the child
	    o Child's date of birth
	    o Date of admission
	    o Date of release
	    o Official's title and contact information

126.	Certification and Benefit Issuance Review Method:
	
	_____100% of students determined to be eligible for free and reduced-price benefits; or
	
	_____Statistically Valid Sample of students determined to be eligible for free and reduced-price benefits
	
	      Confidence Level: 95%_____ 99%_____
	
	      Universe: _____ Sample Size_____
	
	Were all selected applications correctly approved?
	
	Tips: The review method is selected based on what type of benefit issuance system is used and the number of eligible students. Whether 100% or a sample is reviewed, all applications will be checked for accuracy and completion.

127.	Are the correct income eligibility guidelines used to certify applications? **Tips:** The income guidelines are updated annually by July 1. Find the most recent guidelines on the School Meal Eligibility webpage: https://www.cde.state.co.us/nutrition/determine-program-eligibility#freereducedapplicationguidance.

128.	Are the correct conversion factors used when processing applications that indicate more than one income frequency?
	
	Tips: If a household has multiple income sources and the income sources are received with varying frequency, the Sponsor must annualize (calculate all income as for an entire year) by multiplying:
	
	    o Weekly income by 52
	    o Bi-weekly income (received every two weeks) by 26
	    o Semi-monthly income (received twice a month) by 24

<table>
<tr><td></td><td>o   Monthly income by 12

Do not round the values resulting from each conversion. Add the entire un-rounded totals to determine the annual income. Compare this total to the income eligibility guideline annual income and household size. If a household has multiple income sources and the income sources are received with the same frequency, all totals are added together as one frequency. Compare this total to the income eligibility guidelines and household size.</td></tr>
<tr><td>129.</td><td>Is household notification of eligibility consistent with the responses provided on the *Off-site Assessment Tool*?

Tips: Process for notifying a household of eligibility must be consistent with answers provided on the Off-Site Assessment Tool.</td></tr>
<tr><td>130.</td><td>Is household notification of denied benefits consistent with FNS requirements?

Tips: Notification of denial must be in writing and must include:

o   Reason for denial
o   Right to appeal
o   Instructions on how to appeal
o   Ability to re-apply for benefits
o   Current non-discrimination statement

Determining official must record the eligibility determination that includes:

o   Denial date
o   Reason for denial
o   Date the denial notice was sent
o   Signature or initials of the determining official</td></tr>
<tr><td>131.</td><td>Are any applications denied incorrectly?

Tips: Must review 10 denied applications on file and determine whether denied households were processed correctly and notified of:

o   Reason for denial of benefits
o   Right to appeal
o   Instructions on how to appeal
o   Statement that family may re-apply for free and reduced-price benefits at any time during the school year</td></tr>
<tr><td>132.</td><td>Does the direct certification list utilized by the SFA:
a.   Contain the correct information for direct certification?
b.   Come from the proper agency (SNAP, TANF, Medicaid, FDPIR, foster, homeless, runaway, migrant, Head Start, Even Start)?</td></tr>
</table>

	If NO, explain. **Tips:** The direct certification matchlist from the Colorado Nutrition Portal contains the correct information. Matchlists will need to show the student name and one other piece of identifying information. Electronic copies of matchlists are encouraged. All other direct certification lists (foster, homeless, runaway, migrant, Head Start) need to have the appropriate information on them – student name, signature of liaison, and date. Emails are acceptable.
133.	Were all direct certifications (SNAP, TANF, Medicaid, FDPIR, foster, homeless, runaway, migrant, Head Start, and/or Even Start) correctly certified? If NO, explain. Record errors on the Certification and Benefit Issuance Error Worksheet, SFA-1. **Tips:** Correct documentation must be available for all categorically eligible students. Direct certification match lists, agency documentation, homeless/migrant/foster/Head Start/runaway list.

134.	Does the SFA perform Direct Certification matches according to the required timeframes?
	
	If NO, how often are matches conducted?
	
	Tips: There are four required direct certification uploads per year:
	
	    o July 1 – the first day of school (around August 21)
	    o October 1st
	    o Mid-November to Mid-December
	    o Mid-February to Mid-March

135.	Are the Direct Certification lists retained on file by the SFA? If NO, explain. **Tips:** All direct certification lists are to be maintained (printed or electronically). They must be kept on file for 5 years after the date of certification or until audited. Printed/electronic lists must contain the name of the student and at least one piece of identifiable information (i.e. school, address, birthdate etc.).
136.	a. Are free and reduced-price benefits provided to students in a manner that assures confidentiality and prevents overt identification during meal service or at any other time in accordance with regulations and FNS Policy Memo SP45-2012? b. Are free and reduced-price eligible students required to work for their meals? **Tips:** Overt identification is any action that may result in a student being recognized as potentially eligible to receive or be certified for free or reduced-price school meals. Sponsors must ensure that a student's eligibility status is not disclosed at any point in the process of providing free or reduced-price school meals including: notification of the availability of free or reduced-price benefits, certification and

	notification of eligibility, provision of meals in the cafeteria, point of service, provision of additional services, method of payment and/or student cannot be required to work for meals.
137.	Did the SFA accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document? **Tips:** The eligibility status from the eligibility system must match the eligibility status from the point of service system.
138.	Did the SFA update the benefit issuance document(s) accurately and in a timely manner, including those students that are new, transferred, or withdrawn? **Tips:** The most up to date status must be on the benefit issuance document and it should match current eligibility status.
139.	For Manual Systems: If number sheets and coded rosters are used, did the SFA/school document changes in student eligibility/enrollment throughout the month? **Tips:** For manual systems, there must be a clear indication when the Sponsor or school updated documents with student eligibility changes throughout the month.
140.	Did the SFA update benefit issuance documents accurately and in a timely manner upon receipt of Direct Certification updates? If NO, explain. Record errors on the SFA-1. **Tips**: The benefits issuance documents or system needs to be updated *within 3 operating days* of the match list.
141.	Does the SFA account for benefits that have been extended to students living in a household that is receiving SNAP, TANF or FDPIR benefits? If NO, explain. Record errors on the SFA-1. **Tips:** Sponsors are required to extend benefits to the fullest extent possible. Examples of extending eligibly are: extending to siblings on applications, extending benefits from directly certified student to members of the same household, extend eligibility based on the additional household members form, or extending benefits to incoming kindergartners with siblings that are already certified. Sponsors are also required to document extended eligibility. Documentation must include the name of the original certified student, the name of the extended student, date, indication of how determination was made to extend benefits and official's signature.
142.	If any family declined or requested a lower level of benefits, were benefits changed on the Benefit Issuance document? If NO, explain

	Tips: Sponsors must allow families the right to decline meal benefits.

Resources:

Eligibility Manual: https://fns-prod.azureedge.us/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf

School Meal Eligibility Webpage: https://www.cde.state.co.us/nutrition/schoolmealeligibility