



Policy 4.50.1

FREE AND REDUCED PRICE MEALS: CONFIDENTIALITY AND ONLINE PROCEDURES

Effective: 5/16/2017

Children need healthy meals to learn. Russellville School District offer healthy, nutritious meals every school day. Many children in the school district may qualify for free meals or for reduced priced meals based on household size and income criteria. Russellville School District are committed to following the guidelines from the United States Department of Agriculture and the State of Arkansas in processing free and reduced price meal forms.

During the school enrollment process, parents will be notified of the procedures for how to apply, either online or via printed forms. The use of on-line meal applications and acceptance of electronic submissions requires the same level of compliance as the printed forms with regard to security issues surrounding student and parent confidentiality and data protection, the Family Educational Rights and Privacy Act (FERPA), and personally identifiable information (PII, such as social security numbers). Additional security measures must be followed for online processing regarding scanned documents and data storage and disposal of original documents containing FERPA and PII data. The district shall submit to the State of Arkansas Child Nutrition Program procedures for "Security and Disposal Plan for Online Documents" which ensures maintenance of support documentation for distribution of federal and state funds. The district will also provide proof of our ability to provide a digital signature system in compliance with Level 2 Authenticity Security as required by the United State Department of Agriculture and National Institute of Standards and Technology.

In all free and reduced meal eligibility forms processing, the following procedures will be followed for both obtaining and releasing eligibility information.

Obtaining Eligibility Information

A fundamental underpinning of the National School Lunch and School Breakfast Programs (Programs) is that in their implementation, there will be no physical segregation of, discrimination against, or overt identification of children who are eligible for the Program's benefits. While the requirements of the Programs are defined in much greater detail in federal statutes and pertinent Code of Federal Regulations, this policy is designed to help employees understand prohibitions on how the student information is obtained and/or released through the Programs. Employees with the greatest responsibility for implementing and monitoring the Programs will be provided the training necessary to become fully aware of their responsibilities.

The District is required to inform households with children enrolled in District schools of the availability of the Programs and of how the household may apply for Program

benefits. However, the District and anyone employed by the district is **strictly forbidden** from **requiring** any household or student within a household from submitting an application to participate in the program. There are NO exceptions to this prohibition and it would apply, for example, to the offer of incentives for completed forms, or disincentives or negative consequences for failing to submit or complete an application.

In addition to potential federal criminal penalties that may be filed against a staff member who violates this prohibition, the employee shall be subject to discipline up to and including termination.

Releasing Eligibility Information

As part of the district's participation in the National School Lunch Program and the School Breakfast Program, the district collects eligibility data from its students. **Names of the children and eligibility status shall not be published, posted or announced in any manner.** The data's confidentiality is very important and is governed by federal law. The district has made the determination to release student eligibility status or information as permitted by law. **Federal law governs how eligibility data may be released and to whom.** The district will take the following steps to ensure its confidentiality:

Some data may be released to government agencies or programs authorized by law to receive such data without parental consent, while other data may only be released after obtaining parental consent. In both instances, allowable information shall only be released on a need to know basis to individuals authorized to receive the data. The recipients shall sign an agreement with the district specifying the names or titles of the persons who may have access to the eligibility information. The agreement shall further specify the specific purpose(s) for which the data will be used and how the recipient(s) shall protect the data from further, unauthorized disclosures.

The superintendent shall designate the staff member(s) responsible for making eligibility determinations. Release of eligibility information to other district staff shall be limited to as few individuals as possible who shall have a specific need to know such information to perform their job responsibilities. Principals, counselors, teachers, and administrators shall not have routine access to eligibility information or status.

Each staff person with access to individual eligibility information shall be notified of their personal liability for its unauthorized disclosure and shall receive appropriate training on the laws governing the restrictions of such information.

Legal Reference: Commissioner's Memos IA-05-018, FIN 09-041, IA 99-011, and FIN 13-018, and FIN-13-070, ADE Eligibility Manual for School Meals Revised July W98 2012, 7CFR 210.1 -210.31, 7CFR 220.1 –220.22, 7CFR 245.5, 245.6, 245.8, 42 USC 1758(b)(6)

Adopted:

History BOE:

Revised: