



School Nutrition Program Free/Reduced Policy Statement: 7 CFR 245.12

This Free and Reduced Policy Statement outlines the procedure that will be followed and identifies individuals that will complete duties related to the approval and issuance of student meal benefits for Child Nutrition Programs operated by the Local Educational Agency (LEA). These requirements are found in 7 CFR 245.12. In Minnesota all students certified for free or reduced-price meal benefits receive meals at no cost and must not be charged for breakfast and lunch meals; additionally kindergarten students with a paid status must not be charged for breakfast. This Free and Reduced Policy statement shall be permanent and shall only need to be amended by the LEA to reflect any substantive changes. Any amendment to the Free and Reduced Policy Statement shall be approved by the State agency prior to implementation.

Definitions

School Food Authority (SFA): the entity that is legally responsible for the operations of administration of the local school nutrition program.

Local Educational Agency (LEA): a public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or for a combination of school districts or counties as are recognized in a State as an administrative agency for its public elementary schools or secondary schools.

Limited English Proficiency (LEP): persons are individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English.

Local Educational Agency (LEA)/ School Food Authority (SFA) Name Innovation Science and Technology Academy	CLICS Sponsor ID Number 9000018587		
Address 13001 Central Avenue NE	City Blaine	County : Anoka	Zip Code 55434

Free and Reduced-Price Process

In fulfilling its responsibilities in certifying free and reduced-price meal eligibility, the LEA will:

- Adhere to the eligibility criteria specified in 7 CFR 245.3
- Determine eligibility for in accordance with the current Income Eligibility Guidelines for children who are not categorically eligible for meal benefits. 7 CFR 245.3(a)
- Abide by the hearing procedures outlined in 7 CFR 245.7.
- Abide by nondiscrimination practices set forth in 7 CFR 245.8.
- Ensure there are no barriers for program participation for Limited English Proficient (LEP) families. Title VI of the Civil Rights Act of 1964.
- Ensure that foster children are categorically eligible for free meals and may be included as a member of the foster family if the family chooses to apply for meal benefits.

1. List the names of officials designated to perform eligibility determination tasks.

Key Staff Duties	Staff Name(s)	Position
<p>Determining Official(s)</p> <p>Staff approving Applications for Educational Benefits</p>	<p>Sarah Jones</p>	<p>Office Manager</p>
<p>Verifying Official(s)</p> <p>Staff completing the verification process.</p>	<p>Dr. Omotoke Olatoye</p>	<p>Director</p>
<p>Confirming Official(s)</p> <p>Staff confirming benefits for applications selected for verification. Cannot be same person as determining official or hearing official.</p> <p>(7 CFR 245.6a(e)(1)(iii)) The requirement to confirm determinations for applications selected for verification is waived if the local educational agency is using a technology-based system that demonstrates a high level</p>	<p>Amina Hussein</p>	<p>Lunch Assistant</p>

<p>of accuracy in processing an initial eligibility determination based on the income eligibility guidelines for the National School Lunch Program.</p> <ul style="list-style-type: none"> Technology based system is a system that calculates meal benefit determinations by meals of data entry from paper applications, online applications, scanned applications, and/or direct certification imported data. A high level of accuracy means \leq 5% error rate. <p>If implementing the waiver for identify the technology-based system that is used and how often the accuracy of the system is assessed.</p>	<p>Technology System: N/A Frequency of Accuracy Assessment: N/A</p>	
<p>Hearing Official</p> <p>Staff that make benefit decisions for households appealing benefit determinations. Cannot be same person as determining official.</p>	<p>Abdinasser Ahmed</p>	<p>Family Liaison</p>

2. Select the parent information letter and meal benefit application that will be used. If MDE templates will not be used, attach a copy of the document(s) that will be used. If using an online application complete additional questions on page 18. .

Document	MDE Template	Other: Attach copy.
<p>Parent Information Letter</p> <ul style="list-style-type: none"> The parent information letter cannot be made available by only posting on the website. It must also be distributed via USPS mail, e-mail, or included in an information packet. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Application for Educational Benefits</p> <ul style="list-style-type: none"> Provide link if online application. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Benefit Approval/Denial Notification</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3. Indicate the method used to distribute free and reduced-price documents to households. Select all methods that apply by adding an X in the box.

Method	Parent Information Letter	Application for Educational Benefits – <i>Paper form or link to form to print and complete</i>	Application for Educational Benefits – <i>Completed and submitted online</i>	Benefit Approval/Denial Notification
USPS mail to households	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Emailed to households	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Included in enrollment materials	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Available on website		<input type="checkbox"/>	<input type="checkbox"/>	
Available in school/district office		<input type="checkbox"/>	<input type="checkbox"/>	
Other; specify (Ex: social media, open house, orientation, conferences):		<input type="checkbox"/>	<input type="checkbox"/>	

4. Identify steps taken to ensure there are no barriers for program participation for Limited English Proficient (LEP) households. (English not primary language at home.)

Language	Translated Application	Interpreter – Face to Face	Interpreter - phone	Other
Spanish	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hmong	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Somali	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other; specify:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5. Select all the locations where households can submit completed applications.

- Online
- School Office
- Food Service Office
- District Office
- Email (scanned)
- USPS mail
- Other; specify: Click or tap here to enter text.

6. Identify the method(s) that will be used to calculate meal benefits from Applications for Educational Benefits submitted by households.

Method	Check if using	Product Name
Manual calculation	<input checked="" type="checkbox"/>	
Free and Reduced-price Calculator on MDE website (ICAVES Web)	<input type="checkbox"/>	
Software determined – Manual entry of application data	<input type="checkbox"/>	Click or tap here to enter text.
Software determined - automatic (Online/Scanned applications)	<input type="checkbox"/>	Click or tap here to enter text.

7. Hearing Procedures: The LEA must establish a hearing procedure under which a household can appeal a benefit determination and an LEA can challenge continued eligibility for free and reduced-price meals. The hearing procedure must include the provisions outlined in the Free and Reduced-price Meals Fair Hearing Procedure for Local Educational Agencies template (see below). Attach a copy of the local hearing procedure.



HouseholdHearing
Procedure SFA.docx

8. The LEA must maintain documentation substantiating eligibility determinations on file for a minimum of three years for the fiscal year to which the records apply. If there are audit findings that have not been resolved, the applications must be retained as long as required for resolution of the issues raised by the audit. Indicate where documents will be stored and what staff will have access to them.

Time Frame	Storage Location	Staff/Positions with Access
Paper applications including scanned applications	Cabinet file with lock	Determining official, Verifying Official and Confirming Official
Electronic/online applications	Click or tap here to enter text.	Click or tap here to enter text.
Electronic direct certification documentation (CLICS)	Cabinet file with lock	Verifying official
Local direct certification documentation (Homeless, Migrant, Head Start)	Cabinet file with lock	Director and homeless liaison

Direct Certification Procedures

In fulfilling its responsibilities to directly certify students for free meal benefits, the LEA will:

- Access electronic direct certifications and/or upload student enrollment for direct certification on a regular basis (a minimum of once a month for public schools and three times a year for non-public schools).
 - Identify the local homeless and migrant liaison(s).
 - Ensure directly certified students receive free meal benefits as of the date first certified.
1. Identify district staff involved in the direct certification process for issuing free meal benefits to students.

Key Direct Certification Duties	Staff Position
<p>Direct Certification – CliCS</p> <p>Staff persons responsible for accessing direct certification in the CliCS system, transferring free benefits to the benefit issuance system and extending benefits to all students in the household when a student is directly certified via MFIP or SNAP.</p>	<p>Director</p>
<p>District Homeless Liaison</p> <p>District staff person responsible for determining homeless certifications for students.</p>	<p>Family Liaison-Abdinasser Ahmed</p>
<p>District Migrant Education Program Liaison</p> <p>District staff person responsible for maintaining migratory student documentation.</p>	<p>Abdinasser Ahmed</p>
<p>Head Start Contact</p> <p>For Head Start programs that are located in district school sites and meals are being claimed for reimbursement by the district. Write “N/A” if not applicable.</p>	<p>N/A</p>

3. Indicate the frequency for each method of identifying directly certified students.

What is the frequency of:	Weekly	Bi-Weekly	Monthly	Quarterly	Other: Describe	Not Applicable
CLICS direct certification list entered into the point of service system	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click or tap here to enter text.	<input type="checkbox"/>
Enrollment uploaded to CLICS for direct certification of new students.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click or tap here to enter text.	<input type="checkbox"/>
Homeless liaison provides names of students that are certified as homeless	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click or tap here to enter text.	<input checked="" type="checkbox"/>
Notification of migrant student certification.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click or tap here to enter text.	<input checked="" type="checkbox"/>
Notification of students enrolled in Head Start programs which are located in district buildings and are claimed by the district	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click or tap here to enter text.	<input checked="" type="checkbox"/>

4. Is the MDE Template [Direct Certification Notification Letter](#) used to notify households of direct certification approval for free meal benefits?

Yes

No (Attach a copy of the notification letter that is used.)

5. Select the method(s) used to notify household of eligibility for free meals based on direct certification.

USPS Mail notification letter

Email notice

Other; specify: Letter sent home with students in sealed envelopes

6. Select the method(s) used to identify other students in the same household as students identified on the ClICS direct certification list to extend free meal benefits? (SNAP and MFP only) Select all that apply.

- Returned household notification letter.
- Student information system household identification – manual
- Student information system household identification automated
- Other; specify: N/A

Counting, Claiming and Cash Collection Procedures

In fulfilling its responsibilities to maintain internal controls in counting, claiming, and cash collection the LEA will:

- Ensure there will be no physical segregation of, nor any other discrimination against, any child because of inability to pay the full price of the meal.
- Count meals at a point of service.
- Establish procedures to ensure adult and second student meals are not claimed for reimbursement.
- Establish a procedure to collect money from children who pay for their meals, snacks or milk.
- Perform edits of all meal counts in accordance with 7 CFR 210.8(a)(2).
- Not deny meals to any child as a disciplinary measure.
- Establish a District/School meal charge policy compliant with state and federal requirements. ([Minnesota School Meal Policies](#), [Federal Local Meal Charge Policies](#))

1. After reviewing the Money Collection System Key and Point of Service System Key below, identify the type of money collection system and Point of Service (POS) system used at each school/site in the Money Collection and POS System Reporting Table. Include all joint agreement sites. If a school/site has multiple systems all systems must be identified. For example: A computer POS is used for K-5 and a roster is used for Pre-K. Respond “yes” or “no” in the breakfast and lunch column if meals are served outside of the cafeteria (classroom/hallway/bus). Respond “N/A” if not applicable.

If more rows are necessary, open the Money Collection and POS System Reporting Table Supplement File, attached here:



Money Collection
and POS System Rep

Money Collection System Key

Computer-Based

A. Money for meals/a la carte is deposited into a computer account. Deposits can be made online or in person. Accounts are debited as meals are received and a la carte purchases made. Students eligible for free/reduced price meals have accounts established that may be without cash balances. Examples: Drop box, at point of service, district/school office, envelope, and online.

Roster-Based

B. Money for meals/a la carte is brought to a designated location and is accounted for on a roster or accounting form indicating the number of meals pre-paid and/or the amount of a la carte funds available for purchase.

C. Money for meals/a la carte is brought in an envelope marked with the student's name and is accounted for on a roster or accounting form indicating the number of meals pre-paid and/or the amount of a la carte funds available for purchase.

D. Meals/a la carte are paid for with cash or charged at the time they are received. Students/households are billed accordingly each month for meals charged.

E. No monies are collected because the school is operating Provision 2 or a Community Eligibility Program (CEP).

F. No monies are collected because the school is operating a school funded universal meal program and funds are transferred into the nutrition fund from another non-federal source. (Attach a copy of the school board minutes with approval of a sponsor supported universal meal program.)

Ticket/Token-Based

G. Money for meals/a la carte is brought in an envelope marked with the student's name. Tickets/Tokens are coded to the students' eligibility category are distributed to students typically in envelopes. All students received meal tickets/tokens using the same distribution method. Tickets may be for single or multiple purchases.

H. Students purchase/receive tickets/tokens coded by eligibility category a designated locations. No indication of eligibility must be apparent in the method of distribution. All students received meal tickets/tokens using the same distribution method. Tickets may be for single or multiple purchases.

POS Meal Count System Key

1. Students are identified by a PIN, scan card, or biometric scan at the POS when they receive a meal or make an a la carte purchase. The computer system tallies meals by eligibility category and is capable of providing daily and monthly meal totals by eligibility category.
2. Students are individually marked off at the POS on a checklist, classroom roster or and accounting roster as they receive a meal or make an a la carte purchase. The checklist may be the same form on which student payments are entered. The meal checklist is then coded away from the POS of service to calculate meal totals by eligibility category to prevent overt identification.
3. Students turn in an identification/name card when they receive a meal or make an a la carte purchase at the POS. The cards are used to determine meal counts by category. Cards are either returned to students for next day use or are available in the cafeteria.
4. A head count of meals is taken at the point of service. (Provision 2 or CEP).
5. An approved alternative POS count is taken and recorded. Attach a copy of the alternative procedure.
6. Daily coded tickets are surrendered when at the POS when a meal is received. Students must have a ticket/token to receive a meal.
7. Tickets/tokens in specified monetary value are used to make a la carte purchases.
8. Weekly/monthly tickets are punched or marked at the point of service and a separate tally sheet is used to keep a count of the daily number of meals by eligibility category.
9. Punch cards with specified monetary value per punch are used to make a la carte purchase.

POS Location Key

- a. POS is located **after** all food choices.
- b. POS is located **before** some food choices.
- c. POS is located **before** all food choices.

Money Collection and POS System Reporting Table

If the response will be the same for grade level school sites or district wide, only one entry is needed for each grade level or district. (Example: elementary, middle school, high school)

School/Site Name	CLICS Site ID	Money Collection System	POS System Breakfast	Breakfast POS Location	Breakfast POS Outside of Cafeteria	POS System Lunch	Lunch POS Location	Lunch POS Outside of Cafeteria	POS System Afterschool Snack
<i>Example: ABC Elementary</i>	100000XXXX	A	1	a	Yes	1	a	No	4
<i>Example: ABC Elementary Pre-K</i>	100000XXXX	A	5	b	Yes	5	a	Yes	N/A
Innovation Academy Elementary-PreK-6	9000018587	E	2	a	Choose an item.	2	a	Choose an item.	Choose an item.
Click or tap here to enter text.	Click or tap here to enter text.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
Click or tap here to enter text.	Click or tap here to enter text.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.

Click or tap here to enter text.	Click or tap here to enter text.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
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2. Identify the position responsible for the following tasks and whether the task is completed by the district office or at each school site. If the response will be the same for grade level school sites only one entry is needed for each grade level. (Example: elementary, middle school, high school)

School/Site Name	Breakfast POS Monitor At POS during meal service times.	Lunch POS Monitor At POS during meal service times.	Entering Meal Account Payments Accepts and enters payments into student/adult meal accounts.	Submit Claim for Reimbursement	Making Bank Deposits	Assigns POS "Tokens" (PIN, tickets, etc.)
<i>Example: District Office</i>				<i>Admin Assist</i>	<i>FS Director</i>	<i>FS Director</i>
<i>Example: ABC Elementary</i>	<i>Teacher</i>	<i>Assistant Cook</i>	<i>Kitchen Clerk</i>		<i>Kitchen Manager</i>	
Innovation Academy Elementary PreK-6	Teacher	Teacher	Nutrition Director	Nutrition Director	N/A	N/A
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
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1. How frequently are food service bank deposits made?

- No deposits/no cash
- Daily
- Weekly
- Other; specify: N/A

2. Does the meal charge policy address the following? Attach a copy of the district meal charge policy. [Meal Charge Policy Checklist](#)

- How delinquent debt is collected
- Ensure that school staff do not withdraw meals from the tray of a student with a debt.
- Ensure that all free/reduced-price students with a debt are always served a meal

3. Identify procedures that are in place to ensure adult and second student meals are not claimed for reimbursement. Select all that apply.

- Computer system flags second student meals
- Second meals are entered as a la carte
- Computer system designates adult meals as a la carte
- Adult meals are recorded on a separate roster
- Other; specify: No adult nor second student meals

Maintaining Confidentiality/Disclosing Eligibility/Overt Identification

In fulfilling its responsibilities to maintain confidentiality, safeguard disclosure of student eligibility and avoid overt identification of students eligible for free and reduced-price meals, the LEA will:

- Prevent disclosure of confidential free and reduced-price eligibility information as required under 7 CFR 245.6(F-K)
- Obtain written consent from the child's parent/guardian prior to disclosure of eligibility information for purposes other than outlined in 7 CFR 245.6(f-k)

- Notify persons receiving eligibility information as allowed in 7 CFR 245.6(f-k) of the penalties for unauthorized disclosure or misuse of information
- Establish procedures to prevent the overt identification of children eligible for free and reduced-price meals at the point of service and cash collection.

1. List district/school staff and positions with access to meal applications.

Name	Position	District/School
Dr. Omotoke Olatoye	Director	Innovation Academy
Ms. Sarah Jones	Office Manager/Lunch Assistant	Innovation Academy
Ms. Amina Hussein	Lunch Assistant	Innovation Academy
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

2. List district/school staff that have access to student eligibility information including applications, direct certification information, electronic student information systems. Identify the program that is administered that requires the need for eligibility information and the level of eligibility information disclosed using the key in the table below.

Item Code	Level of Information Disclosed Key
	For more information see the Eligibility Manual for School Meals , Section 5: Confidentiality and Disclosure.
A.	Disclosure of aggregate eligibility for meal benefits. Individual students are not identified. No parental consent required.
B.	Disclosure of individual eligibility status only without written parental/guardian consent. Example: MARSS error reports, direct certification list, electronic system eligibility (student information systems, food service accountability systems), other student list with eligibility designations. Allowed only to persons with a Need to Know who are directly connected with administration or enforcement of Federal and State education programs without written parental/guardian consent.
C.	Disclosure of individual eligibility status only with parental/guardian written consent. Examples: School fees, sport activities, instrument rental, uniform fees, etc.
D.	Disclosure of all eligibility information. Allowed only for programs under the National School Lunch Act (NSLA) or Child Nutrition Act (CNA), Comptroller General of the United States and Federal, State or local law enforcement officials investigating alleged violation of any of the programs under the NSLA and CAN or investigating violations of the programs that are authorized to have access to names and eligibility status.
E.	Disclosure of all eligibility information unless parents or guardians elect not to have information disclosed. Allowed for Medicaid or CHIP, administered by a State or local agency authorized under titles XIX or XXI of the Social Security Act to identify and enroll eligible children.
F.	Other disclosure: (Describe) Click or tap here to enter text.

Name	Position	Program(s) Administered	Item Code for Level of Eligibility Information Disclosed
Dr. Omotoke Olatoye	Director	Seamless Summer	D
Ms. Sarah Jones	Office Manager/Lunch Assistant	Seamless Summer	D
Ms. Amina Hussein	Lunch Assistant	Seamless Summer	D
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Choose an item.
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Choose an item.
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Choose an item.

3. Select the cash and token collection methods used to prevent overt identification. Select all that apply in each section.

a) When a la carte food purchases are made.

- A la carte foods are not offered
- Limit a la carte foods to only foods sold as part of a reimbursable meal
- Offer a la carte foods in the same line as a reimbursable meal
- Offer a la carte foods in separate line from reimbursable meal
- Allow only prepaid a la carte food purchases
- Allow only cash payment for a la carte foods
- Other; specify: N/A

b) When collecting meal payments.

- Allow pre-payment online
- Provide envelopes for payments
- Accept payments outside of meal service times
- Accept payments in the food service office
- Accept payments in the school office
- Other; specify: N/A

c) At the POS

- Assign PINs in consecutive order
- Use tickets/tokens that are essentially the same for each eligibility category
- Obscure the view of computer screens that indicate eligibility
- Account balances not provided at the point of service
- For roster POS systems, don't use rosters/class list with eligibility indications
- Other; specify: Click or tap here to enter text.

***Online Application for Educational Benefits (Free/Reduced) Addendum –only complete this section if you are accepting online meal applications**

Describe how the LEA has implemented an online Application for Educational Benefits system for households to electronically apply online for free and reduced-price meal benefits in accordance with Minnesota Statutes 325L.18(b) (Uniform Electronic Transactions Act) and the U.S. Department of Agriculture (USDA) policy.

1. Describe how the on line system meets program requirements for collecting information needed to approve students for meal benefits. Refer to [Checklist for Online Applications](#).

N/A

2. Describe the manner and format the electronic records will be created, generated, sent, communicated, received and stored and the systems established for these purposes.

N/A

3. Describe control processes and procedures to ensure preservation, disposition, integrity, security, confidentiality and auditability of electronic records.

N/A

4. Describe the type of electronic signature used by the online system and the manner and format in which the electronic signature is affixed to the electronic record.

N/A

Attach the following documents to the Free and Reduced Policy Statement (Upload or copy/paste section in each area.)

1. Parent Information Letter, if other than MDE template.
2. Application for Educational Benefits, if other than MDE template
3. Local hearing procedure.
4. Direct Certification Notice of Eligibility, if other than MDE template
5. School board minutes with approval of Sponsor supported universal meals program, if applicable.
6. District/School Meal charge policy.

The undersigned local official certifies that the responses provided are accurate and the LEA agrees to fulfill all responsibilities outlined in this policy statement.

Signature of Local Educational Agency/School Food Authority Official 	Date 2/23/2022
Signature of State Official	Date Click or tap to enter a date.