## Indiana School and Community Nutrition Policy 2025-02 CNPweb Access for Institutions and Food Service Management Companies

Policy: Institutions (including sponsors, sponsoring organizations, school food authorities, child care institutions, afterschool care programs, emergency shelters, adult day care centers) participating in IDOE's child nutrition programs (CNPs) have the option to contract with a food service management company (FSMC) to help manage their food service operations. While an institution and FSMC may agree to divide food service operation duties, the institution must retain certain responsibilities pursuant to program requirements and their permanent agreement with the State agency. Examples of institution-specific duties include:

- Retaining signature authority on the submitting of claims for reimbursement;
- Downloading direct certification (DC) data for program participants;
- Submitting annual financial reports (AFRs) and verification summary reports (VSRs);
- Placing USDA Foods orders and entering surveys;
- · Conducting periodic monitoring; and
- Updating contacts and CNP information in CNPweb.
- Implementation of corrective action

Both institutions and FSMCs use IDOE's CNPweb as part of their CNP operations. However, based on some CNP duties being institution-specific, certain CNPweb access permissions are reserved for institutions, such as submitting claims for reimbursement, accessing DC data and submitting AFRs and VSRs. In these instances, the FSMC may only have a "view only" permission while the institution is able to edit reports, submit claims and access data.

In terms of DC data, since the institution has the formal agreement with the State agency to access this data, then it is the institution who should first have access to the DC downloads and then share that data with those who are considered "need to know," as long as they are meeting the National School Lunch Act's disclosure and confidentiality requirements (<a href="https://www.in.gov/doe/nutrition/free-and-reduced-information/disclosure-appeal-process/">https://www.in.gov/doe/nutrition/free-and-reduced-information/disclosure-appeal-process/</a>). In other words, the institution will need to download reports, conduct DC lookup, approve possible matches, maintain DC data according to the retention schedule, etc. They can share the information with the FSMC for loading into the POS system. The

institution can also work with the FSMC in cases of verifying information or validating case numbers on applications.

CNPweb permissions for either institutions or FSMCs do not alter their regulatory responsibilities for the various CNPs, nor the terms of the permanent agreement with the State agency or the contract between the institution and the FSMC.

Scope: School Food Authorities, Sponsors, Institutions, Facilities, Responsible Parties and Responsible Individuals participating in the National School Lunch Program (NSLP), Child and Adult Care Food Program (CACFP), Summer Food Service Program (SFSP), Special Milk Program (SMP), School Breakfast Program (SBP), Afterschool Snacks, Fresh Fruit and Vegetable Program (FFVP), Food Distribution Program, Seamless Summer Option (SSO).

Sources: 7 CFR 210.9(b)(19), 7 CFR 215.13(g), 7 CFR 210.16, 7 CFR 220(d), 7 CFR 225.6(l), 7 CFR 225.15, 7 CFR 226.23(j), 7 CFR 245.6(b)(9), 7 CFR 245.6(f)(1)