



Food and  
Nutrition  
Service

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DATE: January 8, 2018

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SUBJECT: FNS-640: SY 2016-17 Reporting Guidance

TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

This memo provides SY 2016-17 reporting guidance for the FNS-640 report. The FNS-640 report form is scheduled to be available in the Food Programs Reporting System (FPRS) in January 2018. The attached revised instructions and business rules/edit checks supersede the instructions that were released with memorandum SP 25-2017, *FNS-640: Administrative Review Report Form and Instructions*. State agencies may use the revised instructions and business rules/edit check to begin and/or finalize implementation of processes for reporting and any system updates.

### **FNS-640 Alignment & Pilot**

A workgroup consisting of National and Regional Office staff worked on the alignment of the FNS-640 and administrative review (AR) forms which resulted in the revision of the SY 2016-17 SFA-3 AR form and the first draft of the FNS-640 instructions that were released in April 2017. Beginning in May 2017, several State agencies and Regional office staff participated in a pilot phase to test functionality of the released FNS-640 instructions and business rules/edit checks and provide feedback on the revised instructions for the SY 2016-17 SFA-3 AR form. The SFA-3 AR form with revised instructions and options for use when completing the SY 2016-17 FNS-640 was released with SP43-2017. Additionally, the pilot group participated in testing the report upload and submission process through FPRS. Overall, the feedback from the group on the instructions, business rules/edit checks and report submission has been very positive. The efforts of both the FNS-640 alignment group and the pilot group informed the attached revised instructions and business rules/edit checks as well as the revisions to the SY 2017-18 AR forms directly related to the FNS-640.

### **SY 2016-17 Reporting Flexibilities**

FNS understands that transitioning to reporting data at both the SFA and site levels will require effort, particularly for State agencies completing the report manually without assistance from an electronic system. While efforts were made in consideration to the time and resources needed for system development, staff training, data accuracy, and report completion, concerns remain with some State's ability to

submit data collected during administrative reviews conducted in SY 2016-17 by March 1, 2018.

The expectation remains that all State agencies will report SY 2016-17 data using the redeveloped FNS-640, however, FNS recognizes the challenges associated with this first year of reporting and will therefore offer the following flexibilities for the SY 2016-17 FNS-640 report.

- Reporting Deadline Extension

The reporting deadline for SY 2016-17 reporting has been extended to May 1, 2018. Please note, the extended deadline will not be reflected in FPRS however, State agencies will not be penalized if reports are submitted by the extended deadline of May 1, 2018.

- Waiver Requests

State agencies have the opportunity to submit a waiver request, to their respective Regional Office, proposing the number and percentage of administrative reviews conducted in SY 2016-17 that they will be able to report by May 1, 2018. For example, a State Agency that conducted 200 reviews in SY 2016-17 could propose that due to the burden of manually entering data into the redeveloped FNS-640, the State will submit the FNS-640 to report data on 100 SFAs (50 percent) of the administrative reviews they conducted in SY 2016-17.

State agencies should refer to SP 27-2017, CACFP 12-2017, SFSP 08-2017: *Child Nutrition Program Waiver Request Guidance and Protocol* located online at <https://www.fns.usda.gov/child-nutrition-program-waiver-request-guidance-and-protocol> for guidance on requesting waivers. State agencies are highly encouraged to use the provided template to ensure all required information is included in the request. However, if States choose not to use the template, they must ensure that all components in the template are addressed.

When providing the specific Program requirements to be waived, State agencies should reference the following regulatory citation:

7 CFR 210.18(n): Each State agency must report to FNS the results of the administrative reviews by March 1 of each school year on a form designated by FNS. In such annual reports, the State agency must include the results of all administrative reviews conducted in the preceding school year.

Additionally, the proposed number and percentage of conducted SY 2016-17 Administrative Reviews to be reported by May 1, 2018 must be included when providing information in response to proposed monitoring and review procedures.

Regional and State Directors  
Page 3

State agencies must submit final waiver requests to their respective FNS Regional Office no later than **February 2, 2018**. Regional Offices must submit waiver requests to the National Office by **February 9, 2018**. Responses to requests will be sent by the end of February 2018.

Regional Offices should send waiver requests to Talitha Jordan at [talitha.jordan@fns.usda.gov](mailto:talitha.jordan@fns.usda.gov). Please be sure to the subject line “SY 2016-17 640 Waiver Request – [add Region and State name]”.

### **FPRS Access**

To gain access to the CN/FNS-640 form, users must follow the instructions provided on the FPRS welcome page located online at <https://fprs.fns.usda.gov>.

- New users will have to, first obtain and then, register their Level 2 eAuthentication account with FPRS in order to gain access.
- Users with an existing FPRS registration will only have to submit a new FNS-674 requesting access to the CN/FNS-640.

Note: If you have previously submitted a request for access to the CN/FNS-640, you do not have to submit a new request. Access will be provided once the form is released in FPRS.

### **Technical Assistance and Training**

FNS will continue to offer technical assistance to support State agencies' implementation of the revised form. Webinars to provide training and guidance on reporting using the redeveloped FNS-640 will be held in February 2018. Webinars will also provide a demonstration of report submission in FPRS.

State agencies with questions should contact their respective FNS Regional office.



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