



# Common Administrative Review (AR) Findings

*Back to School Conference  
Illinois State Board of Education  
July 2019*



## Acknowledgement Statement

- Today's presentation does not cover the scope of the NSLP/SBP
- SFAs are responsible for knowing and understanding all handbooks, manuals, alerts, notices and guidance's, as well as any other forms of communication that provide further guidance, clarification or instruction operating the programs.



## IMPORTANT

- ✓ Collected BEFORE we arrive on-site
- ✓ **VERY important to keep WINS current**
  - Authorized Representative
  - Sponsor Contact
  - Phone numbers
  - Email addresses
  - WINS questionnaires by site needed to be completed



# ACCESS AND REIMBURSEMENT

Eligibility Determination

Benefit Issuance

Verification

Meal Counting & Reimbursement



## Eligibility Determination

- ✓ No application on file
  - ❖ On the benefit issuance document, student is claimed as free/reduced but school has no documentation on file.
- ✓ Extension of benefits not documented
  - ❖ must have the EOB form for any student who resides with another on the DC list
- ✓ Income application missing required information
  - ❖ Last 4 digits of SSN, Signature, Income frequency



## Benefit Issuance

- ✓ Single child DC documentation not maintained
  - ❖ Print this out same day → Don't wait
- ✓ HEA does not match benefit issuance document
  - ❖ HEA approved as reduced price but benefit issuance document states free = claiming student incorrectly
- ✓ Changes in benefits not made at end of 30 day carryover period/verification (i.e. operating days)
  - ❖ Student was free last SY but did not turn in a HEA and is still claimed as free



## Verification

- ✓ Not completed by Nov 15
- ✓ No confirmation review
  - ❖ Complete the verification tracking form to monitor your progress
    - Confirming official signature
    - Direct verification was attempted
    - Follow-up attempt made and documented
    - Keep copies of your paper trail
- ✓ Inaccurate number of HEA's verified
  - ❖ VSR indicates for SFA to verify 2 and SFA verifies only 1 or does 3– OR Elem verifies 2 and HS verifies 2





## Verification - *continued*

- ✓ Verified apps not picked from error prone
  - ❖ Must choose from error prone first
  - ❖ Tip – write the EP guidelines on your income chart
- ✓ Did not attempt direct verification
  - ❖ Do this BEFORE sending any letters to the HH
- ✓ Using net income instead of gross
  - ❖ Net income not accepted
- ✓ HH does not provide all income documentation (i.e. child support)







## Meal Counting & Claiming

- ✓ Each serving line does not provide an accurate count by eligibility at the POS
  - ❖ Pre K classroom based on attendance
- ✓ Meal counts incorrectly consolidated
  - ❖ Manual checklist and then entered into POS after meal service = transfer/data input error
- ✓ Questionable patterns exist in the meal counts
  - ❖ Ave daily count is 100 but on the day of ISBE visit, counts are significantly lower



# NUTRITIONAL QUALITY & MEAL PATTERN

Meal Components

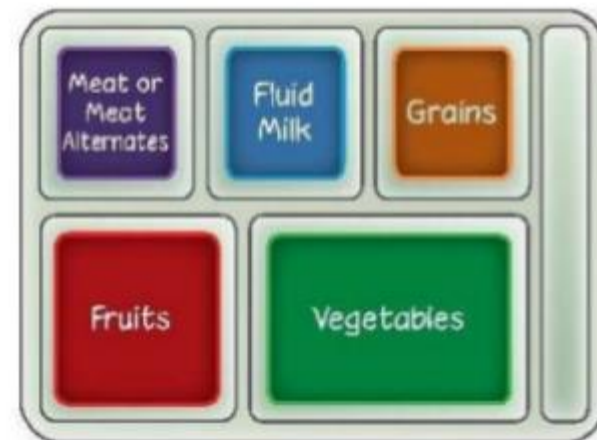
Offer Versus Serve

Dietary Specifications &  
Nutrient Analysis



# Day of Review

## Meal Components/Quantities



- ✓ Inadequate portion sizes
  - ❖ K-8 vegetable portion size =  $\frac{3}{4}$  cup. However PRs only show  $\frac{1}{2}$  cup is offered
  - ❖ Salad portion is 1 cup. Remember leafy greens yield HALF the volume
  - ❖ Also applies to the selected week of menus
- ✓ One cup fruit not offered at breakfast
  - ❖ The only fruit on PR is an orange. This does not yield 1 cup. Refer to the FBG for yield information



# Day of Review

## Meal Components/Quantities - *continued*

- ✓ Lack of CN labels, PFS, standardized recipes
  - ❖ Must have CN or PFS for all processed foods
  - ❖ Must have recipe that has 2 or more ingredients combined
  - ❖ Also applies to the selected week of menus
- ✓ No signage (menu for the day)
  - ❖ If you have choices for students to select from, need a menu for the day so students know what they can choose
- ✓ Serve-Only School issues
  - ❖ Not taking all components





## Selected Week

### Meal Components/Quantities

- ✓ Weekly vegetable subgroups not met
  - ❖ Beans and Dark Green
  - ❖ Repeat violations = FISCAL
- ✓ Missing/inadequate production records
  - ❖ Leftovers, Amount Planned, Not all items listed
- ✓ Numerous menu options & weekly M/MA or G/B not met (i.e. 2 or more entrée choices)
  - ❖ We evaluate the entrée that provides the minimum amount of M/MA & G/B
  - ❖ Can't count the vegetable if it is in the entrée



# Menu Worksheet Evaluation Example

This school offers 2 choices daily:

- 1) Rotating entrée – the M/MA varies daily
- 2) PBJ – only provides 1oz M/MA

|                                | <u>Monday</u> | <u>Tuesday</u> | <u>Wednesday</u> | <u>Thursday</u> | <u>Friday</u> | Weekly Total | Weekly Requirement<br>(oz equivalents) | Weekly Requirement<br>Check |
|--------------------------------|---------------|----------------|------------------|-----------------|---------------|--------------|--|-----------------------------|
| Minimum Meat/Meat<br>Alternate | 1.00          | 1.00           | 1.00             | 1.00            | 1.00          | 5.00         | 9                                      | No                          |

The worksheet will automatically add up the entrée that provides the least amount to make sure the minimums are met



## Offer Versus Serve



- ✓ No signage
  - ❖ Poster for breakfast and lunch is required
- ✓ Staff not understanding OVS
  - ❖ When asked what is the minimum that is required on a tray they don't know
- ✓ OVS not implemented correctly
  - ❖ Students not required to  $\frac{1}{2}$  cup fruit or vegetable
  - ❖ Students required to take a specific item (i.e. milk)



# General Program Compliance

Civil Rights

Professional Standards

On-Site Review

School Wellness Policy

Smart Snacks

Water

Food Safety

Reporting & Recordkeeping

Outreach SBP & SFSP





# Civil Rights

- ✓ Civil rights training not conducted
  - ❖ Required for all staff who interact who work with the school meal programs
- ✓ Lack of documentation
  - ❖ Agenda of When, Who, How long
- ✓ Poster not displayed in a prominent area where ALL can see it
- ✓ Not using the most current statement
  - ❖ TIP – Use ISBE forms annually





## Professional Standards

- ✓ Have not been met and/or tracked
- ✓ Need to identify how each employee is classified (full/part time status)
- ✓ No back-up documentation
- ✓ FSMC food service director cannot be the director





# On-Site Reviews

✓ On-site reviews not done

✓ Must be completed by District employee

✓ Breakfast monitoring

ILLINOIS STATE BOARD OF EDUCATION  
Nutrition Programs Division  
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1st Review  
 Follow-up Review

**NATIONAL SCHOOL LUNCH PROGRAM  
ON-SITE REVIEW FORM  
ASSESSMENT OF SCHOOL MEAL COUNTING AND CLAIMING PROCEDURES**

**INSTRUCTIONS:** Each school year, prior to February 1, school districts with more than one school are required to perform at least one On-Site Review of the lunch counting and claiming system in operation at each school administered by your School Food Authority (SFA). In addition, an observation of staff in action, e.g. cashiers, managers, and servers must be conducted. Answer the following questions by checking the appropriate response.

DISTRICT NAME \_\_\_\_\_ SCHOOL NAME (One Per Building) \_\_\_\_\_

LEA REVIEWER'S NAME \_\_\_\_\_ DATE OF VISIT (By February 1) \_\_\_\_\_ TIME OF VISIT \_\_\_\_\_  
In: \_\_\_\_\_ Out: \_\_\_\_\_

Approved Menu Planning Approach:  Traditional  Enhanced  NoMenu  Assisted NoMenu

Offer vs. Serve used with approved menu planning approach:  Yes  No  
(High schools must implement Offer vs. Serve.)

Grades participating in Offer vs. Serve (Circle all that apply): Pre-K K 1 2 3 4 5 6 7 8 9 10 11 12 or not participating

**MEAL COUNT SYSTEM**

|                          |                          |                          |   |
|--------------------------|--------------------------|--------------------------|---|
| Yes                      | No                       | N/A                      |   |
| <input type="checkbox"/> | <input type="checkbox"/> |                          | 1. Are meals counted at the point of service? (The person responsible for monitoring meals is located where a complete meal can be observed, usually at the end of the service line.)   |
| <input type="checkbox"/> | <input type="checkbox"/> |                          | 2. Does the person taking meal counts understand what constitutes a reimbursable meal under the menu planning approach being implemented?   |
| <input type="checkbox"/> | <input type="checkbox"/> |                          | 3. Does the person monitoring the meals know the school's policies for handling the following meal count procedures? If no, check the procedures that are not known below and follow-up with staff on the correct procedures.                   |
|                          |                          |                          | <input type="checkbox"/> a. Lost, stolen, forgotten, or destroyed tickets, tokens, IDs <input type="checkbox"/> e. A la carte selections  |
|                          |                          |                          | <input type="checkbox"/> b. Power failure (for automated systems) <input type="checkbox"/> f. Second meals  |
|                          |                          |                          | <input type="checkbox"/> c. Student worker meals <input type="checkbox"/> g. Incomplete meals   |
|                          |                          |                          | <input type="checkbox"/> d. Adult meals <input type="checkbox"/> h. field trips   |
| <input type="checkbox"/> | <input type="checkbox"/> |                          | <input type="checkbox"/> i. visiting student meals  |
| <input type="checkbox"/> | <input type="checkbox"/> |                          | 4. Is there a back-up system if the automated system(s) is down?  |
| <input type="checkbox"/> | <input type="checkbox"/> |                          | 5. Is someone trained as a "back-up" to count meals if routine employees are absent?  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 6. Does the meal count system produce an accurate count of reimbursable meals by category (free, reduced-price, and paid) served to eligible children? Community Eligibility Option (CEO) Schools only should mark N/A. If no, check reason(s): |
|                          |                          |                          | <input type="checkbox"/> a. Math errors <input type="checkbox"/> f. Attendance counts   |
|                          |                          |                          | <input type="checkbox"/> b. Counts taken at beginning of line <input type="checkbox"/> g. Morning/classroom counts  |
|                          |                          |                          | <input type="checkbox"/> c. Free and/or reduced-price backed out <input type="checkbox"/> h. Incomplete meals   |
|                          |                          |                          | <input type="checkbox"/> d. Cash backed out <input type="checkbox"/> i. Based on meals delivered/prepared, not meals observed   |
|                          |                          |                          | <input type="checkbox"/> e. Tray counts <input type="checkbox"/> j. Student workers not claimed by correct category   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 7. Does the meal counting system prevent overt identification? Community Eligibility Option (CEO) Schools only should mark N/A. If no, check reason(s):   |
|                          |                          |                          | <input type="checkbox"/> a. Unacceptable coding system <input type="checkbox"/> f. All meals offered/served not available to students eligible for free or reduced-price meals  |
|                          |                          |                          | <input type="checkbox"/> b. Use of special tickets, tokens <input type="checkbox"/> g. Checklist visible to students in line  |
|                          |                          |                          | <input type="checkbox"/> c. Cash only line <input type="checkbox"/> h. Cash register display identifies price of meals  |
|                          |                          |                          | <input type="checkbox"/> d. Visual or vocal ID  |
|                          |                          |                          | <input type="checkbox"/> e. Separate serving times, lines, or dining areas  |

ISBE 67-35 (10/11)



## Wellness Policy

- ✓ Not updated since 2006
- ✓ Not made publically available
- ✓ No established wellness committee
- ✓ No evaluation/assessment and/or made public

## Health & Wellness





## Smart Snacks

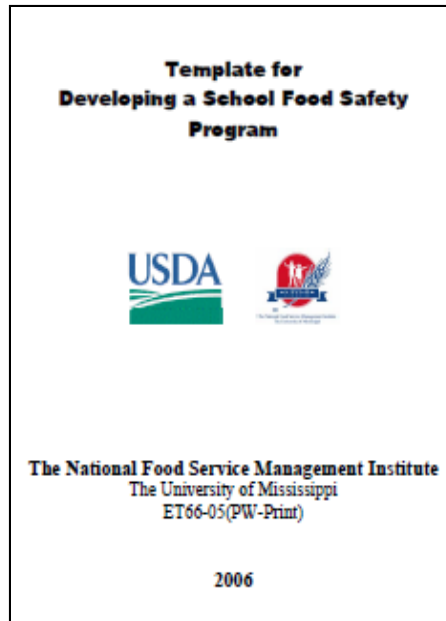
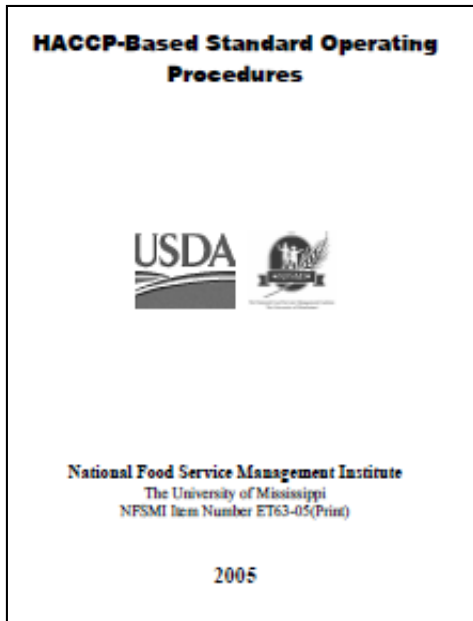
- ✓ No established process to evaluate
- ✓ Foods sold do not meet
- ✓ Documentation not available
- ✓ Entrée items with accompaniments not evaluated





## Food Safety

- ✓ Temperature logs not completed/maintained (i.e. dry storage)
- ✓ No written food safety plan on-site
- ✓ Inspection not posted



Refrigeration Log Location: \_\_\_\_\_  
Month/Year: \_\_\_\_\_

Instructions: A designated foodservice employee will record the location or description of unit, date, time, air temperature, corrective action, and initials on this log. The foodservice will verify that foodservice employees have taken the required temperatures by visually monitoring food employees during the shift and reworking, sanitizing, and dating this log daily. Maintain for a minimum of 1 year.

| Day | Time | Temperature | Corrective Action | Food Worker Initials |
|-----|------|-------------|-------------------|----------------------|
| 1   |      |             |                   |                      |
| 2   |      |             |                   |                      |
| 3   |      |             |                   |                      |
| 4   |      |             |                   |                      |
| 5   |      |             |                   |                      |
| 6   |      |             |                   |                      |
| 7   |      |             |                   |                      |
| 8   |      |             |                   |                      |
| 9   |      |             |                   |                      |
| 10  |      |             |                   |                      |
| 11  |      |             |                   |                      |
| 12  |      |             |                   |                      |
| 13  |      |             |                   |                      |
| 14  |      |             |                   |                      |
| 15  |      |             |                   |                      |
| 16  |      |             |                   |                      |
| 17  |      |             |                   |                      |
| 18  |      |             |                   |                      |
| 19  |      |             |                   |                      |
| 20  |      |             |                   |                      |
| 21  |      |             |                   |                      |
| 22  |      |             |                   |                      |
| 23  |      |             |                   |                      |
| 24  |      |             |                   |                      |
| 25  |      |             |                   |                      |
| 26  |      |             |                   |                      |
| 27  |      |             |                   |                      |
| 28  |      |             |                   |                      |
| 29  |      |             |                   |                      |
| 30  |      |             |                   |                      |
| 31  |      |             |                   |                      |



## SFSP Outreach

- ✓ SFSP outreach not conducted and/or kept
- ❖ If you do NOT know where a SFSP location is in your area, use this generic statement

To find a Summer Meals  
site close to you:  
CALL/LLAME (800) 359-2163  
TEXT FoodIL TO 877877  
[SummerMealsIllinois.org](http://SummerMealsIllinois.org)



# Resource Management Compliance

Maintenance of the Non-profit  
School Food Service Account

Paid Lunch Equity

Revenue from Nonprogram Foods

Indirect Costs





# Maintenance of Nonprofit School Foodservice Account

- Large Deficits
- Unallowable Expenses to Account
- Over Net Cash Resources





## Paid Lunch Equity (PLE)

- No PLE Tools completed
- Did not raise lunch prices
- Lack of documentation of contribution

[Unrounded Requirement Finder](#)

[SY 19-20 Price Calculator](#)

[SY 19-20 NonFederal Calculator](#)

[SY 19-20 Split Calculator](#)

[SY 2019-20 REPORT](#)



## Revenue from Nonprogram Foods

- No documentation to show compliance
  - USDA Revenue from Nonprogram Foods Calc.
  - Locally Generated Spreadsheets
- Adult Meals price too low
  - SFA in CEP, \$0.40 above Federal Free Reimbursement
  - Pricing program, \$0.40 above Highest Paid Student Rate



# Indirect Cost

- Unallowable percentages used
  - Rates calculated by ISBE based on AFR
- No documentation to support
- Usage generated deficit

| <u>District No.</u>  | <u>County</u> | <u>District Name</u>     | <u>Restricted Rate</u> | <u>Unrestricted Rate</u> |
|--|---------------|--------------------------|------------------------|--------------------------|
| Zero (0.00%) rates highlighted in Green were calculated as a negative number |               |                          |                        |                          |
| 99999999999  |               | State Indirect Cost Rate | 2.99%                  | 12.58%                   |



## Contact Us

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# Questions???

