School Meals Administrative Review Frequently Asked Questions and Answers

Q: Will the review be for the current year or the previous year?

A: School meal administrative reviews will primarily cover current year information, in terms of reviewing a claim for reimbursement, menu review, etc., but there are instances when prior year information will be reviewed. For example, if current year verification has not been completed at the time of the review, we will look at the prior year documentation.

Q: When will the review plan be sent out so we know if we are on the list?

A: The <u>review plan</u> was posted online in August. The list is organized by RCDT number and SFA name.

Q: Our SFA only participates in the Special Milk Program. Does the school meals administrative review apply to us?

A: If the Special Milk Program is the only child nutrition program your SFA participates in, then ISBE will not be conducting a school meals administrative review of your SFA.

Q: How will we know we are up for review if the announcement letter was addressed to our Superintendent, but we would be the one that needs to schedule the review?

A: Letters and reports related to the administrative review will be sent electronically through WINS, to all individuals identified on the SFA's WINS questionnaire. The correspondence will be address to the authorized representative, generally the superintendent, but all individuals identified on the questionnaire will be able to view the correspondence.

Q: How long will a review take?

A: It depends on a number of factors. The size of the SFA and the number of issues found during the review are the primary determiners for the length of the review. Since this is the first year of the new review process for ISBE, we do not have historical data to guide us in predicting the length of a review. We anticipate the review taking longer than prior cycle reviews, due to the additional requirements of the review.

Q: How much time do we have when the announcement letter is sent to the SFA to the time the review is conducted?

A: For SY 13-14, ISBE posted a list of planned reviews online in August. In addition, ISBE sent an announcement letter to SFAs planned for review as soon as the SFA's WINS questionnaire for SY 13-14 was approved. ISBE began conducting reviews at the submission of the first claim for reimbursement for the fiscal year. As a result, the length of lead time will vary depending on when during the school year the SFA is reviewed. This process may vary in subsequent years.

Q: Do you let us know which schools are reviewed if we have more than five schools in the district?

A: Yes, the monitor will let you know which sites have been selected for review.

Q: What if we do not serve breakfast at our schools?

A: The reviewer will evaluate only those programs for which you are enrolled and approved.

Q: If we are on the list for a review, when will we find out what the review week is?

A: The assigned monitor will contact the SFA to schedule the visit, at which time; the monitor will let you know all pertinent information.

Q: Can ISBE combine SFA reviews when multiple SFAs use the same menu? A: No, each SFA is considered its own entity and will be reviewed separately.

Q: We have a contract for our food service. The money that we receive from ISBE and from paid lunches flows through us onto the contracted food service. We do not keep any money. How would we complete the resource management section?

A: The SFA is financially and legally responsible for the program. You cannot contract out financial and legal responsibility of the program.

Q: How will individual schools be chosen for site reviews if applications are being picked at random?

A: The review of certification and benefit issuance (applications) is now district-wide and no longer tied to particular sites. Additionally, sites will be selected based on certain criteria, as part of the site selection process. Site selection is not based on the applications we randomly select for review of certification and benefit issuance. These processes are separate.

Q: When speaking of the "month of review", does the reviewer look at the entire month or just one week?

A: The reviewer will look at both the entire month and a week within the month, for different portions of the review. For example, ISBE will review the menu for the entire month in regards to ensuring that all required components are offered, but will go in depth for one week analyzing vegetable subgroups, whole grains and portion sizes.

Q: Which nutrient analysis software is ISBE using to conduct nutrient analyses?

A: ISBE will be using NutriKids software to conduct nutritional analyses during school year 13-14.

Q: If our food distributor conducts nutrient analyses for us, does that count? A: If during a review we determine that one of your sites needs a nutrient analysis, we can

validate an analysis that your SFA conducted, as long as it met all of the requirements, or we will conduct our own. We cannot use an analysis conducted by a food distributor.

Q: How many schools will receive a nutritional analysis, if an analysis is required? A: If a nutritional analysis is required during the review, ISBE will do the analysis for one site/school.

Q: How is the Dietary Specifications Assessment Tool scored?

A: The tool has numerous questions. When all questions are considered as a whole, the tool indicates if the site is low or high risk for having meal pattern violations. USDA developed the tool and did not share the "behind the scenes" scoring methods. If the overall assessment results in a high risk determination, then a nutritional analysis will be conducted by ISBE.

Q: Under offer versus serve at lunch, what is the required portion size of fruit or vegetable that a student must take?

A: A student must take three components at lunch under offer versus serve. A minimum of a 1/2 cup fruit or vegetable must be taken. If two of the three components taken are fruits and/or vegetables, then one fruit or vegetable component can be a $\frac{1}{2}$ cup portion and the second fruit or vegetable component must be a full 1 cup portion for grades 9-12 and a full $\frac{1}{2}$ cup fruit or $\frac{3}{4}$ cup vegetable portion for grades K-8.

Q: Why does the state accounting method keep lunch funds in the general account?

A: Child nutrition programs are line items under the Education Fund, per the Illinois Program Accounting Manual. That means they have separate accounts. Funds specific to the federal child nutrition programs must be maintained in the proper account from year to year, which is no different than other grant or program specific funds.

Q: Must a SFA increase lunch prices if it currently has a large fund balance or if it's current operation is consistently in the black?

A: All SFAs must calculate the average paid lunch prices and determine if any adjustments are required, regardless of any of the circumstances noted in the question.

Q: Where are the indirect cost rates provided by ISBE posted online?

A: The School Business Services Division of ISBE posts the rates annually at http://www.isbe.net/sbss/indirect.htm.

Q: When applying the indirect cost rate, which do we use, the restricted or unrestricted?

A: You may use the unrestricted rate, which is generally higher than the restricted rate.

Q: How do you use the unrestricted indirect cost rate to calculate allowable indirect costs for the food service?

A: You take the SFA's unrestricted indirect cost rate, which is a percentage rate, and multiply it by the total nonprofit food service account expenditures for the SFA. The result is the amount of allowable indirect costs for the food program.

Q: When calculating expenses for the nonprofit food program, can utilities, maintenance and facility costs be contributed to the food service account?

A: Generally, utilities, janitorial or maintenance costs and building or facility costs would be considered indirect costs to the food program. Indirect costs can be charged to the food program at the state approved indirect cost rate or by using a SFA developed indirect cost allocation plan.

Q: What is the intent of the nonprogram foods tool?

A: The intent is to ensure revenue from the sale of nonprogram foods is proportionate to the cost of purchasing the nonprogram foods.

Q: Where is the USDA Revenue from Nonprogram Foods Tool available?

A: It is available on the nutrition website at http://www.isbe.net/nutrition/htmls/nslp hhfka implementation.htm.

Q: How should the SFA document nonprogram food costs?

A: There are a variety of methods that could be used to document nonprogram foods costs, to include separate purchasing/separate invoices, separate accounts in the general ledger, use of the point of service sales system to track purchases, etc.

Q: How do you suggest that program and nonprogram food costs be tracked separately? A: At this point in time, USDA nor ISBE has a recommendation.

Q: If a SFA provides a free meal to office staff, cafeteria workers, etc., should the SFA be paying for those meals with federal/state child nutrition reimbursement funds?

A: The meals described are non-reimbursable under the child nutrition programs, thus they are considered nonprogram foods. Child nutrition program reimbursement cannot be used to cover the cost of nonprogram foods.

Q: If a SFA provides food for events that are not part of the food service program, such as board meetings, literacy nights, etc., should the SFA be paying for that food with federal/state child nutrition reimbursement funds?

A: The food described is non-reimbursable under the child nutrition programs, thus it is considered nonprogram food. Child nutrition program reimbursement cannot be used to cover the cost of nonprogram food.

Q: Are production records required for afterschool snack?

A: Yes

Q: Are Community Eligibility Provision (CEP) schools required to provide applications or other documentation from years prior to their CEP status?

A: During an administrative review of an SFA with CEP schools, the monitor will validate the identified student percentages at those schools to ensure that they were calculated correctly. The monitor will need to review all documentation used to determine the identified student percentages. If the percentages are increased during following years, the monitor will also review that supporting documentation. Also remember that in general, all documentation must be maintained for three years plus the current year.