ADMINISTRATIVE REVIEW Q & A

MEAL ACCESS & REIMBURSEMENT: Certification & Benefit Issuance; Verification; Meal Counting & Claiming

1. **Where do we find the Benefit Issuance document?** Each SFA is responsible for maintaining its own Benefit Issuance document, either electronically or on paper. The document is a list of students determined eligible for benefits (free, reduced) in the district. During the off-site portion of the review, the SFA will submit a copy of the benefit issuance document, or a report from the electronic system that lists the students receiving free or reduced benefits. The document needs to list each student's name, name of school the student attends, benefit status (free or reduced), method of determining benefits (income, direct certification, or categorical), and indicate if the application was selected for verification. The list/report must match the benefit received at the point of service, POS. Only students eligible for benefits should be on the list (no paid students), and each student should be listed only once. The benefit issuance document should *not* be listed by benefit status unless requested by your consultant.
2. **Is there a different process for emergency shelters? (Benefit Issuance)** Emergency shelters are not eligible to participate in SBP or NSLP, and are therefore not subject to the school programs' Administrative Review process. Emergency Shelters are eligible to apply for participation in the Child and Adult Care Food Program (CACFP).
3. **What if we use paper tickets at the POS in regards to Benefit Issuance and Eligibility?** If a school uses paper tickets, the tickets are prepared according to the benefit issuance list. The benefit level might be secretly coded on the ticket so that the POS cashier can accurately count them as they are collected or punched. The benefit issuance list does not need to be available at the POS as long as an accurate count by category can be made according to the ticket information. Use of 'F', 'R', and 'P' or any other overt identification of category is not allowed at the POS.
4. **What is the difference between a verifying official and a confirming official? The verifying official** is the employee who conducts the verification process where selected applicants are asked to submit verification eligibility for free and reduced price meals. The **determining official** is the employee who originally determines whether a student is eligible for free or reduced benefits. The **confirming official** is the employee who rechecks the certification of benefits made by the determining official before verification is conducted to ensure that the original determination was correct. Only applications selected for verification must be confirmed, However SFAs may elect to confirm all applications at the time of determination in which case the application would not need to be confirmed again at the time of verification. The confirming official and the determining official cannot be the same person.
5. **Can the verification person be the same as the confirming official?** Yes, the verification official and the confirming official can be the same person. Also, the verification official and the determining official can be the same person. However, the determining official and the confirming official must be different people.

6. **Can I have more than one person be the confirming official?** As long as the confirming official and the determining official are different people, the SFA may have as many confirming officials as it wants as long as the officials are properly trained and confidentiality is assured.

NUTRITIONAL QUALITY & MEAL PATTERN: Meal components & quantities; Offer versus serve; Dietary specification & nutrient analysis

1. **Is there standard signage available for the posting of the reimbursable meal standards? Please provide a link.** There is no standard signage to post at or near the beginning of the meal service line to help students identify meal components and what makes a reimbursable meal. Iowa Team Nutrition developed the ***Build a Healthy Lunch*** reimbursable meal identification system. This kit is developed to assist students in selecting their meal choices and avoid unintentional purchase of food items not included in the reimbursable meal. This reimbursable meal identification kit allows SFAs/nonpublic schools/RCCIs to be in compliance with the identification of reimbursable meals regulation of the Healthy, Hunger-Free Kids Act 2010. For more information on *the* ***Build a Healthy Lunch Reimbursable Meal Identification System*** please go to the Nutrition Standards 2012 page on the Iowa Department of Education website https://www.educateiowa.gov/. Scroll down to **Resource** section of the Nutrition Standards 2012 page. Signage is also available for breakfast. Go to https://www.educateiowa.gov/. Go to School Breakfast Program and scroll down to School Breakfast Promotion.
2. **Has the menu planning tool been updated for the elimination of the maximums of grains and meat?** No, the USDA-approved *Menu Planning Tool for Certification for Six-Cent Reimbursement* also referred to as the Menu Worksheet will not be updated to reflect the flexibility on weekly maximum meat/meat alternates and grain/bread requirements. However, USDA has updated the instructions that accompany the Food and Nutrition Services (FNS)-developed certification tool to reflect this additional flexibility.

   On February 25, 2013, USDA issued memo, SP 26-2013 *Extending Flexibility in the Meat/Meat Alternates and Grains Maximums for SY2013-2014*, stating the flexibility in weekly maximum meat/meat alternates and grain/bread requirement for both breakfasts and lunch is extended for SY2013-2014. SFAs meeting the weekly minimum for meat/meat alternate and grain/breads will be considered as compliant for certification for 6 cents and administrative review as long as the SFAs continue to meet the meal pattern requirements and dietary specifications, including calories. Currently, USDA is considering longer term guidance on extending this flexibility beyond SY 2013-2014.

   On January 3, the 6 cents final rule was published in the Federal Register making the flexibilities on weekly maximum on grains and meat/meat alternates permanent. SFAs must still meet the weekly minimums for meat/meat alternates and grains. SFAs will continue to be required to meet the weekly minimum and maximum ranger requirements for calories and other dietary specifications for each age/grade group.
3. **Will the menu chosen to be reviewed happen on site or will I have notice of which week will be chosen?** The review of menu and other related documentation to check for meal pattern compliance will generally occur on-site but can be completed off-site. The review of menu(s) will

be for a school week during the review period. The SFA has the discretion of selecting the week they would like the State Agency (SA) to review provided the week has a minimum of three (3) and a maximum of seven (7) operating days. Each distinct breakfast and lunch menu(s) for each age/grade group will be reviewed. The review period is the most recent month for which a Claim for Reimbursement was submitted, provided that it covers at least ten (10) operating days.

RESOURCE MANAGEMENT: Risk Assessment; Non-Profit School Food Service Account; Paid Lunch Equity; Revenue from Non-program Foods; Indirect Costs; USDA Foods

1. **Can using dollars from the General Fund be forgiven? What if you have used the general fund to support food service?** (In reference to PLE) In Iowa, there are restrictions on transferring general funds to the Food Service fund. Please contact the finance staff of the Department of Education.

GENERAL PROGRAM COMPLIANCE: Civil Rights; SFA On-site Monitoring; Local Wellness Policy; Competitive Foods; Water Availability; Food Safety; SBP & SFSP Outreach

2. **If we post breakfast and lunch menus on our website, is this notice of the School Breakfast Program?** No. Posting the breakfast and lunch menus on the SFA website is not considered adequate notification to inform households of enrolled students of the availability of the School Breakfast Program (SBP). In USDA memo, SP 40-2011, published on June 15, 2011, USDA states that SFAs must notify households of the availability of the SBP just prior to or at the beginning of the school year in informational packets that are sent out to each household with free and reduced price meal applications for the school year. In addition, schools should send reminders regarding the availability of the SBP multiple times throughout the school year. These reminders can be through the public address system or other means generally used to communicate with households of enrolled children. Information about the SBP should be posted on the SFA website. USDA encourages SFAs to use the ***Expanding Your School Breakfast Program*** for outreach and expanding activities.
3. **If we purchase vending items off the Martin Brothers list of "Healthy Kids Act Approved Items," or items stating they meet Smart Snacks regulations, is that enough evidence that it meets Smart Snacks and Healthy Kids Act?** No**. If not, what would be needed?** The SFA is responsible to ensure that the Martin Brothers list of "Healthy Kids Act Approved Items" or Smart Snacks approved items are verified using the Alliance Product Navigator and Alliance Product Calculator located at http://www.healthiergeneration.org/live_healthier/eat_healthier/alliance_product_navigator/. https://www.educateiowa.gov. Look for the nutrition calculator in the Learner Support page under the PK-12 menu. The SFA is responsible for keeping the actual nutrition fact label of the nonprogram food item along with documentation.
4. **What is required for the media release that must be submitted annually to the local media?** A sample public release is available in the Form Download in the CNP2000. The public release must include both free and reduced-price income eligibility guidelines, how a household can apply for free or reduced price meal, notice that the household can appeal the decision on meal

eligibility, and the USDA and Iowa Non-Discrimination statements. The media release is available in English and Spanish.

Documentation SFA can keep on file: a copy of the media release, the date the release was sent to the media, and the media outlets the release was sent to.

The State Agency (SA) sends the public release to newspapers via MediaLink. The SFAs must contact their local newspaper to find out if they subscribe to MediaLink. SFA should have documentation on file to show the local media was contacted. If the local media does not subscribe to MediaLink then, the SFA is required to send the release. The SFA must also give the public release to local employment offices and major employers contemplating or experiencing major layoffs.

5. **Who has to have civil rights training?** The USDA FNS-113 instructions state that Local Educational Agencies (LEAs) are responsible for training 'frontline staff." Frontline staffs are those who interact with program applicants and participants and those who supervise "frontline staff." Civil Rights training must be provided annually and documented. Documentation should include agenda, sign-in attendance records, and handouts or materials used during the training.
6. **What is the RCCI process for evaluating/updating Local Wellness Policies?** RCCIs process for evaluating and updating the Local Wellness Policy is no different than the SFAs. The Local Wellness Policy is required to be reviewed and updated on a periodic basis. Until Food and Nutrition Service (FNS) issues regulation and technical assistance materials, what constitutes a periodic basis is the SA discretion. **Who are the stakeholders for RCCIs?** The stakeholders would be parents, students, and executive director, and psychologist, members of the board of directors, foodservice staff, and volunteers.
7. **The link to the civil rights manual doesn't work.** The link to Civil Rights PowerPoint training is now functioning. To access the training, go to the Iowa Department of Education website https://www.educateiowa.gov. Click on Index A – Z from the navigation bar at the top and then select C, then Civil Rights Training for Participating Organizations in Child Nutrition Programs. Then select Civil Rights Training for NSLP. Please note: this training needs to be updated. The USDA and Iowa Non-Discrimination Statements are not correct. Has this been done?
8. **Are water fountains considered "unrestricted" if the children have to ask permission to go to it?**

   "Unrestricted" access to a water fountain means that students are allowed to get water at any time during the breakfast and lunch meal service. It is okay for students to ask permission to get water to help maintain some decorum but students should not be disallowed getting the water. Schools can provide water in a variety of ways if allowing permission to use the water fountain would result in disruptions to the meal service. Schools can offer water pitchers and cups at the lunch tables.
9. **Are RCCIs required to comply with Healthy Kids Act for all meals served, even if they meal is not reimbursable? (supper).** The Healthy Kids Act (HKA) and Smart Snacks requirements apply to vending, a la carte, and regulated fundraising items, that is, any food/beverages sold to students between midnight the night before and 30 minutes after the last bell of the school day. If the RCCI has vending machines from which the students can purchase food and beverages during the school day, then the items in the vending machine must comply with Smart Snacks

and HKA requirements. Nonprogram foods offered via vending or other means must be HKA and Smart Snacks approved items that are verified using the Alliance Product Navigator and Alliance Product Calculator located at http://www.healthiergeneration.org/live_healthier/eat_healthier/alliance_product_navigator/. https://www.educateiowa.gov. Look for the nutrition calculator in the Learner Support page under the PK-12 menu. The RCCI is responsible for keeping the actual nutrition fact label of the nonprogram food item along with documentation.

10. **A food safety plan – where can I find one?** *Developing a School Food Safety Program* is a resource available on the National Food Service Management Institute (NFSMI) website at http://www.nfsmi.org . This resource reflects the required elements in a food safety program as identified in the USDA Guidance. The resource includes a template for developing a school food safety plan, and sample Standard Operating Procedures (SOPs). Select Resource Center from the navigation bar at the top of the webpage, then select Document Library. In the Quick Search by Title, type *Developing a School Food Safety Program*.
11. **For RCCIs, what parties need to receive Civil Rights trainings?** Please refer to the Civil Rights Manual posted on the Iowa Department of Education website. This manual is designed to assist any organization participating in the Child Nutrition Programs (CNP) to provide trainings to staff. FNS Instruction 113-1 state that" staff who interact with program applicants or participants, and persons who supervise these staff must be provided civil rights training annually." For RCCIs, all employees involved with the residents and help plan, prepare, serve, and monitor meal service must receive civil rights training annually. The Civil Rights Manual can be found on the Iowa Department of Education website by going to Quick Links and selecting Learning Tools. Then select *Civil Rights Training for Participating Organizations in the Child Nutrition Programs.* **Do parties that are not involved with food programs, but are involved with participants in other ways (indirect care) need the training?** No.
12. **What requirements are there for staff members giving the civil rights training?** Staff providing the civil rights training must ensure all required elements of the training are covered. The training must include collection and use of data, effective public notification systems, compliant procedures, compliance review techniques, resolution of non-compliance, requirements for reasonable accommodation of persons with disabilities, requirements for language assistance, conflict resolution and customer service.
13. **Is water availability considered "unrestricted" if there are limits if students can enter the water area, but staff assists clients to get water?** "Unrestricted" access to water means that students are allowed to get water at any time during the breakfast and lunch meal service. It is okay for staff to assist students to get water to help maintain some decorum but students should not be disallowed getting water. Schools can provide water in a variety of ways if allowing permission to enter the water area would result in disruptions to the meal service. Schools can offer water pitchers and cups at the lunch tables.
14. **Is the Civil Rights poster to be posted in each cafeteria or if the school has it posted somewhere else, will that work?** The Civil Rights poster must be displayed at each location where school meals are served. Therefore, at RCCIs if breakfast is served in each cottage and not

a central location, the Civil Rights posted must be posted in a visible location at each cottage meal service area.

15. **Is the Food Safety Plan looked at during the review?** Yes, the consultant will be observing meal preparation and service and reviewing the school site's food safety plan to ensure procedures are written, followed, and reviewed periodically. **Do I need to go through every menu item and put on the food safety plan of what category it falls under for the same day service, etc or could I post the information on what to look for in each kitchen?** An effective school food safety plan requires each menu item offered/served to be categorized into the correct process approach. Please refer to the NFSMI resource: ***Developing a School Food Safety Program***. A copy should then be posted in a location the food service staff can easily access as well as a copy kept on file. The food safety program must be reviewed periodically, it is highly recommended to review annually and when there are major changes in the food service operation**. I have reviewed the HACCP training on the ISU extension website. Would that work as well?** If you are the Person-In-Charge of the food service operation at the site, then you are required to take a food safety certification training such as ServSafe®. All foodservice personnel, including permanent and substitute employees, must be provided with refresher training on food safety periodically. All training must be documented. Documentation should include agenda, sign-in attendance records, and handouts or materials used during the training.

OTHER FEDERAL PROGRAM REVIEWS: After-school snacks (ASP); Summer Food Service Program (SFSP); Fresh Fruit & Vegetable Program (FFVP); Special Milk Program (SMP)

1. **Where can I get an after school care snack program manual?** https://www.educateiowa.gov/pk-12/nutrition-programs/afterschool-snack-programs
2. **Fresh Fruit and Vegetable Program – how can we sign up?** For information, go to https://www.educateiowa.gov/pk-12/nutrition-programs/fresh-fruit-vegetable-program and contact Stephanie Dross at Stephanie.dross@iowa.gov.

MISCELLANEOUS:

1. **When do you find out when your onsite review will be held?** Contact your Consultant about your individual review. If you do not know how to contact your consultant, call the state office: 515-281-5356.
2. **How will I know when I need to have my off site review turned in?** An official letter of intent to review the SFA will be sent from your consultant. That letter will include dates for the on-site review, the review period (month), final date that the claim for reimbursement for the review month must be filed, date the Resource Management module must be completed, date the off-site questions must be completed, and the date of the entrance conference.
3. **How much notification will we have when our review will be?** The goal is to give SFAs at least six week's notice in order to allow time to complete the off-site questions.