

Resource Management Comprehensive Review

The *Resource Management Comprehensive Review Form* must be used when conducting a comprehensive review of SFAs that receive one or more risk indicators within one of the four resource management areas. The scope of the resource management comprehensive review is described in greater detail for each Resource Management area in the modules in this section. Information provided by the SFA for the resource management comprehensive review should be based on the SFA's most recently completed school year- the Resource Management review period - unless otherwise indicated. The time period chosen should be consistent throughout the review of the Resource Management Section. As indicated previously, any findings identified during the course of the Resource Management review, even if corrected by the SFA during the course of the RM review, must be followed up with corrective action and technical assistance for the entire RM review period (previous school year) and administrative review period (current school year). If necessary, corrective action must include the SFA's adoption of internal controls to ensure noncompliance does not occur in the future. If noncompliance is identified during the RM review period, State agencies have discretion to examine financial documents from the current school year to determine if additional corrective action is necessary. Refer to the modules that follow for more information.

Fiscal Action

This is a General Area, thus fiscal action is not required. In some instances, such as the expenditure of nonprofit school food service monies on unallowable costs or “double dipping” when indirect costs are charged, the SA must withhold funds or the LEA must otherwise reimburse the nonprofit school food service account in full to cover the amount of funds misspent and/or overcharged to the account. FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. While withholding program payments is not included in the specific regulatory definition for fiscal action, additional information can be found in Section VIII, *Fiscal Action*, Module: *Withholding Payments*.

Module: Comprehensive Review – Maintenance of the Nonprofit School Food Service Account

Intent/Scope of Monitoring

This Module must be used to conduct a comprehensive review of the SFA's resource management practices and may be used in whole or in part to assess compliance and/or the need for technical assistance concerning individual risk indicators triggered during a SFA's Resource Management risk assessment. When conducting a review of the maintenance of the nonprofit school food service account, the SA must assess an SFA's risk of noncompliance with the provisions of 7 CFR 210.2, 210.14(a), 210.14(b), and 210.19(a)(1), which address the maintenance of the nonprofit school food service account.

This Module focuses on ensuring the SFA is maintaining and using its nonprofit school food service account according to regulatory requirements, which include observing the limitation on the use of the nonprofit school food service account revenues set forth in 7 CFR 210.14, and ensuring related costs are necessary, reasonable, and allocable set forth in 2 CFR 225. SA monitoring of this area is intended to ensure that SFAs:

- Use all **nonprofit school food service revenue** solely for the operation or improvement of the school food service:
 - Revenues may be used for food, equipment, and labor to operate the meal program; and
 - Revenues must not be used to purchase land and/or buildings, or to construct buildings, unless approved by FNS.
- Limit **net cash resources** to three months' average expenditures, or have a process or SA approved plan for spending the amount in excess of 3 months. Limiting the size of a SFA's food service net cash resources ensures that funds in the nonprofit school food service account are expended to improve program operations and meal quality.

- Comply with **allowable cost** restrictions, limiting expenses of nonprofit school food service funds to those costs that are necessary, reasonable, and allocable.
- Adequately document loans the LEA may have provided to the SFA's nonprofit school food service account for the purpose of resolving a budget shortfall in the school food service account.

This section of review falls under the General Areas.

Review Procedures

The SA has the flexibility to review all aspects of the maintenance of the nonprofit school food service account off-site if the SA is able to secure all of the financial documentation needed to assess the SFA's compliance in this area. The *Maintenance of the Nonprofit School Food Service Account* section of the *Resource Management Comprehensive Review Form* is used when conducting a comprehensive review of this Module. To answer the questions on the review form, the SA must obtain documentation that may include, but is not limited to, the Statement of Revenues and Expenses, a general ledger, or other similar documents. The SA must assess the information in accordance with the guidance below.

Documents for the Resource Management comprehensive review are taken from the most recently completed school year (RM review period) unless otherwise noted by the State agency

Nonprofit School Food Service and Net Cash Resources:

The SFA must follow and document an annual process to identify revenue excess or shortfall (i.e., net cash resources). To monitor compliance, the SA should use the SFA's Statement of Revenue and Expenses from the most recently completed selected year to identify the following:

$$\text{Fund Balance or Carryover} + \text{Total Revenues} - \text{Total Expenses} = \text{Net Cash Resources}$$

Additionally, a sample Statement of Revenue and Expenses is provided to help the SA perform the calculations in the steps below. Please note this is just a **sample** and may not reflect all categories that typically would appear on a Statement of Revenue and Expenses:

*****SAMPLE*****

Statement of Revenues and Expenses, Budget and Actual, Year Ended June 30, 2016

	<u>Adopted</u>	<u>Final</u>	<u>Actual</u>	<u>Final Budget</u>
Revenues				
Local Sources:				
Charges for services	\$ 655,000	\$ 655,000	\$ 564,694	\$ (90,306)
Earnings on investments	2,000	2,000	2,278	278
Other	25,000	25,000	28,711	3,711
State sources	51,000	51,000	70,729	19,729
Federal sources	4,357,250	4,357,250	4,569,710	212,460
Total revenues	5,090,250	5,090,250	5,236,122 (Step 1)	145,872
Expenditures				
Current operating:				
Enterprise and community services	\$ 5,490,250	\$ 5,690,250	\$ 5,570,671	\$ 119,579
Total current expenditures	5,490,250	5,690,250	5,570,671	\$ 119,579
Contingency	200,000			
Total expenditures	5,690,250	5,690,250	5,570,671 (Step 2)	119,579
Net change in fund balances	(600,000)	(600,000)	(334,549) (Step 3)	265,451

- *Step 1 — Total Nonprofit Food Service Current Revenue:* Determine the SFA's available revenues based on the selected year. The SA must identify all monies received by or accruing to the nonprofit school food service account, including but not limited to meal payments, earnings on investments, other local revenues, State revenues (i.e., reimbursements and State match), and Federal cash reimbursements. This information should be available on the Statement of Revenue and Expenses, the general ledger, or other similar document. SFAs that commingle their nonprofit school food service

account with other school accounts must provide the SA with sufficient information to identify all revenue available to the school food service.

- *Step 2 — Total Current Expenses:* Determine payments owed/total expenses incurred in the operation or improvement of the nonprofit food service program. SFAs that commingle their nonprofit school food service account with other school accounts must provide the SA with sufficient information to identify all expenses charged to the school food service.
- *Step 3 — Net Cash Resources:* Calculate the SFA's net cash resources using the values from Step 1 and Step 2:

Step 1 (Total Current Revenue) - Step 2 (Total Current Expenses) = Step 3 (Net Cash Resources)

- *Step 4 — Identify the SFA's Three Months' Average Expenditures:* Using the Statement of Revenue and Expenses or comparable documentation, the SA must convert the annual expenses to average monthly expenses by dividing a full year's total expenses by the number of full school months (typically September-May or 9 months) and multiply by 3 months as follows:

Step A:

Full year's expenses ÷ Number of full school months = 1 month average expenses

Step B:

1 month average expenses x 3 = SFA three (3) months' average expenses

Note: State agencies may use an alternative calculation to determine the SFA's average monthly expenses.

- *Step 5 — Determine the SFA’s Compliance with Net Cash Resources Requirements in 7 CFR 210:*
 - If the annual net cash resources amount (see Statement of Revenue and Expenses above) is less than the three months’ average expenditure amount as determined above, the SFA is in compliance.
 - If the annual net cash resources amount is higher than three months’ average expenditures, then the SFA is not in compliance unless approval has been given by the SA to the SFA.

Allowable Costs:

On-site Review Procedures:

The SA must evaluate the SFA’s compliance with allowable cost restrictions during the Maintenance of the Nonprofit School Food Service comprehensive review through the following activities:

- *Step 1* —review the SFA’s year-end Statement of Revenue and Expenses for the nonprofit school food service account to determine whether general expenses appear to be reasonable, necessary, and allocable. For an extensive list of allowable and unallowable costs, SAs should refer to 2 CFR Part 200, Subpart E.
 - A reasonable cost must follow State and Federal regulations and must follow restraints imposed by generally accepted sound business practices. For example, as a best practice, reasonable costs should follow an “arms-length” standard, meaning programs costs should be in line with the price that the item or service would cost on the open market. Costs must be assigned to the programs, functions, and activities that benefited from the SFA having incurred the cost. All costs must be adequately documented and treated consistently as direct or indirect.

- Costs that are not reasonable and necessary for program purposes or that do not otherwise satisfy Federal cost principles and program regulations are unallowable.
 - Costs that would otherwise be allowable may be made unallowable by the action or inaction of the SFA. For example, if a SFA purchases kitchen equipment without following a competitive procurement process or prior approval from the State agency, then that cost becomes unallowable because the SFA failed to follow required procurement procedures. No portion of an unallowable cost may be charged to the program.
- *Step 2 — Review a Sample of Expenses:* Select a sample of expenses from the detailed general ledger report for the **RM review** period to determine whether the recorded expenses represent an activity or function recognized as reasonable and necessary for the operations of the programs. If the detailed general ledger fails to provide sufficient information needed to identify expenses, a review of invoices and receipts for the selected year may provide this information. To conduct a sample of the SFA's expenses, the SA must perform the following steps:
- Conduct an assessment of approximately 10% of the expenses in the detailed general ledger. The sample may be conducted as follows:
 - Review a minimum of 10% of salaries and benefits for the year **or** all salaries from a selected full month; ensure all employees paid are involved in the school meal programs **and that they are only paid from the nonprofit school food service account for the hours they worked in the school food service.**
 - Review a minimum of 10% of food, supplies and equipment for the year **or** all food, supplies, and equipment from a selected full month;

- Review a minimum of 10% of other expenses such as utilities (electric, water, gas, etc.), travel costs and/or rental space (storage) for the year **or** all expenses from a selected full month.

Reviewer Tip

For more information about national averages for expenses and revenues and the nonprofit school food service account, please see the *USDA School Lunch and Breakfast Cost Study II*, published April 2008: <http://www.fns.usda.gov/sites/default/files/MealCostStudy.pdf>

While reviewing the sample of expenses, the SA reviewer should identify any expenses that appear to be unnecessary or incompatible with the operations of the school food service. For instance, if the reviewer identifies that the SFA made purchases of shrimp and roast beef, but neither item appear on the SFA's menu or identifies staff salaries charged for employees of the SFA's Food Service Management Company, additional follow-up should occur. The reviewer must interview SFA staff about any questionable items identified and request additional information, such as invoices to substantiate the expenses.

Technical Assistance/Corrective Action

When documenting corrective action, the reviewer must include information about the SFA's violation of Federal law, regulations, or applicable policy guidance, as well as information on the adjustments needed for the SFA to become compliant. Needed corrective action and/or technical assistance must be recorded in *Resource Management Comprehensive Review Form* when a Resource Management comprehensive review is conducted.

Corrective action and technical assistance should be taken for the entire RM review period (previous school year) and Administrative Review AR period (current school year), if necessary.

For example, if the SA finds that the SFA inappropriately spent nonprofit school food service funds on unallowable costs during the RM review period, corrective action will require a transfer of funds from the LEA's general fund into the nonprofit school food service account or require the LEA to otherwise reimburse the school food service for the unallowable expenses. The reviewer should ensure that the LEA reimburses the nonprofit school food service account if the same unallowable costs were charged to the nonprofit school food service account during the current school year. Corrective action should also include the adoption of internal controls to ensure noncompliance does not occur in the future.

Fiscal Action

This is a General Area, thus fiscal action is not required. FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. While withholding program payments is not included in the specific regulatory definition for fiscal action, additional information can be found in Section VIII, *Fiscal Action*, Module: *Withholding Payments*.

Module: Comprehensive Review – Paid Lunch Equity

Intent/Scope of Monitoring

This Module must be used to conduct a comprehensive review of the SFA's resource management practices in the Paid Lunch Equity Resource Management area. When conducting a review of paid lunch equity, the SA must evaluate the prices the SFA charges for paid lunches in relation to the Federal paid and free reimbursement rates. To do so, SFAs must determine:

- the weighted minimum average paid lunch price charged for paid lunches in the previous school year
- the difference between the free lunch per meal reimbursement rate and the paid lunch per meal reimbursement rate in effect for the previous school year; this is also called the "reimbursement difference"

If an SFA's weighted minimum average paid lunch price is equal to or greater than the reimbursement difference, the SFA is not required to make any adjustments in lunch prices or to add revenue to the nonprofit school food service account as long as it continues to charge a weighted minimum average paid lunch price that is not less than the amount of the reimbursement difference.

If an SFA's weighted minimum average paid lunch price is less than the reimbursement difference, the SFA must increase prices for paid lunches or add financial support from non-Federal sources to the school food service account. The paid lunch equity provision is found at 7 CFR 210.14(e).

Due to the complexity of calculations, FNS developed the *Paid Lunch Equity Tool* for SFAs to use in determining compliance with this provision. For more information, refer to 7 CFR 210.14(e) and FNS memorandums SP 39-2011 Revised, *Child Nutrition Reauthorization 2010: Guidance on*

Paid Lunch Equity and Revenue from Nonprogram Foods and SP 11-2017117 *Paid Lunch Equity: School Year 2017-201878 Calculations and Tool*, and SP 11-2017 Revised for the latest PLE Tool on the FNS PartnerWeb.

The intent in monitoring this provision is to ensure support for paid lunches is in compliance with section 205 of the Healthy, Hunger-Free Kids Act.

This area falls within the General Areas of the Administrative Review.

Review Procedures

The *Paid Lunch Equity* section of the *Resource Management Comprehensive Review Form* contains questions to assess the information in accordance with the guidance below. The SA has the flexibility to cover this area either off-site or on-site.

The SA must compare the SFA's completed *Paid Lunch Equity Tool* to a State-completed *Paid Lunch Equity Tool* to verify the SFA's calculations, as follows:

- 1) Obtain the SFA's completed *Paid Lunch Equity Tool* or alternate documentation for the previous school year. Validate the SFA's Paid Lunch Equity calculations by cross-checking the data gathered with data used by the SFA.

Results:

- a) If the SFA's *Paid Lunch Equity Tool* can be validated by the SA, skip to step four below.
 - b) If the SFA's *Paid Lunch Equity Tool* cannot be validated by the SA, complete steps two and three below.
- 2) Complete a separate *Paid Lunch Equity Tool* using the following information gathered from source documents from the SFA:

- The weighted minimum average paid lunch price for paid lunches in SY 2010-2011 (start year of Paid Lunch Equity);
 - All paid lunch prices for October of the previous school year;
 - Number of paid lunches served and the prices charged for those meals served in October of the previous school year;
 - Total paid lunches claimed in the second preceding school year (needed if using non-Federal funds).
- 3) Enter the SFA's data into a separate *Paid Lunch Equity Tool* to determine whether or not a paid lunch increase was necessary.
- 4) Determine if and how the SFA raised its paid lunch prices, if a price increase was required. If paid lunch prices were not raised, determine whether the SFA used non-Federal sources to support its paid lunch prices. If non-Federal funds were used to support paid lunch prices, the SA should determine whether the sources are allowable and appropriately recorded in the nonprofit school food service account.

For a detailed list of allowable and unallowable non-Federal sources, see 7 CFR 210.14(e).

Technical Assistance/Corrective Action

The SA must require the SFA to take corrective action if the SA finds that the SFA:

- incorrectly calculated the appropriate paid lunch price
- did not raise its paid lunch price if such an increase was necessary
- used unallowable non-Federal sources to support its paid lunch price
- did not transfer a sufficient amount of non-Federal funds into the SFA's nonprofit school food service account if the SFA did not raise its paid lunch prices

Given the complexity of this issue, FNS encourages SAs to provide on-site technical assistance. Needed corrective action and/or technical assistance must be recorded in the comments section of the *Off-site Assessment Tool* when a reviewer is assessing compliance outside of a Resource Management comprehensive review or in the *Resource Management Comprehensive Review Form* when a Resource Management comprehensive review is conducted. Corrective action must occur for the Resource Management review period and, if necessary, for the current school year. The SFA should also adopt internal controls to ensure that noncompliance does not occur in the future.

Fiscal Action

This is a General Area, thus fiscal action is not required. FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. While withholding program payments is not included in the specific regulatory definition for fiscal action, additional information can be found in Section VIII, *Fiscal Action*, Module: *Withholding Payments*.

Module: Comprehensive Review – Revenue from Nonprogram Foods

Intent/Scope of Monitoring

This Module must be used to conduct a comprehensive review of the SFA’s resource management practices. When conducting a review of revenue from nonprogram foods, the SA must assess whether the SFA took steps to ensure the *revenues from the sale of nonprogram foods* generate at least the same proportion of SFA revenues as *expenses from the purchase of nonprogram foods* contribute to the SFA’s food costs. (7 CFR 210.14(f))

$\frac{\text{Nonprogram food revenue}}{\text{Total program + nonprogram revenue}} \geq \frac{\text{Total nonprogram food cost}}{\text{Total program + nonprogram food cost}}$

FNS defines “nonprogram foods” as those foods and beverages sold in a participating school other than reimbursable meals and meal supplements that are purchased using funds from the nonprofit school food service account. Nonprogram foods include a la carte items and adult meals. They also include items purchased with nonprofit school food service account funds for vending machines, fundraisers, school stores, and catered and vended meals.

Review Procedures

The *Revenue of Nonprogram Foods* section of the *Resource Management Comprehensive Review Form* provides review questions to assess the SFA’s compliance with the nonprogram revenue requirements. The SA must assess the information in accordance with the guidance below. The SA has the flexibility to cover this area either off-site or on-site.

The SA must:

1. Identify the categories of nonprogram food and beverages provided by the SFA.
2. Ensure that the SFA was reimbursed for food and beverages it may have purchased for internal or external entities (catering)
3. Review the price the SFA charges for adult meals to ensure that meals served to adults are priced sufficiently to cover the overall cost of the meals. The overall cost of the meals must include the value of any USDA Foods (entitlement and bonus). **Note:** For more information, refer to FNS Instruction 782-5 REV. 1, *Pricing of Adult Meals in the National School Lunch and School Breakfast Programs*.
4. Determine how the SFA assessed its compliance with the revenue from nonprogram food requirements in 7 CFR 210.14(f).
5. Determine if and how the SFA adequately addressed any shortfalls necessary due to insufficient revenues generated by the sale of nonprogram foods.
6. Determine if the SFA may be in compliance with the Revenue from Nonprogram Foods requirements despite not meeting the nonprogram food revenues/expenses ratio. **This could occur** if the SFA only sold a limited number of nonprogram foods (i.e., milk) that had an identifiable per-serving cost.

Technical Assistance/Corrective Action

Any violations of program requirements require corrective action. Corrective action and/or technical assistance are necessary if the SFA:

- Did not include all nonprogram food revenues and costs in its assessment calculation;
- Did not ensure specific nonprogram food revenues were transferred into its nonprofit school food service account;
- Priced adult meals below the cost of producing those meals;

- Did not assess its compliance with the Revenue from Nonprogram Foods requirements via either the Nonprogram Foods Tool or 5-Day Reference Period as described in FNS Policy Memo SP 20-2016;
- Did not take steps to adequately increase its nonprogram food revenues and/or secure general funds if out of compliance with the Revenue from Nonprogram Foods requirements.

Corrective action must occur for the Resource Management review period and, if necessary, for the current school year. The SA should also require the SFA to adopt internal controls to ensure that noncompliance does not occur in the future. Needed corrective action and/or technical assistance must be recorded in the *Resource Management Comprehensive Review Form* when a resource management comprehensive review is conducted.

FNS recognizes there is wide variation in the capabilities of systems and mechanisms SFAs employ to maintain and monitor their compliance with the revenue from nonprogram foods requirements. In recognition of these potential difficulties and variations in system capabilities, FNS released FNS Policy Memorandum SP 06-2016, *Nonprofit School Food Service Account Nonprogram Food Revenue Requirements* to help SFAs and SAs better assess compliance with this requirement. Given the complexity of this issue, FNS encourages SAs to provide technical assistance in this area. Technical assistance may include identifying opportunities at the SFA level to increase the SFA's revenue from the sale of nonprogram foods.

Fiscal Action

This is a General Area, thus fiscal action is not required. FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. While withholding program payments is not included in the

specific regulatory definition for fiscal action, additional information can be found in Section VIII, *Fiscal Action*, Module: *Withholding Payments*.

Module: Comprehensive Review – Indirect Costs

Intent/Scope of Monitoring

This Module must be used to conduct a comprehensive review of the SFA's resource management practices. When conducting a review of indirect costs, the SA must evaluate charges to the nonprofit school food service account, including allowable direct and indirect costs.

Indirect costs are incurred for the benefit of multiple programs, functions, or other cost objectives, and therefore cannot be identified readily and specifically with a particular program or other cost objective. They typically support administrative overhead functions, such as fringe benefits, accounting, payroll, purchasing, facilities management, and utilities.

Charges for indirect costs are based on two factors:

- The indirect cost rate established for a specific fiscal year, and the corresponding direct cost base;
- A documented methodology that accurately allocates indirect costs.

In most cases, the indirect cost rate is in the indirect cost rate agreement negotiated and approved by the associated State Educational Agency. Indirect cost rate agreements expire annually and it is imperative that SFAs use the most current approved rate for each fiscal year. The direct cost base is the sum of allowable and unallowable costs that receives a benefit from the costs in the pool.

SAs must ensure that SFAs use the correct indirect cost rate and that the correct rate is applied to the correct direct cost base. For further information on indirect costs, the SA should refer to FNS' *Indirect Cost Guidance* (SP 41-2011, with attachments).

Note: The scope of monitoring may require the SA to assess how unit(s) of the LEA other than the school food service implement their indirect cost responsibilities, as applicable.

This section of review falls under the General Areas.

Review Procedures

The *Indirect Cost* section of the *Resource Management Comprehensive Review Form* contains questions to assess the information in accordance with the guidance below. The SA has the flexibility to cover this area either off-site or on-site.

The SA must review the following information during the Administrative Review:

1. Indirect Cost Rate Agreement:
Ensure that the SFA is using the approved indirect cost rate from the State Education Agency.

INDIRECT COST RATE AGREEMENT
STATE EDUCATIONAL AGENCY

ORGANIZATION: XXX State Educational Agency
4505 East Boulevard
Ark, TX 87778-0000

DATE: _____

AGREEMENT NO. _____

FILING REFERENCE: _____

The purpose of this Agreement is to establish indirect cost rates for use in awarding and managing of Federal contracts, grants, and other assistance arrangements to which Office of Management and Budget (OMB) Circular A-87 applies. This agreement is issued by the U.S. Department of Education pursuant to the authority cited in OMB Circular A-87.

This Agreement consists of four parts: Section I - Rates and Bases; Section II - Particulars; Section III - Special Remarks; and, Section IV - Approvals.

Section I - Rate(s) and Base(s)

Type	Effective Period		Rate	Base	Coverage	
	From	To			Location	Applicability
Fixed	07-01-09	06-30-10	10.0%	1/	All	2/
Fixed	07-01-09	06-30-10	5.0%	1/	All	3/

1/ Total direct costs less items of equipment, alterations and renovations, pass-through funds, and subaward expenditures in excess of \$25,000 per subaward.

2/ All Federal programs which do not require the use of a restricted rate per 34 CFR 76.563.

3/ All Federal programs which require the use of a restricted rate per 34 CFR 76.563.

Treatment of Fringe Benefits

Fringe Benefits applicable to direct salaries and wages are treated as direct costs.

2. Use Correct Rate/Base: Ensure the indirect cost charged to the nonprofit school food service account is consistent with the approved indirect cost rate to the direct cost base found in the approved indirect cost rate agreement. See example above.
3. Accounting Consistency: Handling of indirect costs must be consistent in all activities of the SFA unless otherwise exempted. For example, if the nonprofit school food service

account is charged for electricity costs based on square footage, all other activities of the SFA must be similarly charged, as applicable.

4. Prior Year's Retroactive Billing: Confirm that the nonprofit school food service account was not charged for indirect costs that were previously paid from the general fund. It is unallowable to bill the school food service account for indirect costs unless an agreement exists to show that the SFA had been "loaned" the nonprofit school food service account funds to cover the indirect costs in one or more prior years with the expectation of repayment. In such cases, accounting records should support implementation of the loan agreement. For example, a transfer of funds from the general fund to the food service account might be recorded as a receivable (e.g., "Due from Food Service Fund").
5. Proper Classification of Costs (Direct/Indirect): Costs must be consistently treated as direct or indirect. Confirm that school food service accounts are not charged directly for expenses that are included in the indirect cost pool (double dipping).
6. Support Documents for Indirect Cost Billing: Verify the documentation that supports actual indirect costs charged to the school food service account. Check for mathematical errors and confirm that indirect costs were calculated based on the correct rate and the correct base.

Technical Assistance/Corrective Action

Needed corrective action and/or technical assistance must be recorded on the *Resource Management Comprehensive Review Form* when a resource management comprehensive review is conducted. The SA must require the SFA to take corrective action if the SFA is out of compliance with any aspect of the RM review of indirect costs, including:

- the nonprofit school food service account was charged costs in excess of the approved indirect cost rate;
- the correct rate was applied to an incorrect direct cost base;
- indirect costs were not applied consistently;
- the nonprofit school food service account was charged directly for expenses that were included in the indirect cost pool (double dipping);
- sufficient documentation could not be provided to support the indirect costs charged to the nonprofit school food service account.

Corrective action must occur for the Resource Management review period and, if necessary, for the current school year. The SFA should also adopt internal controls to ensure that noncompliance does not occur in the future.

Needed corrective action and/or technical assistance must be recorded in the comments section of the *Resource Management Comprehensive Review Form*.

Fiscal Action

This is a General Area, thus fiscal action is not required. FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. While withholding program payments is not included in the specific regulatory definition for fiscal action, additional information can be found in Section VIII, *Fiscal Action*, Module: *Withholding Payments*.