SNP Administrative Review Findings — North Spencer County School Corp (7385)
Program Year 2025

North Spencer County School Corp (7385)
3720 E SR 162
Lincoln City, IN 47552-9662

Food Service Contact
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No. of Sites / Reviewed: 5 / 1
Month of Review: December 2024

Commendations

* The SFA is diligent and conducts DC matches regularly and more frequent than required.

* During the onsite review, David Turnham Ed Center conducted a food challenge during lunch service. The food challenge educated students on the nutritional benefits of carrots and gave students the opportunity to select carrots with their meal.

* The FSD and all staff were well organized and prepared for the review.

Certification and Benefit Issuance - North Spencer County School Corp (7385)

132. Direct Certification list contains correct information and comes from the proper agency

Technical Assistance - Coding of Categorical Eligible Students

Students should be coded appropriately on the Free and Reduced roster based on their most recent eligibility reason.

138. Updates to the Benefits Issuance documents are made accurately and timely

Technical Assistance - Effective Date on Eligibility Status

The effective date of a student's eligibility on the Free and Reduced roster should be the most recent date an eligibility change was made. For example, verified applications that result in a status change should have an effective date reflecting the date the change was made.

Verification - North Spencer County School Corp (7385)

209. Verified applications were properly selected, correctly replaced (if necessary), and correctly verified

Technical Assistance - Converting Income for Verification

It is not necessary to convert income provided in verification documentation to a year-to-date weekly average.

209. Verified applications were properly selected, correctly replaced (if necessary), and correctly verified

Technical Assistance - Use of Collateral Contacts in Verification

A collateral contact is a person outside of the household who is knowledgeable about the household's circumstances and can confirm a household's income level or participation in Assistance Programs or Other Source Categorical Eligibility Programs. Collateral contacts could include employers, social service agencies, migrant workers' agencies, and religious or civic organizations. The verifying official should request a collateral contact only in cases when the household has not been able to provide adequate written evidence.

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Resource Management - North Spencer County School Corp (7385)

705. SFA have internal controls to ensure only allowable costs charged?

Technical Assistance - Documentation of Labor Costs

Some staff have dual jobs within the North Spencer County School Corporation. If staff perform work outside the School Nutrition Program, the sponsor needs to track the labor for the School Nutrition Program directly (i.e., complete it by time log). Without this type of documentation, labor would not be an allowable direct expense.

Resource Management Comprehensive Review - North Spencer County School Corp (7385)

766. Assessing Compliance with the Nonprogram Foods Revenue/Cost Ratio

Finding 10141: Assessment of Non-Program Foods Revenue/Cost Ratio
The SFA did assess its compliance with the revenue from non-program foods requirements 7 CFR 210.14(f). However, the assessment did not include the following:
   a) All schools were not included in the calculation.
   b) The cost of the adult meals included entitlement discounts, indicating the full market value was not used.

Corrective Action:
The SFA must assess compliance with the revenue from non-program foods. **For corrective action, the SFA must complete the 5-day reference period using the non-program food revenue tool. Please submit the non-program food revenue tool with documentation to support the figures used.**

Technical Assistance:
The non-program food revenue tool to utilize for a reference period can be found at the following link:
https://docs.google.com/spreadsheets/d/1yERVzWRoukH4jqhAQ-RFBhzMIWEKRyQB/edit#gid=1454493429

Additional guidance can be found at the following link:
https://www.in.gov/doe/nutrition/financial-management/#Revenue_from_Non_Program_Foods

General Program Compliance - North Spencer County School Corp (7385)

1400. The written food safety plan contains required elements and a copy is available at each school

Finding 9142: The written food safety plan does not contain all the required elements.
The written food safety plan does not comply with the HACCP program criteria described in 7CFR 210.13(c). Missing elements include:
   a) Description of Program Overview and Facility
   b) Food service operations within the SFA
   c) Type(s) of facility
   d) Average Daily Participation for programs being operated
   e) Standard Operating Procedures: Has written procedures that are specific to each site

Corrective Action:
For corrective action, please complete the following:
   a) **Review and update the food safety plan. Submit the updated plan to the State agency.**
   b) **Provide staff with food safety plan training. Submit proof that training has been completed.**

Technical Assistance:
Resources for food safety plan monitoring and review are available at the following links:

https://docs.google.com/document/d/13lRjQYRGzL_CqUpGwJmtoc4NDE6ancjERtokVh7I2-8/edit?usp=share_link

https://docs.google.com/document/d/1nXKG4NVW6jQq7cletfN9r3Ff4VswKG_FRFDZYMsxipM/edit?usp=share_link

https://docs.google.com/document/d/1nq05Pl9px7fCbZo-Lf-q0nRs5zNmBtEy97Z5ilUMwvA/edit?usp=share_link

1403. Review of agricultural food components indicates violations of the Buy American provision

Technical Assistance - USDA Buy American Provision Updated Policy Guidance

USDA has recently updated guidance to program sponsors regarding Buy American requirements to become effective PY 2025-2026 school year. For additional information, go here: https://www.fns.usda.gov/cn/buy-american-provisions.
To watch a recorded webinar on updates to the Buy American requirements, go here: https://www.fns.usda.gov/cn/buy-american-provisions/webinar.
To download a copy of the USDA Buy American tool, go here:
https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Ffns-prod.azureedge.us%2Fsites%2Fdefault%2Ffiles%2Fresource-files%2FSP23-2024a.xlsx&wdOrigin=BROWSELINK.

SNP Administrative Review Findings   North Spencer County School Corp (7385)
Program Year 2025

David Turnham Ed Center (7753)
3720 E SR 162
Lincoln City, IN 47552-9662

Food Service Contact
Mrs. Desiree Hartwick
Cafe Manager
(812) 937-2400

Month of Review: December 2024
Date of Onsite Review: January 22, 2025

Meal Counting & Claiming - David Turnham Ed Center (7753)

322. Review Period- daily meal counts by category do not exceed the number of eligible students by category

Technical Assistance - Monthly Eligibles

The total number of eligible students by category was not correctly reported on the claim for reimbursement. When completing the eligibles section for claims, please use the highest number of enrolled students in each category (Free, Reduced, Paid). During the onsite review, the school nutrition program assistant updated the claim for reimbursement to reflect the highest eligibles by category.

General Program Compliance - David Turnham Ed Center (7753)

1409. On-site or off-site storage violations were observed

Technical Assistance - Food Storage and Date Marking

Canned items in the dry storage area were observed to be inconsistently date marked. The SFA must ensure that all facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. Additionally, proper date marking assists in ensuring the First In, First Out (FIFO) inventory management method is being used.