

SNP Administrative Review Findings

The Oaks Academy (K307)

Program Year 2020

The Oaks Academy (K307)

1301 E. 16th Street
Indianapolis, IN 46202-1947

Food Service Contact

Mrs. Rhonda Harris
Food Service Manager
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FSMC: Aramark

Executive Contact

Mr. Andrew N Hart
Head of School
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No. of Sites / Reviewed: 3 / 1
Month of Review: October 2019

Technical Assistance

* Concerns were raised during the AR process and during the on-site visit regarding the variety of fruits and vegetables offered, particularly with fruit offered at breakfast. Whole apples are frequently offered at breakfast and students many times discard them/do not want to take them. It is recommended that the selection of fresh fruit vary from day to day and meal to meal, as well as offering different fruit choices at breakfast and lunch. This increases the chance that every student will find something they like and will eat, which enhances the nutritional content of the meal actually eaten and decreases food waste. Also noted on the day of review were the quality of the breakfast entrée (a 'pancake on a stick' item) and the meal environment. The kitchen smelled like burned plastic prior to breakfast service- the reviewer and many of the students noticed that multiple entrees appeared burned or over-cooked (this particular item, as recommended and designed by the manufacturer, is to be baked off in its plastic wrapper), resulting in many students declining the breakfast altogether or throwing away the entrée. Care must be taken to properly prepare and cook all food items served as part of the USDA School Nutrition Programs, not only in an effort to reduce and prevent waste of Federal dollars, but to encourage consumption of healthy meals by students.

The reviewer also noted the short amount of time given to students to consume breakfast (the breakfast monitor counted down from ten minutes.) It might be worthwhile to consider a longer breakfast period or implementing an alternative model to allow more students enough time to consume their first meal of the day. More information about improving breakfast participation can be found on <https://www.doe.in.gov/nutrition/national-school-breakfast-program>.

Certification and Benefit Issuance - The Oaks Academy (K307)

123. On-site observations validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions and responses demonstrate compliance with FNS requirements

Finding 9000: Technical Assistance- Second Review of Applications

Technical Assistance:

The Healthy, Hunger-Free Kids Act (HHFKA) included several provisions to help increase effectiveness and integrity in Child Nutrition Programs. As part of an effort to decrease certification errors during the eligibility determination process, section 304 of the HHFKA requires that local education agencies (LEAs) that demonstrate high levels of, or a high risk for administrative error associated with certification and benefit issuance conduct a second, independent review of applications for free and reduced price meal benefits before eligibility determinations are made. During the Administrative Review, it was found that the eligibility determination rate for The Oaks Academy was 24.74%. As a result, you will be required to conduct this Second Review of Applications in the 2020-2021 school year. Additional guidance and notification regarding this requirement, as well as the reporting requirement that comes with this federal requirement, will be forthcoming.

123. On-site observations validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions and responses demonstrate compliance with FNS requirements

Finding 9764: Validation of Off-Site Assessment Tool

On-site observations do not validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions and/or responses do not demonstrate compliance with FNS requirements: Rhonda Harris is listed as the "hearing official", but she is also one of the school officials that determines a student's free or reduced eligibility.

Corrective Action:

A school official separate from the processes of determining a student's free or reduced meal eligibility will be designated immediately. No further action required.

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123. *On-site observations validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions and responses demonstrate compliance with FNS requirements*

Finding 9899: Benefit status for children who have not submitted an application for the current school year

Children who did not have any certification documentation on file at the beginning of the school year, and do not qualify for carryover of previous year's eligibility, are being provided free or reduced-price benefits. These errors contributed toward fiscal action calculations.

Corrective Action:

SFA administration understand that students with prior year Free/Reduced eligibility may only retain that eligibility for the first 30 days of school in the current year, or until new eligibility documentation is processed, whichever occurs first. Affected students from the eligibility review have been recoded as "Full Pay" in the POS system (pending a 10-day notification period dated in a letter sent home). No further action required.

133. *Direct Certifications were correctly certified*

Finding 9024: Direct Certifications were not correctly certified

Multiple students were matched as DC-Reduced from the STN database, but the SFA gave them DC-Free benefits in the POS system. These errors contributed to fiscal action calculations.

Corrective Action:

The affected students and their siblings were re-coded as Reduced in the POS system (pending a 10-day notification period dated in a letter sent home). SFA administration understand the difference between DC-Reduced and DC-Free going forward. No further action required.

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

Finding 9030: Updates to the Benefits Issuance documents not made accurately and/or timely

Changes in eligibility as a result of verification, resubmitted applications, new students, transferred students, or withdrawn students occurred during the review period. Benefit issuance documents were not always updated accurately or within required timeframes. Withdrawn students were still on the POS 3 months after withdrawal.

Corrective Action:

Withdrawn students will be removed from the POS or coded as "withdrawn" within 30 days of withdrawal. No further action required.

Verification - The Oaks Academy (K307)

207. *SFA completed verification and verified applications on file match FNS-742*

Finding 9000: SFA did not complete Verification

Verification is not being conducted each school year. A 3% sample of F/R applications are pulled and reviewed by a second school official, but households are not asked to provide supporting documentation.

Corrective Action:

Appropriate SFA administration must view the IDOE's Verification 101 webinar (https://www.youtube.com/watch?feature=youtu.be&utm_content=&utm_medium=email&utm_name=&utm_source=govdeliver&utm_term=&v=nTon9Jyn7N8) and provide attestation that this has been completed as corrective action. Verification for the 2019-2020 must be completed even though the deadline was November 15. Complete Verification Tracking Sheets (attached to this letter) and copies of correspondence with selected households, including documentation submitted by those households, must also be sent securely to the assigned Field Specialist as corrective action. Please note that the deadline for submission of the Verification Summary Report is January 15.

Meal Counting & Claiming - The Oaks Academy (K307)

313. *On-site observations validate Off-Site Assessment Tool responses to Meal Counting & Claiming questions and responses demonstrate compliance with FNS requirements*

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Finding 9007: Meal Counting and Claiming information on the Off-site Assessment Tool not validated, or deficiencies found.

It was determined on-site that daily edit checks are not being conducted for daily meal counts by category (free, reduced, and paid).

Corrective Action:

SFAs must establish internal controls to identify potential problems in the meal count system and to ensure that an accurate claim for reimbursement has been made. Internal controls prevent erroneous claims and potential over claims- one of the required methods of doing this is through daily edit checks. Daily meal counts by category must be compared to the number of eligible students by category, as well as the number of eligible students multiplied by the site's attendance factor. As corrective action, completed daily edit checks for all meal services at all three sites must be submitted (for January or February). If your meal count software does not do this for you, you must do it manually. A template and instructions can be found here: <https://www.doe.in.gov/nutrition/edit-checks>.

314. SFA is following the approved SFA-SA agreement

Finding 9049: SFA not following the approved SFA-SA Agreement and/or Application.

The SFA is not following their approved SFA-State agency Application, including the Point of Service procedures. Students that qualify for reduced-price meal benefits are being charged more than the maximum allowed (\$0.40) for lunch- students at the Fall Creek and Brookside campuses were charged \$0.41 and students at the Middle School campus were charged \$0.45. The CNPWeb site information worksheets approved for the current school year indicated different paid student and adult meal prices than what were actually being charged by the POS system.

Corrective Action:

SFA administrators attest that students who were charged more than the maximum allowed price for reduced lunches were refunded the difference for any meals purchased going back to the first day of school. The CNPWeb site information worksheets have been updated to reflect the actual prices charged to paid students and adults for breakfast and lunch. No further action required.

Resource Management Comprehensive Review - The Oaks Academy (K307)

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

Finding 9000: Other Finding

The SFA is not assessing its own compliance with the Revenue from Nonprogram Foods requirements.

Corrective Action:

Administration must track nonprogram food (a la carte items/extra entrees at breakfast and lunch) sales for a 5-day period and determine food cost for items sold. The data must then be entered into the Revenue from Nonprogram Food Tool (found on <https://www.doe.in.gov/nutrition/financial-management-and-procurement>). A completed tool must be submitted as corrective action, as well as how the school will address a revenue shortfall if applicable.

Technical Assistance:

Non-program foods are any non-reimbursable foods and beverages purchased using funds from the non-profit school food service account. This encompasses all foods sold in schools as well as adult meals, food sold outside of school hours, foods purchased for vending machines, fundraisers, or school stores, or any foods used for catering or vending activities. For the majority of SFAs, a la carte foods offered during meal service account for the largest share of non-program foods.

General Program Compliance - The Oaks Academy (K307)

810. The USDA non-discrimination statement is on appropriate Program materials

Finding 9000: Other Finding

Current meal benefit notification letters are not using the correct non-discrimination statement.

Corrective Action:

Going forward, meal benefit notification letters will include the correct USDA non-discrimination statement (found at <https://www.doe.in.gov/nutrition/scn-civil-rights-requirements>). No further action required.

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1007. On-site observations validate Off-Site Assessment Tool responses to Local School Wellness Policy questions and responses demonstrate compliance with FNS requirements

Finding 9011: Local School Wellness Policy information on the Off-site Assessment Tool not validated, or deficiencies found.

The current Local School Wellness Policy does not include policies for food and beverage marketing or a description of public involvement, public updates, policy leadership, or an evaluation plan. While the policy was reviewed in November 2019, there is no documentation to support that the school community (parents, students, school nutrition representatives, PE teachers, school health professionals, the school board, and school administrators) were invited to participate in the process as stakeholders. The policy states that a "comprehensive manner of evaluation" will be developed, but there is no description of what that is. There is no documentation/evidence that the policy has been made available publicly to the school community.

Corrective Action:

The Local School Wellness Policy must be updated to include the required elements by the end of school year 2019-2020. The SFA must also be able to show that required members of the school community were invited to participate as stakeholders in the update process (via saved copies of newsletter blurbs, email invitations, etc.), as well as in the assessment of the progress made in achieving policy goals. The updated policy and any assessments must be made available to the public (recommendation: post to the school's website). A statement of your understanding of these requirements is needed as corrective action and follow-up may be conducted.

Technical Assistance:

More information about Local School Wellness Policies can be found here: <https://www.doe.in.gov/nutrition/school-wellness-policy>.

SNP Administrative Review Findings**The Oaks Academy (K307)****Program Year 2020****The Oaks Academy (C773)**

1301 E. 16th Street
Indianapolis, IN 46202-1947

Food Service Contact

Rhonda Harris
Foodservice Manager
(317) 822-4908

Month of Review: October 2019

Date of Onsite Review: November 19, 2019

Meal Counting & Claiming - The Oaks Academy (C773)**325. Review Period- meal counts by category were correctly used in the claim for reimbursement****Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.**

The current method of counting meals by category (free, reduced, paid) is not yielding accurate results to be used in the monthly claim for reimbursement. The Point of Sale software does not automatically count meals by category and generate a daily and monthly report- currently an Excel report shows transactions by individual students (and adults) on a given day, and the Food Service Manager filters and sorts transactions by meal and price charged to the students. As this yields a "filtered count" by row, duplicate or voided transactions are potentially being counted, as well as adults who were mistakenly keyed in for a student meal. While it is difficult to determine exactly what caused the differences between the SFA's submitted claim and the counts validated by the IDOE Field Staff, it does indicate a systemic issue that will continue if not addressed. The problem was also noted in the other two sites not reviewed as part of this AR.

Corrective Action:

Federal NSLP regulations require that participating SFAs must have an accurate way of recording reimbursable meals, by day, by type (free, reduced, or paid), without overtly identifying a student's eligibility status. The method used must also clearly separate adult meals and internal controls that prevent more than one reimbursable meal being counted per student per service. Using excess program funds to purchase a meal counting/POS software that prevents duplicate meals and properly counts students separately from adults is an allowable expense and is recommended, though you may continue to work with your current software provider if the issues noted above are addressed. As corrective action, please provide a statement of how the issues will be addressed at all three of your schools. Supporting documentation, such as new reimbursable meal count reports, may be requested.

Meal Components & Quantities - The Oaks Academy (C773)**402. Day of Review- the minimum daily quantity requirements are met for the age/grade group being served****Finding 9052: Day of Review portion sizes insufficient.**

As observed on the Day of Review, the portion sizes of meal components from the planned menu and served on the day of review did not meet the minimum meal pattern requirements for the age/grade group(s) being served. Meals that contain insufficient quantities of meal components are incomplete and in the case of repeated findings are not reimbursable.

Corrective Action:

Minimum offered portion sizes were discussed with Aramark and school staff. The requirements are understood, no further action required.

Technical Assistance:

When implementing Offer Versus Serve, the full minimum daily requirements for each meal component must be offered to students. If the decision is made to not implement OVS for a specific group of students (as in pre-plating for the Kindergarteners), they must still be provided with the full minimum daily requirements.

404. Day of Review- signage explaining the reimbursable meal was posted near/at the beginning of the service line and did not promote water or any other beverage as an alternative to milk**Finding 9055: No signage explaining what constitutes a reimbursable meal at beginning of service line.**

As observed on the Day of Review, signage explaining what constitutes a reimbursable breakfast is not identified near or at the beginning of the meal service line(s).

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Corrective Action:

Aramark staff printed out the correct signage and posted it. No further action required.

502. Day of Review- signage explaining the OVS reimbursable meal was posted near/at the beginning of the service line

Finding 9080: No signage explaining what constitutes a reimbursable meal under Offer vs. Serve.

As observed on the Day of Review, signage explaining what constitutes a reimbursable meal under Offer vs. Serve (including the requirement that students must select at least ½ cup fruit or vegetable) is not identified near or at the beginning of the meal service line(s).

Corrective Action:

Aramark staff printed out and posted the correct signage. No further action required.

Technical Assistance:

Adequate and appropriate signage examples can be found at <https://www.doe.in.gov/nutrition/signage-identifying-reimbursable-meal>.