



SNP Administrative Review Findings

Program Year 2024

Wabash City Schools (8060)

Wabash City Schools (8060)

189 West Market St.
Wabash, IN 46992-1727

Food Service Contact

Mrs. Melanie Honeycutt
Food Service Director
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honeycm@apaches.k12.in.us

Executive Contact

Mr. Matt Stone
Business Manager/COO
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No. of Sites / Reviewed: 5 / 2

Month of Review: February 2024

Certification and Benefit Issuance - Wabash City Schools (8060)

126. Certification: selected applications correctly approved. This serves as a reminder to the reviewer that FA must include the MOR and the Month of the on-site review.

Finding 9017: Correct implementation of application approval process

The application approval process is not implemented correctly at St Bernard Catholic School. An employee tasked with approving meal applications applied for their own grandchildren and potentially approved the application as well. The section on page 2 of the application identifying who approved the application was not completed. This is the one application that was noted as being approved incorrectly.

Corrective Action:

The lack of internal controls as related to the meal application approval process was discussed with the Food Service Director, Asst. Food Service Director, and the Chief Operations Officer. All verbally acknowledged that they understood that an employee submitting a meal application for their own family cannot also approve the meal application. It was discussed that all meal applications received at St Bernard will be forwarded to the Wabash City Schools central food service office to be reviewed and approved moving forward. St Bernard staff will be trained on the new process for meal application approvals prior to the start of PY 2025 operations.

As corrective action, please provide the State Agency with a standard operating procedure that outlines how meal applications will be collected and processed at St Bernard moving forward. In addition, provide the anticipated training date for when the meal application processing SOP will be reviewed with St Bernard site staff.

Documentation of the training should be maintained on file in the food service office. The training agenda below should be used to document all the required training information.

Technical Assistance:

Training Documentation Template:

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:388c5cd8-5ecf-347a-8b54-a75f97924e16>

126. Certification: selected applications correctly approved. This serves as a reminder to the reviewer that FA must include the MOR and the Month of the on-site review.

Finding 9901: Selected applications correctly approved

One application was certified incorrectly or utilizing incomplete information. See Finding 9017. This contributed toward fiscal action calculations.

Corrective Action:

The application error was discovered with less than 10 days remaining in the school year. Technical assistance was provided to the Food Service Director and Asst. Director regarding the 10-day adverse action notification and updating the identified students' meal statuses on the correct date, even after the school year has ended.

As corrective action, please provide proof that the meal statuses have been updated to paid status with the SIS.



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128. *Correct conversion factors used for applications with more than one income frequency*

Technical Assistance: Use of Conversion Factors

Technical assistance was provided to the Food Service Director and Asst. Director regarding the use of the conversion factors when approving meal applications. The conversion factors should only be used to annualize the household's total income when multiple income frequencies are reported on a meal application.

Verification - Wabash City Schools (8060)

206. *On-site observations validate Off-Site Assessment Tool responses to Verification questions and responses demonstrate compliance with FNS requirements? Does the Verification Summary Report accurately reflect the SFA's enrollment?*

Finding 9006: Validation of Off-Site Assessment Tool

On-site observations do not validate Off-Site Assessment Tool responses to Verification questions and/or responses do not demonstrate compliance with FNS requirements. The SFA did submit a Verification Summary Report by the January 15 deadline, however, documentation to support the Verification process was not available at the time of the review. The employee tasked with the Verification process had recently left the position and the Verification supporting documentation, including verification notification letters sent out, responses received from households, and notification of the results of verification could not be located.

Corrective Action:

The Food Service Director, Asst. Director, and Chief Operations Officer were provided technical assistance regarding the proper Verification process and record retention guidelines. To ensure proper internal controls, it was advised that the Food Service Director and Asst. Director should both be involved in the Verification process moving forward. A Verifying Official should be identified to complete all Verification activities. The process should begin on October 1 and be completed by November 15 each year. All Verification documentation must be maintained as proof that the process was completed accurately and in the required timeframe.

As corrective action, please identify who will serve as the Verifying Official moving forward and who will provide oversight to ensure the Verification process is completed correctly and all documentation to support the process is accessible and maintained onsite. In addition, please have those identified complete the "Verification" training course on the IDOE Moodle training website. Submit the certificates of completion as proof of training.

Moodle Website: <https://moodle.doe.in.gov/>

Moodle Instructions: <https://docs.google.com/document/d/1FHEZKGaccC9nosDj7pU63PMVUtbZeYwkkqW-Gkn8Q4/edit>

Technical Assistance:

The Office of School & Community Nutrition offers multiple Verification webinars each year prior to October 1. Though the Verification Moodle course is required as corrective action, those involved in the Verification process should plan to attend the Verification webinars as a refresher when the time comes. The additional Verification resources below can be printed off and used as reference guides.

Verification How-To: https://docs.google.com/document/d/1k2SleVd6qN9NNMT-hBbRQtLiED2TkirtEN5nvrF_bOM/edit

Verification Process Quick Guide:

<https://docs.google.com/presentation/d/1drW0hi1KwCrJSD3xDLJMLX8hYdNIZRjaptlqdwAVIaM/edit#slide=id.p1>

Direct Verification Fact Sheet:

<https://docs.google.com/document/d/1wwB7sk01zzpk1xCbmxnzaBWZUSNFyELibunUdZJA-zg/edit#heading=h.gjdgxs>



Meal Counting & Claiming - Wabash City Schools (8060)

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

Technical Assistance: Meal Charging Policy & Bad Debt

The SFA has a charging policy in place. Technical assistance was provided to the Food Service Director, Asst. Director, and Chief Operations Officer regarding the need for the policy to also address how bad debt is handled. The resources below can be used as a guide. Information related to meal charges & bad debt should be communicated to households annually, such as in a back-to-school notification from the food service department or included in student handbooks. It is recommended to post it on the Food Service webpage as well.

Bad Debt Policy Template: https://www.in.gov/doi/files/baddebtrevised_0.docx

General Program Compliance - Wabash City Schools (8060)

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

Technical Assistance: Full Nondiscrimination Statement on Food Service Webpage

Technical assistance was provided to the Food Service Director & Asst. Director on the need to update the full nondiscrimination statement that is posted on the Food Service webpage.

USDA Full Nondiscrimination Statement:

<https://www.fns.usda.gov/civil-rights/usda-nondiscrimination-statement-other-fns-programs>

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

Technical Assistance: Wellness Policy Requirements

Technical assistance was provided to the Food Service Director, Asst. Director, and Chief Operations Officer regarding stakeholder participation, minimum policy requirements, and the need to complete the triennial assessment. They were further reminded to post the results of the assessment on the corporation website.

Minimum Requirements: <https://www.in.gov/doi/files/minimum-requirements.pdf>

Triennial Assessment Template: <https://www.in.gov/doi/files/triennial-assessment-template.pdf>

1217. *SFA's process and frequency for tracking training hours is sufficient*

Technical Assistance: Documentation of Staff Training

The Food Service Director was reminded to include all topics covered on training agendas when conducting staff training. The template below can be used.

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:388c5cd8-5ecf-347a-8b54-a75f97924e16>

In addition, it was recommended to utilize a training tracker to keep all employee training info organized.

IDOE Training Tracker: <https://www.in.gov/doi/files/copy-professional-standards-tracking-idoe-final.xlsx>



1219. *Employees outside of the School Nutrition Programs with School Nutrition Program duties received appropriate training*

Technical Assistance: Training for Non-Food Service Staff with School Nutrition Program Duties

In the offsite questions, the SFA indicated they had no non-food service staff conducting food service related duties, but teaching staff are responsible for ensuring students have selected the appropriate components for a reimbursable meal during breakfast in the classroom.

The Food Service Director and Asst. Director were reminded that all non-food service staff members with duties related to the School Nutrition Programs must receive annual training related to their responsibilities, including Meal Counting, Offer vs. Serve, and Civil Rights. Documentation must be maintained for all non-food service staff training. The training agenda template below can be used to document the required training.

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:388c5cd8-5ecf-347a-8b54-a75f97924e16>

1501. *Records are retained for 3 years*

Finding 9152: SFA not retaining Program records for a minimum of 3 years.

The SFA is not retaining the appropriate records regarding program management for 3 years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits. The supporting documentation for the PY2024 Verification Summary Report was not available for review.

Corrective Action:
See Finding 9006 for corrective action.

Technical Assistance:

Record Retention Guidelines:

https://docs.google.com/document/d/1pv9_WHvEMp9Gbr3723kwdKVUMMKo5Zq1PjXZ7O3Zw2Q/edit?usp=sharing



SNP Administrative Review Findings

Wabash City Schools (8060)

Program Year 2024

**O.J. Neighbours Elementary School
(8706)**
189 West Market St.
Wabash, IN 46992-1727

Food Service Contact
Mrs. Melanie Honeycutt
Food Service Director
(260) 274-0898

Month of Review: February 2024

Date of Onsite Review: March 20, 2024

Meal Counting & Claiming - O.J. Neighbours Elementary School (8706)

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 SFA's claim for the school for the Review Period did not match the State Agency's validated meal counts for the Review Period. The initial claim submitted by the SFA reported 3749 breakfasts & 4414 lunches. The SA validated 4902 breakfasts & 5877 lunches. It was determined that the initial consolidated meal report pulled for the school did not include all the grade levels in the bldg. Upon re-running the report with all grade levels selected, it matched the State Agency's validated meal counts. The sponsor was provided the opportunity to correct the claim while the Field Specialist was onsite.

Corrective Action:

Technical assistance was provided to the Food Service Director & Asst. Director regarding the claim consolidation errors. It was advised that both individuals should double check the claim numbers for accuracy prior to submitting the claim for reimbursement. It was determined that the Assistant Director would pull the monthly meal counts and edit checks each month to consolidate the claim, and the Director would review and sign off on the data before the Assistant submits the full claim within CNPweb monthly. **If implemented as agreed upon, no further corrective action is needed.**

Meal Components & Quantities - O.J. Neighbours Elementary School (8706)

403. *Day of Review- fluid milk (or allowable substitutions) was available in at least two allowable varieties throughout the serving period on all meal service lines*

Finding 9053: Milk variety not offered throughout serving period on Day of Review.

As observed on the Day of Review, at least two required milk varieties were not available for breakfast in the classroom. Only 1% white milk was noted as being available before the meals were distributed to the classrooms.

Corrective Action:

Technical assistance was provided to the Site Coordinator regarding the requirement to serve two different types of milk daily at breakfast. The school was given the opportunity to add another type of milk to the meal service. **No further corrective action is needed.**

409. *Review Period- all required meal components per weekly meal pattern requirements were offered and served to students*

Technical Assistance: Grain-Based Desserts at Lunch

The Food Service Director and Asst. Director were reminded that grain-based desserts at lunch cannot exceed more than 2 oz eq per week. The second grain offered with the daily PBJ Jammer entree cannot include grahams every day. Another grain, such as a 1 oz pkg of pretzels or crackers must be offered at least 3 times per week, while the 1 oz pkg of grahams can be offered up to two times per week.

Grain-Based Dessert Fact Sheet:

https://docs.google.com/document/d/1qYERGH0ceDtw7i8wkn3GHlkf_099R99uK8asszeR8Fk/edit



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409. *Review Period- all required meal components per weekly meal pattern requirements were offered and served to students*

Technical Assistance: Production Records

Technical assistance was provided to the Food Service Director and Asst. Director regarding production records. All food is prepped in the MS/HS kitchen & satellited out to the other schools. While a main production record for all food prepped is completed at the MS/HS, the production records at the individual school sites should still indicate the specific varieties & quantities of fresh veggies sent to them daily. If the veggies are not documented on the individual school's production records, to anyone reviewing program records it appears that they were not served.

409. *Review Period- all required meal components per weekly meal pattern requirements were offered and served to students*

Technical Assistance: Standardized Recipes

Technical assistance was provided to the Food Service Director and Asst. Director regarding the proper use of standardized recipes.

USDA Recipe Standardization Guide:

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:09e5848c-cbb6-3a27-a601-b399036ef8fa>

Child Nutrition Recipe Box: https://theicn.org/cnrb/recipes-for-schools/?page_id=113192

General Program Compliance - O.J. Neighbours Elementary School (8706)

901. *On-site monitoring review(s) were completed prior to February 1*

Finding 9103: On-site review of the school's meal counting and claiming procedures was not completed prior to February 1.

The SFA did not conduct an on-site review of the school's meal counting and claiming procedure prior to February 1 of the current Program Year. The on-site review occurred after February 1 without SA approval of an extension. According to 7 CFR 210.8(a)(1) and 7 CFR 220.11(d)(1), every school year, prior to February 1, each School Food Authority (SFA) with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the National School Lunch Program (NSLP) and 50% of schools operating the School Breakfast Program (SBP) under its jurisdiction.

Corrective Action:

Technical assistance was provided to the Food Service Director and Asst. Director related to the annual NSLP & SBP monitoring requirements. The monitoring form below was reviewed, highlighting that pages 1-4 are related to the SBP, while pages 5-8 are related to the NSLP. It was recommended to complete the onsite reviews as soon as possible each school year to ensure potential counting and claiming issues are caught early and corrected in a timely manner. Both verbally acknowledged that they understood the monitoring requirements and timeline for completion in PY2025. **If implemented as agreed upon, no further corrective action is needed.**

Technical Assistance:

NSLP/SBP Onsite Review Form:

https://docs.google.com/document/d/1KKDtCZqDTHq0cwTn8nHEEOWHWD_UDjprHFRoHk4KTzc/edit

Calendar of Due Dates: <https://docs.google.com/document/d/1y9oJ3Of6GCteK2M6IDPen8cf35SoO8BsRV8dqaoLlw/edit>



1406. *The most recent food safety inspection report is posted in a publicly visible location*

Finding 9147: Food Safety Inspection Report

The most recent food safety inspection report was not posted in a publicly visible location. It was posted in the kitchen.

Corrective Action:

Site staff was advised to relocate the food safety inspection report to a bulletin board out in the cafeteria for public visibility.

No further corrective action is necessary.

1408. *Temperature logs are available*

Finding 9149: Temperature logs unavailable for review.

Temperatures must be monitored and logged daily for all refrigeration and freezer equipment as well as the storeroom. FNS requires each school in the SFA to maintain temperature logs for a period of six months. Temperature logs were unavailable for the freezer and milk coolers.

Corrective Action:

The Site Coordinator immediately corrected the issue & implemented temperature logs for the units indicated. **No further corrective action is needed.**



SNP Administrative Review Findings

Wabash City Schools (8060)

Program Year 2024

St Bernard Catholic School (D805)

189 West Market St.
Wabash, IN 46992-1727

Food Service Contact

Mrs. Melanie Honeycutt
Food Service Director
(260) 274-0898

Month of Review: February 2024

Date of Onsite Review: March 19, 2024

Meal Counting & Claiming - St Bernard Catholic School (D805)

318. Day of Review- each meal service line provides an accurate count by eligibility category at the point of service

Finding 9000: Pre-Selecting Meals Versus Point-of-Service

At the beginning of the school day, students indicate which meal entree option they will be having for lunch. This information is noted on a "Daily Lunch Record" form that the cashier/meal counter uses to tally up the daily meals counts; however, this is not a proper point-of-service. Meal counts must still be verified once a student has received the meal that they selected at the beginning of the school day. This is considered the point-of-service and must be documented at that time. Documentation records of the point-of-service must be retained accordingly.

Corrective Action:

Technical assistance was provided to the cashier/meal counter regarding "pre-selected" meals and the point-of-service. The meal counter was reminded that each tray should be checked to ensure it has the required number of meal components, and then marked off on the Daily Lunch Record as being served. The existing form has space to record the additional information. It was advised that copies of the Daily Lunch Record forms should be sent to the central Food Service Office with the daily production records. The meal counter implemented the new process immediately while the Field Specialist was onsite. **No further corrective action is needed.**

Technical Assistance:

Technical assistance was also provided to the Food Service Director and Asst. Director regarding the updated point-of-service & recordkeeping process at St Bernard.

Meal Components & Quantities - St Bernard Catholic School (D805)

402. Day of Review- the minimum daily quantity requirements are met for the age/grade group being served

Technical Assistance: Serving Utensils

On the day of the onsite review, it was noted that the server had a 1/3 c disher ready to use for serving the refried beans. Technical assistance was provided, and the server was advised to increase it to a 1/2 c disher to reflect the proper production record serving size. The Food Service Director and Asst. Director were advised of the issue. It was recommended to provide St Bernard with additional 1/2 c dishers to ensure they have enough of the correct serving utensils on-hand.

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 meal is not identified near or at the beginning of the meal service line(s).

Corrective Action:

Technical assistance was provided to the food service staff at St Bernard regarding the need for proper OVS signage. The Food Service Director and Asst. Director at Wabash City Schools were also provided technical assistance on the issue. St Bernard staff will be trained on OVS prior to the start of PY2025 and the appropriate OVS lunch signage will be posted.



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As corrective action, please indicate the anticipated OVS training date for St Bernard site staff.

Technical Assistance:

Lunch OVS Signage Resources

<https://fns-prod.azureedge.us/sites/default/files/resource-files/elem-poster.pdf>

<https://winnersdrinkmilk.com/wp-content/uploads/2023/10/23-Elementary-Lunch-OVS.pdf>

500. Day of Review- Offer vs. Serve was properly implemented

Technical Assistance: Implementation of Offer vs. Serve

CNPweb indicated that the site was implementing Offer vs. Serve (OVS) at lunch, but that was not observed while the Field Specialist was onsite. While the SFA offered a couple choices within the entree, fruit, vegetable, & milk components, all students were still required to select a choice from each. During the onsite meal observations, all lunch meals that were marked at the point-of-service were reimbursable under non-OVS.

The cashier/meal counter and server at St Bernard were provided technical assistance regarding the proper implementation of Offer vs. Serve. They indicated they had not been trained in OVS. The Food Service Director & Asst. Director at Wabash City Schools were also provided technical assistance on the issue. It was decided that St Bernard would continue without OVS only for the remainder of the year & will plan for OVS next school year. This will allow time for St Bernard staff to be properly trained before PY2025 operations begin. Students will also be educated on OVS lunch at the beginning of the school year to ensure they understand the process and know how to select the correct components to make a reimbursable meal.

General Program Compliance - St Bernard Catholic School (D805)

901. On-site monitoring review(s) were completed prior to February 1

Finding 9103: On-site review of the school's meal counting and claiming procedures was not completed prior to February 1.

The SFA did not conduct an on-site review of the school's meal counting and claiming procedure prior to February 1 of the current Program Year. The on-site review occurred after February 1 without SA approval of an extension. In addition, the breakfast monitoring form was completed for the site, but St Bernard only participates in the NSLP.

Corrective Action:

See Finding 9103 under O.J. Neighbours Elementary School for TA provided.

Technical Assistance:

NSLP/SBP Onsite Review Form:

https://docs.google.com/document/d/1KKDtCZqDTHq0cwTn8nHEEOWHWD_UDjprHFRoHk4KTzc/edit

Calendar of Due Dates: <https://docs.google.com/document/d/1y9oJ3Of6GCteK2M6IDPen8cf35SoO8BsRV8dqaoLlw/edit>



SNP Administrative Review Findings
Program Year 2024

Wabash City Schools (8060)

1404. *A copy of the written food safety plan is site-specific and available on-site*

Finding 9145: A copy of the written food safety plan was not available at the reviewed school.

A copy of the written food safety plan was not available at the reviewed school.

Corrective Action:

Technical assistance was provided to the Food Service Director and Asst. Director regarding the need for a copy of Wabash City Schools' food safety plan to be provided to St Bernard. St Bernard site staff should be trained on the contents of the policy and should be monitored regularly to ensure proper food safety and sanitation procedures are being followed.

As corrective action, please confirm the date that a copy of the food safety plan was provided and reviewed with St Bernard staff. If not yet implemented, please provide a timeline for when the food safety plan will be provided and reviewed with St Bernard staff.

1405. *Two food safety inspections are received each school year from the local health department*

Technical Assistance: Annual Letter to Health Department

Technical assistance was provided to the Food Service Director and Asst. Director regarding the annual letter to the local Health Department. St Bernard needs to be included on the school listing as a site under Wabash City Schools.

1406. *The most recent food safety inspection report is posted in a publicly visible location*

Finding 9147: Food Safety Inspection Report

The most recent food safety inspection report is not posted in a publicly visible location.

Corrective Action:

Site staff was advised to relocate the food safety inspection report and post next to the "And Justice for All" poster in the cafeteria for public visibility. **No further corrective action is necessary.**

1408. *Temperature logs are available*

Finding 9149: Temperature logs unavailable for review.

Temperatures must be monitored and logged daily for all refrigeration and freezer equipment. FNS requires each school in the SFA to maintain temperature logs for a period of six months. Temperature logs were unavailable for the refrigerator and chest freezer.

Corrective Action:

Site staff was advised of the temperature monitoring requirements. The Food Service Director and Asst. Director were made aware of the issue and temperature logs were provided for the units indicated. **No further corrective action is needed.**

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

Technical Assistance: Proper Date-Marking of Food Items

Technical assistance was provided to site staff regarding consistent date marking of all food products received from the prep kitchen to ensure First In, First Out (FIFO) rotation.