

SNP Administrative Review Findings

Children & Family Services (K121)

Program Year 2022

Children & Family Services (K121)

2290 S. Theobald Lane
Vincennes, IN 47591-8027

Food Service Contact

Mr. Andrew Malone
Principal
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Executive Contact

Ms. Barb Tilly
Chief Compliance Officer
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No. of Sites / Reviewed: 1 / 1

Month of Review: April 2022

Resource Management - Children & Family Services (K121)

700. Does SFA accurately track all revenues and expenses?

Technical Assistance:

During the site visit, it was observed that adults receive meals. The meal served included the same portions as the residents, including products provided by the food distribution program. However, the adult meals are not recorded on the daily count sheets or given to the Office Assistant to report to the financial department.

At the end of each program year, the sponsor transfers money from the general operating fund to the nonprofit food service account to bring the account to a \$0.00 balance. This transfer should list the line item under revenue, the amount that would be transferred for adult meals served for the year. For example, if the lunch price is \$4.00 and 250 adult lunches were served for the year, the transfer would show that \$1,000.00 is for adult meals.

709. Does SFA sell non-program foods?

Finding 9000: Non-Program Foods

It was observed that non-program foods are being given out for free instead of being charged. These additional foods are not being planned into the meal pattern. Therefore, if someone wants seconds or more of one item (extra entrée), they must be charged or paid for from non-federal funds.

Corrective Action:

For corrective action, please explain how non-program foods (extras such as entrees, juice/milk) will be tracked, and funds are accrued to the nonprofit food service account. If these items are being planned into the meal pattern, please provide a nutrient analysis that shows the ranges for calories, saturated fat, and sodium are being met with the supporting production records.

Technical Assistance:

It is allowable to complete a line item transfer to the nonprofit food service account for non-program foods from a nonfederal account. In this case, using the number of servings for "ala carte" from the production record, the site will determine what needs to be included in the line item transfer. For example, if 100 extra entrees were served and the local established price for entrees is \$1.75, the transfer would show that \$175.00 is for additional entrees.

General Program Compliance - Children & Family Services (K121)

1212. New School Nutrition Programs Director met hiring requirements

Technical Assistance- Professional Standards Hiring

The sponsor hired a consultant to create new menus, improve kitchen efficiency, and increase food safety procedures, among other items. The consultant was determined to be the Child Nutrition Programs foods program contact. However, the consultant did not have prior experience with Child Nutrition Programs or work onsite daily, resulting in a lack of guidance for food service employees. Qualified FSDs, whether hired by the sponsor or a company/co-op, must regularly provide onsite assistance and monitoring of all sites under the sponsor. Regular monitoring means that the FSD must be physically present at least for a measurable portion of each week to ensure food safety, meal pattern, and meal count documentation are maintained.

The lack of oversight within the food service department results in several areas of non-compliance in the daily, weekly, and monthly operations. Therefore, the sponsor needs to determine in the interim who the Child Nutrition foods program contact will be, train staff, and provide oversight of the policies and regulations per USDA FNS until a qualified person has been hired. Here is a summary of the professional standards; <https://www.fns.usda.gov/tn/professional-standards-summary-updates-flyer>.

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

Finding 9000: Professional Standards Training and Tracking

At the time of the review, the tracking for professional standards was not completed. Additionally, completed training could not be validated at the time of review. It appears there is a training completed with staff that includes a food service overview and civil rights. Annual training must focus on the day-to-day management and operation of the school nutrition program

Corrective Action:

The sponsor needs to ensure that all food service employees complete training annually. The sponsor must develop a detailed training plan to complete all required hours for food service employees. For corrective action, please submit the tracking of professional standards for all foodservice employees with supporting documentation. Additionally, please provide the developed training plan for the food service employees to attain all required hours.

Technical Assistance:

Additional resources for professional standards, including trackers, can be found here:

<https://www.in.gov/doi/nutrition/professional-standards/>.

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

Finding 9143: A copy of the written food safety plan is not available at each location.

At the time of the onsite review, the food safety plan was unavailable to be reviewed. The plan was also not found in electronically stored items.

Corrective Action:

The reviewer provided the Principal and Academic Assistant with the Institute of Child Nutrition template for the food safety plan using a process approach and the USDA guidance to help create the plan. The sponsor will need to create a site-specific plan for each location. Once the food safety plan is complete, the staff should be trained on using the food safety plan, including all standard operating procedures listed plan.

For corrective action, please complete the following:

1. Please confirm in writing that the food safety plan has been created and is site-specific.
2. Please provide documentation that staff has been trained to use the food safety plan.

SNP Administrative Review Findings**Children & Family Services (K121)****Program Year 2022****Southwest Indiana Regional Youth Village (B562)**

2290 S. Theobald Lane
Vincennes, IN 47591-8027

Food Service Contact

Mr. Andrew Malone
Principal
(812) 886-3000

Month of Review: April 2022

Date of Onsite Review: May 16, 2022

Other Federal Programs - Southwest Indiana Regional Youth Village (B562)**6. Day of review Menu, Meal Patterns, Production records.****Finding 9226: Production records do not support planned portion sizes to meet meal pattern component requirements.**

On the day of the review, the afterschool snack components did not meet the meal pattern. The peanut butter snack crackers had an overall serving of 28g. However, this serving includes both peanut butter and grain. For a 1oz equivalent grain when menuing savory crackers, a 22g serving is needed. Proper crediting documentation is required in the case of a combination item, like PB crackers.

Corrective Action:

On the day of the review, the cafeteria staff added a string cheese to the snack component to comply with the ASSP meal pattern. Therefore, additional corrective action is not required.

Technical Assistance:

The school was advised and given the opportunity to correct the insufficient quantity of 1 meal component before the meal service started.

7. Site monitored in first 4 weeks of operation, date, deficiencies/CA?**Finding 9228: The SFA has not monitored this site's Afterschool Snack Program within the first 4 weeks of operation each year. *Repeat Finding**

The Afterschool Snack Program's first monitoring must be completed within the first 4 weeks of operation, then once again throughout the program year. At the time of the review, no monitoring was not completed. Afterschool Snack Program operation at this site: 07/01/2021 - 06/30/22.

Corrective Action:

Non-compliance with ASSP onsite monitoring is a repeat finding. The sponsor is required to create a written standard operating procedure for ASSP onsite monitoring procedures, including when it will be completed, who will be completing it, and where files will be maintained. Please submit a copy of the written procedure. Additionally, the sponsor must complete one required onsite monitoring for ASSP by June 30, 2022. Please submit a copy of the completed monitoring.

Technical Assistance:

Please use the ASSP onsite monitoring form found here: <https://www.in.gov/doi/files/self-prep-snack-review-form.doc>.

11. DOR and Review Period Snacks missing components.**Finding 9000: Snacks missing meal components on Day of Review and Review Period disallowed.**

The school uses smart snack compliant items in the afterschool snack program, many of which do not credit into the afterschool snack meal pattern. Please do not confuse the Smart "a la carte" Snack requirements with the meal pattern requirement for ASSP. The snack menu contained multiple days of insufficient servings of one component or missing components. Snacks with missing meal components and insufficient portions claimed for reimbursement have been disallowed.

SFAs should determine menu compliance of items before service.

- Pudding are not creditable in the meal pattern, but could be served as an extra item.
- Veggie chips and straws are not grain-based and do not credit into the meal pattern. For example, chips made with dried potatoes or potato starch are not a creditable item in the Child Nutrition Programs.
- An insufficient portion of popcorn was served in the month of review. While popcorn is allowable, the serving needs to be 3 cups (or 1.0 ounce/28 grams) popped popcorn as 1 serving of grains in a reimbursable meal or snack.

SNP Administrative Review Findings**Children & Family Services (K121)****Program Year 2022**

- One day there was no record as to what was served. Menus are not followed as written, and substitutions are not consistently recorded.

Corrective Action:

For Corrective Action, please complete the following:

1. The SFA will need to create written standard operating procedures for the afterschool snack program that detail menu planning, and meal counting, with the understanding that not all smart snack items are creditable in the afterschool snack program. Please provide the written procedure.
2. The operators and menu planners of the snack program will be required to complete the afterschool snack training in Moodle. Please provide the sign-in sheets and completion certificates.
3. All menu cycles will need to be revised for ASSP to meet the meal pattern set forth by USDA. Please provide all the updated menu cycles for ASSP.

Meal Counting & Claiming - Southwest Indiana Regional Youth Village (B562)

325. Review Period- meal counts by category were correctly used in the claim for reimbursement

Finding 9000: Meal Counting and Claiming *Repeat Finding

During the onsite review, it was observed that meal counts are not taken when meals are served. The sponsor explained this is due to staffing. According to the onsite site staff, meal counts are recorded between 2:30-3:00 pm. The following errors were also identified.

1. Children are being recorded for meals before admission and after being released.
2. Children not on the real-time report (benefit issuance list) were being recorded for meals.
3. Double counting is occurring due to children being in cottages and detention.
4. Manual rosters are not updated as the population changes.
5. May 16th breakfast cannot be claimed for reimbursement because the reviewer checked the meal count sheets at 11:30 am, which were not completed.
6. Edit checks are not completed.

As a result of meals not being recorded during service, this method is considered systemic and does not yield accurate results. Therefore, the month of review (April 2022) has been disallowed for reimbursement. Additionally, claims will be placed on hold until sufficient corrective action is deemed successful. This finding contributes to fiscal action relating to meal counting practices for breakfast, lunch, and afterschool snacks.

Corrective Action:

Meal counters should be trained in civil rights, identifying a reimbursable meal, and recording meal counts. All meal counts must be taken at the time that each child receives their meal (point-of-service count).

For corrective action, please complete the following:

1. Please explain in writing the updated meal count procedures, including how meals will not be double claimed or counted for children when not present, how rosters will be updated as population changes, and how the meal counts will be consolidated at the end of each service.
2. Please provide documentation that shows the ineligible day (May 16, 2022) for claiming was not submitted for claim reimbursement- May 2022.
3. Internal controls must be established to identify potential problems in the meal count system and ensure that an accurate Claim for Reimbursement has been made. In addition, internal controls protect from having erroneous claims and potential overclaims. Edit checks and monitoring are the two required internal controls. Please submit the most recent edit check.
4. All meal counters must complete the meal counting training online on the Moodle platform. In addition, please submit the post-test and training certificate completion.

Technical Assistance:

During the onsite review and exit conference, these findings and requirements were discussed with the principal, food service staff, and chief financial officer. It is highly recommended the sponsor review the permanent agreement to ensure the responsibility of program participation is clearly understood.

SNP Administrative Review Findings

Children & Family Services (K121)

Program Year 2022

Meal Components & Quantities - Southwest Indiana Regional Youth Village (B562)

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 served on the day of review did not meet the minimum meal pattern requirements for the age/grade group(s) served. Meals that contain insufficient quantities of meal components are incomplete and are not reimbursable. Insufficient portion sizes observed on the Day of Review:

-Cornbread was the planned grain on the day of review. However, the recipe was not followed, resulting in an insufficient grain portion (less than 2oz equivalent). Additionally, it was observed that the recipe was not followed as written for the chili.

Corrective Action:

On the day of review, the reviewer provided onsite technical assistance. When a standardized recipe is altered or not followed, it changes the yield, crediting, calories, sodium, saturated fat, etc. The staff added a slice of bread with the meal. Therefore, additional corrective action is not required.

Technical Assistance:

The school was advised and given the opportunity to correct the insufficient quantity of 1 meal component before the meal service started.

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. *Repeat Finding

As observed on the Day of Review, at least two required milk varieties were not available throughout the serving period on all meal service lines. The detention area is provided only white milk at breakfast. For each meal service, two types of milk should be offered through pre-order or in-person selection.

Corrective Action:

Please explain how two types of milk will be offered in all areas of meal service (cottages, detention, and cafeteria) daily for each meal service.

Technical Assistance:

Sponsors must offer at least two types of milk, one of which is an unflavored option, either fat-free or low fat. When providing two types of milk, if flavored is offered, unflavored must also be an option throughout the entire service.

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

Technical Assistance- Meal Pattern Signage

Although meal pattern signage was available on the day of review, it was for offer vs. serve. The sponsor does not provide the option for OvS. The staff removed all signage that did not correspond to the meal pattern service model used at the facility. Please update the meal pattern signage that does not indicate OvS. <https://www.in.gov/doe/nutrition/residential-child-care-institutions/#null>.

410. Review Period- planned menu quantities meet the meal pattern requirements

Finding 9000: Production Records *Repeat Finding

Production Records are not completed thoroughly. Production Records must be completed on the day of service in full.

-Total purchase units of food preparation are not completed consistently.

-Breakdown of # served is not completed consistently.

-The production record for the day of review (breakfast and lunch) was not completed as of June 9, 2022.

Corrective Action:

For corrective action, the food service staff will need to complete the Food Production Records course on the Moodle platform. Please submit the training certificate of completion. Additionally, please provide two weeks of completed production records.

410. Review Period- planned menu quantities meet the meal pattern requirements**Finding 9076: Planned menus served during Review month do not meet portion size/quantity requirements.**

Productions records were reviewed for the Review Period to determine whether the portion sizes of meal components from the planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) served. Meals served with insufficient portion size, or insufficient quantities of meal components are incomplete and are not reimbursable. The menu planner is reminded to plan menus that meet all components in daily and weekly serving sizes. This contributes to fiscal action.

- Not all food labels and crediting documentation were provided during the review, which could affect the result of the determined weekly quantities. Crediting documentation, recipes, and product formulation statements are not being used or retained with meal planning.

Breakfast 9-12

- Juice can count as no more than half the total fruit offered over the course of the week. Additional portions of juice must be sold a la carte. Although the menus were planned with only 1/2 cup of juice being offered daily, the food service staff served 1 cup of juice with the reimbursable meal.
- One type of milk offered (detention) daily for the month of review.

Lunch 9-12

- Vegetables
 - Two of 7 days were insufficient portions (less than 1 cup) for daily compliance, and also insufficient for the week. Additionally, the month of review production records provided 8 additional days of vegetables less than the required 1 cup serving. The menu pattern needs to be implemented with at least 1 cup daily offering of vegetables at lunch regardless of the service model.
 - The required bean/peas (legume) vegetable subgroup was not menued
- Fruit
 - Four out of 7 days were insufficient portions (less than 1 cup) for daily compliance, and also insufficient for the week. Additionally, the month of review production records provided 7 additional days of fruit less than the required 1 cup serving. The menu pattern needs to be implemented with at least 1 cup daily offering of fruit at breakfast regardless of the service model.
 1. Non-creditable items were served for fruit, such as sherbet and fruit pies. While grain-based desserts like cobbler are allowable and can contribute to the fruit component, proper crediting documentation is required. This could include a standardized recipe or product formulation statement.
- Grain
 - One out of 7 days was insufficient portion (less than 2oz equivalent grain) for daily compliance. Additionally, the month of review production records provided 1 additional day where no grain component was offered or served.
- Meat/Meat Alternate
 - One out of 7 days was an insufficient portion (less than 2oz equivalent M/Ma) for daily compliance.
- Milk
 - The month of review production records provided one day where only one type of milk was offered.

Corrective Action:

For Corrective Action, please complete the following:

1. Each menu item should have documentation to support crediting (Food Buying Guide, Recipes, CN Labels, Product Formulation Statement). These documents should be retained onsite as part of the meal pattern compliance. Please confirm how the documentation has been obtained and will be retained on site.
2. Please explain how each menu insufficiency has been addressed.
3. The menu planner will need to complete at minimum a 4-week cycle menu. In addition, each cycle menu must be put through the menu certification worksheets and submitted as part of corrective action.
4. The meal planner will also be required to complete the Crediting Series training located online on the Moodle platform. In addition, please submit the post-test and training certificate completion.

Technical Assistance:

Menu certification worksheets- <https://www.fns.usda.gov/cn/certification-compliance-worksheets-7-day-schedule>

General Program Compliance - Southwest Indiana Regional Youth Village (B562)

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

Finding 9146: Less than 2 food safety inspections were done in the current school year, and no documentation that 2 inspections have been requested. *Repeat Finding

The school did not provide two food safety inspection reports for the current school year, and no documentation was available to substantiate the SFA has requested two food safety inspections for the current year.

Corrective Action:

The sponsor should request in writing health department inspections annually. For corrective action, the sponsor will need to create written standard operating procedures for the Child Nutrition Program that fully details, at minimum, who is in charge of requesting health inspections, where the inspections will be posted, how often the request will occur, and retention of corrective action documentation if needed. Please submit a copy of the written procedures. Additionally, submit a copy of the written quest to the local health department.

Technical Assistance:

IDOE has created a template that can be used when contacting local health departments. As a reminder, a copy of the written request should also be retained on file. <https://docs.google.com/document/d/1iwP5jVuzNualqEwBAiAxDW7pDF3Hrgos/edit>

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

Finding 9147: Most recent food safety inspection report is not posted in a publicly visible location.

Corrective Action:

Please confirm the local health department food safety inspection report has been posted in all areas where meal service occurs (cottages, detention, and cafeteria).

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

Finding 9150: Storage violations were observed.

The SFA must ensure that all facilities for handling, storing, and distributing purchased and donated foods are safeguarded against theft, spoilage, and other losses. Some storage violations were observed on the day of review.

- Floor and walls are dirty- visible dirt and spills.
- Ice buildup in the freezer with food stored directly under it. This can lead to debris contaminating food.

Corrective Action:

Proper food safety handling procedures must occur. Using the Food Safety Checklist, an internal review of the kitchen will need to be completed on a monthly rotation by someone not involved in the day-to-day operation of the school kitchen <https://theicn.org/resources/599/food-safety-sop-logs/105679/food-safety-checklist.docx>.

For corrective action, please submit the following:

1. Please list who will be completing the internal review and provide a detailed timeline of when the Food Safety Checklist will be completed.
2. Please submit a copy of the internal review that has been completed.
3. Please explain how each storage violation has been corrected.