

SNP Administrative Review Findings

Clark-Pleasant Community Schools (4145)

Program Year 2023

Clark-Pleasant Community Schools (4145)

50 Center Street
Whiteland, IN 46184-1606

Food Service Contact

Ms. Kim Combs
Food Service Director
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Executive Contact

Dr. Patrick Spray
Superintendent
(317) 535-7579
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No. of Sites / Reviewed: 8 / 2
Month of Review: October 2022

Commendations

- * The planned menu was colorful and the foods (blueberries, bananas, strawberries, fresh broccoli, fresh peppers) were displayed nicely on the serving line making the choices very appealing for students.
- * The food at Whiteland High School was batch cooked for each meal service, which is encouraged.

Technical Assistance

- * Cashiers need to consistently remind students when account balances are low or negative.
- * A second grain planned with an entree was not included in the recipe but was on other resources. The recipe was updated the day of review.
- * The director was reminded the day of review that trainings such as bullying do not count towards the annual training requirements for foodservice staff. Only trainings that fosters proper administration and operation of the school nutrition programs count toward the training standards. To identify appropriate training topics for various school nutrition program personnel, visit https://fns-prod.azureedge.us/sites/default/files/cn/ps_learningobjectives.pdf.

Please also ensure to plan adequate training hours for all food service staff to meet training requirements for the 22-23 school year.

- * To use a different civil rights training other than the state agency approved versions please reference the civil rights training checklist emailed to the director the day of review.
- * Reminder was provided on non-exempt fundraiser limits.
- * Please review how money for lunch accounts is handled from the time it is brought into the school by the student until it is finally credited to the student account and deposited. Current procedures for cash management involve students bringing in cash payments to the teachers and then the teachers sending this down to the school. To ensure proper tracking of money, consider requiring cash payments to be provided in a sealed envelope with the student name/ID number/teacher on the outside of the envelope. Efforts should be taken to avoid having loose cash handed to teachers, etc.
- * The SFA is reminded to complete and document the wellness policy evaluation. Be sure to inform (and document your efforts to inform) stakeholders of the availability to participate in the wellness policy evaluation. USDA has moved the deadline to evaluate the policy to June 2023.

Certification and Benefit Issuance - Clark-Pleasant Community Schools (4145)

130. Household notification of denied benefits is consistent with FNS requirements

Finding 9021: Denial of benefits notification to household not consistent with FNS requirements

Notification sent to denied households did not include a statement that households may reapply at any time during the school year.

Corrective Action:

As corrective action, the SFA will include the language in the notification of denied benefits letter. Additional response is not required.

Technical Assistance:

The requirement was explained the day of review and the prototype letter was emailed to the director.

SNP Administrative Review Findings**Clark-Pleasant Community Schools (4145)****Program Year 2023***133. Direct Certifications were correctly certified***Finding 9024: Direct Certifications were not correctly certified**

Direct certification documentation for selected students was reviewed for completeness and accuracy. Some students were certified for free meals incorrectly. A student noted as a possible match was incorrectly approved.

Corrective Action:

As corrective action the SFA agrees to review possible direct certification matches with enough discretion to ensure accuracy in certification. More than one data point (i.e., date of birth, middle initial, address, etc.) will be utilized to ensure accuracy in matches. Additionally, the incorrectly matched household has been given 10 days' notice of reduction in benefits. Additional response is not required.

Technical Assistance:

The requirement was explained the day of review.

Verification - Clark-Pleasant Community Schools (4145)*206. On-site observations validate Off-Site Assessment Tool responses to Verification questions and responses demonstrate compliance with FNS requirements***Finding 9000: Verification**

The household applied with an application containing a case number. Rather than approving at face value and verifying for cause, the director called the household to ask for income because the case number was not found in a DC lookup. The household gave income over the phone. Official verification procedures were not followed, and the household should have been approved initially for free meal benefits until the verification process was complete.

Corrective Action:

As corrective action the student's benefit was changed back to free status during the administrative review. Clarifications regarding an application are always allowed and encouraged, but when an application is questionable, the SFA will only use official verification procedures going forward. Additional response is not required.

Technical Assistance:

The requirement was explained the day of review.

Resource Management Comprehensive Review - Clark-Pleasant Community Schools (4145)*767. Nonprogram Revenue and Food Cost Ratio***Finding 9000: Non-Program Food Revenue**

The SFA did not correctly calculate its nonprogram food ratio and its food cost ratio. Incorrect reimbursement rates were used, and many averages were used in a 5-day sample which can skew the calculation.

Corrective Action:

As corrective action an updated non-program food revenue tool has been provided. The updated tool shows the revenue for a la carte items was close to 2.5 times the cost. Due to increase in reimbursements and an extra temporary per-meal boost in reimbursements from the recent Keep Kids Fed Act, the ratio requirements could not be met despite sufficient pricing. Additional response is not required.

Technical Assistance:

The requirements for the calculation were discussed with the director the day of review. The SFA should continue to be mindful of increasing food costs and the potential need to increase non-program food prices as a result.

SNP Administrative Review Findings**Clark-Pleasant Community Schools (4145)****Program Year 2023**

**Grassy Creek Elementary School
(3422)**
50 Center Street
Whiteland, IN 46184-1606

Food Service Contact
Mrs. Kandy Doyle
Food Service Manager
(317) 535-3980

Month of Review: October 2022

Date of Onsite Review: November 16, 2022

Meal Counting & Claiming - Grassy Creek Elementary School (3422)

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

Finding 9066: Inaccurate meal counts by eligibility category at the POS.

As observed on the Day of Review, each type of meal service line does not provide an accurate count by eligibility category at the point of service. The current practice for the preschool children is to have the teachers mark meal counts at breakfast for breakfast and for lunch. When the students come through the lunch line, their meals are already entered in the POS. While they have a process for removing meals that may have been recorded if a child went home sick, meals must be marked when the students come through the line and then entered in the POS, not before, in order to record meals accurately.

Corrective Action:

Meals can be pre-ordered in the morning but must be confirmed through an additional check-off at lunch and recorded in the POS after the meal service. It would likely be just as easy to mark the meals at the POS as the students come through the line to confirm any allergies, etc. The manager has agreed to record the meals as the students come through the line. If the corrective action continues as confirmed, no further action is necessary.

Technical Assistance:

The requirement to count and record meals at the point of service was explained the day of review.

Meal Components & Quantities - Grassy Creek Elementary School (3422)

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

Technical Assistance - Signage**Technical Assistance:**

Signage over the fruit selections at lunch that says, "TAKE ONE FRUIT" or something similar would be helpful. Some students arrived at the POS with more than one fruit, and it was removed from their tray.

SNP Administrative Review Findings

Clark-Pleasant Community Schools (4145)

Program Year 2023

Whiteland High School (3421)

50 Center Street
Whiteland, IN 46184-1606

Food Service Contact

Mrs. Niki DeVos
Food Service Manager
(317) 535-3144

Month of Review: October 2022

Date of Onsite Review: November 16, 2022

Meal Counting & Claiming - Whiteland High School (3421)

319. Day of Review- excessive overrides in the electronic point of service are not used

Finding 9067: Electronic POS system: Excessive overrides at the POS.

As observed on the Day of Review, excessive overrides are used in the electronic system at the POS. The use of excessive overrides is not reasonable. Most were for meal charges but during breakfast service some overrides were noted for a la carte charges. While the use of overrides does not affect the claim for reimbursement it does affect the balance of the non-profit foodservice account.

Corrective Action:

The director stated that the point-of-sale system would be updated to prohibit overrides for the purposes of charging a la carte items. Additionally, training regarding the school's charging policy will be provided. The SFA agrees to the corrective action as written. Additional response is not required.

Technical Assistance:

The requirement was explained the day of review.

Meal Components & Quantities - Whiteland High School (3421)

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

Finding 9075: Production records/supporting documentation indicate weekly meal pattern requirements for the age/grade group(s) not met.

The grain-based dessert limit was exceeded as two packages of graham crackers were offered two days per week with the PBJ entree.

Corrective Action:

As corrective action, the assistant director will reduce the number of days the graham crackers are offered with the PBJ to one day per week. Additional grain options are being explored. The SFA agrees to the corrective action as written. Additional response is not required.

Technical Assistance:

The school was provided technical assistance during the on-site visit.

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

Finding 9078: School is not properly implementing Offer vs. Serve.

As observed on the Day of Review, one or more cashiers did not demonstrate a clear understanding of OVS and its requirements. For both breakfast and lunch, where a student selected a reimbursable meal, the student was made to select an additional item. During the breakfast meal the cashier did not realize the fruit in the parfait could credit as a meal component.

Corrective Action:

Overall, most students were not forced to take additional items; however, when this did occur, the requirement was explained to the cashiers the day of review. The manager will continue to monitor cashiers to ensure they maintain an understanding of OVS. The foodservice director will also plan additional OVS training as part of the staff winter training session. Additional response is not required.

SNP Administrative Review Findings**Clark-Pleasant Community Schools (4145)****Program Year 2023****Technical Assistance:**

The school was provided technical assistance during the on-site visit.

General Program Compliance - Whiteland High School (3421)*1410. Location of the agricultural food components used***Finding 9000: Buy American**

During the Buy American Review, the reviewers found peach cups from China, frozen broccoli from Mexico, and fresh tomatoes from Canada. Documentation to determine if domestic alternatives were considered was not available.

Corrective Action:

If non-domestic products are purchased, documentation to determine if domestic alternatives were considered must be maintained. The only exceptions to the Buy American provisions are as follows:

- The agricultural food component is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or
- Competitive bids reveal the costs of domestic agricultural food components are significantly higher than the non-domestic ones.
- The exception was related to the domestic food as prohibitively costly or limited quantity availability.

Going forward the SFA agrees to comply with all requirements of the Buy American Provision. Additional response is not required.

Technical Assistance:

The requirements were explained the day of review.