

SNP Administrative Review Findings

Holy Redeemer Parish School (K273)

Program Year 2022

Holy Redeemer Parish School (K273)

918 W Mill Road
Evansville, IN 47710-3932

Food Service Contact

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Executive Contact

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Principal
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Month of Review: November 2021

Resource Management Comprehensive Review - Holy Redeemer Parish School (K273)

766. Assessing Compliance with the Non-program Foods Revenue/Cost Ratio

Finding 9000: Assessment of Non-Program Revenue/Cost Ratio

The SFA did not assess its compliance with the revenue from non-program foods requirements 7 CFR 210.14(f).

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 revenue tool with documentation to support the figures used.

Technical Assistance:

The reviewer provided the cafeteria manager with the USDA memo SP20-2016 explaining the reference period with a 5-day revenue tool.

General Program Compliance - Holy Redeemer Parish School (K273)

808. On-site observations validate Off-Site Assessment Tool responses to Civil Rights questions and responses demonstrate compliance with FNS requirements

Finding 9000: Annual Civil Rights Training not Completed

Civil rights training has not been completed since February 1, 2021. Civil Rights training is required annually for all food service staff, including anyone outside food service with duties related to the child nutrition programs that provide direct access to participants during meal service.

Corrective Action:

The SFA must complete Civil Rights training with all employees related to the foodservice operation. For corrective action, the staff will need to complete the civil rights training located on the Moodle platform. Please submit the sign-in sheet, post-test, and training certificate of completion. Additionally, please explain in writing how this training requirement will be met annually.

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.

Some of the information gathered on the Off-site Assessment Tool regarding the SFA's Local School Wellness Policy could not be validated during on-site observations. Discrepancies or deficiencies found on-site:

- The current local wellness policy does not contain all the elements for the final rule. In addition, it was noted that the SFA had not adopted the most current version of the LSWP the Archdiocese of Evansville has in place for schools to use and locally customize.
- Documentation of outreach is not maintained
 - Proof of "advertisement" to the public about their ability to participate in the wellness committee. (newsletter, FB post, etc.)
 - Proof of public knowledge of local wellness policy evaluation and implementation (newsletter, school board meeting minutes, etc.)

Corrective Action:

Corrective action required to address discrepancies or deficiencies in the SFA's Local School Wellness Policy identified from the Off-site Assessment Tool:

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Program Year 2022

1. Update the wellness policy to contain all elements, including clearly written measurable goals (nutrition education, nutrition promotion, physical activity, and other activities), evaluation, communication information, etc. Please submit an updated wellness policy.
2. Please explain the local procedure of what has been put in place to ensure outreach documentation is maintained. In addition, explain procedures in place to document the minutes of the wellness committee meetings.

1110. On-site observations validate Off-Site Assessment Tool responses to Smart Snacks questions and responses demonstrate compliance with FNS requirements

Finding 9000: Determination of Smart Snack Compliance

The SFA is not determining compliance of items sold throughout the school day to ensure smart snack standards are met. After the review, items were put through the healthier generation calculator tool, where it was determined that some items sold were not in compliance with smart snack standards.

Corrective Action:

The SFA is required to determine compliance of items sold throughout the day prior to selling items.

For Corrective Action, please submit the following:

1. Please develop written standard operating procedures that include the process for compliance with smart snacks. Also, provide a copy of the written procedures.
2. Please complete the smart snacks training on the Moodle platform with all staff assisting with selling items throughout the school day. In addition, please submit the training completion certificate and sign-in sheets.

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

Finding 9000: Professional Standards

At the time of the review, the tracking for professional standards was not completed. An additional employee in the kitchen, hired in August 2018, has not received any training other than civil rights. Annual training must focus on the day-to-day management and operation of the school nutrition program

Corrective Action:

The SFA needs to ensure that all foodservice employees complete training annually. The SFA will need to develop a detailed training plan to complete all required hours for foodservice 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 foodservice to attain all required hours.

Technical Assistance:

This finding and requirements were discussed with the cafeteria manager on the day of review. The reviewer also provided the website for professional standards. Additionally, the reviewer provided a list of recommended training for the cafeteria manager to the principal on January 6, 2022.

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. *Repeat Finding

The food safety plan was developed locally in 2019 but has not been reviewed or updated since its implementation. The written food safety plan does not comply with the HACCP program criteria described in 7CFR 210.13(c). Missing elements:

- Standard Operating Procedures

Corrective Action:

The reviewer provided the cafeteria manager with the Institute of Child Nutrition template for the food safety plan using a process approach and the USDA guidance to help create, implement and review the food safety plan. 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 food safety plans have been created and are site-specific for each school.
2. Please provide documentation that staff has been trained to use the food safety plan.

SNP Administrative Review Findings**Holy Redeemer Parish School (K273)*****Program Year 2022***

1500. Reports are submitted to the Indiana Department of Education as required

Technical Assistance: SFA does not submit reports as required to the State agency.

The SFA did not submit the requested data to the State Agency for the Administrative Review in a timely manner (7CFR 210.20). The SFA is expected to meet all deadlines and requests for child nutrition programs. In addition, the SFA should create a system that will notify staff of upcoming due dates for the program.

1602. On-site observations validate Off-Site Assessment Tool responses to SFSP and SBP Outreach questions and responses demonstrate compliance with FNS requirements

Technical Assistance- Summer Meals Outreach

School Food Authorities are required to provide outreach for the Summer Food Service Program prior to the end of each school year- even if they do not operate the SFSP. Therefore, please visit <https://www.in.gov/doi/nutrition/meal-site-information/> prior to the end of each school year to determine nearby SFSP sites so that you may inform households of availability. Furthermore, all outreach (CEP, breakfast, lunch, summer meals, etc.) should be kept on file for three years plus the current program year.

SNP Administrative Review Findings**Holy Redeemer Parish School (K273)****Program Year 2022****Holy Redeemer (D560)**

918 W Mill Road
Evansville, IN 47710-3932

Food Service Contact

Ms. Kaye Durbin
Cafeteria Manager
(812) 422-3688

Month of Review: November 2021

Date of Onsite Review: December 15, 2021

Meal Components & Quantities - Holy Redeemer (D560)

401. *Day of Review- all meals observed and counted for reimbursement contained all of the required meal components*

Finding 9000: Offer vs. Serve

On the day of review, the SFA pre-plated all meals except milk for the students. After discussion with the reviewer, the manager explained the meal service was being completed differently because of the review only. During the last meal service period, the reviewer asked to observe how the regular daily operation. It was determined that OvS was not implemented correctly; all students were required to take fruit, milk, and a combination entree (M/MA & grain), giving the vegetable component the only option to decline. Additionally, Offer vs. Serve training was not completed with staff or the meal counter.

Corrective Action:

Under OVS, students must select at least 3 of 5 food components. One of the choices that must be selected is at least a ½ cup serving of the fruit or vegetable component or a ½ cup total serving of both fruit and vegetable.

For corrective action, please submit the training sign-in sheets and certificates of OvS training. Training can be found on Moodle.

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) being served. Meals that contain insufficient quantities of meal components are incomplete and are not reimbursable. Insufficient portion sizes observed on the Day of Review:

- The lunch planned menu for the day was 1/2 cup of vegetables (green beans and carrots) which is insufficient by 1/4 cup.

Corrective Action:

Prior to the meal service, the foodservice staff added a ¼ cup serving of cucumbers to the service line to meet the daily offering of ¾ cup of vegetables. 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.

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

Finding 9000: Production Records *Repeat Finding

The SFA completed production records only for the month of review. This is a repeat finding from the in-depth technical assistance #1 conducted in January 2021. Corrective action from January 2021 required multiple virtual meetings with the reviewer to ensure production records were being completed and helping understand the completion of the document. If it is found that production records are not being completed daily in a subsequent review, future meals could result in a disallowance.

Corrective Action:

Production records are required to be completed daily. For corrective action, it is required that the cafeteria manager submit the daily production records to the school administration at the end of each day. The school administration will need to review the production record for accuracy and sign off that the record is complete. Reimbursement claims cannot be submitted until all monthly documents are completed, including daily production records. Please confirm the procedure has been implemented and can be pulled for review when requested.

SNP Administrative Review Findings
*Program Year 2022***Holy Redeemer Parish School (K273)***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.**

Production 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 both the daily and weekly serving sizes. If this error is found in subsequent Administrative Reviews, the meals may be considered non-reimbursable and disallowed.

Lunch K-8

• 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.

- Vegetables
 - The menu planner is planning for a 1/2 cup serving of vegetables because the SFA operates Offer vs. Serve. The meal pattern needs to be implemented with at least 3/4 cup daily offering of vegetables regardless of the service model.
 - Insufficient daily compliance 4 out of 5 days for vegetables less than 3/4 cup. This results in the weekly compliance also being insufficient. The meal planner explained vegetables are served daily at 1/2 cup unless another vegetable has been added to the menu for that day. This is how the planned menu is being executed for the month of review which contributed to the the insufficiency. Planning two 1/2 cup servings of vegetables each day would help resolve this issue.
 - Insufficient weekly compliance for other vegetable subgroup
 - Missing the bean/Peas (legume) vegetable subgroup

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 on-site 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.

General Program Compliance - Holy Redeemer (D560)*1408. Temperature logs are available***Finding 9149: Temperature logs unavailable for review.**

The reviewer observed the food service staff taking food temperatures (final cooking and holding temperatures). However, temperature logs are not being completed. FNS requires each site in the SFA to maintain temperature logs for six months.

Corrective Action:

Please submit one month of final cooking and holding temperature logs for corrective action.

Technical Assistance:

The reviewer sent the food service manager the food safety logs found on the Institute of Child Nutrition. <https://theicn.org/icn-resources-a-z/food-safety#310a97462e1534f82>