

Program Year 2017

Life Choice (K263)
2225 West Indiana Street
Evansville, IN 47712-5134

Food Service Contact
Ms. Regina M Russelburg
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Executive Contact
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No. of Sites / Reviewed: 1 / 1

Certification and Benefit Issuance - Life Choice (K263)

125. *RCCI with no day students – correct eligibility documentation?*

Finding 9016: Eligibility documentation missing for RCCI with no day students and no applications.

The SFA does not have the correct eligibility documentation (Statement of Facts) available for residential students in the facility when the residential students do not have applications on file.

Corrective Action:

The SFA will complete the Statement of Facts for the residents that do not have placement paperwork. No further action required.

Technical Assistance:

Reviewers provided on-site technical assistance. <http://www.doe.in.gov/sites/default/files/nutrition/childrens-free-and-reduced-price-eligibility2.pdf>

Meal Counting & Claiming - Life Choice (K263)

313. *On-site observation validate Off-Site Assessment Tool responses to Meal Counting & Claiming questions?*

Finding 9007: Meal Counting and Claiming 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 Meal Counting & Claiming procedures could not be validated during on-site observations. Discrepancies or deficiencies found on-site:

- An edit check is not completed prior to submission of the claim for reimbursement.

Corrective Action:

The SFA will ensure that the monthly edit check will be completed manually prior to the claim submission by using the form found on the IDOE website. No further action required.

Technical Assistance:

Technical Assistance provided to address discrepancies or deficiencies in the SFA's Meal Counting & Claiming procedures identified from the Off-site Assessment Tool: A copy of the edit check procedures can be found here: <http://www.doe.in.gov/nutrition/edit-checks>

General Program Compliance - Life Choice (K263)

808. *On-site observation validate Off-Site Assessment Tool responses to Civil Rights questions?*

Finding 9008: Civil Rights information on the Off-site Assessment Tool not validated, or deficiencies found.

The Civil Rights training has not been completed since January of 2015. The SFA has no procedures in place on receiving NSLP Civil Rights complaints.

Corrective Action:

The SFA will complete annual Civil Rights training with staff by 12/29/16 and then complete annually. The trainer for Civil Rights will take the online quiz. The SFA must have a procedure for handling civil rights complaints as they pertain to the National School Lunch Program including reporting the complaint to the State Agency or directly to the USDA.

Additional Corrective Action- Please provide a copy of the online quiz and training sign-in sheet to field specialist via email

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once completed.

Technical Assistance:

SFA was provided with the state template for procedures to adopt locally. <http://www.doe.in.gov/nutrition/scn-civil-rights-requirements>

1007. *On-site observation validate Off-Site Assessment Tool responses to Local School Wellness Policy questions?*

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:

- Wellness policy has not been updated since 2007.

Corrective Action:

Additional Corrective Action- Please provide a timeline for the review and update of the local wellness policy to meet USDA standards including the July 1, 2017 final ruling.

Technical Assistance:

Technical assistance provided to address discrepancies or deficiencies in the SFA's Local School Wellness Policy identified from the Off-site Assessment Tool: <http://www.doe.in.gov/nutrition/school-wellness-policy>

1217. *Validate OFS #1205 - Did School Nutrition Manager meet annual training requirements?*

Finding 9000: Professional Standards

Professional standards is not being met. Professional development including training hours and/or tracking for all staff pertaining to the National School Lunch Program is not being completed.

Corrective Action:

The SFA will educate themselves on the professional standards ruling. This will not count as part of the yearly training hours. SFA will then complete the needed training hours for each staff member pertaining to the National School Lunch Program by attending IDOE trainings and ICN webinars.

Additional Corrective Action- Provide a list of planned trainings for the remainder of the program year.

Technical Assistance:

The reviewer provided the following links to the food service contact

- .ICN Website <http://www.nfsmi.org/Templates/TemplateDefault.aspx?qs=cEIEPTM=>
- IDOE Webpage <http://www.doe.in.gov/nutrition/professional-standards>
- DOE also will provide in-person training when requested.

1400. *Food safety plan – contain required elements, copy available at each school?*

Finding 9142: The written food safety plan does not contain all the required elements.

Food Safety Plan has not been developed.

Corrective Action:

The FSD will develop a plan by 12/29/16.

Additional Corrective Action- Please notify field specialist when Food Safety Plan is completed.

Technical Assistance:

The reviewer has sent resources to the FSD for help in developing the food safety plan including the Institute of Child Nutrition website.

- Learning what is required in a food safety plan based on process approach (videos): <http://theicn.org/ResourceOverview.aspx?ID=56>

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- Here is a link for the SOPs as created by the institute of child nutrition. Click on the “view” option and select those that apply to you as a school building: <http://sop.nfsmi.org/>

1500. Reports submitted to State agency as required?

Finding 9151: SFA does not submit reports as required to the State agency.

The SFA does not submit reports to the State agency according to reporting and recordkeeping requirements described in 7CFR 210.20. Verification Summary report was not submitted in 2015-2016 program year by the SFA. The SA completed the report in February 2016.

Corrective Action:

The SFA has submitted the PY 2017 verification summary report with the aid of the state reviewer. No further action is required, but be aware that this report must be submitted annually.

Technical Assistance:

<http://www.doe.in.gov/sites/default/files/nutrition/2016-linkable-calendar-due-dates.pdf>

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Meal Counting & Claiming - Life Choice (Z901)

324. *Questionable patterns in Free, Reduced Price or Paid meal counts? Enter data.*

Finding 9073: Questionable patterns in the reported counts of free, reduced, and paid meals for the Review Period.

On the Day of review the meal counts were not taken at the point of service. There were patterns in the reported counts of free, reduced, and paid meals for the Review Period that appear questionable for the population of students participating in the NSLP and SBP. The explanation provided by the school for the questionable meal count patterns was not acceptable. Questionable meal count practices:

- Not taking meal counts at point of service.
- When looking at the monthly meal count forms, the marks for meals eaten appear to be uniform and marked at the same time.

Corrective Action:

The SFA must ensure that meal counts are taken each day and completed at the point of service. Because there is no way to know which meals were claimed in error, no meals have been disallowed, however, future evidence of meals not being counted at the point of service may be disallowed. No further action required.

325. *Review Period meal counts by category correctly used in the claim? Enter data.*

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 does not match the State agency's validated meal counts by category for the school for the Review Period. The problem is considered systemic because the contributing factors are built into the process and would likely recur if the process is not changed.

Meal counts are not taken at point of service. Meal counts are completed at the same time and residents were counted for meals after the discharge dates.

Corrective Action:

The SFA will ensure that meal counts are taken at point of service. The difference between the SFA Count and the State agency are below:

Breakfast Claimed 424	Lunch Claimed 331
Breakfast Actual 420	Lunch Actual 327
Overclaim 4	Overclaim 4

Meal Components & Quantities - Life Choice (Z901)

401. *DOR - meals selected by students contain all required components/quantities? Enter data.*

Finding 9000: Insufficient Meals for Claiming

SFA did not ensure that all components for both breakfast and lunch was served to residents resulting in a disallowance for 4 breakfast meals and 4 lunch meals.

Corrective Action:

The SFA will ensure all meals claimed for reimbursement contain all 5 required components planned for the day. No further action required.

Technical Assistance:

Reviewer highly encourages SFA to implement OVS.

402. *DOR - quantities served meet daily meal pattern requirements for age/grade groups? Enter data*

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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 are not reimbursable. Insufficient portion sizes observed on the Day of Review:

- Milk poured at breakfast was not a full 8oz resulting in a repeat finding of insufficient measuring by the server. The remaining 2 meals served have been disallowed.

Corrective Action:

The SFA will ensure planned portion sizes are served in all components.

Additional Corrective Action- Please provide a timeline of when production training will occur with staff.

403. DOR - two varieties of milk available, allowable substitutions? Enter data.

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 throughout the serving period on all meal service lines for both breakfast and lunch. The State Agency recognizes that State Requirements for menu planning for RCCI's is more difficult than NSLP. The RCCI must still offer 2 varieties of milk selected from 1% white, 1% lactose free, 1% reduced milk or 1 % buttermilk.

Corrective Action:

The SFA will offer two different types of milk during the meal services. No further action required.

404. DOR - signage explaining reimbursable meal near/at beginning of service line?

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 for both breakfast and lunch.

Corrective Action:

The SFA will create or purchase signage for each of the meal patterns. No further action required.

Technical Assistance:

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

406. DOR - meal service structured to meet specific meal pattern requirements for multiple menus, multiple age/ grade groups served?

Finding 9058: Age/grade group meal pattern requirements not being met for multiple menus and/or multiple age/grade groups served.

As observed on the Day of Review, when the school is serving multiple menus and/or age/grade groups, it has not structured the meal service to meet the specific meal pattern requirements for each menu type and/or age/ grade group being served. K-8 and younger menu does not meet meal pattern. It is insufficient in all components.

Corrective Action:

The SFA will plan menu to corresponding age groups K-5 or K-8.

Additional Corrective Action- Please provide a copy of updated menus to field specialist.

Technical Assistance:

The school was provided technical assistance during the on-site visit. <http://www.doe.in.gov/sites/default/files/nutrition/lunch-meal-pattern-rcci-uncommon-grade-groupings-update-2800229.pdf>

409. Review period production records/documentation - required meal components offered, daily/weekly requirements met? Enter data.

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

Based on a review of production records and other supporting food crediting documentation for 1 week during the Review Period, some meals served during the week reviewed did not meet the appropriate daily and weekly meal pattern

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requirements for the age/grade group(s) being served.

- Over 50% of the fruit option is juice. This is because juice is offered unlimited daily at lunch.

Corrective Action:

The SFA will not serve juice at lunch per state licensing and NSLP requirements. No further action required.

Technical Assistance:

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

410. *Review period menus and production records - Quantities and meal pattern requirements met? Enter data.*

Finding 9000: Whole Grain-Rich

Grain products are not whole grain-rich. This is a repeat finding further neglect will result in fiscal action.

Corrective Action:

The SFA will purchase items that whole grain rich. No further action required.

Technical Assistance:

Reviewer provided technical assistance on how to identify whole grain-rich products including sending the following links to the food service contact.

- How to identify whole grain-rich products- <http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>

410. *Review period menus and production records - Quantities and meal pattern requirements met? Enter data.*

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) being served. Meals served with insufficient portion size or insufficient quantities of meal components are incomplete and are not reimbursable. This is a repeat finding resulting in loss of reimbursement for one day during the review period (9 meals have been disallowed).

Corrective Action:

Additional Corrective action- The SFA will have to submit corrected menus with supporting documentation by 12/15/16 to designated field specialist. Furthermore, the SFA will need to complete online meal pattern training. <http://www.nfsmi.org/ResourceOverview.aspx?ID=425>

Technical Assistance:

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

412. *Performance Based Reimbursement turned off due to Review Period findings?*

Finding 9082: Meal Components & Quantities findings for the Review Period resulted in turning off the SFA's Performance Based Reimbursement.**Corrective Action:**

Additional Corrective Action- The SFA will have to demonstrate meal pattern compliance and resubmit 6 Cents Certification documentation. Furthermore, payments will be withheld due to previous review findings not being corrected.

500. *DOR - OVS properly implemented, meals with insufficient portion sizes counted for reimbursement? Enter data.*

Finding 9000: Technical Assistance**Technical Assistance:**

Reviewer highly encourages SFA to implement OVS.

General Program Compliance - Life Choice (Z901)

811. *Justice for All poster displayed in prominent location?*

Finding 9101: Justice For All poster not displayed in prominent location.

The USDA "And Justice for All" poster was not displayed in a prominent location where it is visible to recipients of benefits.

Corrective Action:

The SFA has hung the "and Justice for All" poster provided by the reviewer during the review. No Further Action is needed.

Technical Assistance:

Reviewer provided a copy of the "And Justice for All" poster to SFA during review.

1407. *Temperature logs available?*

Finding 9149: Temperature logs unavailable for review.

FNS requires each school in the SFA to maintain temperature logs for a period of six months. Temperature logs are not used.

Corrective Action:

As part of the Food Safety plan, the SFA will immediately begin using temperature logs for refrigeration and final cooking. No further action required.

As of December 2016, Life Choice voluntarily withdrew from USDA Child Nutrition Program sponsorship and the current Administrative Review was suspended. Should there be a desire to become a sponsor in the future, corrective action for all of the findings listed above as well as six cents re-certification will be required.