

SNP Administrative Review Findings

Mill Creek Community School Corp (3335)

Program Year 2023

Mill Creek Community School Corp (3335)

6631 S CR 200 W
Clayton, IN 46118-8904

Food Service Contact

Mr. Jim Diagostino
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FSMC: Aramark

Executive Contact

Mr. Jim Diagostino
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No. of Sites / Reviewed: 4 / 1
Month of Review: October 2022

Commendations

- * At Mill Creek East Elementary School, it was noted that a nice variety of entrees is offered. Vegetables choices include a cooked and fresh option.

Technical Assistance

- * The application printout from the application software does not list all household members. Reviewers must confirm the number of people in the household. It is recommended to work with the software company to obtain an updated printout.
- * The SFA is reminded that while not required, it is a best practice to verify for cause applications reporting zero income. The "no income fact sheet" can be found here: <https://docs.google.com/document/d/1OTjRS4eh3vu5a8tobkFvU3Hye1GTrbCg2lHzS68Ld5w/edit>.
- * The hearing official as listed in the verification results letter is different from the hearing official in the CNPweb sponsor information sheet. Please update as needed.
- * The school ran out of some vegetables during service for the day and month of review. Another vegetable was added to the serving line. When possible, try to substitute vegetables from the same subgroup. For example, if staff run out of tomatoes, substitute carrots if possible.
- * Juice is offered daily for breakfast and lunch. The school is not exceeding the 50% juice limit; however, it was stated the manager prefers to offer juice for students who do not want to select milk. Juice can never be offered with the intention to use as a milk substitute. Only on a case-by-case basis with medical authority approval can juice be used as a milk substitute.

Additionally, it is a best practice to limit the amount of juice offered as whole fresh, canned, and dried fruit offer more nutritional benefits including fiber. Consider working towards reducing the offering juice fewer days as time goes on. Avoid offering juice for both breakfast and lunch on the same day. Consider limiting juice to 1-2 times per week for each meal type.

- * Non-foodservice staff with duties related to the program must complete and document civil rights training annually and must receive annual training on their job duties related to the program.
- * The SFA is advised to include the year when date marking food rather than just the day and month.
- * The director must work with the manager to ensure recipes are scaled for the number of servings needed.
- * It was noted the day of review that the cooked vegetable (broccoli) was prepared an hour before service. The broccoli may need to be cooked less time and stirred in the middle of cooking as it was cooked unevenly. Hot vegetables should also be batch cooked.
- * Consider purchasing a sectionizer for each school so fresh fruits can be cut quickly and easily for students. Elementary students especially, will eat items like oranges and apples more easily if they are cut.

Certification and Benefit Issuance - Mill Creek Community School Corp (3335)

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. One household was originally approved for reduced benefits based on income and was later found on the direct certification list as approved for free benefits. The benefit did not get issued to the household through the direct certification upload process.

Corrective Action:

The sponsor immediately increased household benefits from reduced to free. Additionally, the director has contacted the

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SFA's information technology contact and the application software company to resolve the software issue. Additional response is not required.

Technical Assistance:

The requirement was explained the day of review.

Verification - Mill Creek Community School Corp (3335)

209. *Verified applications were properly selected, correctly replaced (if necessary), and correctly verified*

Finding 9039: Applications not properly selected for verification.

The SFA utilized the application processing software to determine the number of applications to select for verification. The calculation on the basic sampling summary page was correct (four applications to verify) but the number of applications selected by the computer was inaccurate as only three applications were selected. Six error-prone applications were available. The issue was not found by the SFA before the review.

Corrective Action:

The SFA was able to select another error-prone application to complete the verification requirement of four applications. Verification was still completed before the deadline of November 15th. The SFA will work with the software company to ensure the error is corrected. Going forward the director will double-check the computer selection for accuracy and make corrections to the verification selection as needed. The SFA agrees to the corrective action as written. Additional response not required.

Technical Assistance:

The requirement was explained the day of review.

Meal Counting & Claiming - Mill Creek Community School Corp (3335)

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

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: Daily edit checks were not conducted or documented prior to submission of the claim for reimbursement.

Corrective Action:

The October edit check was pulled and reviewed by the director on the day of review for Mill Creek East Elementary. The SFA agrees to conduct and document edit checks for all schools prior to submitting each claim for reimbursement. The SFA agrees with the corrective action as written. Additional response is not 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: The reviewers went over the edit check process in detail.

Resource Management - Mill Creek Community School Corp (3335)

705. *SFA have internal controls to ensure only allowable costs charged?*

Finding 9000: Internal Controls/Separation of Duties

Each step in the flow of cash (at the school level) from receipt to deposit did not have a clear separation of duty. The cashier accepting and inputting cash into student accounts also closes out the register. Additionally, when cash is received the amount received is not always noted. This provides potential opportunity for theft.

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As corrective action, has provided written internal control procedures to ensure each step in the flow of cash at the school level contains a separation of duties. Additional response is not required.

Technical Assistance:

It was recommended to request from households that lunch money is provided in a sealed envelope and labeled with the student's name and amount in the envelope. A receipt to the household would also be a best practice.

*712. SFA charged indirect costs to nonprofit school food service account?***Finding 9000: Other Finding**

SFA is directly charging pro-rated amounts of janitorial costs and trash service to the non-profit foodservice account.

Corrective Action:

Going forward, janitorial costs must be charged directly using only actual hours worked as documented on a time sheet. Trash can only be charged directly if a dumpster is designated for foodservice. These charges are not allowable as direct charges for program year 2022, and therefore must be removed from the miscellaneous category of the annual financial report (AFR). The costs can be charged to foodservice using an indirect cost calculation of no more than the maximum 10% de minimis rate since an unrestricted rate was not approved for the 2022 school year. To do this, labor must be separated from the FSMC billing and reported under labor costs in the annual financial report since it is used in the calculation of indirect costs. The SFA is actively working with the SCN resource management specialist to provide an updated indirect cost rate calculation in the 2022 AFR. Additional response is not required.

Technical Assistance:

The requirements were explained the day of review.

General Program Compliance - Mill Creek Community School Corp (3335)*1219. Employees outside of the School Nutrition Programs with School Nutrition Program duties received appropriate training***Finding 9000: Training**

One employee directly involved in benefit issuance has not documented completion of civil rights training within a year of the administrative review.

Corrective Action:

As corrective action the employee will take the annual civil rights and maintain documentation of the training. Annual training will also be taken for all duties related to the program. The SFA has provided proof of training as corrective action. Additional response is not required.

Technical Assistance:

The requirement was explained the day of review.

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Mill Creek Community School Corp (3335)

Program Year 2023

**Mill Creek East Elementary School
(2675)**
6631 S CR 200 W
Clayton, IN 46118-8904

Food Service Contact
Ms. Charlene Jones
Kitchen Manager
(317) 985-0408

Month of Review: October 2022

Date of Onsite Review: November 4, 2022

Meal Components & Quantities - Mill Creek East Elementary School (2675)

411. Review Period- the school has complied with the planned menu, or changes made are acceptable substitutions

Finding 9000: Production Record

The production format used did not contain all required information as crediting and purchase units used were missing.

Corrective Action:

The director was able to find an updated record in the production record software that does contain the crediting information. It was agreed on the day of review that the purchase units used would be documented in the comments section. The SFA agrees to the corrective action as written. Additional response is not required.

Technical Assistance:

Production record format requirements were explained the day of review.

General Program Compliance - Mill Creek East Elementary School (2675)

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

Finding 9150: Storage violations were observed.

The SFA must ensure that all its facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. The health department noted that condensation was built up in the walk-in freezer. A work order was requested, and a fix was attempted; however, some dripping is still noted.

Corrective Action:

As corrective action the SFA agrees to submit an additional work order to fix the freezer leak. If the corrective action is implemented as written, additional response is not required.

Technical Assistance:

The SFA was advised to move boxes away from the dripping.