

SNP Administrative Review Findings

Northeast Dubois County Schools (2040)

Program Year 2020

Northeast Dubois County Schools (2040)

5379 E Main Street
Dubois, IN 47527-9671

Food Service Contact

Mrs. Joyce A Hulsman
Food Service Director
(812) 678-2251

Executive Contact

Mr. William Hochgesang
Superintendent
(812) 678-2781

No. of Sites / Reviewed: 4 / 1
Month of Review: February 2020

Commendations

- * The food service director should be commended on efforts made in the child nutrition programs. The food service director has reached out to the reviewer for assistance with questions and pieces of training. The food service director was excited about the AR process and was eager to learn.

Certification and Benefit Issuance - Northeast Dubois County Schools (2040)

126. Certification: selected applications correctly approved

Finding 9901: Selected applications correctly approved

One application was manually keyed into the free and software system to determine benefits incorrectly, resulting in lesser benefits. This contributes to fiscal action.

Corrective Action:

During the onsite review, the food service director sent a notice of adverse action to the household. Additional response is not required.

Technical Assistance:

This finding and requirements were discussed with the food service director on the day of review.

140. Direct Certification – updates to Benefits Issuance documents are made accurately and timely upon receipt of DC updates

Finding 9032: Direct Certification – updates to Benefits Issuance documents not made accurately and/or timely upon receipt of DC updates

The SFA did not make timely and accurate changes to the benefit issuance documents upon receipt of direct certification updates. Two households were not issued the direct certification benefits when identified from the STN website.

Corrective Action:

Prior to the onsite review, the food service director increased the benefits for the households that did not receive the direct certification benefits. The food service director will reach out to the free and reduced software company to receive training. Additional response is not required.

Technical Assistance:

This finding and requirements were discussed with the food service director on the day of review.

142. Benefits are changed on the Benefits Issuance document if a family declines or requests lower benefits

Finding 9034: Benefits did not change on the Benefits Issuance document if a family declines or requests lower benefits

The SFA did not change the eligibility category of households that declined benefits or households that requested a lower level of benefits. A household's request for a lower benefit level was not reflected in the benefit issuance document.

Corrective Action:

During the onsite review, the food service director sent a notice of adverse action to the household. Additional response is not required.

Technical Assistance:

This finding and requirements were discussed with the food service director on the day of review.

SNP Administrative Review Findings**Northeast Dubois County Schools (2040)****Program Year 2020****Verification - Northeast Dubois County Schools (2040)**

208. *Documentation demonstrates a confirmation review was conducted and required procedures were followed*

Finding 9037: Confirmation review not conducted as required.

Documentation demonstrating that a confirmation review took place was not on file at the SFA.

Corrective Action:

Please explain (in writing) how a confirmation review will be completed in the future. A representative of the SFA is required to take the Verification for Directors Course in the inTEAM blackboard to learn the processes regarding verification. Please submit the completion certificate for documentation.

Technical Assistance:

The findings and requirements were discussed with the food service director on the day of review.

214. *Updates to the Benefits Issuance list were made in the appropriate timeframes when verification resulted in changes to student eligibility*

Finding 9046: Change in student benefit levels due to Verification results not updated as required.

For students whose eligibility changed due to Verification, the SFA did not update the eligibility status on the benefit issuance document(s) according to regulations. The applications chosen for verification did not have benefits changed after the outcome of verification was determined.

Corrective Action:

During the onsite review, the food service director sent a notice of adverse action to the household. Additional response is not required.

Technical Assistance:

This finding and requirements were discussed with the food service director on the day of review.

Meal Counting & Claiming - Northeast Dubois County Schools (2040)

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

Finding 9000: Other Finding

When submitting the monthly claims to the state agency for reimbursement, the SFA added second meals for NSLP (lunch) for all schools into the claim numbers submitted. Second meals served under NSLP cannot be claimed for reimbursement.

Corrective Action:

The SFA has revised all the claims for the 2019-2020 program year by using the accuclaim report that was initially pulled. Additional response is not required.

Technical Assistance:

This finding and requirements were discussed with the deputy treasurer on the day of review.

Resource Management Comprehensive Review - Northeast Dubois County Schools (2040)

750. *Year-End Available Balance*

Finding 9000: Other Finding

The annual financial report could not be validated at the time of the review. The SFA transitioned in the middle of the school year to new financial responsibilities. This led to transfers that could not be clearly defined at the time of the review.

Corrective Action:

For corrective action, the SFA needs to determine accurate revenues and expenses to determine the correct balance. Once actual figures are determined, the SFA will need to revise the annual financial report and submit supporting documentation to the state agency for approval.

Technical Assistance:

This finding and requirements were discussed with the deputy treasurer and the corporation treasurer on the day of review.

SNP Administrative Review Findings**Northeast Dubois County Schools (2040)****Program Year 2020****757. Allowable Costs Test****Finding 9000: Labor**

While it is allowable to charge the non-profit food service account for labor for people performing food service job responsibilities, the SFA did not accurately determine the amount. The SFA is not approved for an indirect cost rate and charged labor expenses to the NPFSA using a percentage for the program year 2018-19.

Corrective Action:

The SFA will require cafeteria assistants to complete time and effort logs when they are performing food service job responsibilities. For corrective action, the SFA is required to complete a spreadsheet that indicates how much labor was charged to the NPFSA and submit to the state agency.

Technical Assistance:

This finding and requirements were discussed with the food service director, deputy treasurer, corporation treasurer, and superintendent on the day of review. The reviewer also provided technical assistance to the deputy treasurer and corporation treasurer regarding what is allowable for employee gifting with the non-profit food service account.

767. Nonprogram Revenue and Food Cost Ratio**Finding 9000: Non-program Assessment Results**

After the SFA completed the nonprogram foods revenue assessment, it was determined that the revenue ratio was less than the food ratio resulting in ala carte prices being priced too low.

Corrective Action:

The food service director has identified several items that need a price increase. Prior to the next school year, the following items will be increased: large salad, small salad, veggie & fruit trays, sparkling ice, cottage cheese, milk & juice cartons, cereal, and juice bottle. Additional response is not required.

Technical Assistance:

The reviewer provided technical assistance on how to complete the nonprogram revenue tool. It is suggested that multiplying the raw food cost paid for an item by two and one-half to three times provides a reasonable sales price.

General Program Compliance - Northeast Dubois County Schools (2040)**1007. Onsite 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 onsite observations. Discrepancies or deficiencies found onsite:

- current local wellness policy does not contain all the elements for the final rule
- committee members are not compliant with requirements
- school website for public outreach could not pull up the wellness policy
- documentation was not provided showing a periodic assessment was completed, or the wellness committee has met regarding the policy

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:

1. A formal evaluation must be completed before the end of the 20-21 school year, as USDA has granted an extension for this evaluation due to COVID 19. Using the evaluation tool found on our website, evaluate the current policy with the wellness committee. Please provide the evaluation. Please develop a timeline for any updates to the wellness policy to contain all elements, including the measurable goals for nutrition education, nutrition promotion, physical activity, and other activities. Please provide the timeline for when the policy will be evaluated and changes updated.
2. Provide documentation showing the updated wellness policy has been uploaded to the school website
3. Add committee members to meet requirements (Allow parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, evaluation, and update of the local school wellness policy).

SNP Administrative Review Findings**Northeast Dubois County Schools (2040)****Program Year 2020****Technical Assistance:**

For more information, go to: <https://www.doe.in.gov/nutrition/school-wellness-policy>

For additional assistance, contact Maggie Schabel at mschabel@doe.in.gov.

Evaluation tool- <https://www.doe.in.gov/sites/default/files/nutrition/triennial-assessment-template.pdf>

1219. Employees outside of the School Nutrition Programs with School Nutrition Program duties received appropriate training

Finding 9000: Other Finding

Some of the cashiers at the schools have primary job duties outside of foodservice. The school corporation requires teachers to take a civil rights course that is different than the IDOE's posted training. While this is allowable, the civil rights training and attendance were not available at the time of review for the cashiers. Additionally, the cashiers did not receive meal pattern training.

Corrective Action:

Please provide a copy of the civil rights training content and list of who completed the training for the cashiers. Please explain in writing how each cashier will receive annual civil rights and meal pattern training.

Technical Assistance:

This finding and requirements were discussed with the food service director and superintendent on the day of review.

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

Technical Assistance- Summer Food Service 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 Summer Food Service Program (SFSP). Please visit <https://www.doe.in.gov/nutrition/summer-food-service-program> prior to the end of each school year to determine nearby SFSP sites so that you may inform households of availability.

SNP Administrative Review Findings**Northeast Dubois County Schools (2040)****Program Year 2020****Celestine Elementary School (1543)**

5379 E Main Street
Dubois, IN 47527-9671

Food Service Contact

Mrs. Teresa Knebel
Cafeteria Manager
(812) 678-2777

Month of Review: February 2020

Date of Onsite Review: March 5, 2020

Meal Components & Quantities - Celestine Elementary School (1543)

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 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:

-The school was offering baked beans that provided a creditable 1/2 cup vegetable component. The school did not plan another vegetable for the day. The daily requirement is a 3/4 cup for the vegetable component.

Corrective Action:

On the day of review, the reviewer provided in-depth meal pattern training with the cafeteria manager. The foodservice staff increased the vegetable component to 3/4 cup by offering 1/4 cup of baby carrots with the meal option. Additional response is not required.

Technical Assistance:

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

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- Breakfast Pattern Meal Signage

The school did have signage for the breakfast meal pattern; however, it was not posted in a visible location. The school needs to hang the signage near the beginning of the service line.

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.

Based on a review of production records and other supporting food crediting documentation for one week during the Review Period February 3-7, 2020, some meals served during the week reviewed did not meet the appropriate daily and weekly meal pattern requirements for the age/grade group(s) being served. Meals missing required meal components during the week reviewed:

-Missing starchy vegetable subgroup. If this error is found on subsequent Administrative Reviews, the meals may be considered non-reimbursable and disallowed.

Corrective Action:

The reviewer and the food service director went over menus for the rest of the year to identify if all vegetable subgroups are offered. The food service director will publish the menus with the newest changes that were identified in the menu review. The FSD will also conduct extra monitoring to ensure the portion sizes are correct, and the weekly guidelines are met.

For corrective action, the menu planner and head cooks at each school location are required to complete the Nutritional Quality and Meal Planner training and the Crediting Foods course located in blackboard in-TEAM. Please submit the post-tests and training certificates to show the completion of the training of any employees. Due to the closure of the school, if some employees have not completed training, please provide a written timeline for the training.

SNP Administrative Review Findings**Northeast Dubois County Schools (2040)****Program Year 2020****Technical Assistance:**

This finding and requirements were discussed with the food service director on the day of the review.

410. Review Period- planned menu quantities meet the meal pattern requirements**Finding 9000: Food Production Records**

Food production records being used are incomplete. The food production is missing the following recorded data:

- Number of servings for students, ala carte and adults
- The overall number of reimbursable meals served and the number of adult meals served
- The column of total purchase units is incomplete
- Milk is not recorded

Corrective Action:

Food Production records provides a record that meal requirements were met for reimbursable meals, ensures that all menu items are served in the correct serving size, and enough food was prepared. For corrective action, the food service director and site staff are required to complete the Food Production Record course located in the blackboard inTEAM. Please submit the sign-in sheet for attendance and the certificate of completion. Due to the closure of the school, if some employees have not completed training, please provide a written timeline for when foodservice employees will complete these trainings.

Technical Assistance:

This finding and requirements were discussed with the food service director and site staff on the day of review.

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) being served. Meals served with insufficient portion size or insufficient quantities of meal components are incomplete and are not reimbursable.

• Lunch:

- The daily minimum portion size of vegetables was insufficient for four days-1/2 cup instead of 3/4 cup. This also results in the weekly minimum requirement for vegetables to be insufficient. If this error is found on subsequent Administrative Reviews, the meals may be considered non-reimbursable and disallowed.
- The whole grain-rich percentage for the grain component was 35% for the week. The final rule requires half of the weekly grains in the NSLP and SBP to be whole grain-rich, and the remaining weekly grains must be enriched. If this error is found on subsequent Administrative Reviews, the meals may be considered non-reimbursable and disallowed.

Corrective Action:

The food service director has instructed the cafeteria manager to order from the vendor that the other schools are using from the Co-Op bread bid. By doing this, the sliced bread and buns will be whole-grain. The vegetable serving will be increased to 3/4 cup daily. The FSD will also provide extra monitoring and the correct serving utensil to ensure the portions are corrected.

For corrective action, the SFA will need to develop written procedures detailing the ordering process following procurement requirements and proper ways to substitute menu components that the foodservice employees must follow. Additionally, the food service director will need to submit planned menus to the reviewer prior to the 2020-2021 school year, including the menu certification worksheets.

Technical Assistance:

This finding and requirements were discussed with the food service director on the day of review.

501. Cafeteria staff have been trained on OVS**Finding 9079: Cafeteria staff have not been adequately trained on the requirements and implementation of Offer vs. Serve.**

The foodservice employees do not have a clear understanding of offer vs. serve. The staff requires students to take all components for lunch. At breakfast, the staff allows the students to decline one portion of the fruit. However, when some students did not want milk, they are still required to take it.

SNP Administrative Review Findings**Northeast Dubois County Schools (2040)****Program Year 2020****Corrective Action:**

For corrective action, the foodservice employees are required to complete offer vs. serve training. InTEAM blackboard has many trainings that will help staff with everyday operations. All staff is required to complete the Offer vs. Serve- Breakfast Pattern and Offer vs. Serve- Lunch Pattern in the inTEAM blackboard. Please submit the sign-in sheet for attendance and the certificate of completion. Due to the closure of the school, if some employees have not completed training, please provide a written timeline for when foodservice employees will complete these trainings.

Technical Assistance:

The school was provided technical assistance during the onsite visit.

General Program Compliance - Celestine Elementary School (1543)

1404. *A copy of the written food safety plan is site-specific and available onsite*

A copy of the written food safety plan was not available at the reviewed school.

Technical Assistance:

The food safety was not available at the time of the review. After the reviewer left, the cafeteria manager found the food safety plan the food service director created. Please take the time to ensure the policy is updated with current standard operating procedures and equipment lists.

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

The most recent food safety inspection report was not posted in a publicly visible location.

Technical Assistance:

Technical Assistance was provided, and the most recent health inspection was relocated to a publicly visible area. As a reminder, each school should have the health inspection posted for public display.

1407. *SFA written food safety plan is implemented*

Finding 9148: Observations on the Day of Review do not indicate compliance with the SFA's written food safety plan.

Proper HACCP principles not observed:

- improper or insufficient personal hygiene - missing hairnets
- unpackaged food was not covered during service (use of sneeze guard needed)

Corrective Action:

All unpackaged food was put under the sneeze guard for the lunch service after the reviewer provided technical assistance. For corrective action, the staff is required to complete the Food Safety Basics training located in the blackboard inTEAM. The SFA is required to develop written standard operating procedures for each food safety violation listed; please submit a copy of each procedure that has been developed. Also, please submit the training certificate from blackboard inTEAM and the staff sign-in sheet that completed the training. Due to the closure of the school, if some employees have not completed training, please provide a written timeline for when foodservice employees will complete these trainings.

Technical Assistance:

Please refer to the hair restraint policy- https://www.doe.in.gov/sites/default/files/nutrition/hair-restraint_0.pdf