

SNP Administrative Review Findings**Northwestern School Corporation (3470)****Program Year 2018****Northwestern School Corporation (3470)**

3075 N. Washington
3431 N 400 West
Kokomo, IN 46901-5857

Food Service Contact

Mrs. Hope Neuzerling
Food Service Director
(765) 457-8101

Executive Contact

Mr. Ryan Snoddy
Superintendent
(765) 457-8101

No. of Sites / Reviewed: 4 / 1
Month of Review: January 2018

Certification and Benefit Issuance - Northwestern School Corporation (3470)*123. On-site observation validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions?***Finding 9764: Certification & Benefits Issuance 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 Certification and Benefits Issuance procedures could not be validated during on-site observations. Discrepancies or deficiencies found on-site: The sponsor was allowing a carry-over in excess of 30 days at the start of the school year. The SFA used October 1 as the expiration date of all previous year's eligibility.

Corrective Action:

Carry-over status may only be valid for up to 30 days into the following school year. The SFA will ensure that on the 31st day of school, those without a current application or DC designation are moved to paid status.

If implemented fully, no further action is required.

*133. Direct Certifications correctly certified?***Finding 9024: Some students directly certified for free meals were not certified correctly.**

Direct certification documentation for selected students was reviewed for completeness and accuracy. Some students were not correctly marked as DC, but were receiving a benefit based on application.

Corrective Action:

The SFA must ensure that all students who are directly certified are correctly designated as such in the point of sale system. Ensuring that students who are directly certified are correctly labeled as such may reduce the number of total applications the SFA will have to pull for verification and also ensures that those who are directly certified are not pulled for verification.

If implemented fully, no further response is needed.

*134. Direct Certification matches performed according to required timeframes?***Finding 9025: The SFA does not perform direct certification matches with the State agency according to regulations.****Technical Assistance:**

The direct certification list was run prior to school starting and not again until January. The SFA should run the list prior to pulling the verification sample (late September) to ensure that the most accurate pool of applications is selected from.

*135. Direct Certification lists retained on file by the SFA?***Finding 9026: Direct Certification documentation is not kept on file at the SFA.**

The SFA did not retain original direct certification lists on file.

Corrective Action:

The SFA must maintain the original direct certification lists on file. The lists may be retained digitally as long as they are accessible. The original list from the IDOE direct certification website must be maintained, not the list of DC students from the student database.

SNP Administrative Review Findings
*Program Year 2018***Northwestern School Corporation (3470)**

If implemented fully, no further response is required.

*142. Family declined/requested lower benefits – benefits changed on Benefits Issuance document?***Finding 9034: The SFA did not change the eligibility category of households requesting a lower level of 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 on the Benefit Issuance document. Two students in one household were not removed from receiving benefits.

Corrective Action:

The SFA will notify the household of the expiration of benefits and remove the students from eligibility.

If implemented fully, no further response is needed.

Verification - Northwestern School Corporation (3470)*215. SFA complete verification by Nov 15 or request extension?***Finding 9048: Verification not completed by November 15.**

For 2017-2018, the SFA did not complete its Verification process prior to November 15. The SFA did not have an extension approved by the SA, allowing the SFA to complete its Verification process by December 15. It is understood that this year, the verification official was absent from work unexpectedly around the time of verification and this is a rare occurrence.

Corrective Action:

The SFA should put a plan in place to ensure verification is completed by November 15 each year or that an extension is requested if that deadline cannot be met.

If implemented fully, no further response is needed.

Technical Assistance:

Discussed with SFA the importance of beginning verification as early as October 1 and completing the process by November 15.

Resource Management Comprehensive Review - Northwestern School Corporation (3470)*766. Process for calculating compliance with Revenue From Nonprogram Foods requirements?***Finding 9000: Other Finding**

SFA did not properly correctly calculate its non-program food ratio and/or its food cost ratio.

Corrective Action:

The SFA must complete the Revenue from Non-program Food Tool for a 5-day period in order to show they are in compliance with this requirement and charging appropriately for non-program foods.

General Program Compliance - Northwestern School Corporation (3470)*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:

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:

- Update wellness policy annually
- Include stakeholder participation

SNP Administrative Review Findings**Northwestern School Corporation (3470)****Program Year 2018**

Include guidelines for non-sold foods and beverages
Include food and beverage marketing

Technical Assistance:

Discussed with SFA the areas within the wellness policy that need updated:

Stakeholder participation- include parents, students, SFA, teachers, school board, administrators, school health professionals, and general public.

Nutritional guidelines for non-sold foods and beverages- address regulations against any food or drink made available to students during the school day

Food and beverage marketing- allow marketing on school campus for smart snack compliant foods.

1110. *Did on-site observation validate responses to Smart Snacks Questions #1100-1103 on the Off-Site Assessment Tool?*

Finding 9000: Smart Snacks Compliance**Technical Assistance:**

The "Pop Shop" at the High School is currently non-compliant with smart snacks requirement. After the start of next school year, we will conduct an unannounced visit to the high school. If the Pop Shop remains non-compliant at that time, we will withhold reimbursement payments until compliance is met and maintained.

1500. *Reports submitted to State agency as required?*

Finding 9000: Charging Policy

The Charging Policy does not meet USDA requirements.

Corrective Action:

The USDA has requirements for the local charging policy/procedure. The SFA must update the current policy to meet the USDA requirements. Missing elements: debt collection- how the SFA will attempt to collect debt and at what point the debt will be deemed uncollectable; debt collection time frame- once the debt is determined to be uncollectable, the SFA must establish how often the uncollectable debt will be paid for using non-federal funds. While USDA recommends this be done annually, it could be done within another time frame such as every two years, monthly, semi-annually, etc.

Please submit a copy of the updated charging policy as corrective action.

Technical Assistance:

The IDOE has example charging procedures on our website: <https://www.doe.in.gov/nutrition/snp-pricing-guidance>

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 record keeping requirements described in 7CFR 210.20. Both the Annual Financial Report and the Verification Summary Report were submitted past the due dates for each.

Corrective Action:

The SFA will ensure that all reports are submitted by the due date each year. The Annual Financial Report is due by September 1 of each year and the Verification Summary Report is due by December 15 each year.

If implemented fully, no further response is needed.

Technical Assistance:

Keep in mind, if the AFR is not submitted on time, the October claim will be placed on hold. The Verification Summary Report cannot be completed until the October Claim is completed. Please utilize the Calendar of Due dates on the IDOE website to keep track of when reports should be submitted.

1602. *On-site observation validate Off-Site Assessment Tool responses to SFSP & SBP Outreach questions?*

SNP Administrative Review Findings

Northwestern School Corporation (3470)

Program Year 2018

Finding 9009: SFSP & SBP Outreach information on the Off-site Assessment Tool not validated, or deficiencies found.

Technical Assistance:

The SFA will advertise the Summer Food Service Program to students prior to the end of the school year. Stating that free meals are available in the area and listing the IN Department of Education's website will suffice for this advertisement.

SNP Administrative Review Findings**Northwestern School Corporation (3470)****Program Year 2018****Northwestern Jr. High School (2907)**

3075 N. Washington
3431 N 400 West
Kokomo, IN 46901-5857

Food Service Contact

Ms. Hope Neuzerling
Food Service Director
(765) 457-8101

Month of Review: January 2018

Meal Counting & Claiming - Northwestern Jr. High School (2907)

317. DOR meal observation – overt identification, F/R eligible students treated differently?

Finding 9062: Overt identification of students receiving F/R benefits.

As observed on the Day of Review, the meal counting system as implemented does not prevent overt identification of students receiving free and reduced price benefits.

Corrective Action:

All students regardless of F/R status must be treated the same when going through the meal serving line. Students with sufficient funds may purchase a la carte items as they wish and cannot be required to take a reimbursable meal.

If implemented fully, no further response is needed.

Meal Components & Quantities - Northwestern Jr. High School (2907)

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

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

Currently, milk is in the same vertical refrigerator as all a la carte beverages. Milk needs to be in a separate serving area from a la carte beverages so that it is distinguished as its own meal component and no other beverage is promoted over milk at meal service.

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(s).

Corrective Action:

Meal pattern signage must include what comes on a reimbursable meal as well as what the students must take to create a reimbursable meal under Offer Versus Serve. The SFA will update signage to comply with this requirement.

If implemented fully, no further response is needed.

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: Production Records

Production records are not maintained to show exactly what vegetables are served daily and therefore, the vegetable subgroup offerings cannot be determined.

Corrective Action:

Production records must be completed to ensure compliance with the meal pattern. This includes the vegetable subgroup

SNP Administrative Review Findings**Northwestern School Corporation (3470)****Program Year 2018**

offerings. The SFA will ensure that each vegetable offering is tracked on production records daily to show compliance with the vegetable subgroups.

Please submit one week of production records that shows this finding has been corrected.

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. *Repeat Finding

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.

The breakfast menu was short on the weekly grain requirement and the lunch menu was short m/ma weekly requirement.

Corrective Action:

Because this is a repeat finding, there is fiscal action. We have disallowed the lowest claimed day and both breakfast (15 meals) and lunch (103 meals) for the month of review (January). This FA will not be waived and will be subtracted out of the next field claim for reimbursement. The reviewer and FSD discussed how menus must change to meet the minimum weekly requirements.

If implemented fully, no further action is required.

Technical Assistance:

The school was provided technical assistance during the on-site visit and a training has been scheduled for the high school staff on OVS.

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

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

As observed on the Day of Review, students were not required to take 1/2 cup of fruit or vegetable with their meal.

Corrective Action:

The reviewer conducted OVS training with all cafeteria staff on March 12, 2018. No further response is needed.

General Program Compliance - Northwestern Jr. High School (2907)

901. *On-site monitoring review completed prior to February 1?*

Finding 9103: On-site review of the school's meal counting and claiming procedures was not completed prior to February 1.

The SFA did not conduct an on-site review of the school's meal counting and claiming procedure prior to February 1 of the current Program Year. The on-site review occurred after February 1 without SA approval of an extension.

Corrective Action:

The FSD will conduct the visits and send the review forms as corrective action.

1409. *Storage violations observed, on-site, off-site?*

Finding 9150: Storage violations were observed.

The SFA must ensure that all of its facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. In the walk-in cooler and freezer, storage shelves are not 6 inches off the floor.

Corrective Action:

Food storage shelving and equipment must be 6 inches or more off of the floor to ensure proper cleaning can take place. The SFA will ensure that all food storage shelving is raised to at least 6 inches off of the floor.



SNP Administrative Review Findings
Program Year 2018

Northwestern School Corporation (3470)

If implemented fully, no further response is required.