

SNP Administrative Review Findings

South Knox School Corp (4325)

Program Year 2024

South Knox School Corp (4325)

6116 E. State Rd. 61
Vincennes, IN 47591-9078

Food Service Contact

Mrs. Leslie H Boger
Food Service Director
(812) 726-4450
lboger@sknox.k12.in.us

Executive Contact

Mr. Jeff Cochren
Superintendent
(812) 726-4440
jcochren@sknox.k12.in.us

No. of Sites / Reviewed: 2 / 1
Month of Review: November 2023

Commendations

- * The food service staff did a terrific job planning, organizing, and preparing for their 2024 Administrative Review. The staff was very professional and conscientious about meeting the School Nutrition Program requirements.
- * The kitchen at South Knox Middle-High School was clean and organized.

Technical Assistance

- * On the day of review, it was observed that a high volume of packaged unopened items were being thrown away. It is recommended the food service director look into the implementation of a share table. More information can be found on the IDOE's website. <https://www.in.gov/doe/files/Sharing-Table-Fact-Sheet.pdf>
- * The current structure of the two school setup reflects individual operation in most cases for the School Nutrition program. It is recommended the food service director position be re-evaluated to centralize program requirements such as training, menu planning, direct certification, free and reduced issuance, etc.

Certification and Benefit Issuance - South Knox School Corp (4325)

126. *Certification: selected applications correctly approved.*

Finding 9901: Selected applications correctly approved

Four applications were approved with incomplete information. The households indicated a higher number of people; however, they did not list everyone on the applications. When the applications were approved, the higher number of household members were used in the determination without any additional follow-up.

Corrective Action:

The reviewer provided onsite technical assistance regarding a completed application and how to document follow-up information to obtain missing information if needed. In addition, the reviewer provided the food service director with the opportunity to correct the applications. The FSD contacted all the households to obtain the missing information, and no changes were required to be made to the eligibility determinations. The reviewer verified the updated applications onsite.

Therefore, an additional response is not required.

129. *Household notification of eligibility is consistent with Off-Site Assessment responses*

Finding 9902: Household notification of eligibility not compliant with regulations

The notification of eligibility sent to households did not contain the required information. The following items were missing from the notification letters:

- The full non-discrimination statement;
- The hearing official's contact information was missing from the appeal instructions.

Corrective Action:

At the time of the review, the food service director updated the notification letters in the software by using the IDOE template letter. The reviewer verified the updated letters onsite. **Therefore, an additional response is not required.**

Technical Assistance:

It is recommended to review all template letters prior to the start of each school year, as it is the responsibility of the SFA to ensure the correct language is included in the letters.

SNP Administrative Review Findings

South Knox School Corp (4325)

Program Year 2024

133. Direct Certifications were correctly certified

Technical Assistance- Direct Certifications were not correctly certified

Four students identified during the benefit issuance review received a lesser benefit than qualified. Due to a notification error in CNPweb, the SFA was unaware of the increased benefits for these students. The reviewer provided technical assistance onsite on how to identify the new changes. The school food service director implemented the new changes on December 12, 2023, and provided the effective date documentation to the reviewer. Additionally, the FSD refunded the households for the incorrect benefit based on transaction history.

Verification - South Knox School Corp (4325)

207. SFA completed verification and verified that the applications on file match FNS-742.

Summary of Verification Reviewed for SBOA

7 CFR Part 245.6(a) requires that each School Food Authority properly select and verify a sample of the approved free and reduced-price applications on file as of October 1 of each school year.

Verification procedure used: Standard, Error Prone

Number of applications on file as of October 1: 50

Number of applications selected for verification: 2

Number of additional applications verified for cause: 0

Number of applications with no response: 1

Number of applications with changes: 2

Number of verified applications reviewed by state agency staff during the review: 2

Based on the method and sample size selected, verification is considered complete, and no additional sampling is necessary.

For more information on verification please go to: <https://www.in.gov/doe/nutrition/free-and-reduced-information/verification-and-direct-verification/>

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

Finding 9042: Selected applications not verified correctly.

Based on the verified applications selected for review, the documentation received was not acceptable.

- The income statement provided for one household application is before the month prior to application.

Corrective Action:

During the onsite review, the food service director contacted the household to receive an updated pay stub within the correct timeframe for submission for verification. **For corrective action, please provide a copy of the income statement and revised results letter.**

Technical Assistance:

Acceptable documentation of income or receipt of assistance from any of the following sources may be provided for any point in time between the month prior to application and the time the household is required to provide income documentation.

213. SFA's notice of adverse action contained all required information, including notification of appeal rights

Finding 9045: SFA's notice of adverse action did not contain all the required information.

The SFA's notice of adverse action as a result of verification did not contain all the required information. The following issues were noted:

- The non-discrimination statement is incorrect.
- The hearing date was not listed for ten calendar days; only XXXX was provided.

Corrective Action:

At the time of the review, the food service director updated the verification results letter in the software by using the IDOE template letter. The reviewer verified the updated letter onsite. **Therefore, an additional response is not required.**

SNP Administrative Review Findings

South Knox School Corp (4325)

Program Year 2024

Technical Assistance:

It is recommended to review all template letters prior to the start of each school year, as it is the responsibility of the SFA to ensure the correct language is included in the letters.

Resource Management - South Knox School Corp (4325)

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

Finding 9000: Internal Controls/Separation of Duties

Each step in the flow of cash at South Knox Elementary, 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.

Corrective Action:

For corrective action, please provide written internal control procedures to ensure each step in the flow of cash at the school level contains a separation of duties.

Technical Assistance:

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

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

Technical Assistance- Documenting Labor

Minimally, throughout the year, an instructional assistant will run the point-of-sale. The labor is not documented or charged to food service since the ECA treasurer's distribution covers that time. Labor should be charged when that person is working. If there is someone else working, then it should be documented accordingly. Additionally, the salary between the ECA treasurer and instructional assistant could vary. An SCN Finance contact was provided to the corporation treasurer as a resource to discuss allowable ways to record labor charges charged to food service.

Resource Management Comprehensive Review - South Knox School Corp (4325)

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

Finding 10141: Assessment of Non-program Foods Revenue/Cost Ratio *Repeat Finding

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 food revenue tool with documentation to support the figures used.

Technical Assistance:

The non-program food revenue tool to utilize for a reference period can be found at the following link:

<https://docs.google.com/spreadsheets/d/1yERVzWRoukH4jqhAQ-RFBhzMIWEKRYQB/edit#gid=1454493429>. Additional guidance can be found at the following link: <https://www.in.gov/doe/nutrition/financial-management/#Revenue from Non Program Foods>.

General Program Compliance - South Knox School Corp (4325)

810. Civil Rights Training Compliance

Finding 9000: Civil Rights Training

One employee at South Knox Elementary has not completed civil rights within the last 12 months.

Corrective Action:

For corrective action, please submit documentation of the employee's completed Civil Rights training.

SNP Administrative Review Findings**South Knox School Corp (4325)****Program Year 2024**

1007. Onsite observations validate Off-Site Assessment Tool responses to Local School Wellness Policy questions and responses demonstrate compliance with FNS requirements

Finding 10137: Wellness Policy Requirements *Repeat Finding

The local school wellness policy does not contain the minimum required elements. The following elements are missing:

-One local school wellness policy was provided to the reviewer; however, two different LSWPs are posted on the school website. The reviewer was unable to determine which is the current LSWP during the onsite review.

- The wellness contact in CNPweb is incorrect.
- Several items were not available to review the LSWP during the review. These items were listed in the Administrative Review preparations checklists, and the reviewer requested the information during the onsite review.
- List of committee members,
- Triennial assessment,
- Outreach of the triennial assessment results,
- Documentation of meetings wellness committee meetings

Corrective Action:

For corrective action, all requested items must be provided to the reviewer and the sponsor should be aware that there could be additional findings.

- **Most current wellness policy, along with where to find the outreach of the LSWP,**
- **Update CNPweb wellness contact,**
- **List of committee members and relationship to the SFA,**
- **Triennial assessment,**
- **Outreach of the triennial assessment results,**
- **Documentation of meetings wellness committee meetings**

SNP Administrative Review Findings

South Knox School Corp (4325)

Program Year 2024

South Knox Middle-High School (3490) Food Service Contact

6116 E. State Rd. 61
Vincennes, IN 47591-9078

Ms. Leslie H Boger
Food Service Director
(812) 726-4450

Month of Review: November 2023

Meal Components & Quantities - South Knox Middle-High School (3490)

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:

- Insufficient Meat/Meat Alternate for 9-12 grade grouping- Ham sub and wrap was 1.5oz equivalent.
- Insufficient grain for 9-12 grade grouping- salad crackers and croutons were 1oz equivalent.

Corrective Action:

During the onsite review, the food service staff increased the portions for all items identified. For the salad option, additional crackers were added to meet a 2oz daily equivalency. For the ham sub & wrap, a cheese stick was added to the meal options. **If these revisions continue to be followed, an additional response is not required.**

Technical Assistance:

The school was advised and given the opportunity to correct the insufficient quantity of two meal component(s) before the meal service started.

403. Day of Review- fluid milk (or allowable substitutions) was available in at least two allowable varieties throughout the serving period on all meal service lines

Finding 9054: Milk substitutions on the Day of Review not allowable.

Milk substitutions made on the Day of Review were not allowable per 7 CFR 210.10. Some students were provided juice in place of milk without a medical note from the prescriptive authority.

Corrective Action:

The reviewer provided onsite technical assistance to the food service director about accommodating substitutions outside the meal pattern. The reviewer also clarified the 50/50 juice rule for breakfast and lunch. The FSD will begin offering juice as part of the fruit component. In addition, the approved milk substitution that was on hand in the storage area was moved to the pass-through behind the cashier so that students would have an option for acceptable milk. **Therefore, an additional response is not required.**

409. Review Period- all required meal components per weekly meal pattern requirements were offered and served to students

Finding 10133: Insufficient servings of Grains, Meat/Meat Alternate, Vegetables, Fruits, and or Milk were planned or served during the Menu Certification week

The meal pattern has requirements that must be met both daily and weekly for all components. During the review of planned menus for the menu certification week, there were insufficient serving sizes offered for meat/meat alternatives and grain for the daily and weekly requirements.

- Meat/Meat Alternate at Lunch
 - The ham and cheese sub/wrap is 1.5oz equivalent, which is insufficient for the daily requirement for the 9-12 grade grouping. This also results in an insufficiency for the weekly requirements for 6-8 and 9-12 grade groupings.
- Grain
 - The salad option is equivalent to 1.75oz, which is insufficient for the daily requirement for the 9-12 grade grouping. This also results in an insufficiency for the weekly requirements for 9-12 grade groupings.
 - The whole grain-rich percentage for the week at breakfast is 49.8%, which should be at least 80% for the week.

SNP Administrative Review Findings

South Knox School Corp (4325)

Program Year 2024

- The whole grain-rich percentage for the week at lunch for grades 6-8 is 71.28%, which should be at least 80% for the week.
- The whole grain-rich percentage for the week at lunch for 9-12 grades is 74.38%, which should be at least 80% for the week.

Corrective Action:

For corrective action, provide revised menus showing the meal pattern is met for the daily and weekly requirements for each grade group being served. Additionally, complete the crediting series training found on the Moodle website and provide the certificate as proof of completion.

Technical Assistance:

The IDOE Moodle website is found here: <https://moodle.doe.in.gov/>

Meal pattern requirements can be found here: <https://www.in.gov/doe/nutrition/national-school-lunch-program/>

501. Cafeteria staff have been trained on OVS

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

One employee at South Knox Elementary has not completed offer versus serve training whose job responsibilities involve meal counting and claiming at the point of sale.

Corrective Action:

For corrective action, please submit documentation of the employee's completed Offer vs. Serve training.

General Program Compliance - South Knox Middle-High School (3490)

812. Day of Review- Program benefits were available to all children without discrimination

Finding 9102: Discrimination in Program benefits observed on Day of Review. *Repeat Finding

As observed on the Day of Review, Program benefits were not made available to all children without discrimination. Students in alternative suspension were not provided with all meal choices being offered for the day. The students were provided the main entree', hot vegetable, fruit cup, and milk. The portions for fruit and vegetables were 1/2 cup each (insufficient vegetable portion for 7-12, and insufficient fruit for 9-12).

Corrective Action:

It is suggested that the students come to the cafeteria meal service line to make choices and then return to the classroom. Another option could include the students' pre-ordering lunch selections, allowing the meals to be delivered to the classroom. **For corrective action, please explain how students in alternative suspension have access to all choices offered, along with supporting documentation.**

Technical Assistance:

This finding and requirements were discussed with the assistant principal, food service director, and superintendent during the onsite review.

901. Onsite monitoring review(s) were completed prior to February 1

Technical Assistance- Onsite Review Completion

The reviewer provided technical assistance regarding how to complete each section of the site reviews. It is suggested the monitors complete the site reviews after receiving technical assistance on what is required.

1105. Foods and beverages sold to students during the school day meet Smart Snacks standards

Finding 9160: Foods and beverages sold to students not compliant with Smart Snacks standards. *Repeat Finding

During the onsite review, it was determined that the food sold from the cafeteria met Smart Snack compliance. However, some foods and beverages sold to students during the school day outside the cafeteria do not meet Smart Snacks standards. On the day of review, the vending machines were available for students in grades 7-12 to purchase drinks and food. The drinks were not compliant with the lowest grade grouping. **This is a repeat finding from program years 2017 and 2020.**

SNP Administrative Review Findings**South Knox School Corp (4325)****Program Year 2024**

Additionally, the culinary class has a restaurant that opens one day a month for students and faculty to purchase items during the school day. Documentation was requested for the items being sold in the restaurant and vending machines, along with a list of food-related fundraisers. At the time of the review, the requested items were not provided.

Corrective Action:

Smart snack standards are applied during the school day, defined as from midnight to 30 minutes after the end of the instructional day. For corrective action, please complete the following:

1. Provide a list of food-related fundraisers for 2023-2024 South Knox Middle-High School. This would include events such as candy grams (occurring during the onsite review), chocolate-covered roses, \$1 chocolate bars, etc.
2. Please provide a nutrition facts label and smart snack calculator printout for all food and beverages (by grade group) for items in the vending machines.
3. Please provide nutrition facts, ingredient labels, recipes, and the smart snack printout for each item sold in the culinary class restaurant.
4. The SFA is required to create written standard operating procedures for determining compliance for smart snacks sold outside the cafeteria and approval procedures for related fundraisers. Both items should include how the documentation of the compliance will be determined, tracked, and maintained and who will determine the compliance. The person(s) responsible for determining compliance is required to be changed due to continued noncompliance.

Due to continued noncompliance and lack of following the submitted and approved corrective action from prior reviews, the claims will be placed on hold until corrective action has been submitted and the State Agency has monitored compliance through a series of unannounced visits. Additional findings could be determined once the requested items are provided to the reviewer.

Technical Assistance:

The school should work with the vendor to fill the vending machines with compliant items that allow them to be turned on during the instructional day or place the vending machine on a timer that begins 30 minutes after the instructional day.

1300. Potable water is free and available to all students during lunch and breakfast

Technical Assistance- Water Bottle Fill Stations

The school did comply with water availability during meal service through water fountains. However, it was observed that the water fill station in the cafeteria and hallways was not in working order. The food service director placed a service order with maintenance to fix the water-fill stations.

1409. Onsite or off-site storage violations were observed

Finding 9150: Storage violations were observed.

The SFA must ensure that all facilities for the handling, storing, and distributing of purchased and donated foods are appropriately safeguarded against theft, spoilage, and other loss. The following storage violations were noted during the onsite review:

- Thawing product in the cardboard box submerged in juice
- Cans were not dated when removed from the original packaging

Corrective Action:

The reviewer provided onsite technical assistance regarding properly storing foods with the food service director and head cook. The following items were corrected during the onsite review. **Therefore, an additional response is not required.**

- The thawed product was discarded at the time of review.
- Dates were transferred to the cans based on the date they were received.

Technical Assistance:

The reviewer suggested purchasing dish machine temperature stickers to ensure the dish machine is reaching temperature (health department note). The food service director received the stickers on December 15, 2023.