

SNP Administrative Review Findings

South Spencer Co School Corp (7445)

Program Year 2023

South Spencer Co School Corp (7445)

321 S 5th Street
Rockport, IN 47635-1506

Food Service Contact

Mrs. Maggie Caudill
Food Service Director
(812) 649-4801
Maggie.caudill@sspencer.k12.in.us

Executive Contact

Mr. Brad Schneider
Superintendent of Schools
(812) 649-2591
brad.schneider@sspencer.k12.in.us

No. of Sites / Reviewed: 4 / 1
Month of Review: March 2023

Commendations

- * The staff were friendly and eager to learn.

Technical Assistance

- * While the Administrative Review for School Nutrition programs has been conducted, the 2022 Annual Financial Report will be reviewed and approved separately. This report could be amended if corrective action is required for the AFR.

Certification and Benefit Issuance - South Spencer Co School Corp (7445)

123. *Onsite observations validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions, and responses demonstrate compliance with FNS requirements*

Technical Assistance- Online Free and Reduced Software

While it is allowable to have an online free and reduced software to complete the initial determination of benefits, the SFA should conduct periodic checks to ensure the system processes and issues benefits accurately. This would be an added internal control measure to verify no systemic problems are occurring.

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. Two students qualified for direct certification; however, the identified students differed from those who were issued benefits.

Corrective Action:

The food service director worked with the household prior to the start of the onsite review to correct the benefit status. During the onsite review, the reviewer validated that the status changed on March 17, 2023. Therefore, additional corrective action is not required.

Verification - South Spencer Co School Corp (7445)

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, one application's post-verification determination was incorrect. The application chosen for verification for cause was verified using net income instead of gross income.

Corrective Action:

For corrective action, the SFA will need to send a notice of adverse action to the household and decrease benefits. Please submit a copy of the adverse action notice and POS documentation showing the decreased benefit. Additionally, the verification summary report results section will need to be updated.

Technical Assistance:

A helpful resource for Verification How-to can be found here: https://docs.google.com/document/d/1k2SleVd6qN9NNMT-hBbRQtLiED2TkirtEN5nvrF_bOM/edit.

212. *SFA met follow-up requirements if the household failed to respond to the verification request*

Finding 9035: SFA did not follow up as required when households failed to respond to a Verification request.

At the time of the review, follow-up documentation was unavailable.

Corrective Action:

The sponsor agrees to document the follow-up efforts in the application's free and reduced software verification section and retain all supporting documentation. Therefore, additional corrective action is not required.

SNP Administrative Review Findings**South Spencer Co School Corp (7445)****Program Year 2023****General Program Compliance - South Spencer Co School Corp (7445)**

808. Onsite observations validate Off-Site Assessment Tool responses to Civil Rights questions and responses demonstrate compliance with FNS requirements

Finding 9000: Civil Rights Training with Non-Food Service Staff

At the time of the review, Civil Rights training was not completed with non-foodservice staff with direct access to the students during meal service.

Corrective Action:

Please submit Civil Rights training documentation for the school employees for corrective action.

Technical Assistance:

As a reminder, Civil Rights should be completed annually with all staff that has direct access to the students during meal service.

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

Finding 9000: Local School Wellness Policy

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:

- Documentation of wellness meetings and committee members were unavailable during the review.
- The policy listed on the website (health section) for public outreach is not the most current 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:

- Provide where to find the outreach of the LSWP.
- Provide committee members and relationships with the SFA. (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).
- Provide documentation of the completed wellness meetings, including what was covered and sign-in sheets.

Technical Assistance:

When outsourcing with a company to provide language and policy suggestions, the SFA must ensure that the wellness committee reviews and implements the policy, including meeting all requirements. <https://www.in.gov/doi/files/minimum-requirements.pdf>. As a reminder, the triennial assessment must be completed every three years. This needs to be done by the end of June 2023. Available resources to complete the assessment can be found at <https://www.in.gov/doi/nutrition/wellness-policies/>.

1217. SFA's process and frequency for tracking training hours are sufficient

Finding 9000: Professional Standards

The tracking for professional standards for food service employees was not completed at the time of the review. Annual training must focus on the day-to-day management and operation of the school nutrition program.

Corrective Action:

The SFA needs to ensure that all food service employees complete training annually. The SFA must develop a detailed training plan to complete all required hours for food service employees. For corrective action, please submit the tracking of professional standards for all food service employees with supporting documentation. Additionally, please provide the developed training plan for the food service to attain all required hours.

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

Technical Assistance- School Breakfast Notification

The SFA is reminded to conduct school breakfast outreach multiple times a year, including price, location, and meal service time. All outreach documentation should be retained locally to support this requirement.

SNP Administrative Review Findings

South Spencer Co School Corp (7445)

Program Year 2023

Rockport Elementary (7803)

321 S 5th Street
Rockport, IN 47635-1506

Food Service Contact

Ms. Gayle Bittel
Head Cook
(812) 649-2201

Month of Review: March 2023

Date of Onsite Review: April 25, 2023

Other Federal Programs - Rockport Elementary (7803)

7. Site monitored in first four weeks of operation, date, deficiencies/CA?

Finding 9228: The SFA has not monitored this site's Afterschool Snack Program within the first four weeks of operation each year.

The Afterschool Snack Program's first monitoring must be completed within the first four weeks of operation. After that, additional monitoring is required anytime during the rest of the operation. At the time of the review, the monitoring was not conducted. Afterschool Snack Program operation at this site: 8/03/2022 - 5/18/2023.

Corrective Action:

For corrective action, the SFA is required to create a written standard operating procedure for ASSP onsite monitoring procedures, including when it will be completed, who will be completing it, and where files will be maintained. Please submit a copy of the written procedure. Additionally, the SFA must complete one required onsite monitoring for ASSP by May 15, 2023. Please submit a copy of the completed monitoring.

11. DOR and Review Period Snacks missing components.

Finding 9233: Snacks missing meal components on the Day of Review and Review Period disallowed.

The school is using smart snack compliant items in the afterschool snack program, many of which do not credit for the afterschool snack meal pattern. Please do not confuse the Smart "a la carte" Snack requirements with the meal pattern requirement for ASSP. The snack menu contained multiple days of insufficient servings of one component or missing components. Snacks with missing meal components and insufficient portions claimed for reimbursement have been disallowed. Additionally, all snacks served during April 2023 that do not meet the meal pattern are ineligible for claim reimbursement.

SFAs should determine menu compliance of items before service.

- Gummy fruit snacks were determined as not creditable in the meal pattern.
- Baked chips that are not grain-based do not credit into the meal pattern. For example, chips made with dried potatoes are not a creditable item in the Child Nutrition Programs.
- While popcorn is allowable, the serving needs to be 3 cups (or 1.0 ounce (28 grams)) popped popcorn as 1 serving of grains in a reimbursable meal or snack.

Corrective Action:

It is highly recommended the SFA create at least a 2-week cycle menu for after-school snacks.

For corrective action, please complete the following.

1. The SFA will need to create written standard operating procedures for the afterschool snack program that detail menu planning, and meal counting, with the understanding that not all smart snack items are creditable in the afterschool snack program. Please provide the written procedure.
2. The operators and menu planners of the snack program will be required to complete the after school snack training in Moodle. Please provide the sign-in sheets and completion certificates.
3. Please provide documentation that shows the ineligible days for claiming in April 2023 were not submitted for claim reimbursement.

Meal Counting & Claiming - Rockport Elementary (7803)

325. Review Period- meal counts by category were correctly used in the claim for reimbursement

Finding 9000: Meal Counting and Claiming

The SFA's claim for the school for the Review Period does not match the State Agency's validated meal counts for the school for the Review Period. The school takes counts manually (tic sheets) and then enters them into the software at the end of the service using a bulk entry. The March 13, 2023 tic sheet was not fully completed in the meal count section, with some meals

SNP Administrative Review Findings

South Spencer Co School Corp (7445)

Program Year 2023

not being marked, but the overall total of meals served was marked off. This indicates that not all meal counts are taken at the POS. As a result, 22 meals have been disallowed.

Corrective Action:

During the onsite review, the reviewer provided technical assistance in completing the meal count sheet. A follow-up was conducted by the food service director with the site staff to review how the count sheet should be completed. As a result, the count sheet will be completed and verified at the end of each service by another food service employee for the remainder of the school year. Starting program 2024, all meal counts will be recorded directly into the POS. Therefore, additional corrective action is not required.

Meal Components & Quantities - Rockport Elementary (7803)

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 are not allowable.

Milk substitutions made on the Day of Review were not allowable per 7 CFR 210.10. Juice was provided instead of milk, which is not equivalent to cow's milk. The paperwork on file does not support the substitution.

Corrective Action:

For corrective action, please provide the updated medical note supporting the juice substitution or an invoice documenting an approved substitution equivalent to cow's milk being purchased.

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

Finding 9000: Breakfast Production Records

The SFA completed production records only for the month of review for breakfast. USDA requires production records for all meals (breakfast, lunch, snack) claimed for reimbursement every day of the school year. The person who submits the claim for reimbursement is responsible for certifying that each site claim and meal type has all records available to support the claim. This includes daily production records by meal type. If it is found that production records are not being completed daily in a subsequent review, future meals could result in a disallowance.

Corrective Action:

The State Agency is placing all future claims (current and following program year) on hold when submitted for reimbursement. The SFA must submit the completed breakfast production records to the field specialist. Once the field specialist has reviewed the monthly, completed food production record, the claim for reimbursement will be released for payment. On May 3, 2023, the food service director submitted a written corrective action response explaining the staff will be trained on production records, productions records will be added to a daily requirements list of duties, the FSD will review digital production records weekly to ensure completion, and the SFA agrees to monthly submission of the production records to the field specialist. Therefore, additional corrective action is not required.

410. Review Period- planned menu quantities meet the meal pattern requirements

Finding 9076: Planned menus served during the 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. Therefore, the menu planner must plan menus that meet all components in daily and weekly serving sizes.

- The dark green vegetable subgroup was insufficient for the week of review- 1/8 cup instead of 1/4 cup.

Corrective Action:

It is required that the SFA plan and offer the meal pattern to meet the daily and weekly compliance for the grade grouping corresponding with the school. The food service director should review all cycle weeks to ensure the daily and weekly requirements are met. On May 3, 202, the food service director submitted a written coercive action response explaining that site managers would no longer be responsible for planning menus, menu planning would be completed at the SFA level to ensure menus are planned meeting requirements, site managers would complete meal pattern training ensuring menu changes and/or substitutes at the site level is acceptable. The SFA will review menus and production records monthly to ensure menu pattern compliance. Therefore, additional corrective action is not required.

SNP Administrative Review Findings
*Program Year 2023***South Spencer Co School Corp (7445)**

500. *Day of Review- Offer vs. Serve was properly implemented*

Finding 9078: The school is not properly implementing Offer vs. Serve.

As observed on the Day of Review, the school did not clearly understand OVS and its requirements for breakfast and lunch meal types. Additionally, no offer vs. service training has been completed this program year with site staff.

Corrective Action:

For corrective action, the school must complete Offer versus Serve training. Please submit documentation of the completed training.

Technical Assistance:

The school was provided technical assistance during the onsite visit. Offer vs. Serve training is an annual requirement and is recommended to be completed during the back-to-school training with staff.

Dietary Specifications - Rockport Elementary (7803)

603. *Technical assistance and/or corrective action were found to be necessary upon completion of the off-site portion of the Dietary Specifications Assessment Tool*

Technical Assistance- Cafeteria Environment, Menu Options, and Efficiency

The lunchroom atmosphere behavioral economics has benefits in improving student satisfaction, engaging school nutrition staff, increasing participation, and being easy to implement. To learn more about smarter lunchroom strategies, please visit <https://healthy-food-choices-in-schools.extension.org/the-60-strategies-of-the-smarter-lunchrooms-scorecard/>. During the onsite review, the reviewer and food service director created a mock line setup for breakfast that included multiple options for entrees to help increase participation. Some suggestions included a pick-two option for grain and m/ma for the entree, putting fresh produce first, canned fruit, and then juice. Additionally, the presentation of food on the line was discussed.

General Program Compliance - Rockport Elementary (7803)

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

Finding 9103: Onsite review of the school's meal counting and claiming procedures were not completed prior to February 1.

At the time of review, documentation was unavailable to provide the SFA conducted an onsite review of the school's meal counting and claiming procedure for school breakfast before February 1 of the current Program Year. According to 7 CFR 210.8(a)(1) and 7 CFR 220.11(d)(1), every school year prior to February 1, each School Food Authority (SFA) with more than one school must perform no less than one onsite review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the National School Lunch Program (NSLP) and 50% of schools operating the School Breakfast Program (SBP) under its jurisdiction.

Corrective Action:

For corrective action, the SFA is required to create a written standard operating procedure for onsite monitoring procedures, including when it will be completed, who will be completing it, and where files will be maintained. Please submit a copy of the written procedure. Additionally, the SFA must complete one required onsite monitoring for the school breakfast program by May 15, 2023. Please submit a copy of the completed monitoring.

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

Technical Assistance- Food Safety Plan Review and Update

The SFA is reminded to review and update the food safety plan as changes occur within the food service operation. The last update was in 2018.

1408. *Temperature logs are available*

Finding 9149: Temperature logs unavailable for review.

FNS requires each school in the SFA to maintain temperature logs for six months. Temperature logs were unavailable for breakfast-related items and pass-thru refrigerators/warmers.

SNP Administrative Review Findings

South Spencer Co School Corp (7445)

Program Year 2023

Corrective Action:

For corrective action, the staff must record the temperatures of food, coolers, and warmers using a HACCP log. In addition, please submit temperature logs for supporting documentation.

Technical Assistance:

HACCP logs can be found here: https://www.in.gov/doe/nutrition/food-safety/#Monitoring_and_Recordkeeping

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. During the onsite review, all food was not stored at least 6 inches off the floor. This was also a non-critical violation of the local health department's most recent health inspection (March 9, 2023).

Corrective Action:

The food service director will schedule training with site staff to review food safety basics, including proper storage of food items. For corrective action, please submit training sign-in sheets and the agenda of the completed training.