

**SNP Administrative Review Findings**

**Southwest School Corp (7715)**

*Program Year 2023*

**Southwest School Corp (7715)**

1502 North Section Street  
Sullivan, IN 47882-1225

**Food Service Contact**

Mr. Jon Stuckey  
Asst. Superintendent  
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FSMC: Sodexo

**Executive Contact**

Mr. Chris Stitzle  
Superintendent  
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No. of Sites / Reviewed: 4 / 1  
Month of Review: December 2022

**Commendations**

- \* The food service staff did a terrific job planning, organizing, and preparing for their 2023 Administrative Review. The staff was very professional and conscientious about meeting the School Nutrition Program requirements.

**Technical Assistance**

- \* The school corporation must ensure the corporation employee overseeing the FSMC contract has a strong working knowledge of USDA programs. It is imperative that the School Food Authority (SFA) continue to review all documentation related to services provided by the FSMC, including but not limited to the following: reviewing the itemized monthly statements to ensure there are no questionable or unallowable charges billed to the foodservice account, reviewing the SFA available USDA Foods for use in menus to ensure the corporation is getting full value from the use of commodities in reimbursable meals and not used for other activities, inspecting all kitchens regularly to ensure foods are stored properly, rotated on FIFO, and secured from theft and spoilage. During the review, it was noted that the FSMC billed for fewer afterschool snacks than what was claimed and correlated with supporting documentation resulting in the SFA being undercharged. The following items were recommended to the SFA regarding FSMC billing:
  - For accuracy, the SFA should create a standard operating procedure to review every monthly itemized, detailed billing.
  - The SFA should determine approval procedures for FSMC travel, employee recognition programs, timekeeping records, and/or shared labor between SFAs.
  - The SFA should receive training on how to read the reports provided by the FSMC.
- \* 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 - Southwest School Corp (7715)**

*130. Household notification of denied benefits is consistent with FNS requirements*

**Finding 9021: Denial of benefits notification to a household not consistent with FNS requirements**

Notification sent to denied households was not completed timely in some instances longer than a month after the application processing.

**Corrective Action:**

Households with children denied benefits must receive prompt, written notification of their denial. The notification may be provided by mail or email to the adult household member who signed the application. The free and reduced determining official sent written corrective action to the reviewer on January 27, 2023, explaining that households will be notified promptly by email and letter stating the change in regards to meal assistance. If an adverse action notice is required, this will also be completed promptly within ten calendar days. Therefore, additional corrective action is not required.

*137. Eligibility determinations are correctly transferred to the Point of Service Benefits Issuance document*

**Finding 9029: Eligibility determinations not correctly transferred to the Point of Service Benefits Issuance document**

**\*Repeat Finding**

Based on a review of documentation for selected students, certified eligibility is not always transferred correctly to the benefit issuance system-electronic POS terminal.

- One application was processed correctly with a reduced benefit but was issued as a free benefit.

**Corrective Action:**

During the onsite review, the administrative assistant sent the household a letter of adverse action. In addition, the school will complete a random selection of other approved applications to ensure there is not a systemic error in the POS when application determinations are transferred electronically. Therefore, additional corrective action is not required.

**SNP Administrative Review Findings**  
*Program Year 2023***Southwest School Corp (7715)**

141. *Meal benefits are extended to students in households receiving SNAP, TANF, or FDPIR benefits*

**Technical Assistance- Locally Coding Direct Certification Extensions**

Students being extended direct certification or having already had a benefit determined are not consistently coded as direct certification when identified. When direct certification is extended to other household members, benefits should also be coded as direct certification in the benefit issuance system. These students are also exempt from income verification if qualified for a direct certification extension. Community Eligibility Provision is a site-based qualification program using direct certification-free numbers. If students are being extended the benefit through direct certification, however, not coded as direct certification, this will cause a misrepresentation of direct certification-free numbers resulting in a lower identified student percentage. As a result, a low identified student percentage might skew the numbers used for use in Community Eligibility Provision determinations.

**Verification - Southwest School Corp (7715)**

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 being 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. Benefits were decreased after ten days for multiple students.

**Corrective Action:**

The reviewer provided technical assistance to the administrative assistant responsible for verification for the SFA regarding updating the eligibility status during the verification period. As a result, the administrative assistant provided written corrective action stating that manual changes that do not automatically apply within the software will be added to a google calendar alert to ensure the changes are made promptly. Additionally, the administrative assistant completed verification training in Moodle and provided the certificate to the reviewer on February 1, 2023. Therefore, additional corrective action is not required.

**Resource Management Comprehensive Review - Southwest School Corp (7715)**

765. *Adult Meals*

**Technical Assistance- Program Adult Meals**

During the onsite review, it was observed that not all the program adult meals are tracked manually or by the software. Although the school allows program adults to have one free lunch meal when working, these meals must be tracked. As a reminder, adults outside the food service daily operation would not be considered program adults and revenue collected as a part of the sale.

**General Program Compliance - Southwest School Corp (7715)**

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- Teacher Aides**

There was no documentation that Civil Rights training had been conducted for teacher aides that assist with breakfast grab-n-go. The teacher aides' job duties provide direct access to children through the serving line, which falls into the requirement for training to be completed.

**Corrective Action:**

The food service director completed Civil Rights training with teacher aides and submitted sign-in sheets to the reviewer. Therefore, additional corrective action is not required.

**SNP Administrative Review Findings****Southwest School Corp (7715)****Program Year 2023****Sullivan Elementary School (7965)**1502 North Section Street  
Sullivan, IN 47882-1225**Food Service Contact**Mrs. Jennifer Whitlock  
Head Cook  
(812) 268-3341

Month of Review: December 2022

Date of Onsite Review: January 11, 2023

**Other Federal Programs - Sullivan Elementary School (7965)****6. Day of review Menu, Meal Patterns, Production records.****Technical Assistance- Production Records**

The school has an approved list of items that can be served for the afterschool snack program and has incorporated product formulation statements to ensure creditable items are being provided to students. When the staff completes the production records, it is recommended to be detailed when recording the components offerings, i.e., instead of crackers, .75oz list goldfish crackers .75oz.

**7. Site monitored in first 4 weeks of operation, date, deficiencies/CA?****Finding 9228: The SFA has not monitored this site's Afterschool Snack Program within the first 4 weeks of operation each year.**

The Afterschool Snack Program monitoring was completed during week five operations for the program year 2023 at Sullivan Elementary School.

**Corrective Action:**

The afterschool snack program monitoring should be completed twice annually (once during the first four weeks of operation and another anytime throughout the rest of the operation). The food service director utilizes an electronic calendar for tasks. Monitoring will be planned and added to the calendar to ensure all monitoring takes place as needed. During the onsite review, the FSD added the second monitoring visit to the calendar as a task to be completed before mid-March. Therefore, additional corrective action is not required.

**Meal Components & Quantities - Sullivan Elementary School (7965)****401. Day of Review- all meals observed and counted for reimbursement contained all of the required meal components****Finding 9000: Identification of Reimbursable Meals**

On the day of review, three meals were disallowed.

- Two meals contained insufficient portions to make a reimbursable meal because the serving of oranges was planned as half orange credits as ½ cup.
- One meal was missing a fruit and/or vegetable after the student declined the cashier for a fruit or vegetable. The cashier still counted this meal as reimbursable when it should have been rung up as a la carte.

**Corrective Action:**

The reviewer provided technical assistance to the food service director regarding how oranges credit. The cafeteria manager will use the Food Buying Guide and Food Buying Calculator to better assist with crediting/purchasing. In addition, an onsite demonstration to get creditable portion size by volume was completed. Staff was provided technical assistance from the food service director for what needs to be included in OVS meals and how to ring meals in the POS if they decline both fruit and vegetable. Therefore, additional corrective action is not required.

**500. Day of Review- Offer vs. Serve was properly implemented****Technical Assistance- Grab-and-Go Breakfast**

On the day of the review for breakfast, it was communicated by the staff that students were not consistently taking milk with the reimbursable meal, although offer vs. serve was not an option. The food service director reminded the staff that each meal must have milk due to the implementation of how grab-and-go breakfast is set up.

**SNP Administrative Review Findings**  
*Program Year 2023***Southwest School Corp (7715)****General Program Compliance - Sullivan Elementary School (7965)***1411. Review of agricultural food components indicates violations of the Buy American provision***Technical Assistance- Buy American**

There were two products (Mexico) that violated the Buy American Provision at Sullivan Elementary School, and supporting documentation was not available to support the non-domestic products were unavailable at the time of the review. The State Agency recognizes that many food products are difficult to acquire currently; however, please remember that federal tax dollars are used to purchase these products. Please make every effort to purchase products that are from the United States. Here is a resource that can help determine seasonal produce in the USA. <https://snaped.fns.usda.gov/seasonal-produce-guide>