

SNP Administrative Review Findings**Spencer-Owen Community Schools (6195)****Program Year 2019****Spencer-Owen Community Schools (6195)**

205 East Hillside Ave
Spencer, IN 47460-1421

Food Service Contact

Ms. Jennifer Schmitter
Asst. Food Services Coordinator
(812) 829-2233
FSMC: Aramark

Executive Contact

Mr. Chad Briggs
Superintendent
(812) 829-2233

No. of Sites / Reviewed: 6 / 2
Month of Review: September 2018

Certification and Benefit Issuance - Spencer-Owen Community Schools (6195)*126. Certification Benefits/Issuance Review Method, applications correctly approved?***Finding 9901: Multiple applications were certified incorrectly or utilized incomplete information.**

Multiple applications were certified incorrectly or utilized incomplete information. As a result of incorrect application format, applications were approved based on incorrect case number formats and Medicaid numbers. The social security numbers for some income applications were missing. Some errors contributed toward fiscal action calculations.

Corrective Action:

Corrections have been made to certification errors. Additionally, the application format was corrected the day of review to only allow for case numbers based on food stamps, TANF, or FDPIR. Additional response is not required.

Technical Assistance:

Application formats were discussed with the sponsor the day of review.

Verification - Spencer-Owen Community Schools (6195)*209. Review of verified applications – properly selected, replaced applications correctly, verified correctly?***Finding 9000: Technical Assistance****Technical Assistance:**

Reviewers provided onsite technical assistance regarding the organization of Verification. Separate the Verification and Verification for Cause applications when filing. This helps to determine which applications were selected for the annual Verification requirement.

*211. Verification notification letter?***Finding 9000: Verification Letter**

The following issues were found with the sponsor's verification notification letter:

- non-discrimination statement is incorrect,
- asks for SSN,
- and reports household income is based off of a monthly average.

Corrective Action:

The sponsor must ensure the verification notification letters contain all required information. As corrective action, the sponsor confirmed that they will utilize the state prototype letters to ensure requirements are met. Additional response is not required.

Technical Assistance:

Requirements for the verification notification letter were discussed with the sponsor the day of review.

General Program Compliance - Spencer-Owen Comma Schools (6195)*1007. On-site observation validate Off-Site Assessment Tool responses to Local School Wellness Policy questions?***Finding 9000: Other Finding**

Program Year 2019

Technical Assistance:

A reminder has been provided to the school corporation that an assessment of the wellness policy must be completed by the wellness committee at least every 3 years.

1215. Validate OFS #1205 - Did School Nutrition Manager meet annual training requirements?

Finding 9000: Other Finding

Technical Assistance:

Recommended to include other topics in training for staff. Additional OVS, marketing, customer service, etc. Most training appears to be on safety topics.

1219. Validate OFS #1209 - Employees outside of the School Nutrition Program with School Nutrition Program duties receive training?

Finding 9000: Other Finding

Non-foodservice staff who have duties related to the school nutrition program were not trained annually as required by program regulations. Specifically, the treasurer approves applications and files claims and therefore is required to have annual Civil Rights training as well as specific job training related to the tasks assigned.

Corrective Action:

The sponsor must ensure all staff with duties related to the program are provided training on those job duties. Training will be provided and documented. Additional response is not required.

Technical Assistance:

Training requirements for non-food service staff with duties related to the program was discussed with the sponsor the day of review.

SNP Administrative Review Findings**Spencer-Owen Community Schools (6195)****Program Year 2019****McCormick's Creek Elementary (6619) Food Service Contact**

205 East Hillside Ave
Spencer, IN 47460-1421

Mrs. Cathy Wallace
Unit Leader
(812) 828-6000

Month of Review: September 2018

Date of Onsite Review: October 31, 2018

Meal Counting & Claiming - McCormick's Creek Elementary (6619)

318. DOR - accurate meal counts by category at POS?

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

Overall, breakfast in the classroom is implemented successfully; however, the sponsor is reminded to ensure meal counts are taken as each meal is served rather than once students are seated.

Meal Components & Quantities - McCormick's Creek Elementary (6619)

403. DOR - two varieties of milk available, allowable substitutions?

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

Milk substitutions made on the Day of Review were not allowable per 7CFR 210.10. A nutritionally equivalent milk sub is not provided for a student with milk allergy/intolerance.

Corrective Action:

If a student has a disability (such as lactose intolerance or a milk allergy), the SFA must provide an appropriate substitute, and if a student has a disability, it is no longer allowable to require the student to decline the milk under offer versus serve. The SFA must provide a substitute.

Technical Assistance:

Milk sub requirements were discussed with the sponsor the day of review.

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 breakfast is not identified near or at the beginning of the meal service line(s).

Corrective Action:

The sponsor must post meal pattern signage for breakfast near or at the beginning of the meal service line(s). The sponsor has ordered additional signage for posting and will post within the week. Breakfast signage will need to be checked at all school locations. Additional response is not required.

Technical Assistance:

The school was provided technical assistance during the on-site visit.

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

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

As observed on the Day of Review, cashiers did not demonstrate a clear understanding of OVS and its requirements. Where a student selected a reimbursable meal, the student was made to select an additional item.

Corrective Action:

The sponsor cannot require students to take additional items if a reimbursable meal has already been selected. Additional

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OVS training was provided to staff the day of review by the director and reviewer. OVS resources were also provided and will be reviewed. Additional response is not required.

Technical Assistance:

The school was provided technical assistance during the on-site visit. Additionally, OVS resources were provided.

<https://www.doe.in.gov/nutrition/offer-vs-serve-lunch>.

SNP Administrative Review Findings**Spencer-Owen Community Schools (6195)****Program Year 2019****Owen Valley High School (6613)**

205 East Hillside Ave
Spencer, IN 47460-1421

Food Service Contact

Ms. Christie Maxwell
Unit Leader
(812) 829-2266

Month of Review: September 2018

Date of Onsite Review: October 30, 2018

Meal Components & Quantities - Owen Valley High School (6613)

400. DOR – all required components available during entire meal service, all lines?

Finding 9002: Meal components missing on Day of Review.

As observed on the Day of Review, required meal components were not available on every reimbursable meal service line to all participating students. Alternate meals did not include vegetables.

Corrective Action:

The sponsor must ensure all five components are planned with each meal when claiming for reimbursement. Included are alternate meals claimed for reimbursement. Meals were corrected prior to serving. Additional response is not required.

Technical Assistance:

The school was advised and given the opportunity to add missing meal component during the meal service when missing components were observed.

403. DOR - two varieties of milk available, allowable substitutions?

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

Milk substitutions made on the Day of Review were not allowable per 7CFR 210.10. A nutritionally equivalent milk sub is not provided for a student with milk allergy/intolerance.

Corrective Action:

If a student has a disability (such as lactose intolerance or a milk allergy), the SFA must provide an appropriate substitute, and if a student has a disability, it is no longer allowable to require the student to decline the milk under offer versus serve. The SFA must provide a substitute.

Technical Assistance:

Milk sub requirements were discussed with the sponsor the day of review.

409. Review period production records/documentation - required meal components offered, daily/weekly requirements met?

Finding 9000: Other Finding

As noted on review documentation, required meal components were not available on every reimbursable meal service line to all participating students. Alternate meals did not include vegetables.

Corrective Action:

The sponsor must ensure all five components are planned with each meal when claiming for reimbursement, including alternate meals if claimed. Going forward all vegetable subgroups will be offered with alternate meals; however, 34 meals must be reclaimed from the month of review (September). Additionally, 27 meals were deducted from the sponsor's claim for reimbursement prior to submitting the claim for October (the month of the onsite review prior to the day of correction). Additional response is not required.

Technical Assistance:

Requirements for claiming alternate meals was discussed with the sponsor the day of review.

General Program Compliance - Owen Valley High School (6613)

1406. Most recent Food safety inspection posted, visible to public?

Finding 9147: Most recent food safety inspection report is not posted in a publicly visible location.

Corrective Action:

At the time of the onsite review the most recent health inspection was not posted in the cafeteria for public display. The manager posted the inspection the day of review. No Further Action Required.

Technical Assistance:

The requirement for posting the health inspection was discussed with the sponsor the day of review.

1411. Did any review of products indicate violations of the Buy American provision?

Finding 9000: Buy American

On the Day of Review, several onsite items were non-domestic agricultural food components. Buy American requires purchases to be domestic agricultural food components in NSLP unless documentation is obtained to explain purchases of non-domestic agricultural food components.

Corrective Action:

The sponsor will ensure domestic products are used unless an exception was granted by the SFA because:

- The agricultural food component is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or
- Competitive bids reveal the costs of domestic agricultural food components are significantly higher than the non-domestic ones
- The exception was related to the domestic food as prohibitively costly or limited quantity availability.

The sponsor will work with their vendors to ensure food components are obtained domestically. Additional response not required.

Technical Assistance:

Buy American requirements were discussed with the sponsor the day of review.