

SNP Administrative Review Findings

Springs Valley Community Schools (6160)

Program Year 2023

Springs Valley Community Schools (6160)

498 S Larry Bird Boulevard
French Lick, IN 47432-1078

Food Service Contact

Mrs. Sasha Robison
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FSMC: Aramark

Executive Contact

Dr. Trevor Apple
Superintendent
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No. of Sites / Reviewed: 2 / 1
Month of Review: December 2022

Commendations

- * Serving lines were colorful and the variety of fresh fruits and vegetables offerings was noteworthy.

Technical Assistance

- * Springs Valley's food service account is still operating as an extracurricular account (ECA) instead of an 0800 fund account; it is highly encouraged to change from an activity fund to an 0800 account.
- * It is recommended that the free and reduced process be reviewed at the SFA level before the issuance of benefits. Additionally, the people responsible for F/R should obtain training from the software in areas related to benefit issuance.
- * 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 had only provided invoices for August and September 2022. FSMCs should be providing monthly invoices to SFAs. 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.

Certification and Benefit Issuance - Springs Valley Community Schools (6160)

133. *Direct Certifications were correctly certified*

Finding 9024: Direct Certifications were not correctly applied

Direct certification documentation for selected students was reviewed for completeness and accuracy. One student was qualified for direct certification; however, the identified student differed from the student who was issued benefits.

Corrective Action:

The ECA Treasurer/FSD sent the household a notice of adverse action on January 27, 2023. The reviewer validated that the status changed on February 6, 2023, during the follow-up visit on February 23, 2023. Therefore, additional corrective action is not required.

Technical Assistance:

During the onsite review, the reviewer provided the updated direct certification guides to the computer coordinator. It is recommended the computer coordinator complete the direct certification training in Moodle.

Verification - Springs Valley Community Schools (6160)

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

Finding 9000: Verification for Cause

One household approved for Direct Certification Medicaid (free) was contacted for Verification for Cause. Any household that is directly certified should be excluded from any verification efforts.

Corrective Action:

The reviewer provided technical assistance regarding verification requirements during the follow-up review. The SFA agrees not to complete verification for any household qualified for direct certification. The ECA Treasurer/FSD revised the verification

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summary report to not include the DC-free household under the results section on February 23, 2023. Therefore, additional corrective action is not required.

Technical Assistance:

It is highly recommended the sponsor attend verification training in the fall of 2023.

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 on the back of the applications in the "office use section" and retain any supporting documentation. Therefore, additional corrective action is not required.

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

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

The SFA's notice of adverse action due to verification did not contain all the required information, including notification of appeal rights.

- At the time of the review, no notice of adverse action documentation was available.

Corrective Action:

The sponsor will send results letters to households selected for verification. Additionally, the sponsor will retain copies of all sent letters. Therefore, additional corrective action is not required.

214. Updates to the Benefits Issuance list were made in the appropriate timeframes when verification resulted in changes to student eligibility

Finding 9047: Change in benefit levels due to Verification were not changed within required timelines.

When a student's eligibility status changed due to verification, benefits were not decreased within ten calendar days from the final verification decision. The notice of verification selection letter explained that benefits would change on November 18, 2022, but benefits were not changed until January 25, 2023, for three students.

Corrective Action:

During the onsite review, the ECA Treasurer notified the household of the adverse action explaining the benefits change. Since the changes were not made timely, claims for reimbursement starting December 2022 will need to be adjusted from free to reduced using the identified student transaction history. In addition, all meal adjustments for the identified students must be paid using non-federal dollars. Please submit documentation to support the claim adjustment and outside funds for lunch meals.

Meal Counting & Claiming - Springs Valley Community Schools (6160)

314. SFA is following the approved SFA-SA agreement

Technical Assistance- Update Needed in CNPweb

It was noticed that some of the information submitted in the site applications in CNPweb was incorrect. During the onsite review, the field specialist provided technical assistance to the ECA Treasurer/FSD regarding meal pricing, site contacts, and how to complete the seamless summer option. As a reminder, site applications need to be updated by the SFA anytime a change occurs throughout the program year.

Resource Management Comprehensive Review - Springs Valley Community Schools (6160)

766. Assessing Compliance with the Nonprogram Foods Revenue/Cost Ratio

Finding 9000: Assessment of Nonprogram Revenue/Cost Ratio

The SFA did not assess its compliance with the revenue from nonprogram foods requirements 7 CFR 210.14(f).

Corrective Action:

The SFA must assess compliance with the revenue from nonprogram foods. For corrective action, the SFA must complete the 5-day reference period using the nonprogram food revenue tool. Please submit the nonprogram revenue tool with documentation to support the figures used.

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The reviewer provided the FSD with the USDA memo SP20-2016 explaining the reference period with a 5-day revenue tool.

General Program Compliance - Springs Valley Community Schools (6160)

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 Minimum Requirements *Repeat Finding

Wellness Policy does not include all the required elements. The policy is missing but not limited to:

- USDA Requirements for School Meals
- Two goals for nutrition education, physical activity, nutrition promotion, and other school-based activities to promote student wellness.
- Food and Beverage Marketing

Corrective Action:

The Local School Wellness policy and all aspects of the policy must be met. The Local School Wellness policy must be revised for corrective action to meet the Final Rule Summary. Please include an updated copy of the Local School Wellness Policy.

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/doe/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/doe/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 FSMC 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.

1219. *Employees outside of the School Nutrition Programs with School Nutrition Program duties received appropriate training*

Finding 9000: Non-Nutrition Staff Trainings *Repeat Finding

One employee directly involved in benefit issuance has not documented completion of civil rights training within a year of the administrative review.

Corrective Action:

The employee will take the annual civil rights and maintain training documentation for ongoing corrective action. Annual training will also be taken for all duties related to the program. The SFA has provided proof of training as corrective action. Therefore, additional corrective action is not required.

1501. *Records are retained for three years*

Finding 9152: SFA not retaining Program records for a minimum of 3 years.

The SFA is not retaining the appropriate records regarding program management for three years after the final Claim for Reimbursement for the fiscal year or until the resolution of any audits. During the onsite review, it was observed that not all records were being kept onsite. Some items missing included meal count sheets and production records. While no meals

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have been disallowed for the missing production records, future disallowances could occur if this is found in subsequent reviews. Additionally, it was determined the FSMC food service director was job shared with another school corporation and might have taken some of the free and reduced applications, verification, and financial records to an off-site location.

Corrective Action:

The SFA must maintain the program administration and oversight for the Child Nutrition programs. It is highly recommended the SFA review the contract with the FSMC to understand what is expected, including who is required to complete what responsibilities in the program. The SFA is expected to be involved in monitoring the following areas- claims, benefit issuance and verification, monitoring, and financial reporting.

For corrective action, please explain what changes have been completed to maintain program administration and oversight for the Child Nutrition programs, including retaining documents locally onsite.

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

Finding 9009: SFSP & SBP Outreach

Summer Food Service Program (SFSP) outreach to households was not conducted by the SFA. Although the SFA does not operate the SFSP, all program sponsors operating School Nutrition Programs must inform households of the availability of SFSP meals through other sponsors. The State Agency provides language through the Weekly Newsletter in early May for sponsors to use to meet this requirement.

Corrective Action:

The State Agency SFSP website is updated each school year towards the end of May with a link to a map of SFSP open sites. The SFA agrees to send this information to households at or near the end of the school year. Therefore, additional corrective action is not required.

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Springs Valley Community Schools (6160)

Program Year 2023

Springs Valley High School (6589)

498 S Larry Bird Boulevard
French Lick, IN 47432-1078

Food Service Contact

Ms. Barbara Hibdon
Kitchen Manager
(812) 936-9984

Month of Review: December 2022

Date of Onsite Review: January 27, 2023

Meal Counting & Claiming - Springs Valley High School (6589)

322. Review Period- daily meal counts by category do not exceed the number of eligible students by category

Technical Assistance- Free, Reduced, Paid Eligibles

The total number of eligible children was reported incorrectly in the eligibles section of the site claims. The total number of eligible children should reflect the highest number of enrolled students on a given day within the month. This is not a monthly total based on the number of operating days times enrollment. Additionally, this number should be updated monthly to reflect enrollment trends.

324. Review Period- there were no questionable patterns in the reported meal counts by category

Technical Assistance- Manual Meal Counting Process

Springs Valley Middle-High School claims free, reduced, and paid meals by established categories. However, on some days, food service staff completed meal counts using tic sheets instead of coded meal rosters or through the point of sale. While the school food service director did not include these days for claiming, the SFA is reminded that tic sheets are not an acceptable meal counting practice for NSLP/SBP when claims are submitted with free, reduced, and paid categories.

Meal Components & Quantities - Springs Valley High School (6589)

401. Day of Review- all meals observed and counted for reimbursement contained all of the required meal components

Finding 9000: Reimbursable Meal Components *Repeat Finding

During breakfast observation, it was determined that staff counted three physical items for reimbursable breakfast meals. Three of the meals did not contain fruit, but each contained a strawberry-flavored yogurt which staff initially interpreted as a fruit serving. As a result, three meals that were missing components have been disallowed.

Corrective Action:

All student selected meals must meet the requirements to be eligible for claiming. Site staff must complete Offer Vs. Serve training (Moodle or ICN) for corrective action. In addition, site staff must complete the fruit and meat/meat alternate crediting training located in Moodle. Please submit the post-tests and training certificates to show the completion of the training.

Technical Assistance:

In previous reviews conducted with the school corporation, it was documented that staff offered strawberry-flavored yogurt as a fruit option. However, technical assistance has been provided multiple by State Agency field specialists, including most recently during the onsite review, explaining that flavored yogurt is not a fruit and is considered a meat alternative in Child Nutrition programs.

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

Finding 9081: Review of Productions records expanded to the entire Review Period. *Repeat Finding

Based on a review of production records and other supporting food crediting documentation for the entire Review Period, some meals served during the Review Period did not meet the appropriate daily and weekly meal pattern requirements for the age/grade group(s) being served. Review Period meals missing required meal components: Meals were planned correctly; however, according to production records, a fruit or vegetable component was not done to all claimed meals resulting in a disallowance of meals at breakfast. Due to the repeated finding and onsite observation during the breakfast review, the review was expanded to the first day of school. Additionally, the production records are only completed with the items available for the day, how many servings were prepped, and how many servings were leftover. A breakdown of the disallowance for Springs Valley High School is listed below.

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- August 2022 resulted in a disallowance of 283 breakfast meals.
- September 2022 resulted in a disallowance of 227 breakfast meals.
- October 2022 resulted in a disallowance of 96 breakfast meals.
- November 2022 resulted in a disallowance of 100 breakfast meals.
- December 2022 resulted in a disallowance of 54 breakfast meals.

Corrective Action:

During the onsite review, the reviewer provided technical assistance to the head cook, the FSMC food service director, and the ECA Treasurer/FSD regarding completing the food production record and the requirement of a 1/2 cup of fruit or vegetable for reimbursable meals for offer vs. serve requirements. The SFA agrees with insufficient documentation of the meal pattern and has completed the following since the onsite review. Onsite monitoring was conducted on January 31, 2023, where it was noted that more items had been placed on the share table since requiring students to take 1/2 cup of fruit or vegetable with the meal. Additionally, all food service staff completed production record training. Finally, the FSMC has completed several site visits to create order guides and provided recipes, production records, and onsite technical assistance to implement the requirements as planned.

For corrective action, please provide two weeks of completed production records.

411. Review Period- the school has complied with the planned menu, or changes made are acceptable substitutions

Finding 9000: Menu Implementation

The school does not understand the menu for breakfast. The menu is planned with pick-two options that include a grain and meat alternate, but the onsite food service staff did not implement the menu as pick-two; instead as individual entrees. This option would not meet the weekly grain requirements. While no meals have been disallowed, if this error is on subsequent review, a future disallowance of meals could occur.

Corrective Action:

The FSMC uses a menu team to create local menus at the schools. It is highly recommended that the Food Service Director work with the menu team to understand how the menu is being planned to assist in training staff. This will help the local food service staff understand how the menu is planned to determine compliance with grade groupings. In addition, this will help local food service staff understand what can be counted for a reimbursable meal. For corrective action, please describe how the menu will be implemented and what steps have been taken to understand how the cycle menus are planned.

General Program Compliance - Springs Valley High School (6589)

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

Finding 9161: Beverages sold in the school do not meet Smart Snack requirements for the youngest age/grade group enrolled.

The school includes 6-12 enrollment. Beverages sold in a school with mixed grades must meet the Smart Snacks standards for the youngest age/grade group enrolled. The school is not in compliance with this requirement.

Corrective Action:

It is recommended that the school work with the vendor to fill the vending machine 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.

For corrective action, please explain in writing the changes implemented for the vending machines to meet smart snack standards.

1406. The most recent food safety inspection report is posted in a publicly visible location

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

Corrective Action:

The school food service director/ECA treasurer posted the health inspection for public viewing in the cafeteria on February 24, 2023. Therefore, additional corrective action is not required.