

SNP Administrative Review Findings

St Susanna School (K094)

Program Year 2024

St Susanna School (K094)

1212 E Main St
Plainfield, IN 46168-1763

Food Service Contact

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No. of Sites / Reviewed: 1 / 1
Month of Review: December 2023

Commendations

- * Production records are completed electronically, potentially saving time when a master copy of a cycle menu is maintained.
- * The school lunch webpage was thorough, not only providing the school lunch menu but also Q&A, charging policy, and the full non-discrimination statement as required.

Technical Assistance

- * When conducting direct certification lookups, ensure students are added to the approved list for the lookup in order for it to be saved to the year to date list.
- * Two 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 January 11, 2024, and provided the effective date documentation to the reviewer. Additionally, the FSD refunded the households for the incorrect benefit based on transaction history.
- * While the non-discrimination statement is not required on the menu, if it is added the correct statement must be used. The short statement is, "This institution is an equal opportunity provider."
- * The State Agency professional standards tracking spreadsheet was shared with the director on the day of review. Utilizing this resource and updating it as each staff training occurs is an easy way to keep up with training hours.
- * The difference between portion size and crediting was discussed with the director the day of review. In some cases, they may be the same, but not always.
- * Be mindful of portion sizes for breaded items such as onion rings. The vegetable portion must still meet the minimum vegetable portion without the breading.

Certification and Benefit Issuance - St Susanna School (K094)

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

Based on a review of documentation for selected students, certified eligibility is not always transferred correctly to the benefit issuance system (tickets, rosters, tokens, electronic POS terminal). The benefit issuance is conducted by a different staff member, requiring the determining official to communicate each student's benefit for input into the point-of-sale system. This procedure leaves room for error.

Corrective Action:

It would be a best practice for the determining official to enter each eligibility into the point-of-sale system as each application is approved and each direct certification match is found. **As corrective action, please develop and submit a procedure to ensure benefit issuance is conducted accurately. It is recommended for the determining official to double check the eligibility once entered into the point-of-sale system to ensure accuracy.**

Technical Assistance:

It was also noted that all communication between the determining official and the person issuing benefits should be maintained to document student status changes.

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138. Updates to the Benefits Issuance documents are made accurately and timely

Finding 9000: 30 Day Carryover

Benefits carried over from the prior school year did not expire on the 31st operating day for some households who failed to re-apply for meal benefits during the current school year.

Corrective Action:

As corrective action, the director will give the households 10 days notification of a reduction in benefits. The director will also ensure carryover eligibility expires on the 31st operating day by updating the calendar each year with a reminder. **Submit the household notification letters to the State Agency as corrective action.**

Technical Assistance:

Prior year's eligibility benefits expire when a new benefit is determined in the current year or on the 31st operating day, whichever comes first. If using an electronic point-of-sale system, check to see if the system has the capability to automatically expire prior year's eligibility determinations on the 31st operating day. For more information, the 30-Day Carryover Fact sheet can be found here:

<https://docs.google.com/document/d/1o8MXjpnjs248XKWsRrttIU6oFAyczkmdY3SZHq1pgnk/edit>. The USDA Eligibility Guidance Manual can be found here: https://fns-prod.azureedge.us/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf.

142. Benefits are changed on the Benefits Issuance document if a family declines or requests lower benefits

Finding 9034: Benefits not changed on the Benefits Issuance document if a family declines or requests lower benefits

The SFA did not change the eligibility category of households that declined benefits or households that requested a lower level of benefits. A household's request for a lower benefit level was not reflected on the Benefit Issuance document.

Corrective Action:

As corrective action, the director contacted the family again to confirm if they wanted to continue to receive benefits or make the change originally requested. The update was made in the point-of-sale system. Please also submit to the State Agency the procedure to ensure benefit updates are made as required/requested.

When benefits are voluntarily decreased, the LEA must send a notice of adverse action that includes:

- Written confirmation of the action;
- An indication that the change was made at the request of the household; and
- An explanation of the household's right to continue receiving free or reduced price benefits, should the household choose to do so.

Submit a copy of the notice of adverse action to the State Agency as corrective action.

Technical Assistance:

If any change (such as a household's voluntary request to withdraw) is made after the initial approval of eligibility for free or reduced-price benefits during the current school year, the determining officials must indicate the change on the application. The determining official will use the same method used to record initial eligibility determinations, which includes:

- Noting the change;
- Recording the date of the change; and
- Implementing the change by updating rosters or other methods used at point-of-sale, if necessary.

Verification - St Susanna School (K094)

208. Documentation demonstrates a confirmation review was conducted and required procedures were followed

Finding 9037: Confirmation review not conducted as required.

Documentation demonstrating that a confirmation review took place was not on file at the SFA. Per the director, a second check (confirmation review) of the application selected for verification was completed by the principal; however, it was not documented.

Corrective Action:

Confirmation reviews must always be documented. The meal benefit application contains a section on the back to document

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all verification efforts, including the confirmation review. **As corrective action, complete the verification series training in Moodle. Submit training certificates to the State Agency as documentation. Additionally, please confirm how all confirmation reviews will be documented going forward.**

215. SFA completed verification by November 15

Finding 9048: Verification not completed by November 15.

For the current school year, the SFA did not complete its Verification process prior to November 15. The SFA did not have an extension approved by the State Agency, allowing the SFA to complete its Verification process by December 15.

Corrective Action:

As corrective action, complete the verification series training in Moodle. **Submit training certificates to the State Agency as documentation.**

Meal Counting & Claiming - St Susanna School (K094)

313. On-site observations validate Off-Site Assessment Tool responses to Meal Counting & Claiming questions and responses demonstrate compliance with FNS requirements

Finding 9000: Delinquent Fund and Bad Debt Policy

The local school meal charging policy does not address the collection of delinquent funds nor does it contain a policy for bad debt.

Corrective Action:

Policies regarding the collection of unpaid meal charges should be included in the written meal charge policy that is required of all SFAs participating in the Federal school meal programs no later than July 1, 2017 (see SP-46, Local Meal Charge Policies, July 8, 2016). It is up to the district to determine at what point the debt will be considered uncollectable and reclassified as bad debt. All districts are required to have a Bad Debt Policy. As corrective action, provide the State Agency with an updated meal charge policy that addresses the collection of delinquent funds and bad debt. Please utilize the following charge policy development checklists to ensure a comprehensive policy is developed:

<https://ospi.k12.wa.us/sites/default/files/2023-08/mealchargepolicychecklist.pdf>. Although this is WA guidance, it is all the USDA checklists put into one document.

It was also noted during the review that meal debt exists from inactive students. Please also review the inactive student meal debt and determine what is considered uncollectable versus uncollectable. The bad debt policy must be applied to uncollectable debt and a journal entry showing non-federal funds used to cover bad debt must be provided to the State Agency as corrective action. An updated policy has been submitted to the reviewer. **Additional response is not required.**

Technical Assistance:

Unpaid meal charges, like any other money owed to the NSFSA, are considered "delinquent debt" when payment is overdue, as defined by state or local policies. The debt is classified as delinquent as long as it is considered collectable and efforts are made to collect it. A debt owed to the NSFSA (i.e., an account receivable) is an asset. As such, the debt remains on the accounting documents until it is either collected or is determined to be uncollectable and written off. SFAs must make reasonable efforts to collect unpaid meal charges classified as delinquent debt and the cost of these efforts is an allowable use of NSFSA funds. A reasonable timeframe and methods for collecting unpaid meal charges must be established at the SFA level.

When local officials determine that further collection efforts for delinquent debt are useless or too costly, the debt must be reclassified as "bad debt." However, once a delinquent debt is reclassified as a bad debt, it is no longer considered an asset because it is, by definition, uncollectable. Therefore, bad debts must be written off as operating losses. However, while bad debt must be written off as an operating loss, this particular operating loss may not be absorbed by the NSFSA but must be restored using non-federal funds.

Section 200.426 of Subpart E states that "Bad debts... arising from uncollectable accounts and other claims, are unallowable.

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Related collection costs, and related legal costs, arising from such debts after they have been determined to be uncollectable are also unallowable." Therefore, NSFSA resources may not be used to cover costs related to the bad debt, such as continued legal and collection costs. Once delinquent meal charges are converted to bad debt, records relating to those charges must be maintained in accordance with the record retention requirements in 7 CFR 210.9(b)(17) and 7 CFR 210.15(b).

313. On-site observations validate Off-Site Assessment Tool responses to Meal Counting & Claiming questions and responses demonstrate compliance with FNS requirements

Finding 10153: Edit Checks

Edit checks were not conducted and/or documented.

Corrective Action:

As corrective action, an edit check for January has been completed and submitted. Going forward, edit checks must be completed each month prior to submitting each claim for reimbursement. **Additional response is not required.**

Technical Assistance:

Edit check resources can be found under the recordkeeping section of the following website:
<https://www.in.gov/doe/nutrition/national-school-lunch-program/>.

Resource Management - St Susanna School (K094)

712. SFA charged indirect costs to non-profit school food service account?

Finding 9000: Indirect Costs

As of the day of the onsite review, it was noted that the indirect cost payment, as reported in CNPweb, was not deducted from the school foodservice account. This is now outside of the 90-day window to charge indirect costs to the non-profit school foodservice account.

Corrective Action:

If the corporation chooses to recover the indirect expenses incurred in the operation of the foodservice programs, this should be reported only after the transfer of funds is actually made and within 90 days from the end of the school year in which the cost incurred. **As corrective action, the SFA has updated the annual financial report to reflect that indirect costs were not assessed. Additionally, please submit a procedure for assessing any future indirect costs, including the formula used, as well as the timeline for assessing and performing the transfer of funds.**

Technical Assistance:

This information is found within the annual financial report instructions. AFR Instructions can be found at the following link:
https://docs.google.com/document/d/1V7E6nj-P8cYxPYUTF4_0DSVJPBg-49njyeRiEO7eLvw/edit.

Resource Management Comprehensive Review - St Susanna School (K094)

765. Adult Meals

Finding 9000: Process for Covering Adult Meal Cost

Certain non-foodservice staff receive meals at no cost. A procedure has not been established to ensure non-federal funds are correctly transferred to the non-profit school foodservice account to cover the cost of these meals.

Corrective Action:

As a corrective action, submit to the State Agency a procedure for accurately tracking adult meals served at no cost and for covering the cost of meals served to the non-foodservice staff at no charge, including the frequency in which funds will be transferred. Additionally, for the current school year, calculate the amount of meals served at no cost for the non-foodservice staff, determine the value of unpaid meals using the current adult meal price, and restore the value to the non-profit food service account using non-federal funds. Supporting documentation for these actions must be submitted to the State Agency.

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

Finding 10141: Assessment of Non-Program Foods Revenue/Cost Ratio

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. As corrective action, the SFA must complete the 5-day reference period using the non-program food revenue tool. The director has submitted a completed non-program food revenue tool. The sponsor is reminded the tool must be completed annually. **Additional response is not required.**

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 - St Susanna School (K094)

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

Finding 10140: Wellness Policy Review and Update

The following findings were noted regarding the review and update of the local school wellness policy: The review and update of the local school wellness policy did not occur as required.

Corrective Action:

For corrective action, the following must occur:

- LEAs must conduct an assessment of the wellness policy every three years, at a minimum. This assessment will determine compliance with the wellness policy, how the wellness policy compares to model wellness policies, and progress made in attaining the goals of the wellness policy. The local school wellness policy must be reviewed and updated by the wellness committee. A copy of the assessment must be submitted to the State Agency.
- Provide proof that the results of the most recent assessment have been communicated to the public, including progress toward meeting the goals of the policy.

Technical Assistance:

Wellness policy resources can be found at the following website: <https://www.in.gov/doe/nutrition/wellness-policies/>.

1110. *On-site observations validate Off-Site Assessment Tool responses to Smart Snacks questions and responses demonstrate compliance with FNS requirements*

Finding 9010: Smart Snacks information on the Off-site Assessment Tool not validated, or deficiencies found.

Smart snacks compliance was not determined for extra meal items sold a la carte (i.e., breadstick).

Corrective Action:

As corrective action, the resources below will be reviewed to help gain a better understanding of the Smart Snacks requirements. Additionally, the director has calculated smart snacks compliance for the breadstick and determined it does not meet. Going forward, the breadstick will only be sold with the entrée as planned. **Additional response is not required.**

Technical Assistance:

A Guide to Smart Snacks in Schools: <https://www.fns.usda.gov/sites/default/files/resource-files/smartsnacks.pdf>
Indiana's Fundraisers Rule: <https://drive.google.com/file/d/1ilvFWWYSXCbl2xXU-hfv1Fyz-44G3b2l/view?usp=sharing>
Nutrition Standards for All Foods Sold in Schools: https://fns-prod.azureedge.us/sites/default/files/resource-files/allfoods_summarychart.pdf

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

Finding 10114: Non-foodservice staff conducting duties related to food service had not been trained annually

At the time of the review, there were non-food service employees conducting duties related to program requirements who had not been trained. The IT person in charge of benefit issuance has not completed training on job duties related to the program.

Corrective Action:

Annual training for all staff with food service responsibilities is a program requirement. **As corrective action, provide written procedures outlining training requirements to ensure this requirement will be met. For the employees identified as needing training during the review, provide proof of training, such as certificates or an agenda of topics covered with attendees' names and signatures.**

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

Finding 9009: SFSP Outreach

Summer Food Service Program (SFSP) outreach to households was conducted but not documented 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. All outreach efforts must be documented each year. The State Agency provides language through the Weekly Newsletter in early May for sponsors to use to meet this requirement.

Corrective Action:

The SFA agrees to conduct and document outreach at the end of each school year. The State Agency SFSP website is updated towards the end of May each school year with a link to a map of SFSP open sites. **As corrective action, the End of School Year Reminders and Updates Moodle Training must be completed. The training certificate must be provided to the State Agency as proof of corrective action.**

Technical Assistance:

USDA Policy Memo SP 07-2014, SFSP 07-2014 Expanding Awareness and Access to Summer Meals can be read at the following link: https://fns-prod.azureedge.us/sites/default/files/resource-files/SP07_SFSP07-2014os.pdf.

SNP Administrative Review Findings

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Program Year 2024

Saint Susanna School (B300)

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Food Service Contact

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Month of Review: December 2023

Date of Onsite Review: January 9, 2024

Meal Components & Quantities - Saint Susanna School (B300)

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 Day of Review not allowable.

Milk substitutions made on the Day of Review were not allowable per 7CFR 210.10. Students were provided with water per parent request.

Corrective Action:

A milk substitute request can come from a parent or guardian, but the substitute must be nutritionally equivalent to milk. If the requested substitute is not nutritionally equivalent, and therefore outside of the meal pattern, the request must come in the form of a medical statement from a medical professional with prescriptive authority. The SFA will accommodate all special dietary needs regarding milk substitution correctly going forward. **As corrective action, the director must complete the special dietary needs training in Moodle to ensure requirements are understood. Submit the training certificate to the State Agency as documentation that the training has been completed.**

Technical Assistance:

All special dietary needs are now recognized as a disability and therefore, must be accommodated.

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

Finding 9076: Planned menus served during review month do not meet portion size/quantity requirements.

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. The following issues were noted:

- Weekly grain requirements for the breakfast meal pattern were not met as some items served multiple days credited as a single grain serving (pop tart, cereal).
- Vegetable portion size for the lunch meal pattern for one day was insufficient.

Corrective Action:

For breakfast, the weekly grain requirement is 8 servings, which means an item crediting as a single grain can only be planned a maximum of two days per week. The SFA must plan an additional meat/meat alternate or grain serving with the items mentioned above or ensure single grain items are only planned two days per week.

For lunch, please remember that leafy greens count as half the volume served. To credit as 3/4 cup of vegetable, a 1.5 cup serving of romaine lettuce must be served.

As corrective action, please submit updated breakfast and lunch menus, including completed production records for five days demonstrating the corrected menu and portion sizes have been served. Also, submit an updated side salad recipe with the correct portion size.

Technical Assistance:

The school was provided technical assistance during the on-site visit. The menu planner is reminded to plan menus that meet all components in both the daily and weekly serving sizes. Meals served with insufficient portion size or insufficient quantities of meal components are incomplete and are not reimbursable.