

SNP Administrative Review Findings

Vincennes Catholic School (K122)

Program Year 2023

Vincennes Catholic School (K122)

800 Vigo Street
Vincennes, IN 47591-2834

Food Service Contact

Ms. Kacey Barmes
Food Service Director
(812) 882-5460
kbarmes@evdio.org

Executive Contact

Mrs. Samantha McClure
Principal
(812) 882-5460
smcclure@evdio.org

No. of Sites / Reviewed: 2 / 1
Month of Review: November 2022

Commendations

- * A nice variety of fresh vegetables were available on the day of review.

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 - Vincennes Catholic School (K122)

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

Finding 9000: 30-Day Carryover

Children who receive free or reduced meal benefits during the previous school year are eligible for free or reduced meals up to 30 operating days into the next school year. The carryover begins on the first operating day of school until a new eligibility determination is made or until the 30-day carryover expires, whichever comes first. The SFA lists the carryover expiration date as October 1 in the free and reduced software beyond the 30th operating day.

Corrective Action:

For corrective action, please explain how the carryover date will be determined and loaded into the software system.

126. *Certification: selected applications correctly approved*

Finding 9901: Selected applications correctly approved

One application was certified utilizing incomplete information- missing the last four digits of SSN or box checked for no SSN.

Corrective Action:

During the onsite review, the food service director contacted the household to correct the application. Therefore, additional corrective action is not required.

131. *Applications denied correctly*

Finding 9022: Applications incorrectly denied

One application was processed with adults and enrolled students in the SFA. However, the additional children listed on the application not enrolled in SFA were not included in the total number of household members resulting in the application being incorrectly denied.

Corrective Action:

The food service director immediately extended the benefit. Additionally, a notification letter was mailed to the household explaining the change of benefit found during the review. The SFA credited the student account for the overpayment. The reviewer validated the documentation of the benefit change in the software during the onsite follow-up on February 17, 2023. 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

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). Direct certification Medicaid-reduced was correctly identified but issued as free benefits for seven students. Additionally, during the follow-up review site visit on February 17, 2023, the reviewer validated that the benefits had not been updated per the adverse action notification sent to households in December 2022.

SNP Administrative Review Findings**Vincennes Catholic School (K122)****Program Year 2023****Corrective Action:**

For corrective action, please submit documentation of benefit changes. Since the changes were not made per the adverse action notification, claims for reimbursement starting January 2023 will need to be adjusted from free to reduced using the identified student's transaction history. In addition, all meal adjustments beginning January 2023 for the identified students will need to be paid for using non-federal dollars and not collected from households. Please submit documentation to support the claim and outside funds for lunch meals.

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

Finding 9000: Direct Certification Extensions

Direct certification benefits were extended to non-household members for three students. DC can only be extended to other household members in the case of DC SNAP, TANF, and Medicaid. Additionally, the food service director approved several students on the DC website without confirming it was the correct student information.

Corrective Action:

During the onsite review, the CNPweb DC website was updated to deny originally approved matches that were incorrectly extended. Additionally, a notification of adverse action was mailed to the households explaining the change of benefit found during the review. The reviewer validated the documentation of the benefit change in the software during the onsite follow-up on February 17, 2023.

For corrective action, Direct Certification training needs to be completed in Moodle. Please submit documentation of completed training.

Verification - Vincennes Catholic School (K122)

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.

Corrective Action:

Once the verification sample has been selected, it must undergo a confirmation review by someone at the LEA other than the determining official. This person is considered the confirming official. The confirming official reviews the applications selected for verification to ensure the initial determination of benefits is accurate. For corrective action, please explain how the confirmation will be completed, including who will be responsible for this portion of the process moving forward.

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, the post-verification determination was incorrect for one or more applications.

- One application was calculated from the net income reported on the application rather than gross income confirmed by income statements.
- One application provided annual tax documentation rather than weekly income statements corresponding with the reported income on the application.

Corrective Action:

An adverse action notification was mailed to the households explaining the change of benefit found during the review. The reviewer validated the documentation of the benefit change in the software during the onsite follow-up on February 17, 2023. For corrective action, the SFA must contact the household that submitted annual tax documentation to receive income statements supporting the reported income. Once the documentation is received, the SFA should send a results letter and make any necessary changes to the verification summary report. Additionally, all follow-up information should be provided to the reviewer.

Technical Assistance:

A helpful resource for Verification How-to can be found here: https://docs.google.com/document/d/1k2SleVd6qN9NNMT-hBbRQtLIED2TkirtEN5nvrF_bOM/edit

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211. SFA's verification notification letter included all the required information

Finding 9044: Verification notification letter does not contain all the required information.

The SFA's verification notification letter does not include a date to return documents to confirm eligibility. Additionally, the letter doesn't explain that failure to respond will result in the termination of benefits.

Corrective Action:

The food service director will load the State Agency template into the software to ensure all required fields are met for the letter. Therefore, additional corrective action is not required.

Resource Management Comprehensive Review - Vincennes Catholic School (K122)

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

Finding 9000: Assessment of Non-Program 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. For corrective action, the SFA must complete the 5-day reference period using the non-program food revenue tool. Please submit the non-program revenue tool with documentation to support the figures used.

Technical Assistance:

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

General Program Compliance - Vincennes Catholic School (K122)

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

Technical Assistance- Racial/Ethnic Data Categories

After a review of the racial/ethnic categories, it was determined the sponsor needs to add the unknown option for the ethnic section to align with the requirements for FNS 113.1. The school collects the R/E data during enrollment. However, the categories used for DOE state reporting differ from those required for USDA FNS requirements. If the data collection is unable to be aligned, an option would be to have food services have their own collection based on USDA requirements.

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

Finding 9000: Nutritional Guidelines for all Food and Beverages Sold

After a review of the local school wellness policy, it was determined the language is outdated for the nutritional guidelines for all food and beverages sold relating to High Schools 9-12. The current policy states that at least 50% of all foods and beverages sold outside the reimbursable school meal programs during the school day will meet the nutritional guidelines. All items sold during the school day must meet the dietary guidelines for smart snacks unless a fundraising exemption is used. Additionally, the link for Smarter Lunchroom techniques is broken.

Corrective Action:

Please provide a written timeline for the wellness policy update for corrective action.

Technical Assistance:

The finding and requirements were discussed with the principal and food service director.

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

Finding 9000: Professional Standards Tracking

At the time of the review, the tracking for Professional Standards was not completed.

Corrective Action:

For corrective action, please submit tracking of professional standards for all food service employees with supporting documentation.

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Program Year 2023**Vincennes Catholic School (K122)**

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

The SFA did not conduct summer Food Service Program (SFSP) outreach to households. 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. The SFA will also retain all outreach. Therefore, additional corrective action is not required.

Technical Assistance:

Technical assistance was provided to address discrepancies or deficiencies in the SFA's SFSP & SBP Outreach procedures.

SNP Administrative Review Findings**Vincennes Catholic School (K122)****Program Year 2023****Rivet Jr.-Sr. High School (B560)**

800 Vigo Street
Vincennes, IN 47591-2834

Food Service Contact

Ms. Kacey L Barmes
Food Service Director
(812) 882-5460

Month of Review: November 2022

Date of Onsite Review: December 20, 2022

Meal Components & Quantities - Rivet Jr.-Sr. High School (B560)

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. Water is being substituted for students in place of the milk component without proper documentation from someone with prescriptive authority.

Corrective Action:

During the onsite review, the reviewer provided technical assistance regarding milk substitutions with the food service director. For corrective action, please provide an invoice showing an approved milk substitution has been ordered or provide updated medical documentation from someone with prescriptive authority explaining water should be in place of milk.

Technical Assistance:

At a minimum, schools must notify parents and guardians of the process for requesting meal modifications to accommodate a child's disability, how they will be notified of a decision, and their procedural rights. Back-to-school registration events are a great time to make parents aware of this process and to make the medical statement forms available or, if a student has a medical form on file, to check with the family that the child's medical needs remain the same.

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

Finding 9077: The school did not comply with the planned menu for the Review Period

One week of planned menus from the Review Period was compared to production records for the same week. The school substituted some items on the planned menus. While substitutions are allowed, the daily meal pattern minimums and maximums for each meal service line, menu type, and age/grade group were not met for one or more of the substituted menus. Meals not meeting meal pattern requirements due to menu substitutions:

- Vegetable subgroups are not being met when there are substitutions. The SFA is serving the correct daily minimum portion size. However, they are not double-checking that the substituted vegetable fits into the planned subgroup or amending the rest of the planned week.
- Red/Orange vegetable was substituted for a starchy vegetable and not updated the rest of the week.
- Raisins were substituted for mixed fruit. The mixed fruit was planned for 1 cup, but only a 1/2 c creditable portion was provided when raisins were substituted in place of mixed fruit.

Corrective Action:

The reviewer provided the food service director with onsite technical assistance regarding menu planning, grade group requirements, and crediting. As a result, the food service director implemented the following menu pattern changes:

- The FSD provided the vegetable subgroup chart to the head cook. It was implemented that whenever a vegetable needs to be subbed, the head cook must find a sub within the originally planned subgroup.
- The FSD discussed the crediting difference between fresh, canned, and dried fruit. An additional serving will be provided whenever dried fruit is offered if only one fruit item is planned.

The menu planner must complete the Crediting Series training online in Moodle for corrective action. In addition, please submit the post-test and training certificate completion.

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501. Cafeteria staff have been trained on OVS

Finding 9079: Cafeteria staff have not been adequately trained on requirements and implementation of Offer vs. Serve.

Corrective Action:

For corrective action, please provide documentation of the completed Offer Vs. Serve training with supporting documentation such as certificates or sign-in sheets.

Technical Assistance:

As a reminder, OvS should be reviewed annually.

General Program Compliance - Rivet Jr.-Sr. High School (B560)

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. *Repeat Finding

The SFA did not conduct an onsite review of the school's meal counting and claiming procedure prior to February 1 of the current Program Year.

Corrective Action:

For corrective action, please complete the site reviews at both locations and submit copies of the monitoring. Someone outside the day-to-day operation must complete the site reviews. In addition, please explain how site reviews will be conducted annually by February 1st.

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

Finding 9145: A copy of the written food safety plan was not available at the reviewed school.

During a follow-up site visit on February 17, 2023, the reviewer validated that a food safety plan was available at the school. However, the plan did not contain standard operating procedures.

Corrective Action:

For corrective action, please provide a list of detailed standard operating procedures added to the school's food safety plan.