

SNP Administrative Review Findings**Washington Community Schools (1405)****Program Year 2022****Washington Community Schools (1405)**

301 East South Street
Washington, IN 47501-3224

Food Service Contact

Mrs. Carrie Alford
Business Manager
(812) 254-5536
FSMC: Sodexo

Executive Contact

Dr. Daniel L Roach
Superintendent
(812) 254-5536

No. of Sites / Reviewed: 6 / 2
Month of Review: October 2021

Commendations

- * The food service staff did a great job organizing and preparing for the Administrative Review. In addition, they were available to learn throughout the process while the review was being conducted. This allowed the review to be completed quickly.

Technical Assistance

- * During the review, it was noted that the FSMC did not update the administrative fee, management fee, and equivalent meals for the new contract year that started July 1, 2021, resulting in the SFA being undercharged. While we will not make this a finding at the time, the State Agency would like to note that the school administration should be reviewing monthly itemized billing to ensure that all costs are allowable and correct. It is recommended that the school administration create a standard operating procedure to review all monthly itemized, detailed billing for accuracy. The FSMC and SFA should also determine approval procedures for FSMC travel and employee recognition programs.

General Program Compliance - Washington Community Schools (1405)

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

Technical Assistance- Local School Wellness Policy

As a reminder, the triennial assessment must be completed every 3 years, unless USDA grants a waiver. It is recommended that the assessment take place prior to the end of June 2022. Available resources to complete the assessment can be found at <https://www.in.gov/doe/nutrition/wellness-policies/>. Additionally, when assessing the LSWP, updating the language on the occurrence of wellness meetings throughout the year is suggested.

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

Technical Assistance- Program Outreach

The website has a spot dedicated to food services. This is an excellent way for public program outreach. However, the resources on the food services tab are not current. Therefore, it is recommended to update the following:

- CEP Free School Meals Program is from 2018- update this information annually.
- Meal prices are from 2019-20. All student's meal prices are \$0.00 this year with the SSO waiver. The adult meal prices should reflect the current price- update this information annually.
- The non-disclosure agreement- change to the nondiscrimination statement.
- This would be a great spot to link the wellness policy, updates, and who to contact to participate in developing and reviewing the wellness policy.

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North Elementary School (1129)

301 East South Street
Washington, IN 47501-3224

Food Service Contact

Mrs. Jackie C Mott
Cafeteria Manager
(812) 254-8363

Month of Review: October 2021

Date of Onsite Review: December 3, 2021

Other Federal Programs - North Elementary School (1129)

4. Validate snack counts – snacks properly counted and claimed

Finding 9000: Site-Based Claiming

The paperwork from the YMCA snack service is combined with North Elementary. The SFA did not receive the paperwork for the last day of service in October 2021 after submitting the claim to the State Agency. As a result, the reimbursement was underclaimed.

Corrective Action:

Claims for reimbursement can be submitted up to 60 days after the last day of the claim month. Supporting documentation should be reviewed and maintained when submitting a claim to the State Agency, including daily meal counts, productions records, menus, monthly consolidation reports, and vendor invoices. The SFA must review and approve the paperwork as an internal control prior to submitting a claim. Furthermore, CNPweb requires site-based claiming, so consolidation from 2 sites should not occur. However, the YMCA snack service on Fridays is consolidated with North Elementary.

For corrective action, please submit the following:

1. The YMCA site has been added to CNPweb. Please complete the site application for the YMCA and begin site-based claiming starting January 2022. Also, revise North Elementary's application if Friday is no longer a serving day for ASSP.
2. Develop a written procedure that explains how and who paperwork must be turned in after each service day. This procedure should be reviewed with the YMCA staff prior to implementation. As a reminder, claims should not be completed until all paperwork has been received. Please submit the updated procedure explaining the paperwork submission.

6. Day of review Menu, Meal Patterns, Production records.

Finding 9000: ASSP Meal Pattern

On the day of review, the snack service had planned two fruits (1 orange with a juice), which does not comply with the ASSP menu pattern. The meal pattern requires two items from different components to be provided.

Corrective Action:

Before the start of the service, the reviewer allowed the opportunity to add another component to the snack service. As a result, the site staff was able to add a 1oz—grain product to the snack service. Therefore, additional corrective action is not required.

Technical Assistance:

During the on-site visit, the reviewer provided technical assistance of fruits crediting in the SNP meal pattern. Not all fruits credit at 1/2 or 1 cup. Determining how fruit credits can be done by using the USDA Food Buying Guide, found here: <https://foodbuyingguide.fns.usda.gov/>. As a reminder, fruits and vegetables are the same component in the ASSP meal pattern.

General Program Compliance - North Elementary School (1129)

811. The USDA "And Justice for All" poster is displayed in a prominent location and visible to recipients of benefits

Finding 9101: "AJFA" Posting

The USDA "And Justice for All" poster was not displayed in a prominent location where it is visible to recipients of benefits on the day of review at the YMCA snack service.

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This poster should be prominently displayed in offices, schools, and other sites that administer USDA-assisted programs. Free posters are available from the Indiana Department of Education, Office of School and Community Nutrition Programs. Available resources can be found here: <https://www.in.gov/doe/nutrition/civil-rights-requirements/> to order these posters.

For corrective action, please confirm in writing the "And Justice for All" poster has been displayed in a prominent location at all snack services.

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Washington Community Schools (1405)

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Washington Jr.- Sr. High School (1125) Food Service Contact

301 East South Street
Washington, IN 47501-3224

Mrs. Brittany Burns
Cafeteria Manager
(812) 254-3860

Month of Review: October 2021

Date of Onsite Review: November 30, 2021

Meal Counting & Claiming - Washington Jr.- Sr. High School (1125)

325. Review Period- meal counts by category were correctly used in the claim for reimbursement

Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.

The SFA's claim for the school for the Review Period does not match the State agency's validated meal counts by category for the school for the Review Period.

- The FSMC was not using the edit check report from the POS for the JR/SR high school. Instead, the staff created an excel tracking file to record daily sales activity. This tracking file included adult meals in the student meals section.
- After the SFA pulled the edit check report, adult meals were included in the student reimbursable meal total.

The problem is considered systemic because the contributing factors are built into the process and would likely recur if not changed.

Corrective Action:

Meals provided to adults are not reimbursable and cannot be claimed as such. This includes meals provided to teachers, even if meals are served and eaten in classrooms. Point of sale systems should be reviewed to confirm that only meals served to students are recorded as reimbursable meals. Adult and a la carte sales should always be recorded separately and never claimed for reimbursement.

For corrective action, please complete the following:

1. The SFA should work with the software company to check the buttons setups for student and adult meals to ensure that meals are being recorded in the appropriate sections. Please explain all updates made to the point of sale set up for claiming compliance in writing.
2. Once the POS has been updated, the monthly edit checks for 2021-22 should be completed. Then, all claims should be revised to claim student meals only. As a reminder, any upward claims can be completed within 60 days of the claim month, but downward claims can be completed anytime. Any claims submitted where it is known that adult meals were claimed for reimbursement should be reviewed and revised.
3. Please submit updated edit checks for PY 21-22.

Meal Components & Quantities - Washington Jr.- Sr. High School (1125)

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

Finding 9000: Offer vs. Serve

During the on-site review, it was determined that the breakfast service was not OvS, but the lunch service is OvS. While this is allowable, the areas not implemented correctly for these serving methods are listed below.

Breakfast

- Although OvS is not the serving method, the cashiers do not require the students to take milk. Meals were disallowed after the reviewer explained that all components are needed to be taken when not implementing OvS.

Lunch

- It was observed that one cashier does not understand what is required for OvS. The cashier required students to take fruit when not needed, did not count potatoes as a vegetable, and looked at the tray to count only three or more items, regardless of whether they made a meal.

Corrective Action:

After discussion with the site staff, the FSD decided that the school will implement OvS for breakfast and lunch starting January 1, 2022. In the meantime, the FSD will be completing OvS training for breakfast and lunch with staff. In addition, the

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FSD will address how to identify larger portions and entrees and how to charge them as ala carte.

For corrective action, please submit the training sign-in sheets and certificates of OvS training. Additionally, please ensure that the site applications in CNPweb are updated to reflect OvS for the meal services.

Technical Assistance:

It was observed that larger portions of potato wedges and entrees (sometimes two) were being served but not charged as ala carte. The larger portions were not part of the planned menu; therefore, they should be charged to the students as an ala carte serving. The reviewer provided on-site technical assistance with the FSD on weights vs. measures for M/MA, fruits, and vegetables. The FSD weighed the portion of potato wedges to show how it measures for a 1/2 cup serving and demonstrated this to the site staff.

402. Day of Review- the minimum daily quantity requirements are met for the age/grade group being served

Finding 9052: Day of Review portion sizes insufficient.

As observed on the Day of Review, the portion sizes of meal components from the planned menu and served on the day of review did not meet the minimum meal pattern requirements for the age/grade group(s) being served. Meals that contain insufficient quantities of meal components are incomplete and are not reimbursable. Insufficient portion sizes observed on the Day of Review:

- The breakfast planned menu for the day was 1/2 cup applesauce which is insufficient by 1/2 cup.

Corrective Action:

The manager added 4 oz—juice with breakfast during the on-site review. Therefore, an additional response is not required.

Technical Assistance:

The school was advised and given the opportunity to correct the insufficient quantity of 1 meal component before the meal service started.

406. Day of Review- the meal service is structured to comply with the required age/grade group meal pattern requirements when multiple menus and/or age/grade groups are served

Finding 9058: Age/grade group meal pattern requirements not being met for multiple menus and/or multiple age/grade groups served.

As observed on the Day of Review, when the school is serving multiple menus and/or age/grade groups, it has not structured the meal service to meet the specific meal pattern requirements for the lunch menu grade groups being served.

Corrective Action:

The food service director has contacted the FSMC menu planning team to load the 6-8 grade grouping menus into Primero Edge. The food service director will begin implementing the 6-8, 9-12 grade groupings starting January 2022 for lunch. Therefore, additional corrective action is not required.

Technical Assistance:

Additional technical assistance was provided on-site for food quality focusing on batch cooking. The reviewer observed sandwiches being cooked and wrapped 2.5 hours before serving. The Food Service Director visited the school to determine whether this regular practice was introduced during COVID to help get items throughout the day. The FSD helped the manager rework the daily schedule to allow batch cooking to increase food quality.

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.

Planned menus for breakfast and lunch were reviewed for one week in the month of review. The meal pattern is broken into different requirements for lunch by the grade groupings. The report indicated that grades 9-12 were insufficient for daily and weekly compliance in some components. Meals served with insufficient portion size, or insufficient quantities of meal components are incomplete and are not reimbursable.

Lunch 9-12

- Vegetables
 - Insufficient weekly compliance for Red/Orange vegetable subgroup on the homestyle lines

Breakfast K-12

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- The USDA meal pattern allows for an overlap of 6-12 grades during breakfast.
 - The planned meal pattern did not include a full 1 cup serving of fruit. Instead, 1/2 cup was planned and offered. This resulted in being insufficient for the day and week fruit SBP requirements. Additionally, the menu plan offered 56% of the fruit component for the week to be in the form of juice, which is not allowable.

Corrective Action:

The reviewer provided on-site technical assistance with the food service director regarding menu planning, grade group requirements, determining whole grain products, and crediting. As a result, the food service director implemented the following menu pattern changes:

- To increase the red/orange vegetable subgroup, the food service director has changed menus so that two vegetables need to be served daily in the homestyle lines instead of one. This will allow for more variety throughout the week and increase portions of all the subgroups. The FSD also printed out the meal pattern for the site manager to have on hand in case of changes to the core menu plan.
- To increase the fruit serving at breakfast, the FSD required that two fruits be offered daily, such as bananas and juice.

Please explain any additional changes to the menu plans made to other menu cycles for corrective action. Since the manager at the site is making changes to the menu plan, the manager will also be required to complete the Crediting Series training located online in inTEAM. In addition, please submit the post-test and training certificate completion.

General Program Compliance - Washington Jr.- Sr. High School (1125)

1409. *On-site or off-site storage violations were observed*

Finding 9000: Storage Violations

On the day of review, some storage violations were observed:

- Food was directly stored under ice build-up on pipes, leading to debris contaminating food.
- Milk was stored directly on the floor.

Corrective Action:

Proper food safety handling procedures must occur. The staff corrected the milk stored directly on the floor during the on-site review. It was noted that this does not usually happen, but the storage area had a more significant inventory level to a large shipment of breakfast items and catering supplies. Additionally, it was determined that ice had been an issue with employee slips, trips, and falls. During winter break, a service was scheduled to fix the problem causing the build-up. Therefore, if this maintenance took place as planned, additional corrective is not required.