Commendations

* The SFA was very prepared for the administrative review. Many of the required documents were submitted to the State Agency weeks before the on-site review.

Certification and Benefit Issuance - Carroll Consolidated School Corp (0750)

127. Correct income eligibility guidelines used to certify applications

**Finding 9000: Foster Students**
When a household completes an income application and certifies that a child in their household is a foster child, the SFA must certify the child is indeed a ward of the state. This is accomplished through referencing the STN Direct Certification website or by contacting the school corporation's liaison to verify the student is, in fact, a ward of the state. Without proper documentation, a student cannot be considered foster and awarded the eligibility of free. One student was found to be inaccurately determined foster. This student will be given the proper transition period and moved to reduced status.

**Corrective Action:**
The SFA has contacted their corporation liaison regarding foster students and now possesses proof that all students determined to be foster are correct. The SFA will send a letter to the household with the student that was previously listed as foster, notifying them of the decrease in eligibility. The other household members were determined to be reduced due to qualifying income. This student will now be reduced. The SFA will submit the letter sent to the household as corrective action.

129. Household notification of eligibility is consistent with Off-Site Assessment responses

**Finding 9902: Household notification of eligibility not compliant with regulations**
The notification of eligibility sent to households did contain the required information. The notification letter sent to households informing them of eligibility must include the right to refuse benefits language.

**Corrective Action:**
The SFA will update their point of sale, auto-generated letter, which notifies directly certified students of their benefit, to include right to refuse benefits language. The SFA will submit the updated letter to the State Agency as corrective action.

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 (i.e. the POS system). The SFA has one system for the cafeteria and a separate system for the school (Mosaic and Harmony). These systems are not working together to always transfer the correct benefit for all students. Five students were certified as free but were receiving reduced meals due to the benefit being transferred incorrectly.

**Corrective Action:**
The SFA will contact both software companies to resolve the issue. If no solution can be reached, the SFA will need to check that each student's eligibility benefit was correctly transferred to the point of sale system. The SFA will also send a letter to each identified household informing them of their change in benefit. The SFA will submit the letters the State Agency as corrective action.
212. SFA met follow-up requirements if the household failed to respond to the verification request

Finding 9000: Follow-up Requirements for Verification
Following the verification process, households that do not respond must be sent a letter notifying them of the verification outcome and given 10 calendar days before being benefits are decreased to paid status in the point of sale system. The SFA sent a letter to each non-responding household but the letter contained no mailing date and no date the student(s) would be changed to paid status.

Corrective Action:
The SFA will correct the auto-generated verification letter in their point of sale system to reflect the necessary changes. They will submit the updated letter as corrective action.

215. SFA completed verification by November 15

Finding 9048: Verification not completed by November 15.
For school year 2019-2020, the SFA did not complete its Verification process prior to November 15. The SFA did not have an extension approved by the SA, allowing the SFA to complete its Verification process by December 15.

Corrective Action:
The SFA will describe how they will ensure the verification process will be completed on time for school year 2020-2021. They will submit this to the State Agency as corrective action.

Meal Counting & Claiming - Carroll Consolidated School Corp (0750)
313. On-site observations validate Off-Site Assessment Tool responses to Meal Counting & Claiming questions and responses demonstrate compliance with FNS requirements

Technical Assistance:
A la carte prices should be increased. Currently, it is cheaper to purchase foods a la carte than to purchase a reimbursable meal.

316. Meal counts for all schools for the review period were correctly consolidated and claimed by the SFA

Finding 9000: Charge Policy
The school is not following the board-approved charge policy. The amount of negative balances continues to climb monthly as students are not denied a meal and are able to continuously charge. If the school allows this practice, they must have a plan in place to ensure meals will be paid for in a timely manner.

Corrective Action:
The school corporation must develop an action plan that describes how unpaid meal charge balances will be paid using non-federal funds. They will submit this action plan to the State Agency.

General Program Compliance - Carroll Consolidated School Corp (0750)
1007. On-site observations validate Off-Site Assessment Tool responses to Local School Wellness Policy questions and responses demonstrate compliance with FNS requirements

Finding 9011: Local School Wellness Policy information on the Off-site Assessment Tool not validated, or deficiencies found.
Some of the information gathered on the Off-site Assessment Tool regarding the SFA's Local School Wellness Policy could not be validated during on-site observations. Discrepancies or deficiencies found on-site - lacking goals in the areas of: nutrition education, nutrition promotion, physical activity, and other activities.

Corrective Action:
Corrective action required to address discrepancies or deficiencies in the SFA's Local School Wellness Policy identified from the Off-site Assessment Tool - the SFA will meet with the wellness committee and develop two measurable goals for each of
the following areas: nutrition education, nutrition promotion, physical activity, and other activities. As corrective action, the SFA will submit a timeline that describes when the goals will be developed and approved by the board.
SNP Administrative Review Findings

Program Year 2020

Carroll Consolidated School Corp (0750)

Carroll Elementary School (0629)
2362 E State Road 18
Flora, IN 46929-1367

Month of Review: December 2019
Date of Onsite Review: January 28, 2020

Food Service Contact
Mrs. Ellen Sipes
Food Service Director
(574) 967-5113

Meal Counting & Claiming - Carroll Elementary School (0629)

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

Technical Assistance:
The corporation is currently offering universal free breakfast to all elementary students. The SFA should maintain financial estimates on the cost of this service to ensure this can continue to be offered in the coming year(s).

Meal Components & Quantities - Carroll Elementary School (0629)

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

Finding 9000: Breakfast in the Classroom
During Breakfast in the Classroom meal observation, it was noted some meals counted by teachers as a reimbursable meal did not contain the required items to be allowed to be claimed as a reimbursable meal. One student took only a 1/2c juice, and many students did not take at least 1/2c fruit. The kitchen manager took down an exact count of students and which classroom they were in and has adjusted the meal count to reflect only those full reimbursable meals to be claimed on the day of review.

Corrective Action:
The SFA will monitor Breakfast in the Classroom for one week, and each day, selecting 2 classrooms to observe. They will use the Breakfast in the Classroom monitoring form found on the IDOE website: https://www.doe.in.gov/sites/default/files/nutrition/bic-monitoring-form.pdf. They will report their observations as corrective action. They will then use these observations to continue to train teachers on correctly identifying a reimbursable meal.

Technical Assistance:
As a double check to ensure each student received all items required for a reimbursable meal, the kitchen staff will count the number of fruit servings taken compared to the number of meals claimed for each class.

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

Technical Assistance:
For the daily salad entrée option, try offering a variety of meat/meat alternates to increase participation.

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

Technical Assistance:
The SFA is reminded that if they have more than one serving line, each serving line must include all required components of a reimbursable meal, including all vegetable sub-groups weekly.

General Program Compliance - Carroll Elementary School (0629)
Finding 9160: Foods and beverages sold to students not compliant with Smart Snacks standards.
On the day of review, students were observed entering the elementary staff lounge as school was being dismissed and purchasing beverages from the coke machine. While some beverages are smart snack compliant at the K-6 age group, carbonated full-calorie beverages are never allowed.

Corrective Action:
The administration has spoken with all teachers and students at the elementary school to ensure students will no longer enter the staff lounge for any reason. No further action required.

1407. SFA written food safety plan is implemented

Technical Assistance:
The elementary school offers unlimited fruits and vegetable. With each trip to the bar, a student should be supplied with a clean bowl or plate. A student should never reuse their original plate due to cross contamination.

1407. SFA written food safety plan is implemented

Finding 9000: Sanitation
Teachers and students were observed using the kitchen's ice machine to fill personal drinking cups throughout the day. By allowing this practice, the chance of contamination to all remaining ice in the machine is increased substantially. Only kitchen staff should have access to the ice machine to ensure all food safety rules are followed.

Corrective Action:
The SFA will develop new procedures on how they will remedy this situation. They will also include this new procedure in their food safety manual. A copy of the new procedure will be submitted as corrective action.

1411. Review of agricultural food components indicates violations of the Buy American provision

Finding 9000: Buy American
The SFA was found to have purchased produce from outside the United States. The SFA is reminded that during the winter months, it is necessary to plan seasonally-appropriate menus.

Corrective Action:
The SFA has adjusted their menu to include seasonally-appropriate items and plan to serve fresh melons in the fall months. No further action is required.