Commendations

* Onsite reviews were conducted thoroughly and on time.
* The SFA was organized and well prepared for the review despite the challenges that the COVID-19 has presented.

Resource Management Comprehensive Review - North Spencer County School Corp (7385)

**757. Allowable Costs Test**

**Finding 9118: Sample of expenses charged to nonprofit school foodservice account not reasonable and necessary.** The State agency reviewed a sample representing 10% of expenses for the most recently completed 2018-2019 program year, using the SFA’s detailed general ledger. The following recorded expenses did not represent an activity or function recognized as reasonable and necessary for the operations of the school food service programs: HHHS Book Rental for $458.48.

**Corrective Action:**
The SFA restored $458.48 to the nonprofit school foodservice account for the unallowable purchase of students' book rental fees. Additional response is not required.

**Technical Assistance:**
It is recommended that the SFA pays the student workers (in actual currency) and then students could use those funds to cover book rental fees. Federal and State laws regarding student workers should be reviewed and written policies put in place for any student workers.

General Program Compliance - North Spencer County School Corp (7385)

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

**Finding 9008: Civil Rights 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 Civil Rights procedures could not be validated during on-site observations. Discrepancies or deficiencies found on-site:

-Civil rights training that includes the school nutrition information is not provided to the cashiers. Anyone who has direct access to the students during meal service needs to complete the civil rights training, including cashiers.

**Corrective Action:**
Corrective action required to address discrepancies or deficiencies in the SFA's Civil Rights procedures identified from the Off-site Assessment Tool:

During the review, the food service director added all staff outside of school nutrition that helps with duties related to school nutrition to the program year 2021 training plan. All new hires will complete civil rights training as part of the onboarding for school nutrition as they are hired. Additional response is not required.

**Technical Assistance:**
This finding and requirements were discussed with the food service director.
Finding 9241: All advertising materials used to communicate the availability and location of free meals at area eligible sites did not contain the required non-discrimination statement.

Corrective Action:
The SFA will include the non-discrimination statement on all advertising materials used to communicate the availability and location of free meals at area eligible sites. Additional response is not required.

Technical Assistance:
The reviewer discussed with the food service director the requirements of including the non-discrimination statement on forms of communication. A USDA required non-discrimination statement must be included on ALL forms of communication and program materials related to receipt of free or reduced-price child nutrition program benefits, including all materials for public information, education, or distribution that mention USDA programs.
Finding 9075: Production records/supporting documentation indicate weekly meal pattern requirements for the age/grade group(s) not met.
Based on a review of production records and other supporting food crediting documentation for 1 week during the Review Period March 2-6, 2020, some meals served during the week reviewed did not meet the appropriate daily and weekly meal pattern requirements for the age/grade group(s) being served.

Corrective Action:
Prior to the start of school the food service director met with the kitchen managers to discuss back to school training agenda items. The food service director went over meal pattern requirements with the kitchen managers. The kitchen managers will also complete food production records to ensure that each item served is recorded and servings are in the correct number of served columns of student, ala carte and adults. Additional response is not required.

Technical Assistance:
The finding and requirements were discussed with the food service director.

Finding 9000: Food Production Records
Food production records are incomplete. The following data has not been recorded:
-Number of servings prepared
-Number of servings for students, ala carte and adults for each item
-The column of total purchase.

Corrective Action:
Food Production records provide a record that meal requirements were met for reimbursable meals, ensures that all menu items are served in the correct serving size, and enough food was prepared. For corrective action, the food service director and site staff are required to complete the Food Production Record course located in the blackboard inTEAM. Please submit the sign-in sheet for attendance and the certificate of completion.

Technical Assistance:
This finding and requirements were discussed with the food service director.

Finding 9000: Juice Allotment
Juice can count as no more than half the total fruit offered over the course of the week. Additional portions of juice must be sold a la carte. Although the menus were planned with only 1/2 cup of juice being offered daily, the cashiers allowed students to take two juices with the reimbursable meal.
SNP Administrative Review Findings

North Spencer County School Corp (7385)

**Program Year 2020**

**Corrective Action:**
Prior to the start of school, the food service director met with the kitchen managers to discuss back to school training agenda items. The director addressed that juice is planned as 1/2 cup of the fruit component and additional servings will be charged as ala carte. Additional response is not required.

**Technical Assistance:**
The finding and requirement was discussed with the food service director.

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501. *Cafeteria staff have been trained on OVS*

**Technical Assistance - Offer Vs. Serve**

**Technical Assistance:**
The reviewer and the food service director discussed offer vs. service training. A review of OVS should be completed annually with staff, and an in-depth OVS training should be complete with any new hires. This is to ensure that staff understand the many ways a student can create a reimbursable meal.

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### Dietary Specifications - Heritage Hills High School (7759)

603. Technical assistance and/or corrective action were found to be necessary upon completion of the off-site portion of the Dietary Specifications Assessment Tool

**Technical Assistance for Dietary Specifications and/or Nutrient Analysis.**

**Technical Assistance:**
After a review of the food production records, it was not clear if the different grade groupings for the meal pattern were met. While reviewing some of the items, it provided that both grade groupings are planned accordingly. It is suggested that the staff indicate the difference of the meal pattern between grade groupings on the production records, or complete a separate food production record for the grade groupings. By doing this, it will help clearly identify that the meal pattern plan is carried out per grade grouping.

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### General Program Compliance - Heritage Hills High School (7759)

1407. *SFA written food safety plan is implemented*

**Technical Assistance - Hair Restraint**

**Technical Assistance:**
The reviewer and food service director discussed hair restraints for the school nutrition employees. The IDOE has a hair restraint policy that must be followed even if the health department does not require hair restraints. Food service staff working with exposed food in the kitchen or on the serving line must wear a hair restraint such as a hat or hairnet.

https://www.doe.in.gov/sites/default/files/nutrition/hair-restraint_0.pdf

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### Other Federal Programs - Heritage Hills High School (7759)

1827. *Meal documentation for last five days of review period indicate required meal components available? Enter data.*
Technical Assistance - Food Production Record Documentation

**Technical Assistance:**
During the review of the food production records, it appeared that not all items served were recorded. It is vital that each item served is listed on the food production record. A food production record provides a record that reimbursable meal requirements such as correct serving sizes were met and documents that enough food was prepared.