



SNP Administrative Review Findings
Program Year 2025

Delphi Community School Corp (0755)

Delphi Community School Corp (0755)

501 Armory Road
Delphi, IN 46923-1908

Food Service Contact

Ms. Amanda Lazarus
Food Service Director
(765) 564-3481
lazarusa@delphi.k12.in.us

Executive Contact

Mrs. Lindsey Brown
Superintendent
(765) 564-2100
brownl@delphi.k12.in.us

No. of Sites / Reviewed: 4 / 1
Month of Review: March 2025

Commendations

- * Lunch observation at the reviewed school boasted an array of fresh, colorful vegetables. They were well displayed, and the students were able to select an assortment of their choice. Student consumption of fresh vegetables was wonderful. Hardly any waste was observed at the end of meal service.

Certification and Benefit Issuance - Delphi Community School Corp (0755)

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

Technical Assistance - Case number on income application

The SFA must ensure the most up-to-date guidance regarding case numbers on income applications is utilized. Reference the SNAP and TANF Fact Sheet on the IDOE website:

<https://docs.google.com/document/d/1q9R8PlqzyFkKCKBIEBkDDTBCwx7nmYhTdDn9fNwBV6s/edit?usp=sharing>.

126. Certification: selected applications correctly approved.

Finding 9901: Selected applications correctly approved

Multiple applications were certified incorrectly or were approved with falsified information. This contributed toward fiscal action calculations. Household income reported on the income application was changed by a school staff member to allow households to qualify for a free or reduced benefit.

Corrective Action:

The school was instructed by the State Agency to conduct verification on all documents where it was obvious that the income had been changed on the application. Benefit errors have been corrected, and households were sent written notifications of the change in eligibility.

As additional corrective action, complete and provide the following:

- a) Upload into the review tool copies of letters sent to households notifying of the benefit changes.
- b) Complete free and reduced application processing training in Moodle and submit the training certificate to the State Agency.

Please note: Fiscal action will be calculated to reflect corrected claims for reimbursement based on updated meal benefits once the state agency reviewer is able to validate the current claims for reimbursement. Additionally, the food service account cannot absorb the lost revenue from the meals served to students for free or reduced-price but should have paid or reduced-price for their meals. This loss of revenue must also be restored to the food service account from a non-federal fund. Proof of the restoration such as a fund transfer will be requested as part of the corrective action once the final fiscal action is calculated and provided in future correspondence. (See Finding 9000 #325)

Technical Assistance:

Errors were reviewed with the determining official the day of review. For any instance where information is changed on an income application, detailed notes must be retained including reason for changes, name of household member contacted, how they were contacted, the school official making the changes, etc. White-out should never be used on legal documents.



SNP Administrative Review Findings Program Year 2025

Delphi Community School Corp (0755)

128. Correct conversion factors used for applications with more than one income frequency

Finding 9019: Incorrect conversion factors used when processing applications

For applications indicating more than one income frequency, the SFA did not use the correct conversion factors to determine annual household income: weekly – times 52; bi-weekly – times 26; twice per month – 24; and monthly – times 12.

Corrective Action:

The SFA free and reduced contact and any staff responsible for processing meal benefits are required to complete Free and Reduced Application Processing training in Moodle. Submit the training certificate(s) as proof of completion.

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

Technical Assistance - Eligibility Date

The SFA must ensure all student eligibility dates are within the current school year. Eligibility must be determined annually each school year beginning July 1st or after to receive a free or reduced benefit for the school year.

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

Technical Assistance - Updates to the Benefit Issuance Document for Withdrawn Students

The SFA is reminded when pulling eligibility reports that withdrawn students should not be included.

Verification - Delphi Community School Corp (0755)

206. On-site observations validate Off-Site Assessment Tool responses to Verification questions and responses demonstrate compliance with FNS requirements? Does the Verification Summary Report accurately reflect the SFA's enrollment?

Technical Assistance - Verification documentation

The SFA is reminded to only complete the verification section of the income application if the household was selected for verification. Otherwise, the verification section of the income application can be left blank.

Resource Management Comprehensive Review - Delphi Community School Corp (0755)

750. Nonprofit School Food Service Account and Year End Available Balance

Finding 10187: Non-profit school foodservice account validation

The non-profit school foodservice account could not be validated as documentation was not provided.

Corrective Action:

As corrective action, documentation to validate the non-profit school foodservice account for program year 2024 must be provided to the state agency.

765. Adult Meals

Finding 9128: Meals served to adults are not priced sufficiently to cover the overall cost of the meals.

Breakfasts and lunches served to teachers, administrators, custodians and other adults are not priced so that the adult payment in combination with any per-meal revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the meals. The overall cost of adult meals must include the value of any USDA Foods (entitlement and bonus) used in the preparation of the meals.

Corrective Action:

The approved adult meal price reported in CNPWeb must be correctly transferred to the POS. The SFA must provide



SNP Administrative Review Findings

Delphi Community School Corp (0755)

Program Year 2025

proof that the approved adult meal price has been entered into the POS correctly and adults are charged accordingly.

Technical Assistance:

When the SFA completes the CNPWeb application for each new school year, the approved adult meal price is determined on the site information sheet. The SFA must review this information and ensure each school is charging adults according to their approved rate.

General Program Compliance - Delphi Community School Corp (0755)

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

Finding 9000: Eligibility Training

Training was not conducted before completing Direct Certification downloads or processing income applications. Numerous errors were found during a review of the benefit issuance procedures.

Corrective Action:

The staff assigned to determine meal benefits must complete Direct Certification training and Free and Reduced application processing training in Moodle. Training must be completed before processing any benefits for the 2025-2026 school year. Submit training certificates as corrective action.

Technical Assistance:

The SFA is reminded to complete eligibility training annually prior to conducting DC downloads or processing income applications.

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

Finding 10126: Professional Standards Training Requirements and Documentation

Training for all food service staff was not routinely conducted or tracked sufficiently. Documentation of training has been an annual requirement since the Professional Standards requirements since at least 2017. Several certificates of completion for the Food Service Director were provided, but no training records for the remaining food service staff were provided.

Corrective Action:

Annual training for all staff with food service responsibilities is a program requirement. As corrective action, provide a written procedure outlining how staff training will be conducted and documented moving forward to ensure this requirement will be met. For the employees identified as needing Civil Rights training during the review, provide proof of training such as certificates, or agenda of topics covered with attendee names and signatures.

Technical Assistance:

Any training completed should have a dated agenda, topics discussed, and staff signatures. If handouts are provided during the trainings, copies should be maintained with the training documentation. Required Professional Development Training Hours: <https://docs.google.com/document/d/1Ho8j7bMBtNtYwq14lNtakNMHpypSVN9ALp6iPsCTzk/edit?usp=sharing>. General Training Agenda Template: <https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:893568f0-3317-327d-b7f7-55ef5969d162>.

1403. Review of agricultural food components indicates violations of the Buy American provision

Technical Assistance- USDA Buy American Provision Updated Policy Guidance

USDA has recently updated guidance to program sponsors regarding Buy American requirements to become effective PY 2025-2026 school year.

For additional information, go here: <https://www.fns.usda.gov/cn/buy-american-provisions>.

To watch a recorded webinar on updates to the Buy American requirements, go here: <https://www.fns.usda.gov/cn/buy-american-provisions/webinar>.

To download a copy of the USDA Buy American tool, go here:

<https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Ffns-prod.azureedge.us%2Fsites%2Fdefault%2Ffiles%2Fresource-files%2FSP23-2024a.xlsx&wdOrigin=BROWSELINK>.



SNP Administrative Review Findings
Program Year 2025

Delphi Community School Corp (0755)

1500. Reports are submitted to the Indiana Department of Education as required

Finding 9151: SFA does not meet reporting deadlines to the State agency as required.

The Annual Financial Report was not submitted to IDOE on time.

Corrective Action:

Reporting requirements were discussed with and understood by Program administrators. As corrective action explain what strategies will be utilized to ensure reporting deadlines are met and the person(s) responsible for submitting the reports.

Technical Assistance:

IDOE's Calendar of Due Dates can be found at

https://docs.google.com/document/d/1gQejacWaNHaz_tozqZFehNz0p59JDFW21J9SHz5-BPE/edit. It is recommended that the SFA maintains an electronic calendar set up with due dates and reminders to ensure reporting requirements are met.



SNP Administrative Review Findings

Delphi Community School Corp (0755)

Program Year 2025

Delphi Community Elementary School (0641)

501 Armory Road
Delphi, IN 46923-1908

Food Service Contact

Ms. Amanda Lazarus
Food Service Director
(765) 564-3481

Month of Review: March 2025

Date of Onsite Review: April 17, 2025

Meal Counting & Claiming - Delphi Community Elementary School (0641)

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

Finding 9000: Claim Validation

Sponsor was unable to provide documentation to support the claim for reimbursement for the month of review. Reports provided did not show an accurate number of meals served based on the number of meals claimed.

Corrective Action:

The SFA will provide an accurate report of meals served for the month of review as corrective action. If meals are found to be claimed in error, fiscal action will be assessed.

Meal Components & Quantities - Delphi Community Elementary School (0641)

Technical Assistance - Ensuring sufficient serving sizes

To ensure the required serving size of each component is met, specifically when serving fresh vegetables, staff must use a measured serving utensil such as a spoodle. Foods should not be served with a glove-covered hand.

409. Review Period- all required meal components per weekly meal pattern requirements were offered and served to students

Finding 10133: Insufficient servings of Grains, Meat/Meat Alternate, Vegetables, Fruits, and or Milk were planned or served during the Menu Certification week

The NSLP and SBP meal pattern has requirements that must be met both daily and weekly for all components. During the review of planned NSLP and SBP menus for the menu certification week, the following insufficiencies were noted:

- the minimum weekly grain requirement was not met (breakfast and lunch).
- the minimum weekly vegetable subgroup requirement was not met (lunch).

Corrective Action:

As corrective action, provide revised menus showing the meal pattern is met for the daily and weekly requirements for each grade group being served. Additionally, complete the Meal Pattern training found on the Moodle website and provide the certificate as proof of completion.

Technical Assistance:

The IDOE Moodle website is found here: <https://moodle.doe.in.gov/>.

Meal pattern requirements can be found here: <https://www.in.gov/doe/nutrition/national-school-lunch-program/>.

409. Review Period- all required meal components per weekly meal pattern requirements were offered and served to students

Finding 10139: Production Records

The following issues were noted with production records: the portion size reported on the production record did not correspond accurately with the recorded crediting. Additionally, proper crediting documentation was not retained for all foods served during the week of review.

Corrective Action:

As corrective action, submit to the State Agency complete breakfast and lunch production records along with crediting documentation for one week from the reviewed site.



SNP Administrative Review Findings
Program Year 2025

Delphi Community School Corp (0755)

500. Day of Review- Offer vs. Serve was properly implemented

Finding 9078: School is not properly implementing Offer vs. Serve.

As observed on the Day of Review, kitchen staff and cashiers did not demonstrate a clear understanding of OVS and its requirements. Meals were counted as reimbursable under OVS when a meal was incomplete due to the meal containing less than the required number of items at breakfast. Eleven meals were disallowed on site and not claimed for reimbursement.

Corrective Action:

As corrective action, kitchen staff and cashiers must receive OVS training, including the daily enforcement of OVS requirements. Provide written documentation for the training, including the date, the agenda, and a sign-in sheet of attendees.

Technical Assistance:

The school was provided technical assistance during the on-site visit.

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.

Even though Offer vs. Serve is utilized, training on how to implement OVS correctly did not occur for the current program year.

Corrective Action:

Staff must be trained on OVS requirements. Training documentation must be submitted as corrective action, including documents used to train staff and sign-in sheet.

Technical Assistance:

The school was provided technical assistance during the on-site visit.

General Program Compliance - Delphi Community Elementary School (0641)

1408. Temperature logs are available

Finding 9000: Food Safety Violation

Staff did not check the temperature of pizza as it was batch cooked throughout meal service. Upon the State Agency request to check the temperature, the pizza was found to be undercooked.

Corrective Action:

Staff must receive food safety training to ensure they are aware of all the required final cooking temperatures for foods regularly prepared in their kitchen. The SFA will submit training documentation used to train staff and a staff sign-in sheet showing they have completed food safety training.

Technical Assistance:

Technical assistance was provided while on-site during meal observation. Staff were reminded of the difference between final cook temp and hot holding.