INDIANA DEPARTMENT *of* EDUCATION

Program Year 2025

Lutheran School Assn of Evansville (K282)
111 E. Virginia St.
Evansville, IN 47711-5431

Food Service Contact
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No. of Sites / Reviewed: 1 / 1
Month of Review: February 2025

Commendations

* The business administrator and food service staff were all eager to learn and asked questions during the review.

* All staff were friendly and accommodating during the review.

Certification and Benefit Issuance - Lutheran School Assn of Evansville (K282)

126. Certification: selected applications correctly approved. This serves as a reminder to the reviewer that FA must include the MOR and the Month of the on-site review.

Finding 9901: Selected applications correctly approved
Multiple applications were certified incorrectly or utilizing incomplete information. This contributed toward fiscal action calculations.

When households reported a case number on applications, the case numbers were not checked for accuracy according to the acceptable format. Three applications were approved for benefits based on incomplete information. SFAs must ensure the assistance program's case number is consistent with the format used by the assistance program. Indiana's SNAP case number format is 10 digits long, beginning with a 10 or a 60.

Further, in order to approve a student for free or reduced meals due to Medicaid, the student must be found in the CNPweb on either a Direct Certification results list or through Direct Certification Lookup.

Corrective Action:
During the review, school staff contacted the households for further information. Corrections have been made to certification errors and the households were sent a letter notifying of the change in eligibility. **As additional corrective action, complete application processing training in Moodle and submit the training certificate to the state agency.** IDOE Moodle https://moodle.doe.in.gov/.

Technical Assistance:
Errors were reviewed with the determining official on the day of review.

A guide to identifying a complete application is located at the following link - https://docs.google.com/document/d/1O-_4K9RvbHsU2unP3HyswH0T4cFkuSF_QvwmblM4jRA/edit?tab=t.0.

Direct Certification resources are located at the following links - https://docs.google.com/document/d/1GGzfSMFKyxjSO0qOx1OGE8JR6dNsMX5yuS_a3y0FLvg/edit?tab=t.0.

https://docs.google.com/document/d/1Cph-GHj0176qBSSps-cDxgrLh4f2RKOpoAMd-NP2pSc/edit?tab=t.0

134. Direct Certification matches were performed according to the required timeframes

Technical Assistance: Direct Certification Matches

As a reminder, SFAs must conduct direct certification a minimum of three times during the school year. Matching must occur at or around the beginning of the school year, three months after the beginning of the school year and six months after the beginning of the school year.

While the minimum is three times during the school year, SFAs are encouraged to conduct matching monthly as a best practice.

208. Documentation demonstrates a confirmation review was conducted and required procedures were followed

Technical Assistance - Confirmation Reviews

Documentation demonstrating that a confirmation review took place was not on file at the SFA. Technical assistance was provided onsite to ensure that a confirmation review takes place moving forward. The confirming official must be someone other than the original application processor(s). This step serves to ensure that the selected meal applications were approved correctly by the initial processor(s).

215. SFA completed verification by November 15

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

At the time of review, the SFA had not completed its Verification process. The process was started during the review.

Corrective Action:
For corrective action, the SFA must complete verification. To validate completed verification, submit documentation (applications, letters, household information submitted, etc.) to the State agency.

Technical Assistance:
Technical assistance was provided to the SFA during the onsite review. The difference between verification for cause and verification was discussed with the SFA. The verification process was explained and resources were provided. Guides and resources for the verification process are available at the following link - https://www.in.gov/doe/nutrition/free-and-reduced-information/verification-and-direct-verification/#Annual__Traditional__Verification.

313. On-site observations validate Off-Site Assessment Tool responses to Meal Counting & Claiming questions and responses demonstrate compliance with FNS requirements

Finding 10150: Delinquent Funds and Bad Debt Policy
The local school meal charging procedures do not address the collection of delinquent funds, nor does it have a policy for bad debt. Further, the meal charge procedures provided to households in the student handbook are not consistent with the procedures listed on the school website.

Corrective Action:
Policies regarding the collection of unpaid meal charges should be included in the written meal charge policy that is required of all SFAs participating in the Federal school meal programs no later than July 1, 2017 (see SP-46, Local Meal Charge Policies, July 8, 2016). It is up to the district to determine at what point the debt will be considered uncollectable and reclassified as bad debt. All districts are required to have a Bad Debt Policy.

For corrective action, complete the following:
  a) **Provide the State Agency an updated meal charge policy that addresses the collection of delinquent funds and a policy for bad debt. The policy must state that the non-profit school foodservice account will not absorb the loss and will be restored using non-federal funds.**
  b) **Update the student handbook and school website with the revised meal charge procedures. Submit documentation to the State agency demonstrating the updates.**

Technical Assistance:

Please utilize the following charge policy development checklists to ensure a comprehensive policy is developed: https://ospi.k12.wa.us/sites/default/files/2023-08/mealchargepolicychecklist.pdf.

Unpaid meal charges, like any other money owed to the NSFSA, are considered "delinquent debt" when payment is overdue, as defined by state or local policies. When local officials determine that further collection efforts for delinquent debt are useless

or too costly, the debt must be reclassified as "bad debt." Additional guidance for unpaid meal charges and clarification on collection of delinquent meal payments can be found here: https://www.fns.usda.gov/cn/unpaid-meal-charges-clarification-collection-delinquent-meal-payments.

Resource Management - Lutheran School Assn of Evansville (K282)

700. SFA accurately track all revenues and expenses, including Supply Chain Funds?

Finding 10123: Supply Chain Funds are not tracked/were not deposited into the food service account/were spent on unallowable items
The funds received through USDA Supply Chain Assistance (SCA) were not tracked separately to ensure they were spent on domestic and minimally processed foods.

Corrective Action:
During the onsite review, the reviewer provided technical assistance regarding local tracking procedures related to Supply Chain Assistance funding. The reviewer provided the IDOE optional tracker that can be used at the local level, showing the SCA amount received and spent down on minimally processed items such as milk, fresh produce, etc. **For corrective action, the SFA must start tracking the SCA funds locally. Please provide a copy of the SCA tracking.**

Resource Management Comprehensive Review - Lutheran School Assn of Evansville (K282)

766. Assessing Compliance with the Nonprogram Foods Revenue/Cost Ratio

Finding 10141: Assessment of Non-Program Foods 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. **As corrective action, the SFA must complete the 5-day reference period using the non-program food revenue tool. Please submit the non-program food revenue tool with documentation to support the figures used.**

Technical Assistance:
The non-program food revenue tool to utilize for a reference period can be found at the following link: https://docs.google.com/spreadsheets/d/1yERVzWRoukH4jqhAQ-RFBhzMIWEKRyQB/edit#gid=1454493429.
Additional guidance can be found at the following link: https://www.in.gov/doe/nutrition/financial-management/#Revenue_from_Non_Program_Foods.

General Program Compliance - Lutheran School Assn of Evansville (K282)

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: Triennial Assessment of the Local School Wellness Policy

The triennial assessment for the Wellness Policy was not completed timely. The assessment was completed during the onsite review. As a reminder, the results of the assessment must be made available to the public. This could be done by posting the assessment results on the school website.

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 is not being 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 and food service staff were provided, however, not all have been logged into the training tracker. The training tracker has not been updated since the start of the school year and, therefore, did not accurately reflect the

number of completed and remaining training hours for staff. At the time of review, food service staff had not yet met the annual training requirements and were unaware that additional hours were required.

Corrective Action:
Annual training for all staff with food service responsibilities is a program requirement.
For corrective action, complete the following:
   a) **Provide a written procedure outlining how staff training will be conducted and documented moving forward to ensure this requirement will be met.**
   b) **For the employees identified as needing training during the review, provide proof of training such as certificates or an agenda of topics covered with attendee names and signatures.**
   c) **Submit an up-to-date training tracker to the State Agency.**

Technical Assistance:
Any training completed should have a dated agenda, topics discussed, and staff signatures. If handouts are provided during the training, copies should be maintained with the training documentation.

Required Professional Development Training Hours:
https://docs.google.com/document/d/1Ho8j7bMBtNtIYwq14INtakNMHpypSVN9ALp6iPsCTzk/edit?usp=sharing

General Training Agenda Template: https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:893568f0-3317-327d-b7f7-55ef5969d162

A Professional Standards Training Tracking template is available at the following link - https://www.in.gov/doe/files/copy-professional-standards-tracking-idoe-final.xlsx

St. Paul Building (D625)
111 E. Virginia St.
Evansville, IN 47711-5431

Food Service Contact
Ms. Cathy Bell
Food Service Manager
(812) 424-7252

Month of Review: February 2025
Date of Onsite Review: March 4, 2025

Meal Components & Quantities - St. Paul Building (D625)

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

Finding 9075: Production records/supporting documentation indicate weekly meal pattern requirements for the age/grade group(s) not met. *Repeat Finding
Productions records were reviewed for the review period to determine whether the portion sizes of meal components from the menu planned and served during the review period, met the minimum meal pattern requirements for the age/grade group being served. Weekly vegetable subgroup requirements were not met for the following subgroup(s), resulting in 110 lunches being disallowed:
  a) The dark green vegetable subgroup is missing entirely, as it was not planned or served during the review period. The weekly minimum is 1/2 cup.
  b) The bean/legume vegetable subgroup is insufficient. Only 1/4 cup of bean/legume was served throughout the week. The weekly minimum is 1/2 cup.

Corrective Action:
For corrective action, the food service staff must complete the Moodle Meal Pattern training. Submit certificates of completion to the State Agency. Additionally, the SFA must revise the lunch menus to meet all meal pattern requirements, including vegetable subgroup requirements. Submit one week of revised lunch menus and completed production records to the State Agency. IDOE Moodle https://moodle.doe.in.gov/.

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

General Program Compliance - St. Paul Building (D625)

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

Technical Assistance: USDA Buy American

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.