

INDIANA DEPARTMENT of EDUCATION

SNP Administrative Review Findings

Program Year 2024

No. of Sites / Reviewed: 4 / 1

Month of Review: February 2024

Lafayette Catholic School (K256) 2410 S 9th Street Lafayette, IN 47909-2499 Food Service Contact Mrs. Barb Schummer Business Associate (765) 474-7500 bschummer@lcss.org FSMC: Chartwells

Lafayette Catholic School (K256)

Executive Contact Mr. Daryl Beck Principal (765) 474-2496 dbeck@lcss.org

Commendations

* Student meal benefits for the sample of students reviewed were processed correctly.

- * A nice variety of all components was offered to students at the reviewed school.
- * Review documents were well organized and staff were friendly and eager to learn.

Technical Assistance

- * Although eligibility was not affected, the number of people reported in some households appeared to be incorrect. When duplicate names are reported, check with the households to confirm accuracy in the number of household members.
- * When a household submits an application indicating an applicable Assistance Program:
- -The applicable Assistance Program must be identified and the program case number must match the applicable Assistance Program.

-The child must be given free meals.

-The LEA official should compare the applications with case numbers to the direct certification list to determine if any children listed on the application are on that list. When a match is found:

-The application must be disregarded;

-The household must be placed on the direct certification list; and

-Categorical eligibility must be extended to all children in the household.

When a match is not found, the LEA should:

-Contact the household for further clarification; or

-Verify the application for cause.

These students are not considered directly certification but rather approved based on a categorical application.

Certification and Benefit Issuance - Lafayette Catholic School (K256)

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

Finding 9000: Updates To Letters

The following updates must be made to household notification letters:

-the hearing official must be updated to be someone other than the determining official.

-the denied letter gives the price only for reduced meals. Update the letter to include the price of the full-price meal.

-The direct certification approval letter asks households to report once they no longer qualify for SNAP or TANF. This is no longer required with year-long eligibility.

Corrective Action:

As corrective action, provide updated letter templates or proof of the SFA's request to the software company to update the information as noted above.



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Meal Counting & Claiming - Lafayette Catholic School (K256)

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

Finding 10168: Edit Check Attendance Factor

The attendance factor was missing or incorrect in the daily edit check.

Corrective Action:

The free, reduced price, and paid lunch counts must be compared to the number of attendance adjusted eligible students as part of conducting the daily edit check. As corrective action, the SFA has submitted the most recently completed edit check showing the correct attendance factor has been used. **Additional response is not required.**

Technical Assistance:

There must be an acceptable explanation for each day the free/reduced price/paid lunch count was greater than the number of attendance adjusted free/reduced price/paid eligible students, respectively.

Resource Management Comprehensive Review - Lafayette Catholic School (K256)

755. Allowable Costs

Finding 9117: Unallowable general expenses charged to the nonprofit school food service account.

Based on the SFA's accounting records for the most recently completed program year, general expenses charged to the nonprofit school foodservice account were not reasonable, necessary and/or allocable. Unallowable expenses, purpose of expenditures and amounts: Phone stipend for \$550.00 for FSMC employee.

Corrective Action:

The unallowable expenditure must be restored to the non-profit school foodservice account using non-federal funds.

Additionally, internal controls must be established by SFA personnel to obtain and view the underlying support of transactions charged by the food service management company to verify the transaction was for an allowable school foodservice purpose. The SFA must obtain and review source documents, such as invoices or proof of payment for vendor transactions or a schedule of employees, assigned locations, salaries, and hours to be worked for payroll transactions submitted by the food service management company for reimbursement.

For corrective action, submit written internal controls for reviewing the FSMC monthly invoices and proof of fund restoration to the state agency as corrective action.

Technical Assistance:

School Corporations that contract with a food service management company on a cost reimbursement basis should ensure they are monitoring contracts sufficiently including verifying or reviewing the following:

- Reviewing invoices received from the food service management company compared to amounts paid by the food service management company.
- Reviewing contracts for compliance with Buy American.
- Verifying return of discounts, rebates, or credit are properly applied to the School Corporation's account.
- Reviewing meal pattern compliance worksheets, production records, etc. for meal pattern compliance.

Additional contract management practices can be found in the following resources: https://fns-

prod.azureedge.us/sites/default/files/cn/SP40_CACFP12_SFSP14-2016a2.pdf; https://www.in.gov/doe/files/SP13-2023s.pdf-Best-Practices-for-Contracting-with-Food-Service-Managment-Companies.pdf



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General Program Compliance - Lafayette Catholic School (K256)

810. The USDA non-discrimination statement is on appropriate Program materials

Finding 10125: Non-compliance with the USDA non-discrimination statement

The USDA non-discrimination statement was missing or used incorrectly on appropriate program materials.

Corrective Action:

The full nondiscrimination statement must be used on documents of two or more pages, but on documents of one page or less, the short statement may be used; either statement must be the same font size as the rest of the document. As corrective action, the following program materials have been updated with the correct non-discrimination statement and submitted to the state agency: verification notification and results letters. **Additional response is not required.**

Technical Assistance:

The IDOE SCN Civil Rights webpage contains links to the USDA Child Nutrition Program Civil Rights Statements. Please bookmark and use the appropriate links to access the long and short civil rights statements. https://www.in.gov/doe/nutrition/civil-rights-requirements/

The correct USDA Short Nondiscrimination Statement: This institution is an equal opportunity provider.

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

Finding 9000: Wellness Policy-Outdated Language

The wellness policy contains the following outdated language:

-Nutrient content limit listed for foods sold to students is inaccurate. The sodium limit for snacks has changed from 230 mg to 200 mg per serving. Also, trans fat content is not combined with saturated fat. Saturated fat content per serving must be less than 10% and trans-fat, per the nutrition facts label, must contain zero grams per serving.

-The sodium limit for all entrees sold to students, regardless of type, is limited to 480 mg.

-The wellness policy references utilizing the results of the most recent School Meals Initiative (SMI) Review in the wellness policy evaluation. The SMI review has been replaced by the Administrative Review.

Corrective Action:

The wellness policy must be updated to include current language and requirements. The update must occur with input from the committee and the public must be made aware of their ability to provide input. **Provide a copy of the updated wellness policy as corrective action.**

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

Finding 10140: Wellness Policy Review and Update

The following findings were noted regarding the review and update of the local school wellness policy: The review and update of the local school wellness policy did not occur as required.

Corrective Action:

As corrective action the following must occur:

- LEAs must assess the wellness policy every 3 years, at a minimum. This assessment will determine compliance with the wellness policy, how the wellness policy compares to model wellness policies, and progress made in attaining the goals of the wellness policy. The local school wellness policy must be reviewed and updated by the wellness committee. A copy of the assessment must be submitted to the State Agency.

-Provide proof that the results of the most recent assessment have been communicated to the public, including progress toward meeting the goals of the policy.

Technical Assistance:

Wellness policy resources can be found at the following website: <u>https://www.in.gov/doe/nutrition/wellness-policies/</u>.



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1110. On-site observations validate Off-Site Assessment Tool responses to Smart Snacks questions and responses demonstrate compliance with FNS requirements

Finding 9010: Smart Snacks information on the Off-site Assessment Tool not validated, or deficiencies found. At the Jr. Sr. High, vending machines containing non-compliant items were available to students immediately at the end of the school day.

Corrective Action:

As corrective action, the resources below must be reviewed by the SFA and FSMC directors to help gain a better understanding of the Smart Snacks requirements. Additionally, the vending machines containing non-compliant items must be programmed to remain inaccessible to students from midnight until 30 minutes after the school day ends. Provide confirmation from the vending company that this has occurred.

Technical Assistance:

A Guide to Smart Snacks in Schools: <u>https://www.fns.usda.gov/sites/default/files/resource-files/smartsnacks.pdf</u> Indiana's Fundraisers Rule: <u>https://drive.google.com/file/d/1ilvfWWYSXCbl2xXU-hfv1Fyz-44G3b2l/view?usp=sharing</u> Nutrition Standards for All Foods Sold in Schools: <u>https://fns-prod.azureedge.us/sites/default/files/resource-files/ault/files/r</u>



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St. Mary Cathedral (D430) 2410 S 9th Street Lafayette, IN 47909-2499 Food Service Contact Mrs. Lorrie A Rainey Director (765) 474-2496

Month of Review: February 2024 Date of Onsite Review: March 27, 2024

General Program Compliance - St. Mary Cathedral (D430)

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

Finding 9150: Storage violations were observed.

The SFA must ensure that all facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. The First In, First Out (FIFO) inventory management method is not being used as some items were not dated.

Corrective Action:

As corrective action, provide date-marking training to staff. Provide a dated agenda and sign-in sheet to the State Agency as documentation.

Lafayette Catholic School (K256)