



SNP Administrative Review Findings Program Year 2025

Randolph Eastern School Corp (6835)

Randolph Eastern School Corp (6835)

731 N. Plum St.
Union City, IN 47390-1029

Food Service Contact

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FSMC: Chartwells

Executive Contact

Mr. Neil Adams
Superintendent
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No. of Sites / Reviewed: 3 / 2
Month of Review: November 2024

Commendations

- * The cashier did an excellent job of implementing the offer vs. serve procedure during lunch. When asked what the minimum components she was looking for on the lunch tray, she confidently answered correctly. Successful cashier training was clearly demonstrated.

Technical Assistance

- * Average Daily Attendance (ADA) is figured by taking the total number of students with meal access in attendance each day of the claim month divided by the number of operating days. Reporting this accurately may require cooperation with your business or attendance office.
- * On 12/18/24, the superintendent and the field specialist discussed the best practices for reviewing the FSMC monthly invoices. The school corporation must ensure the corporation employee overseeing the FSMC contract has a strong working knowledge of USDA programs. The School Food Authority (SFA) must continue to review all documentation related to services provided by the FSMC, including but not limited to the following: reviewing the itemized monthly statements to ensure there are no questionable or unallowable charges billed to the food service account, reviewing the SFA available USDA Foods for use in menus to ensure the corporation is getting full value from the use of commodities in reimbursable meals and not used for other activities, inspecting all kitchens regularly to ensure foods are stored properly, rotated on FIFO, and secured from theft and spoilage. The following items were recommended to the SFA regarding FSMC billing:
 - a) For accuracy, the SFA should create a standard operating procedure to review every monthly itemized, detailed billing.
 - b) The SFA should determine approval procedures for FSMC travel, employee recognition programs, timekeeping records, and/or shared labor between SFAs.
 - c) The SFA should receive training on how to read the reports provided by the FSMC.

Certification and Benefit Issuance - Randolph Eastern School Corp (6835)

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 for No Income Applications

The SFA is reminded that while not required, it is the best practice to verify for cause applications reporting zero income. The "no income fact sheet" can be found here:

<https://docs.google.com/document/d/1OTjRS4eh3vu5a8tobkFvU3Hye1GTrbCg2IHZS68Ld5w/edit>

Meal Counting & Claiming - Randolph Eastern School Corp (6835)

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

Finding: New Students Without POS Pin Numbers

During the lunch review, two new students without a point-of-service pin number were automatically recorded as free without an established benefit. Student meals should not be claimed as free or reduced status unless there is supporting documentation validating this status.

Corrective Action:

For corrective action, please complete the following:

- a) Develop a standard operating procedure for newly enrolled students to ensure a POS pin number has been provided, including that students will be claimed as paid until a benefit has been determined. Submit a copy of the SOP to the State agency.



SNP Administrative Review Findings

Randolph Eastern School Corp (6835)

Program Year 2025

- b) The SFA will need to pull transaction history data reports from the POS to determine which students were claimed in error for breakfast and lunch at Union City Jr/Sr High School in November and December 2024. Submit documentation to the State agency.

Technical Assistance:

Technical assistance was provided while onsite regarding this specific finding.

Resource Management Comprehensive Review - Randolph Eastern School Corp (6835)

757. Incomplete Resource Management Comprehensive Review Non-Profit Food Service Account and Nonprogram Foods Revenue

Finding: Insufficient Action on Pre-Review Requirements

At the time of the review, the documentation requested for the resource management comprehensive review for the non-profit food service account and non-program foods revenue had not been provided to the reviewer.

Corrective Action:

For corrective action, the SFA must provide the requested documentation to complete the resource management review. The reviewer sent correspondence by email to the SFA prior to and during the onsite review. Submit the documentation to the State agency. Additional findings and corrective actions could occur upon review of the documentation.

Technical Assistance:

Technical assistance was provided during the administrative review training and one-on-one over the phone. Administrative review preparation checklist- <https://docs.google.com/document/d/13nivCoScht-2mmtx5ZbLUhdAQL48eoeF/edit?usp=sharing&oid=106613229826082982940&rtpof=true&sd=true>.

765. Adult Meals

Finding: Incorrect Amount Charged for a Second Adult Lunch

Breakfast and lunch served to adults must be priced so that the adult payment is sufficient to cover the overall cost of the meal, including the value of any USDA entitlement and bonus donated foods used to prepare the meal. Since the nonprofit school food service account cannot pay or subsidize adult meals, schools must appropriately set adult meal prices. Adult second lunches must be charged at the required price, the same as the first lunch. The SFA charges adults \$2.50 when they purchase a second lunch.

Corrective Action:

For corrective action, please complete the following:

- Calculate the number of second lunches sold using point-of-service documentation.
- Determine the revenue difference and complete a restoration of funds to the nonprofit school food service account using non-federal funds.
- Provide copies of the restoration and POS documentation to the State agency.

Technical Assistance:

Technical assistance was provided during the onsite review.

General Program Compliance - Randolph Eastern School Corp (6835)

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

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

The incorrect USDA non-discrimination statement was used on free and reduced household notification letters.

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**



SNP Administrative Review Findings

Randolph Eastern School Corp (6835)

Program Year 2025

corrective action, please update the F/R household notification letters with the correct non-discrimination statement. Submit a copy of the corrected letter to the State agency.

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/>. While we are awaiting written guidance regarding any changes regarding the use of the non-discrimination statement with Child Nutrition Programs, USDA has recently posted the following statement here: [Non-Discrimination Statement | Home](#)

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

Finding: Wellness Policy Requirements

The following results were noted regarding the review and update of the local school wellness policy: The triennial assessment of the local school wellness policy was not completed, and the wellness policy was last revised in 2017.

Corrective Action:

As corrective action, the following must occur:

- a) 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 wellness committee must review and update the local school wellness policy. Examples of assessments can be found at https://www.in.gov/doe/nutrition/wellness-policies/#Evaluating_the_Policy.
- b) Submit a copy of the assessment and updated wellness policy to the State agency.

Technical Assistance:

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

1400. The written food safety plan contains required elements, and a copy is available at each school

Finding: The written food safety plan does not contain all the required elements.

The written food safety plan does not comply with the HACCP program criteria described in 7CFR 210.13(c). The sites have not implemented all of the checklists, temperature logs, and standard operating procedures.

Corrective Action:

All school food authorities (SFAs) that operate the National School Lunch Program and/or School Breakfast Program must have a food safety plan based on HACCP principles. A well-designed food safety plan will manage potential food safety hazards at every stage of the food service process, from receiving to serving. The written food safety plan should be specific to each individual school within the district, considering the physical location, equipment, staff, menu, etc., of that site. Involve site managers in the process and keep the food safety plan on hand for implementation and reference.

For corrective action, please complete the following:

- a) Review and update the food safety plan. Submit the updated plan to the State agency.
- b) Provide staff with food safety plan training. Submit proof that training has been completed.

Technical Assistance:

Information on food safety was discussed and sent via email during the onsite review and the AR Exiting Meeting. For additional information and resources, visit IDOE's Food Safety webpage at <https://www.in.gov/doe/nutrition/food-safety/>.

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>.



SNP Administrative Review Findings

Randolph Eastern School Corp (6835)

Program Year 2025

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>.

1501. Recordkeeping- CEP Records

Finding: SFA Does Not Retain Community Eligibility Program Records

The SFA did not retain documentation to support the identified student percentages and claiming percentages for the latest CEP approval.

Corrective Action:

During the onsite review, the SFA worked with the free and reduced software company to reproduce the misplaced records.

For corrective action, the SFA will need to create written internal control procedures to retain original student benefit documentation. Submit a copy of the written procedures that will be implemented.

Technical Assistance:

Technical assistance was provided at the time of the CEP validation and during the AR exit meeting.

IX Special Provision Options - Randolph Eastern School Corp (6835)

2115. CEP

Finding: Allocation of Non-Federal Funds to Cover the Cost of Non-Profit Food Service Deficit

Non-federal funds are not being properly allocated to account for the difference of offering all meals to students at no charge and the Federal reimbursement. According to the signed CEP agreement, "The LEA agrees to pay, from sources other than Federal funds, the costs of serving breakfast and lunches that are in excess of the Federal assistance received, including Federal reimbursement."

Corrective Action:

For corrective action, please complete the following:

- a) **Explain what non-federal funds are being used to cover the cost of the nonprofit school food service deficit.**
- b) **The SFA must complete a restoration of funds for the meals served in excess of the Federal assistance received. Provide documentation of the restoration to the 0800 fund.**

Technical Assistance:

A technical assistance meeting is scheduled for the SFA's food service contact and IDOE SCN staff in April 2025. The goal of the spring meeting is to complete a new CEP validation to increase the identified student percentage.



SNP Administrative Review Findings

Randolph Eastern School Corp (6835)

Program Year 2025

North Side Elementary School (7164)

731 N. Plum St.
Union City, IN 47390-1029

Food Service Contact

Mrs. Trella Horn
Corporation FSD
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Month of Review: November 2024

No Findings during Site 7164 Review



SNP Administrative Review Findings

Randolph Eastern School Corp (6835)

Program Year 2025

Union City Community Jr.-Sr. High School (7161)
731 N. Plum St.
Union City, IN 47390-1029

Food Service Contact
Mrs. Trella D Horn
Corporation FSD
(765) 964-4840

Month of Review: November 2024

Date of Onsite Review: December 10, 2024

Meal Counting & Claiming - Union City Community Jr.-Sr. High School (7161)

321. Review Period meal counts are reasonable compared to Day of Review meal counts

Finding: Meal Count Validation

The reviewer was unable to validate the claim for the month of review for North Side Elementary (CEP school) and Union City Community Jr-Sr High School (non-CEP School). Grades 5-6 meals are being served and counted in the POS at the Jr/Sr High school. However, the 5-6 grade meals are manually subtracted out and added to the elementary school claim.

Corrective Action:

For corrective action, please complete the following:

- c) Grades 5-6 student meals can no longer be subtracted manually from the Jr-Sr High School lunch count and added to the elementary school lunch count. Beginning immediately, the POS lunch edit check sheets must be changed to grades K-6 and 7-12 or K-4, 5-6, and 7-12.
- d) Meals should be claimed at the site in which they are served which should also coincide with the grades for each site as approved in CNPweb. Provide a detailed timeline that will be followed to prepare and complete a new CEP validation with the State agency.
- e) Provide copies of the edit checks for breakfast and lunch for North Side Elementary and Union City Jr/Sr High School in November and December 2024.

Technical Assistance:

Technical assistance was provided with this specific finding during the exit meeting.

Meal Components & Quantities - Union City Community Jr.-Sr. High School (7161)

404. Day of Review- signage explaining the reimbursable meal was posted near/at the beginning of the service line and did not promote water or any other beverage as an alternative to milk

Finding: No signage explaining what constitutes a reimbursable meal at the beginning of the service line.

As observed on the day of breakfast review, non-offer vs. serve signage explaining what constitutes a reimbursable meal is not identified near or at the beginning of the meal service line or on the grab-and-go cart located in the hallway.

Corrective Action:

Depending on whether a site is non-offer vs. serve or offer vs. serve, the appropriate signage must be posted in a visible area near the meal service line or before the point of service that shows students how to select a reimbursable meal. On the day of the onsite visit, proper signage was emailed to the SFA and posted. **Therefore, no further action is required.**

Technical Assistance:

The SFA was provided with a refresher email on required serving line signage via their field specialist on October 31, 2024. Included in the email were samples of all the various signage and information explaining offer vs. serve. The signage requirement for the non-offer vs. serve site was reviewed with the SFA while onsite.

406. Day of Review- the meal service is structured to comply with the required age/grade group meal pattern requirements when multiple menus and/or age/grade groups are served

Finding: Serving More Than One Grade Group

During the review of menus for the Union City Community Jr-Sr High School, it was determined that one menu was planned for all grades 7-12 that included the same portion sizes for all menu options. The meal pattern does designate a difference between 6-8 and 9-12 grades. The school must begin to use the 6-8 menu pattern and the 9-12 menu pattern for lunch. While



SNP Administrative Review Findings

Randolph Eastern School Corp (6835)

Program Year 2025

there is overlap for K-8 grade group, there is not an overlap for grades 7-12. The 9-12 grade grouping requires larger portion sizes and an increased number of calories and sodium.

Corrective Action:

For corrective action, the meal planner will be required to develop menus that meet all grade grouping requirements. Please provide documentation of how the menu planning has been changed to meet all requirements set forth by USDA. Additionally, provide one week of completed production records for 6-8 and 9-12 lunch meal service. Submit copies of the documentation to the State agency.

Technical Assistance:

Technical assistance was provided with the FSMC menu planner during the onsite visit.

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

Finding: Insufficient Dark Green Vegetable

The in-depth review of the selected lunch week resulted in an insufficient weekly serving of dark green vegetables. The meal pattern requires a minimum of 1/2 cup to be offered throughout the week, and only 1/8 cup was served.

Corrective Action:

For corrective action, please complete the following:

- The menu planner must complete the meal pattern training found in Moodle: <https://moodle.doe.in.gov/course/index.php?categoryid=57>. Submit a copy of the training certificate to the State agency.
- Submit one week of completed lunch production records and the planned menu to the State agency.
- Provide SFA procedures for reviewing the menus with the food service management company to ensure compliance.

Technical Assistance:

During the exit meeting, this was discussed with the menu planner.

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

Technical Assistance: Starchy Vegetables Availability

Multiple servings of starchy vegetables are offered throughout the week, and only 1/2 cup is required in the meal pattern. The menu planner is encouraged to avoid offering too many starchy vegetables because the additional calories could result in being over the daily/weekly allowance for calories. Starchy vegetables are also slightly higher in sodium than the other subgroups.

Dietary Specifications - Union City Community Jr.-Sr. High School (7161)

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

Finding: Standardized Recipes

Standardized recipes with crediting information are not used. Therefore, it was not known how the component produced by the recipe credited toward the School Nutrition Program Meal Pattern Guidelines.

Corrective Action:

Prior to serving any food that is used to meet a requirement for either the School Breakfast or Lunch Program, staff should know how it credits. When a food item has two or more ingredients, a standardized recipe is required. For the SFA's corrective action, the Moodle Training titled Crediting <https://moodle.doe.in.gov/course/index.php?categoryid=57> must be completed by the menu planner. Submit one week's worth of standardized recipes, including the certificate of completion for the Moodle training, to the State agency. Lastly, confirm that moving forward, the crediting information for all foods used for both program requirements will be determined before serving.

Technical Assistance:

During the onsite and exit meeting, technical assistance was conducted.



SNP Administrative Review Findings
Program Year 2025

Randolph Eastern School Corp (6835)

General Program Compliance - Union City Community Jr.-Sr. High School (7161)

1106. Food or beverages sold to students during fundraisers meet Smart Snacks standards or fall within Indiana's limit on fundraisers

Finding: School Day Fundraisers with Non-Compliant Smart Snack Foods

The school holds fundraisers in which students may participate during the school day. However, the school does not have an established protocol for keeping track of fundraisers involving food and beverages sold to students. The reviewer could not validate whether the Smart Snacks requirements were met. Smart Snacks compliance also applies to food and beverages sold a la carte by food service.

Corrective Action:

Each school may have only two exempt fundraisers per school year that include the sale of foods and/or beverages for consumption during the school day that do not meet the nutrition standards for Smart Snacks. **For corrective action, develop and implement a standard operating procedure for a school day fundraiser. Provide a copy of the procedures to the State agency.**

Technical Assistance:

Technical assistance was conducted during the onsite. Indiana's Smart Snacks in School Fundraiser Exemption Rule-
<https://drive.google.com/file/d/1ilvfWWYSXCbl2xXU-hfv1Fyz-44G3b2l/view?usp=sharing>.

1405. Two food safety inspections are received each school year from the local health department

Finding: Less than two food safety inspections were completed in the current school year and no documentation was available to show that two inspections were requested.

The school did not provide two food safety inspection reports for the current or prior school year and no documentation was available to substantiate the SFA requested two food safety inspections for the current year.

Corrective Action:

The SFA should annually submit a request to the local health department using the template found here: <https://docs.google.com/document/d/1iwP5jVuzNualqEwBAiAxDW7pDF3Hrgos/edit> and retain a copy of the request in the event the health department does not conduct two inspections. **For corrective action, complete the template and send it to the health department. Submit a copy of the letter to the State agency. In addition, confirm that moving forward, two inspections will be requested at the beginning of the school year when the School Nutrition Program application for participation is completed.**

Technical Assistance:

This requirement was explained to the food service director during the onsite review. Additional information on food safety can be found here: <https://www.in.gov/doe/nutrition/food-safety/>.