



SNP Administrative Review Findings

Richmond Community Schools (8385)

Program Year 2025

Richmond Community Schools (8385)

300 Hub Etchinson Parkway
Richmond, IN 47374-5398

Food Service Contact

Mrs. Karen Scalf
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Executive Contact

Dr. Curtis Wright
Superintendent
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No. of Sites / Reviewed: 11 / 3
Month of Review: April 2025

FSMC: Chartwells

Commendations

- * Staff at Vaile Elementary School planned and executed the Child and Adult Care Food Program (CACFP) meal pattern requirements for the preschoolers during lunch.
- * Staff at Hibberd Intermediate and Vaile Elementary Schools successfully implemented Offer vs. Serve (OvS) during lunch.
- * The FSMC Director and the assistant director of dining were new to the administrative review process and eager to learn the corrective procedure for any noted findings.

Technical Assistance

- * Potable water is located outside the cafeteria in the hallway. A sign promoting its availability is suggested. Furthermore, adding potable water pitchers or coolers in the cafeteria with signage will promote water consumption more than having it located directly outside of the restrooms in the hallway.
- * Non-discrimination posters must be displayed in a prominent location for the public to view.
- * To decrease food waste and overall costs, the kitchen managers should be made aware of field trips. This practice allows the amount of food prepared to be adjusted accordingly. During the review, a field trip occurred, and the kitchen was not made aware, causing overproduction of approximately 40 meals.

Meal Counting & Claiming - Richmond Community Schools (8385)

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

Finding 9000: Meal Count During Field Trips

Proper procedures for counting lunches were not followed during field trips; meals were not documented at the point of service (POS).

Corrective Action:

SFAs must establish a local meal counting and claiming procedure to count field trip meals accurately. Meals must be counted at the POS. The POS is defined as when the student has received the reimbursable meal.

For corrective action, develop and implement a standard operating procedure (SOP) for serving/documenting meals in the Child Nutrition Program during field trips. Submit a copy of the SOP to the State agency.

Technical Assistance:

A copy of the field trip requirements was given to the SFA during the onsite review.

For more information, please review the field trip fact sheet:

https://docs.google.com/document/d/1qoe3DiGW5w_1MEID1G3qmZinQn4bc4K6W89I7ms3R40/edit?tab=t.0#heading=h.pz0cbk509kz7.

Resource Management Comprehensive Review - Richmond Community Schools (8385)

765. Adult Meals

Technical Assistance- Determining Adult Meal Prices for Non-Pricing SFAs

Breakfast and lunch served to adults under the School Nutrition Programs 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 food service account cannot pay for or subsidize adult meals, School Food Authorities (SFAs) must appropriately set adult meal prices.

The SFA should use the non-pricing examples to set prices. For more information, please refer to the pricing guidance for adults: https://docs.google.com/document/d/1bkFaCeW7vAkP3PuQd_F7-2sORFEPT87UYek9tGrAlcc/edit?tab=t.0.



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General Program Compliance - Richmond Community Schools (8385)

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 on the SFSP outreach program materials.

Corrective Action:

The full nondiscrimination statement must be used on documents of two or more pages, but the short statement may be used on documents of one page or less; either statement must be the same font size as the rest of the document. **As corrective action, please update the following program materials with the correct nondiscrimination statement: SFSP: Outreach documents, submit a copy of the updated resource(s) to the State Agency.**

Technical Assistance:

The most current non-discrimination statement can be found on the following webpage: <https://www.usda.gov/non-discrimination-statement>. Please review the school nutrition weekly newsletter regularly for any updates.

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: Wellness Policy

The SFA has many wellness initiatives that are occurring; however, these are not included in the local school wellness policy. When the wellness committee meets, the policy should be revised to document these initiatives that are already in place to achieve student health and well-being. For more information, please review the wellness policy resources:

<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 9142: Food Safety

Proper HACCP principles not observed at all three sites:

- 1) The potential of cross-contamination was observed. Raw ground beef was observed thawing in the cooler next to bags of cheese sauce.
- 2) The First-in, First-out (FIFO) inventory management method is not being used. At two schools, items thawing in the cooler were not date-marked to indicate when they were removed from the freezer and put under refrigeration to thaw. Bags of food were removed from their original packaging and were not date-marked.
- 3) Equipment, baseboards, and floor mats were found to be unsanitary.
- 4) Food temperatures are not always documented, and thermometers are not calibrated and documented regularly.

Corrective Action:

For corrective action, please complete the following:

- 1) **Develop and include standard operating procedures (SOPs) in the food safety plan addressing each of the food safety violations that occurred during the administrative review. Submit copies of the SOPs to the State Agency.**
- 2) **Develop a regular cleaning schedule, including daily, weekly, monthly, and yearly tasks. Submit copies of the cleaning schedules and tasks to the State Agency.**
- 3) **Submit copies of the HACCP calibration log.**

Technical Assistance:

IDOE School Nutrition Programs Food Safety webpage: <https://www.in.gov/doe/nutrition/food-safety/>.

SOP guidance can be found at https://docs.google.com/document/d/1Myu0CMzd-3sTvPFGHPr-ATCkYx4Sfi1y6lFqn9_EnCQ/edit?tab=t.0.



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

Finding 9143: A copy of the written food safety plan is not available at each school.

Only one food safety plan was written for the entire school district, and it was not site-specific for each location. Additionally, the plan was not available at each site or for the kitchen staff.

Corrective Action:

Each school should have a copy of the food safety plan readily available. Staff should know where the plan is located and be initially trained in the food safety and sanitation procedures upon hire and on a continued, regular basis. **For corrective action, the SFA is required to review the resources provided below to help ensure the plan meets all requirements and that copies are available in all school kitchens. Please submit copies of the new or revised sections of the food safety plan to the State agency.**

Technical Assistance:

IDOE School Nutrition Programs Food Safety webpage: <https://www.in.gov/doe/nutrition/food-safety/>.

Writing a HACCP-based Food Safety Plan: <https://theicn.org/resources/1532/writing-a-haccp-based-food-safety-plan-for-schools-workshop/117824/writing-a-haccp-based-food-safetyplan-for-schools-workshop-participants-workbook.pdf>.

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

Technical Assistance- USDA Buy American Provision Updated Policy Guidance

USDA 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/buyamerican-provisions/webinar>.

To download a copy of the USDA Buy American tool, go here: <https://www.fns.usda.gov/sites/default/files/resource-files/SP23-2024a.xlsx>.



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Richmond Community Schools (8385)

Hibberd Intermediate School (J045)

300 Hub Etchinson Parkway
Richmond, IN 47374-5398

Food Service Contact

Mr. Jesse Deavers
Director of Dining Services
(795) 973-3309

Month of Review: April 2025

Date of Onsite Review: May 12, 2025

No Findings during Site J045 Review



SNP Administrative Review Findings

Richmond Community Schools (8385)

Program Year 2025

Test Intermediate School (8997)

300 Hub Etchinson Parkway
Richmond, IN 47374-5398

Food Service Contact

Mr. Jesse Deavers
Director of Dining Services
(765) 973-3309

Month of Review: April 2025

Date of Onsite Review: May 13, 2025

Other Federal Programs - Test Intermediate School (8997)

6. Day of review Menu, Meal Patterns, Production records.

Finding 9000: Incomplete Production Record

The After School Snack Program (ASSP) production record does not list the serving amounts beside each food item.

Corrective Action:

The ASSP must meet meal pattern requirements. **For corrective action, please submit the planned menu with portion sizes listed to confirm the meal pattern will be met for the upcoming school year. Additionally, confirm that the serving sizes will be listed on the ASSP production record.**

Technical Assistance:

This finding was discussed with staff during the on-site review.

7. Site monitored in first 4 weeks of operation, date, deficiencies/CA?

Finding 9000: ASSP Monitoring

The monitoring review form for Test Intermediate School, conducted on October 8, 2024, is incomplete. Incomplete areas included average daily participation (ADP), day of review attendance, day of review menu, date by the reviewer, or signature and date by the building supervisor.

Corrective Action:

Since the school year has ended, the forms cannot be retroactively corrected or additional monitoring completed. The reviewer provided technical assistance in thoroughly completing the review forms. **The sponsor understands the requirement as discussed and will take the responsibility to complete all monitoring forms fully going forward. Therefore if the corrective action is completed for future monitoring forms, no additional response is required.**

Technical Assistance:

This finding was discussed with staff during the on-site review. As a reminder, ASSP monitoring should be completed twice each program year, with the first monitoring occurring within the first four weeks of operation.

Meal Counting & Claiming - Test Intermediate School (8997)

318. Day of Review- each meal service line provides an accurate count by eligibility category at the point of service

Finding 9000: Meals Not Documented at the Point of Service

Breakfasts served to students in detention (IRS students) were not being counted at the point of service (POS). An individual would take meals to the area where the children were having class.

Corrective Action:

On the day of the site visit, the classroom teacher immediately corrected this, implementing a POS procedure starting with lunch the same day. **No further action is required.**

Technical Assistance:

While on-site at the school, technical assistance was provided to the food service director.



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Meal Components & Quantities - Test Intermediate School (8997)

402. Day of Review- the minimum daily quantity requirements are met for the age/grade group being served

Technical Assistance: Fruit and Vegetables Bar

As observed on the day of review, students are allowed unlimited servings from the fruit and vegetable bar free of charge to the students, but this does increase the overall cost to the corporation through the management company contract. Any extra foods provided as part of a reimbursable meal need to be included in the weekly dietary specifications.

Items offered on the fruit and vegetable bar, particularly pea salad and potato salad, contribute additional calories, saturated fat, and sodium. Fresh produce items with no additional accompaniments also contribute additional calories. Serving size limits should be established to control the amount of calories, saturated fat, and sodium students have access to and ensure that weekly dietary specifications are met, and to control program costs.

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 9055: No signage explaining what constitutes a reimbursable meal at beginning of service line.

As observed on the Day of Review, breakfast signage explaining what constitutes a reimbursable meal is not identified near or at the beginning of the meal service line(s).

Corrective Action:

Signage was posted during the breakfast onsite review. **No further action is required.**

Technical Assistance:

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

411. Review Period- the school has complied with the planned menu, or changes made are acceptable substitutions

Finding 9077: School did not comply with the planned menu for the Review Period

One week of planned menus from the Review Period was compared to production records for the same week. The school substituted some items on the planned menus. While substitutions are allowed, the weekly meal pattern minimums and maximums for each meal service line, menu type, and age/grade group were not met for one or more of the substituted menus. The citrus kidney & garbanzo bean salad planned for Friday of the review week was substituted with cucumber slices. This resulted in the bean/legume vegetable subgroup being insufficient for the week of review.

Corrective Action:

For corrective action, submit a standard operating procedure detailing the process for handling menu substitutions. Additionally, retrain all staff at Test Intermediate School on meal pattern requirements, including weekly vegetable subgroup requirements. Submit documentation of completed training to the State Agency.

Technical Assistance:

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

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

Technical Assistance: Offer vs. Serve

During the breakfast meal service observation, several students had to be reminded to take fruit or 100% fruit juice with the meal. This can indicate that OVS rules are not being followed or enforced on a regular basis. More signage to explain what constitutes a meal and further education of students on the requirements for a reimbursable meal.



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General Program Compliance - Test Intermediate School (8997)

812. Day of Review- Program benefits were available to all children without discrimination

Finding 9000: Serving Special Needs Students

A student using a wheelchair was not able to maneuver through the lunch line due to the setup of the stanchions. The student had to request assistance from food service staff. When food service staff were able to assist, they did not offer all choices within meal components to the student.

Corrective Action:

The FSD explained that a dedicated staff member would typically accompany this student, and it was unknown why the staff member was not with the student on the day of the on-site review. **For corrective action, a standard operating procedure must be developed to address instances when students need assistance. Further, the setup of the line stanchions should be reconfigured to allow wheelchair access. Submit a copy of the SOP and confirm that staff will be trained annually on this procedure.**



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Richmond Community Schools (8385)

Vaile Elementary School (9045)

300 Hub Etchinson Parkway
Richmond, IN 47374-5398

Food Service Contact

Mr. Jesse Deavers
Director of Dining Services
(765) 973-3309

Month of Review: April 2025

Date of Onsite Review: May 13, 2025

Meal Counting & Claiming - Vaile Elementary School (9045)

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

Technical Assistance: Importance of the Point of Service Meal Documentation

During meal service, several student meals were not counted as served because they were exiting the line without putting in a lunch pin number. All meals must be documented at the POS. If staff have trouble with younger students stopping at the register, make a game of it and add something fun like a stop sign beside the register. The students need to understand they cannot leave the area until their meal is accounted for in the system.

Meal Components & Quantities - Vaile Elementary School (9045)

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

Finding 9000: Vegetable Requirement

Due to incorrect implementation of offer versus serve, the portion sizes of meal components served on the day of review did not meet the minimum meal pattern requirements for the K-5 age/grade group being served. Insufficient quantities of meal components may result in a disallowance of meals if found in subsequent reviews. Insufficient portion sizes observed on the Day of Review:

- 1) Vegetable meal component for lunch - 1/2 cup each of refried beans and broccoli was planned. However, staff did not allow students the option to select both vegetables. Therefore, only 1/2 cup of vegetable was offered instead of the required minimum of 3/4 cup.

Corrective Action:

For corrective action, the SFA must retrain staff on meal pattern requirements and offer versus serve. Complete the Meal Pattern (Lunch) and the Offer Verses Serve K-8 courses in Moodle. Provide the State Agency with certificates of completion as documentation that training has been completed. IDOE Moodle: <https://moodle.doe.in.gov/>

Technical Assistance:

The lunch meal pattern requirements can be found at https://www.in.gov/doe/nutrition/national-school-lunch-program/#Lunch_Meal_Pattern.