



**SNP Administrative Review Findings**

**Rossville Consolidated Schools  
(1180)**

*Program Year 2024*

**Rossville Consolidated Schools (1180)**

1 Robert Egly Drive  
Rossville, IN 46065-0011

**Food Service Contact**

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**Executive Contact**

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No. of Sites / Reviewed: 2 / 1  
Month of Review: March 2024

**Commendations**

- \* The kitchen, serving area, and cafeteria were well-maintained and clean.
- \* The certification and benefit issuance process was conducted without error for the sample of students checked during the review.

**Technical Assistance**

- \* Consider modifying the satellite service standard operating procedure to create a procedure for service from the breakfast cart.
- \* The director is encouraged to season hot vegetables. Even onion or garlic powder will improve flavor and may increase consumption and decrease waste.

**Verification - Rossville Consolidated Schools (1180)**

210. *Direct Verification of selected applications was conducted according to requirements*

**Finding 9043: Requirements for directly verifying applications not met.**

The SFA did not follow requirements for directly verifying selected applications. The household notification letter for verification was sent prior to attempting direct verification.

**Corrective Action:**

The verifying official was provided training the day of review on the requirement to conduct direct verification prior to sending the verification notification letters. Moodle training will be completed again prior to verification for the 24/25 school year.

**Additional response is not required.**

**Technical Assistance:**

If the application can be directly verified for the benefit approved on the application, save the printout or take a screenshot, and retain it with the verification documents. This process eliminates the need to contact the household for additional information. If the application cannot be directly verified, then follow the normal process of verification by sending the notification letter. The direct verification fact sheet can be found here:

<https://docs.google.com/document/d/1wwB7sk01zzpk1xCbmxnzaBWZUSNFyELIbunUdZJA-zg/edit#heading=h.gjdgxs>.

**Meal Counting & Claiming - Rossville Consolidated Schools (1180)**

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**

Finding: The local school meal charging policy must be updated to specifically define bad debt. A separate bad debt policy was not found in board policies or provided to the State Agency.

**Corrective Action:**

Policies regarding the collection of unpaid meal charges should be included in the written meal charge policy that is required



**Program Year 2024**

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. **As corrective action, provide to the State Agency an updated meal charge policy that addresses the collection of delinquent funds and a policy for bad debt. The policy must include a statement that, per USDA regulations, the loss cannot be absorbed by the non-profit school foodservice account and will be restored using non-federal funds. 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>.

**Technical Assistance:**

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. The debt is classified as delinquent as long as it is considered collectable and efforts are being made to collect it. A debt owed to the NSFSA (i.e., an account receivable) is an asset. As such, the debt remains on the accounting documents until it is either collected or is determined to be uncollectable and written off. SFAs must make reasonable efforts to collect unpaid meal charges classified as delinquent debt and the cost of these efforts is an allowable use of NSFSA funds. A reasonable timeframe and methods for collecting unpaid meal charges must be established at the SFA level.

When local officials determine that further collection efforts for delinquent debt are useless or too costly, the debt must be reclassified as “bad debt.” However, once a delinquent debt is reclassified as a bad debt it is no longer considered an asset because it is, by definition, uncollectable. Therefore, bad debts must be written off as operating losses. However, while bad debt must be written off as an operating loss, this particular operating loss may not be absorbed by the NSFSA but must be restored using non-federal funds.

Section 200.426 of Subpart E states that “Bad debts...arising from uncollectable accounts and other claims, are unallowable. Related collection costs, and related legal costs, arising from such debts after they have been determined to be uncollectable are also unallowable.” Therefore, NSFSA resources may not be used to cover costs related to the bad debt, such as continued legal and collection costs. Once delinquent meal charges are converted to bad debt, records relating to those charges must be maintained in accordance with the record retention requirements in 7 CFR 210.9(b)(17) and 7 CFR 210.15(b).

**Resource Management Comprehensive Review - Rossville Consolidated Schools (1180)**

**767. Nonprogram Revenue and Food Cost Ratio**

**Finding 10173: Calculation of Adult Meal Cost**

The adult meal cost reported in the non-program food revenue tool was calculated incorrectly. The full value of USDA foods was not included in the non-program adult meal cost calculation.

**Corrective Action:**

When USDA entitlement and bonus donated foods are utilized in the preparation of meals sold to non-program adults, the cost calculation of the meals must include the value of the donated foods used. The PAL value, as found in the Food Distribution Program Allocation Form, can be used or the fair market value. **As corrective action, the non-program food revenue tool must be updated to reflect the correct cost of foods for non-program adult meals.**



## SNP Administrative Review Findings

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### Program Year 2024

#### 767. Nonprogram Revenue and Food Cost Ratio

**Finding 10174: Revenue ratio was less than its food cost ratio.**

The SFA found that its revenue ratio was less than its food cost ratio and did not act to adequately resolve the problem.

**Corrective Action:**

The SFA must take additional steps to ensure compliance with non-program food revenue requirements. Such steps may include:

- sufficiently increase nonprogram food prices,
- add sufficient funds to the SFA's nonprofit food service account,
- and/or take other actions to adequately resolve the problem.

**As corrective action please explain what actions have been taken to ensure compliance with non-program food revenue. Additionally, provide to the State Agency documentation of the actions such as:**

- point-of-sale price listing showing a la carte price increases,
- deposit of non-federal funds and
- plans to regularly maintain the non-federal fund contribution to the non-profit school foodservice account, and
- an updated non-program food revenue tool showing compliance as a result of increased prices or the addition of non-federal funds.

**Technical Assistance:**

USDA non-program food revenue guidance can be found at the following websites: <https://www.in.gov/doe/files/sp20-2016s-non-program-food-guidance.pdf>; <https://fns-prod.azureedge.us/sites/default/files/cn/SP39-2011r.pdf>.

### General Program Compliance - Rossville Consolidated Schools (1180)

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

**Finding 10137: Wellness Policy Requirements**

The local school wellness policy does not contain the minimum required elements. The following element is missing: food and beverage marketing. Additionally, the wording for competitive foods and beverages sold during the school day is vague and does not address that smart snacks guidelines will be met. (Only non-sold food is mentioned in regard to meeting smart snacks guidelines.)

**Corrective Action:**

**As corrective action the local school wellness policy committee must re-review and update the wellness policy. Committee meeting notes and agenda as well as the updated policy must be provided 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:

- It was not documented as to whether potential stakeholders were made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness policy.
- The evaluation of the wellness policy was made in regard to the content of the policy but not the implementation of the policy. The tool used was outdated and did not document progress made in attaining the goals of the policy. The most current IDOE tool for evaluating the wellness policy can be found here: <https://www.in.gov/doe/files/triennial-assessment-template.pdf>.

**Corrective Action:**

**As corrective action the following must occur:**



*Program Year 2024*

- Potential stakeholders must be made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness policy. Provide the announcement to the State Agency.
- Re-evaluate the policy using a current tool and provide the completed tool 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:**

The three required components of the triennial assessment, include 1) compliance with the wellness policy 2) how the wellness policy compares to model wellness policies 3) progress made in attaining the goals of the wellness policy. 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 9142: 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). Missing elements: standard operating procedures, menu items by process approach, and equipment list.

**Corrective Action:**

As corrective action an updated food safety plan has been provided to the State Agency. **Additional response is not required.**

1602. *On-site observations validate Off-Site Assessment Tool responses to SFSP and SBP Outreach questions and responses demonstrate compliance with FNS requirements*

**Finding 9009: SFSP Outreach**

Summer Food Service Program (SFSP) outreach to households was not conducted by the SFA. Although the SFA does not operate the SFSP, all program sponsors operating School Nutrition Programs must inform households of the availability of SFSP meals through other sponsors. The State Agency provides language through the Weekly Newsletter in early May for sponsors to use to meet this requirement.

**Corrective Action:**

The SFA agrees to conduct outreach at the end of each school year. The State Agency SFSP website is updated towards the end of May each school year with a link to a map of SFSP open sites. **As corrective action, the End of School Year Reminders and Updates Moodle Training must be completed. The training certificate must be provided to the State Agency as proof of corrective action.**

**Technical Assistance:**

USDA Policy Memo SP 07-2014, SFSP 07-2014 Expanding Awareness and Access to Summer Meals can be read at the following link: [https://fns-prod.azureedge.us/sites/default/files/resource-files/SP07\\_SFSP07-2014os.pdf](https://fns-prod.azureedge.us/sites/default/files/resource-files/SP07_SFSP07-2014os.pdf).



**SNP Administrative Review Findings**

**Rossville Consolidated Schools**  
**(1180)**

***Program Year 2024***

**Rossville Elementary School (1033)**

1 Robert Egly Drive  
Rossville, IN 46065-0011

**Food Service Contact**

Mrs. Carla Elliott  
Food Service Director  
(765) 379-2990

Month of Review: March 2024

Date of Onsite Review: April 17, 2024

**Meal Components & Quantities - Rossville Elementary School (1033)**

*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 crediting reported.

**Corrective Action:**

**As corrective action completed (breakfast and/or lunch) production records for one week must be submitted to the State Agency. Also, provide proof of production record and crediting training for staff.**

*410. Review Period- planned menu quantities meet the meal pattern requirements*

**Finding 9076: Planned menus served during review month do not meet portion size/quantity requirements.**

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, meet the minimum meal pattern requirements for the age/grade group(s) being served. The minimum grain requirement of 1 equivalent for lunch was not met for one day of the review period as only 1/4 cup of rice was served. Also, the weekly grain and meat requirements of 8 equivalents each for lunch were not met.

**Corrective Action:**

**As corrective action, please explain how the menu will be corrected to meet portion size requirements. A corrected menu, updated certification worksheet, and updated recipes showing the increased portion sizes must be submitted to the State Agency.**

**Technical Assistance:**

The school was provided technical assistance during the on-site visit. The menu planner is reminded to plan menus that meet all components in both the daily and weekly serving sizes. It was explained to the director the day of review that the entrees with the least number of grain servings each day added up over the week must meet the minimum weekly requirement of 8 grain equivalents for grades K-5. The director was also reminded about the difference between weight versus volume in crediting various foods. The crediting training also contains training on weight versus volume.

*410. Review Period- planned menu quantities meet the meal pattern requirements*

**Finding 10171: Standardized Recipes**

Standardized recipes were not available for the following menu items served during the review period and/or day of review: chips and cheese, sandwiches, yogurt parfait, pizza munchable, and cooked vegetables.

**Corrective Action:**

**As corrective action, standardized recipes must be developed for the above-mentioned menu items. Submit copies of completed recipes to the State Agency.**



*Program Year 2024*

**Technical Assistance:**

A standardized recipe template with instructions can be found here:

<https://drive.google.com/drive/folders/1TogadACpRuCsyZRu2doy9-9TDKwpKn8K>.

**General Program Compliance - Rossville Elementary School (1033)**

1404. *A copy of the written food safety plan is site-specific and available on-site*

**Finding 9145: A copy of the written food safety plan was not available at the reviewed school.**

The food safety plan was not printed for staff.

**Corrective Action:**

The food safety plan must be made available to all staff. A physical copy must be kept in the kitchen area since all staff do not have access to a digital copy. **As corrective action confirm that a physical copy was made available.**

1407. *SFA written food safety plan is implemented*

**Finding 9148: Observations on the Day of Review do not indicate compliance with the SFA's written food safety plan.**

Proper HACCP principles not observed: improper or insufficient personal hygiene - hairnets did not fully cover hair (only the bun or ponytail) and dangling earrings were worn by most staff in the kitchen while preparing food. Additionally, aides were walking through the kitchen without a hair restraint.

**Corrective Action:**

**As corrective action, please re-train all staff on the personal hygiene standard operating procedure. Provide a dated sign-in sheet with agenda to the State Agency as proof of training.**

1408. *Temperature logs are available*

**Finding 9149: Temperature logs unavailable for review.**

FNS requires each school in the SFA to maintain temperature logs for a period of six months. Temperature logs were unavailable for: all refrigeration and freezer equipment as well as the storeroom.

**Corrective Action:**

Temperatures must be monitored and logged daily for all refrigeration and freezer equipment as well as the storeroom.

**Submit logs with at least one week of monitored temperatures to the State Agency as corrective action.**

**Technical Assistance:**

Sample food safety logs can be found at the following website: <https://theicn.org/icn-resources-a-z/food-safety/>.