



SNP Administrative Review Findings

South Bend Community School Corp (7205)

Program Year 2024

South Bend Community School Corp (7205)

215 S. Dr Martin Luther King Jr. Blvd
South Bend, IN 46601-2003

No. of Sites / Reviewed: 32 / 7
Month of Review: February 2024

Food Service Contact

Mr. James Lutaaya
Food & Nutrition Director
(574) 393-6025
jlutaaya@sbcsc.k12.in.us
FSMC: Chartwells

Executive Contact

Dr. Todd Cummings
Superintendent
(574) 393-6000
ctoddcumings@sbcsc.k12.in.us

Technical Assistance

- * All pre-k students at Monroe Elementary are provided with a meal regardless of whether a meal has been brought from home. This occurs for breakfast and lunch. The reviewer stated it should be implied that when a student brings a packed meal from home, they do not intend to eat a school provided meal. It is still permissible to ask a student if they would like the meal, but it should not be automatically served to all students.
- * At Madison Steam Academy there was very little time for the students to eat their meals once they were out of the meal service line. During the first grade class meal service, the last student had less than seven minutes to eat her meal. The SFA and principal from Madison Steam are working on ways to prevent this from occurring in the future.

Certification and Benefit Issuance - South Bend Community School Corp (7205)

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 9017: Correct implementation of application approval process

The meal application approval process was not implemented correctly. Two meal applications at New Vision were not initially approved correctly by the site's approving official. However, SBCSC food service office staff were able to directly certify the students on those applications for free meals, thus overriding the initial meal application approval. In addition, many students who were directly certified for free meal benefits were also directly verified.

Corrective Action:

Technical assistance was provided to the SFA-FSD, FSMC-FSD, and SBCSC food service office staff responsible for reviewing the meal applications approved at New Vision and completing the Direct Certification process for New Vision. It was discussed that New Vision's approving official would need to be retrained on the meal application process prior to PY2025 if the school continued to accept meal applications. In addition, it was discussed that once a student has been directly certified for meal benefits, they should not also be directly verified. The direct verification process should only be used to check meal applications that have been pulled as part of the verification sample size.

Given that the majority of students at New Vision were able to be directly certified, SBCSC is planning to include the school in their CEP recertification process prior to PY2025 operations beginning. If CEP is implemented for this school as planned, the meal application approval process will not be required moving forward. As a reminder, schools that operate as a separate legal entity of the SFA may participate only as single CEP sites and cannot be grouped within the South Bend Community Schools CEP group. **No further corrective action is needed.**

Verification - South Bend Community School Corp (7205)

206. *On-site observations validate Off-Site Assessment Tool responses to Verification questions and responses demonstrate compliance with FNS requirements? Does the Verification Summary Report accurately reflect the SFA's enrollment?*

Finding 9006: Validation of Off-Site Assessment Tool



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On-site observations do not validate Off-Site Assessment Tool responses to Verification questions and/or responses do not demonstrate compliance with FNS requirements. The Verification process was not conducted during the required timeframe of October 1-November 15, and the Verification Summary Report (VSR) was submitted after January 15.

Corrective Action:

The SFA currently has only one school site that is not participating in CEP. Technical assistance was provided to the SFA-FSD, FSMC-FSD, and SBCSC food service office staff responsible for completing the Verification process. All verbally acknowledged that they understood the timeline for completing the process moving forward; however, given that the majority of students at the school requiring verification were able to be directly certified, SBCSC is planning to include the school in their CEP recertification process prior to PY2025 operations beginning. If CEP is implemented for this school as planned, the normal Verification process will not be required moving forward. **No further corrective action is needed.**

Meal Counting & Claiming - South Bend Community School Corp (7205)

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

Finding 9007: Meal Counting and Claiming information on the Off-site Assessment Tool not validated, or deficiencies found.

Some of the information gathered on the Off-site Assessment Tool regarding the SFA's Meal Counting & Claiming procedures could not be validated during on-site observations. Discrepancies or deficiencies found on-site: Community Baptist Christian School, New Vision Christian Academy, and St John the Baptist all utilize manual meal count sheets and all reported claim consolidation errors. The problem is considered systemic because the contributing factors are built into the process and would likely recur if the process is not changed.

Corrective Action:

Technical assistance was provided to the SFA-FSD, FSMC-FSD, and SBCSC food service office staff regarding the claim consolidation errors at these three sites. All were advised of the need for a two-person system to double check the daily meal count sheets to what is recorded on the monthly edit check forms for accuracy prior to submitting the claim for reimbursement. **As corrective action, please provide a standard operating procedure outlining who will be responsible for consolidating the monthly meal count sheets and completing the edit check forms, and who will be responsible for completing the second review of the consolidated claim data for each school prior to submitting the full claim for reimbursement within CNPweb.**

General Program Compliance - South Bend Community School Corp (7205)

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

Technical Assistance: Short Nondiscrimination Statement

Technical assistance was provided to the SFA-FSD and FSMC-FSD regarding the use of the short nondiscrimination statement on Summer Food Service Program (SFSP) outreach. The correct short statement is, "This institution is an equal opportunity provider," but the SFA used "employer" instead of "provider."



Program Year 2024

**Community Baptist Christian School
(D305)**

215 S. Dr Martin Luther King Jr. Blvd
South Bend, IN 46601-2003

Food Service Contact

Ms. Amy Harwood
Secretary
(574) 291-3620

Month of Review: February 2024

Date of Onsite Review: March 5, 2024

Meal Counting & Claiming - Community Baptist Christian School (D305)

325. Review Period- meal counts by category were correctly used in the claim for reimbursement

Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.

The SFA's claim for the school for the Review Period did not match the State Agency's validated meal counts for the Review Period. On 2/12/24, the lunch meal count sheet indicated 151 meals served, but only 100 meals were claimed. Overall, 3052 meals were claimed, but SA validated 310, a net underclaim. The SFA was provided with the opportunity to correct the claim while the Field Specialist was onsite.

Corrective Action:

See Sponsor-Level Finding 9007 for Corrective Action.

Meal Components & Quantities - Community Baptist Christian School (D305)

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

Technical Assistance: Meal Service Structure with Multiple Menus and Age/Grade Groupings

On the day of the onsite review, there was no difference noted between the middle and high school meals as served. The middle school student meals are planned under the K-8 meal pattern but are served the 9-12 meal pattern. Technical assistance was provided to the SFA-FSD & FSMC-FSD regarding serving multiple menus and/or age grade groups during the meal service period. It was recommended to post signage stating that K-8 students can select certain portion sizes within the components offered, such as 1 fruit option or 1 breadstick, etc., and the 9-12 students can select additional portion sizes within the components offered, such as 2 fruit options or 2 breadsticks, etc., to account for the differences in the daily menu and overall meal pattern requirements.

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

Finding 9078: School is not properly implementing Offer vs. Serve.

In CNPweb Offer vs. Serve was selected for lunch. However, as observed on the Day of Review, Offer vs. Serve (OVS) was not being implemented. While OVS is optional at lunch for the K-5 & 6-8 grade groupings, OVS must be implemented at lunch for the 9-12 grade grouping.

Corrective Action:

Technical assistance was provided to the SFA-FSD, FSMC-FSD, and SBCSC food service office staff regarding the requirement to implement OVS for the 9-12 grade grouping. The SFA must first determine if they will implement OVS at lunch for all grades, or just the required 9-12 grade grouping. If it is decided to implement OVS at lunch for all grades, site staff must be trained properly in OVS requirements. **As corrective action, please indicate if the school will implement OVS at lunch for all grades, or just the required 9-12 grade grouping in PY2025. In addition, please provide a specific timeline outlining when OVS training will take place for site staff prior to PY2025 operations beginning. If training has already**



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occurred, please provide written documentation of the training, including the date, the detailed agenda, and a sign-in sheet of attendees. The training agenda template below can be utilized to capture all the necessary information.

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:388c5cd8-5ecf-347a-8b54-a75f97924e16>

General Program Compliance - Community Baptist Christian School (D305)

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

Technical Assistance: Site Specific Food Safety Plan

As observed on the day of the onsite review, a copy of the food safety plan was available, but it was not specific to the satellite kitchen operations. FSMC site staff was provided technical assistance related to the need for the site's plan to be specific to the food safety and sanitation practices of a satellite kitchen. For example, if the satellite kitchen is only hot holding & cold holding food for service, a standard operating procedure for cooking food would not need to be included.

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

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 the reach-in cooler.

Corrective Action:

Technical assistance was provided to site staff while the Field Specialist was onsite. The FSMC staff was notified and indicated they would provide the required temperature logs immediately. **No further corrective action is needed.**

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. Potentially hazardous foods that were refrigerated, prepared, or opened, and held for more than 24 hours were not date marked, including applesauce and salads.

Corrective Action:

Technical assistance was provided to site staff regarding consistent date marking of all food products being held for more than 24 hours. The FSMC staff was notified of the need for date marking labels and indicated that they would be provided immediately. **No further corrective action is needed.**



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Jefferson Traditional School (7549)

215 S. Dr Martin Luther King Jr. Blvd
South Bend, IN 46601-2003

Food Service Contact

Ms. Elizabeth Adams
Manager
(574) 393-4119

Month of Review: February 2024

Date of Onsite Review: March 6, 2024

General Program Compliance - Jefferson Traditional School (7549)

1406. The most recent food safety inspection report is posted in a publicly visible location

Finding 10156: Posted Health Inspection

On the day of the onsite review, an outdated "Certificate of No Violations from 2022" was posted, not the most recent health inspection report.

Corrective Action:

Site staff was advised and provided the opportunity to post the most recent inspection report. **No further corrective action is necessary.**

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. On the day of the onsite review, a box of flour tortillas delivered on 5/19/23, with an expiration date of 7/4/23, was located in dry storage. It is possible the tortillas had been frozen before the expiration date & thawed recently, but this was not indicated anywhere on the box.

Corrective Action:

Technical assistance was provided to site staff regarding consistent date marking of all food products to ensure First In, First Out (FIFO) rotation. The box of flour tortillas was discarded while the Field Specialist was onsite. **No further corrective action is needed.**



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Madison Steam Academy (7573)
215 S. Dr Martin Luther King Jr. Blvd
South Bend, IN 46601-2003

Food Service Contact
Ms. Denise Wesson
Manager
(574) 393-3213

Month of Review: February 2024

Date of Onsite Review: March 5, 2024

Meal Components & Quantities - Madison Steam Academy (7573)

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

Finding 9078: School is not properly implementing Offer vs. Serve.

As observed on the Day of Review, one or more cashiers did not demonstrate a clear understanding of OVS and its requirements. One meal was counted as reimbursable under OVS when a meal was incomplete due to missing the minimum number of required meal components. The student had the entrée salad (vegetable and meat alternate), baked beans, and bell peppers.

Corrective Action:

The school was provided technical assistance during the onsite visit. **As corrective action, site staff must be retrained in OVS requirements. Please provide the State Agency with written documentation of the training, including a dated, detailed agenda with staff signatures. The training agenda template below can be utilized to capture all the necessary information.**

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:388c5cd8-5ecf-347a-8b54-a75f97924e16>

General Program Compliance - Madison Steam Academy (7573)

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

Finding 10157: Buy American

A review of agricultural food components indicated violations of the Buy American Provision. There were grape tomatoes that were a product of Mexico. Documentation was not available to determine if domestic alternatives were considered or exceptions were granted.

Corrective Action:

As corrective action, please provide the State Agency a standard operating procedure that outlines how all sites will handle deliveries of non-domestic food products and document exceptions to the Buy American Provision.

Technical Assistance:

Technical assistance was provided to the SFA-FSD and FSMC-FSD regarding the Buy American Provision. The USDA requires that School Food Authorities (SFAs) purchase, to the maximum extent practicable, domestic commodities or products. It is each school's responsibility to ensure USDA dollars are spent on American grown products.

There are limited exceptions to the Buy American Provision. These exceptions allow for the purchase of products that do not meet the "domestic" standard when use of domestic products is not practicable. The following must be recorded for each non-domestic product purchased and documentation must be retained onsite:

- Date (date documentation is completed)
- Name of product



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- Country of origin
- Reason for purchase, such as the SFA determined the cost of the domestic product was exceptionally more than the cost of the non-domestic alternative or the agricultural food component is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality.

Buy American Checklist: <https://drive.google.com/file/d/1Q8ZPjb250d41SWKKTEa6nvNVhcTFz2Qh/view>



Program Year 2024

Monroe Elementary School (7585)
215 S. Dr Martin Luther King Jr. Blvd
South Bend, IN 46601-2003

Food Service Contact
Ms. Erin Bumgardner
Manager
(574) 393-2511

Month of Review: February 2024
Date of Onsite Review: March 6, 2024

General Program Compliance - Monroe Elementary School (7585)

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 food storage facility is unclean and/or disorderly. Walk in cooler floors contained a lot of debris.

Corrective Action:

Technical assistance was provided to site staff during the onsite visit regarding the need to sweep and scrub the cooler floor on a regular basis. **No further corrective action is needed.**



Program Year 2024

New Vision Christian Academy (D249) Food Service Contact

215 S. Dr Martin Luther King Jr. Blvd
South Bend, IN 46601-2003

Ms. Ivy Butler
Director
(574) 514-3950

Month of Review: February 2024

Date of Onsite Review: March 5, 2024

Meal Counting & Claiming - New Vision Christian Academy (D249)

325. Review Period- meal counts by category were correctly used in the claim for reimbursement

Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.

The sum of the school's daily meal counts by category for the review period does not match the State agency's validated meal counts for the school for the review period. On several days, the daily meal count sheets reported more meals served than documented on production records:

2/12: meal count sheet stated 40 breakfasts served, production stated 20 meals served.

2/15: meal count sheet stated 30 breakfasts served, production stated 16 meals served.

Net overclaim of 34 meals.

2/12: meal count sheet stated 40 lunches served, production stated 30 meals served.

2/15: meal count sheet stated 32 lunches served, production stated 28 meals served.

2/28: meal count sheet stated 31 lunches served, production stated 30 meals served.

Net overclaim of 15 meals.

The claim consolidation errors for this site will contribute toward fiscal action calculations.

Corrective Action:

See Sponsor-Level Finding 9007 for Corrective Action.

Meal Components & Quantities - New Vision Christian Academy (D249)

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

Finding 9078: School is not properly implementing Offer vs. Serve.

In CNPweb Offer vs. Serve was selected for both breakfast & lunch. However, as observed on the Day of Review, Offer vs. Serve (OVS) was not being implemented at either meal service. While OVS is optional at breakfast for all grades and lunch for the K-5 & 6-8 grade groupings, OVS must be implemented at lunch for the 9-12 grade grouping.

Corrective Action:

Technical assistance was provided to the SFA-FSD, FSMC-FSD, and SBCSC food service office staff regarding the requirement to implement OVS for the 9-12 grade grouping. The SFA must first determine if they will implement OVS at breakfast and OVS at lunch for all grades, or just the required 9-12 grade grouping. If it is decided to implement OVS at both breakfast and lunch for all grades, site staff must be trained properly in OVS requirements for both meal services. If it is decided that OVS will only be implemented at lunch for the 9-12 grade grouping, only lunch OVS training is required. **As corrective action, please indicate at which meal services OVS will be implemented in PY2025. In addition, please provide a specific timeline outlining when OVS training will take place for site staff prior to PY2025 operations beginning. If training has already occurred, please provide written documentation of the training, including the date, the detailed agenda, and a sign-in sheet of attendees. The training agenda template below can be utilized to capture all the necessary information.**

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:388c5cd8-5ecf-347a-8b54-a75f97924e16>



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502. *Day of Review- signage explaining the OVS reimbursable meal was posted near/at the beginning of the service line*

Technical Assistance: Offer vs. Serve Meal Signage

Current meal service signage is non-Offer vs Serve, as that is how the site has been operating its meal services. Technical assistance was provided to the SFA-FSD & FSMC-FSD regarding the need to update meal signage to accurately reflect OVS implementation prior to PY2025 operations beginning.

General Program Compliance - New Vision Christian Academy (D249)

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.

A copy of the written food safety plan was not available at the reviewed school.

Corrective Action:

Technical assistance was provided to the Food Service Director and Asst. Director regarding the need for a copy of SBCSC's food safety plan to be provided to New Vision Christian Academy. Site staff should be trained on the contents of the policy and should be monitored regularly to ensure proper food safety and sanitation procedures are being followed.

As corrective action, please confirm the date that a copy of the food safety plan was provided and reviewed with New Vision site staff. If not yet implemented, please provide a timeline for when the food safety plan will be provided and reviewed with site staff prior to PY2025 operations beginning.

1406. *The most recent food safety inspection report is posted in a publicly visible location*

Finding 9147: Food Safety Inspection Report

On the day of the onsite review, there was no recent food safety inspection posted. It was observed that the school had recently received a "consultation" visit on 2/26/24 to correct issues related to the grease traps and service sink drain prior to scheduling an opening inspection to receive a food permit.

Corrective Action:

The Field Specialist contacted the St Joseph County Department of Health to determine the local requirements for food permits and the status of New Vision Christian Academy. The Department of Health administrator confirmed that the site just had their first formal inspection, and the food permit was ready to be picked up. Technical assistance regarding the status of the food permit was provided to the SFA-FSD & FSMC-FSD. Both verbally acknowledged that they would ensure the food permit was picked up and posted at the site as soon as possible. **As corrective action, please provide the State Agency with a copy of New Vision's food permit & most recent health inspection report.**



Program Year 2024

St John the Baptist (D265)

215 S. Dr Martin Luther King Jr. Blvd
South Bend, IN 46601-2003

Food Service Contact

Ms. Maureen Kapica
Secretary
(574) 232-9849

Month of Review: February 2024

Date of Onsite Review: March 4, 2024

Meal Counting & Claiming - St John the Baptist (D265)

325. Review Period- meal counts by category were correctly used in the claim for reimbursement

Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.

The SFA's claim for the school for the Review Period did not match the State Agency's validated meal counts for the Review Period. On 2/9/24, the lunch meal count sheet only indicated 90 meals served. Meals prepped (100) was entered as total meals served. Overall, 2152 meals were claimed, but SA validated 2142, a net overclaim. The SFA was provided with the opportunity to correct the claim while the Field Specialist was onsite.

Corrective Action:

See Sponsor-Level Finding 9007 for Corrective Action.

Meal Components & Quantities - St John the Baptist (D265)

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

Technical Assistance: Vegetable Serving Size

On the day of the onsite review, it was noted that the 2nd vegetable planned for the day, grape tomatoes, would not be served that day. Prior to the meal service beginning, the Field Specialist observed that the server had a 1/2 c disher ready to use for serving the steamed corn. Technical assistance was provided, and the serving staff and additional FSMC staff on site were advised to increase it to a 3/4 c disher to ensure the minimum vegetable requirement would be met for the day.



Program Year 2024

Washington High School (7517)
215 S. Dr Martin Luther King Jr. Blvd
South Bend, IN 46601-2003

Food Service Contact
Ms. Ilka Cruz
Manager
(574) 393-5547

Month of Review: February 2024
Date of Onsite Review: March 6, 2024

Meal Components & Quantities - Washington High School (7517)

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

Finding 9078: School is not properly implementing Offer vs. Serve.

As observed on the Day of Review, a student selected a reimbursable meal, and then the student was made to select an additional item(s).

Corrective Action:

The school was provided technical assistance during the onsite visit. **As corrective action, site staff must be retrained in OVS requirements. Please provide the State Agency with written documentation of the training, including a dated, detailed agenda with staff signatures. The training agenda template below can be utilized to capture all the necessary information.**

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:388c5cd8-5ecf-347a-8b54-a75f97924e16>

General Program Compliance - Washington High School (7517)

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. Not all food is stored at least 6 inches off the floor. In both walk in refrigerators there was food that was stored directly on the floor. In addition, there was evidence of pests in the dry storage rooms at Washington High School.

Corrective Action:

Technical assistance was provided to the school manager and FSMC representative regarding the requirement that food must be stored at least six inches off the floor to help prevent pest infestations. The SFA-FSD and FSMC-FSD were notified of the pest issue and advised to contact their pest control services for further evaluation. The food was removed from the floor while the SA was onsite. **No further corrective action is necessary.**

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

Finding 10157: Buy American

Review of agricultural food components indicates violations of the Buy American provision. There were grape tomatoes that were a product of Mexico. Documentation was not available to determine if domestic alternatives were considered or exceptions were granted.

Corrective Action:

See Finding 10157 under Madison Steam Academy for TA provided, and corrective action needed.