

**SNP Administrative Review Findings****Christ The King School (K270)****Program Year 2020****Christ The King School (K270)**

3101 Bayard Park Drive  
Evansville, IN 47714-2602

**Food Service Contact**

Mrs. Leslie A Flittner  
Food Service Director  
(812) 455-1141

**Executive Contact**

Mr. Matt Moore  
Principal  
(812) 476-1792

No. of Sites / Reviewed: 1 / 1  
Month of Review: October 2019

**Commendations**

- \* The SFA should be commended on completing the entire verification process correctly and timely. The SFA was organized in recordkeeping for both the verification and free and reduced processes, although there were errors identified.

**Certification and Benefit Issuance - Christ The King School (K270)***126. Certification: selected applications correctly approved***Finding 9017: Correct implementation of application approval process**

The application approval process is not implemented correctly. Errors found on the applications include missing household members and the last four digits of the SSN. These errors were corrected during the onsite review.

**Corrective Action:**

During the onsite review, the determining official was able to correct applications missing information that included household members and the last four digits of the SSN. Additional response is not required.

**Technical Assistance:**

Application requirements were discussed with the administrative assistant and the cafeteria manager on the day of review.

**Meal Counting & Claiming - Christ The King School (K270)***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.**

Discrepancies or deficiencies found on-site:

-The POS reports do not contain all the information for an edit check to be considered complete. The reports do not show how many eligible students for each category is available.

**Corrective Action:**

Corrective action required to address discrepancies or deficiencies in the SFA's Meal Counting & Claiming procedures identified from the Off-site Assessment Tool:

-The SFA is required to complete an edit check monthly that shows the daily number of meals to be claimed and the number of eligible students for meals. Please submit a copy of the most recent edit check.

**Technical Assistance:**

Technical Assistance provided to address discrepancies or deficiencies in the SFA's Meal Counting & Claiming procedures identified from the Off-site Assessment Tool: the reviewer provided the cafeteria manager with the edit check template and instructions.

**Resource Management Comprehensive Review - Christ The King School (K270)***753. Internal Controls***Technical Assistance:**

The SFA needs to develop a written policy that prohibits the use of nonprofit school food service account funds to cover bad debt.

**SNP Administrative Review Findings**  
*Program Year 2020***Christ The King School (K270)***766. Assessing Compliance with the Nonprogram Foods Revenue/Cost Ratio***Finding 9000: Non-program Foods Revenue Assessment**

The SFA did not assess its compliance with the revenue from non-program foods requirements 7 CFR 210.14(f).

**Corrective Action:**

The SFA must assess compliance with the Revenue from nonprogram foods. For corrective action, the SFA must complete the 5-day reference period using the non-program food revenue tool. Please submit the non-program revenue tool with documentation to support the figures used.

**Technical Assistance:**

The reviewer provided the cafeteria manager the USDA memo SP20-2016 explaining the reference period with a 5-day revenue tool.

*770. Correct Rate/Base Calculation***Finding 9000: Indirect Costs too High**

The SFA exceeded the maximum allowable amount of indirect costs that can be charged to the nonprofit school foodservice account.

**Corrective Action:**

The SFA has provided documentation to show that the nonprofit school foodservice account recovered \$165.89 for the overpayment of indirect costs. Additional response is not required.

**Technical Assistance:**

Please note that parochial schools have a maximum indirect cost rate of 10%. Also, when calculating the allowable amount of indirect costs to be charged to foodservice, be sure to use the following formula:

Total Expenses (Minus Food & Equipment) X Approved Indirect Cost Rate (10%) = Maximum Allowable Amount of Indirect Costs.

*771. Indirect Cost Consistency***Finding 9135: SFA did not handle indirect costs consistently in all activities of the SFA.**

Handling of indirect costs must be consistent in all activities of the SFA unless otherwise exempted. For example, if the nonprofit school food service account is charged for electricity costs based on square footage, all other activities of the SFA must be similarly charged, as applicable.

**Corrective Action:**

The SFA must ensure that indirect costs will be charged consistently across all federal programs operating within the school corporation. For corrective action, please confirm that all federal programs operating within the school will be charged consistently for indirect costs.

**Technical Assistance:**

Please note that if indirect costs are charged to foodservice (i.e. utilities, etc.), they must also be charged consistently to other federal programs (i.e. Title I, etc.).

*773. Proper Classification of Costs (Direct/Indirect)***Finding 9138: Costs not consistently classified as direct or indirect**

The school food service accounts are charged directly for expenses that are included in the indirect cost pool (double-dipping). Costs charged as direct expenses that are also included in the indirect cost pool: Water & Sewage.

**Corrective Action:**

The SFA has provided documentation to show that the nonprofit school food service account has recovered \$229.97 for utilities that were charged both directly and indirectly. Additional response is not required.

**Technical Assistance:**

Please refer to the financial management webpage to ensure compliance with the classification of indirect costs:

**SNP Administrative Review Findings****Christ The King School (K270)****Program Year 2020**

<https://www.doe.in.gov/nutrition/financial-management>. The provided link consists of the Indirect Cost Guidance Manual, as well as the Indirect Cost Fact Sheet.

**General Program Compliance - Christ The King School (K270)***810. The USDA non-discrimination statement is on appropriate Program materials***Finding 9000: Nondiscrimination Statement**

The USDA full non-discrimination statement is not on the school website. A USDA required nondiscrimination statement must be included on all forms of communication and program materials related to receipt of free or reduced-price child nutrition program benefits, including all materials for public information, education, or distribution that mention USDA programs.

**Corrective Action:**

For corrective action, please post the full nondiscrimination statement on the school website. Please provide the web address once the school website has been updated.

**Technical Assistance:**

The nondiscrimination statement was provided to the administrative assistant and cafeteria manager on the day of review.

*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: Technical Assistance- School Wellness Policy****Technical Assistance:**

As a reminder, the triennial assessment must be completed every 3 years. This needs to be done by the end of 2020. Available resources to complete the assessment can be found at <https://www.doe.in.gov/nutrition/school-wellness-policy>.

*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.**

Discrepancies or deficiencies found on-site:

-Items that are sold outside of the reimbursable meal such as unmenued entrees, sides, or packaged items like ice cream, chips, beverages need to meet smart snack compliance. Currently, no items sold have been determined for smart snack compliance.

**Corrective Action:**

For corrective action, the cafeteria manager will need to determine a process for smart snacks, including items that might be sold during the school day outside of the cafeteria. All items that are sold during the school day (except allowable exemptions) are required to be checked for compliance in the smart snack calculator. In addition, the cafeteria manager will need to complete the Smart Snacks in Schools Series training located in the inTEAM blackboard. Please explain the process that has been out in place for smart snacks. Also, please submit the training completion certificate.

**Technical Assistance:**

Technical assistance provided to address discrepancies or deficiencies in the SFA's Smart Snacks policies and practices identified from the Off-site Assessment Tool: the reviewer provided the cafeteria manager with the smart snack calculator and the USDA smart snack memo SP 23-2014 (V.3).

*1217. SFA's process and frequency for tracking training hours is sufficient***Finding 9000: Training of Food Service Employees**

At the time of the review, the tracking for professional standards was not completed. An additional employee in the kitchen, hired August 2018, has not received any training other than civil rights. Annual training must focus on the day-to-day management and operation of the school nutrition programs.

**Corrective Action:**

The SFA needs to ensure that all foodservice employees complete training annually. The SFA will need to develop a detailed training plan for foodservice employees to complete all required hours. For corrective action, please submit the tracking of

**SNP Administrative Review Findings****Christ The King School (K270)****Program Year 2020**

professional standards for all foodservice employees with supporting documentation. Additionally, please provide the developed training plan for the foodservice to attain all required hours.

**Technical Assistance:**

This finding and requirements were discussed with the administrative assistant and the cafeteria manager on the day of review. The reviewer also provided the website for professional standards.

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

**Finding 9000: Food Safety Plan \*Repeat Finding**

The school does not have a written food safety plan.

**Corrective Action:**

For corrective action, the SFA must complete a written food safety plan. Also, required in the food safety plan are standard operating procedures specific to the school. Please confirm the food safety plan has been completed and includes developed standard operating procedures.

**Technical Assistance:**

This finding and requirements were discussed with the administrative assistant and cafeteria manager on the day of review. The reviewer also provided the food safety plan template.

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

**Finding 9000: Technical Assistance- Summer Food Service Outreach****Technical Assistance:**

School Food Authorities are required to provide outreach for the Summer Food Service Program prior to the end of each school year- even if they do not operate the Summer Food Service Program (SFSP). Please visit <https://www.doe.in.gov/nutrition/summer-food-service-program> prior to the end of each school year to determine nearby SFSP sites so that you may inform households of availability.

**SNP Administrative Review Findings****Christ The King School (K270)****Program Year 2020****Christ The King School (D545)**3101 Bayard Park Drive  
Evansville, IN 47714-2602**Food Service Contact**Mrs. Leslie A Flittner  
Food Service Director  
(812) 475-6800

Month of Review: October 2019

Date of Onsite Review: November 25, 2019

**Meal Components & Quantities - Christ The King School (D545)***400. Day of Review- all required meal components were available to all students during the entire meal service***Finding 9002: Meal components missing on Day of Review.**

As observed on the Day of Review, required meal components were not available on every reimbursable meal service line to all participating students. The chef salad was missing the grain component prior to the beginning of the meal service. The cafeteria manager verbally provided that grains are not planned or offered with the salad that appears on menus. At this time, no meals were disallowed. Failure to comply with meal pattern requirements could result in future disallowances. Please note that production records are proof that meals were planned and prepared to meet all meal pattern components.

**Corrective Action:**

The reviewer provided training regarding the meal pattern, including the opportunity to add the missing grain component before the meal service started. The cafeteria manager added crackers to the salads on the day of review. Since grains are not planned with the salad option, please explain what changes have been made to the cycle menus to reflect all components being offered daily with all options.

**Technical Assistance:**

The school was advised and given the opportunity to add the missing meal component(s) before the meal service started. This finding and meal pattern requirements were discussed with the administrative assistant and cafeteria manager on the day of review.

*402. Day of Review- the minimum daily quantity requirements are met for the age/grade group being served***Finding 9052: Day of Review portion sizes insufficient.**

As observed on the Day of Review, the portion sizes of meal components from the planned menu and served on the day of review did not meet the minimum meal pattern requirements for the age/grade group(s) being served. Meals that contain insufficient quantities of meal components are incomplete and are not reimbursable. Insufficient portion sizes observed on the Day of Review:

-The school was offering a hash brown patty that provided a creditable 1/4 cup vegetable component. The school did not plan another vegetable for the day. The daily requirement is a 3/4 cup for the vegetable component.

**Corrective Action:**

On the day of review, the reviewer provided in-depth meal pattern training with the cafeteria manager. The foodservice staff increased the vegetable component to 3/4 cup by offering 1/2 cup of baby carrots with all meal options. Additional response is not required.

**Technical Assistance:**

The school was advised and given the opportunity to correct the insufficient quantity of one meal component(s) before the meal service started. The reviewer provided technical assistance on standardized recipes with the cafeteria manager on the day of review. The school planned the grilled cheese option to be a creditable 2oz. equivalent meat/meat alternate. The school was only providing enough cheese to credit as 1oz. equivalent meat/meat alternate. The USDA sliced cheese credits two slices at 1oz. equivalent meat/meat alternate.

*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. \*Repeat Finding**

SNP Administrative Review Findings

Christ The King School (K270)

Program Year 2020

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

**Corrective Action:**

For corrective action, the school will need to obtain meal pattern signage. Please provide documentation the meal pattern signage has been obtained and installed.

**Technical Assistance:**

During the onsite visit, the reviewer provided different places to contact regarding signage for the meal pattern.

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

**Finding 9075: Production records/supporting documentation indicate weekly meal pattern requirements for the age/grade group(s) not met. \*Repeat Finding**

Meal pattern violations were noted during the review, including not being able to provide supporting documentation of the meal pattern.

1. No food labels to indicate crediting such as nutrition facts, CN labels, or product formulation statements have been maintained. The only food labels found were from the week of review from the prior review, 2016-17 school year.
2. Food production records are not completed. Additionally, nothing is recorded on separate papers to indicate what is served. Not all the substitutions are recorded on the main menu which is the only piece of documentation to show what was planned. However, this is not a detailed menu indicating portion sizes. In looking at the menu provided to the public, vegetable subgroups are not being met. Salads were served 12 days in October were missing a component (grain).
3. A food inventory is not being completed for on-hand food including USDA Foods (commodities). Inventory should be completed monthly at a minimum.

Due to the lack of documentation that supports meal pattern compliance, all meals (2181) in October 2019 have been disallowed. Further failure to comply with the meal pattern requirements and failure to maintain supportive documentation could result in future meals being disallowed and/or claims being placed on hold until compliance is demonstrated.

**Corrective Action:**

Corrective action required to address discrepancies or deficiencies in the SFA's Meal Pattern Compliance identified from the Off-site Assessment Tool:

1. The SFA is required to contact manufacturers to obtain product formulations statements or CN labels on products that are being used. Crediting on some products may also be determined using the Food Buying Guide. The foodservice must complete the Crediting Foods Course located in the inTEAM blackboard. Please submit the attendance sheet and the training certificate that will document the training has been completed.
2. Food production records document what is being served to the students. The SFA must complete food production records daily. The foodservice must complete the Food Production Record Course located in the inTEAM blackboard. Please submit the attendance sheet and the training certificate that will document the training has been completed.
3. USDA has a daily and weekly meal pattern that has been determined by grade groupings. The SFA must ensure that each requirement is met. The SFA is required to revise the menu cycles to meet the vegetable subgroups and all components required for the meal pattern. The SFA will need to start using the menu certification worksheets to determine if the daily and weekly compliance is met. Please explain what has been changed on the menu cycles. Additionally, please submit the weekly menu certification worksheets.
4. The SFA will need to complete a monthly inventory. The SFA is required to complete the Institute of Child Nutrition Inventory Management- Controlling Cost training. Please submit the attendance sheet and the training certificate that will document the training has been completed.

**Technical Assistance:**

The school was provided technical assistance during the on-site visit. This finding and meal pattern requirements were discussed with the administrative assistant and cafeteria manager on the day of review. The reviewer provided the cafeteria manager with the meal pattern requirements and food production records.

Menu Certification Worksheets- <https://www.doe.in.gov/nutrition/menu-certification>

Inventory Management- Controlling Cost training-

<https://theicn.docebosaa.com/learn/course/external/view/elearning/13/InventoryManagement-ControllingCost>

**SNP Administrative Review Findings**

**Christ The King School (K270)**

**Program Year 2020**

811. *The USDA "And Justice for All" poster is displayed in a prominent location and visible to recipients of benefits*

**Finding 9101: Justice For All poster not displayed in prominent location.**

**Technical Assistance:**

On the day of review the USDA "And Justice for All" poster was not displayed in a prominent location where it is visible to recipients of benefits. The reviewer provided technical assistance and the poster was moved to a different location.

1408. *Temperature logs are available*

**Finding 9000: Food Safety**

On the day of review, the reviewer observed the sausage and hash browns were not kept at the required serving temperature. There was no record of the final cooking temperature of either product. The foodservice staff is not turning on the steam table where the food is being served. Also, temperatures are being taken but not recorded.

**Corrective Action:**

Temperature logs are required to be maintained for a minimum of 6 months. For corrective action, please explain what changes have been made to the serving area to make sure the food temperatures are maintained. Also, please provide temperature logs for December.

**Technical Assistance:**

The reviewer provided in-depth technical assistance regarding food safety. The reviewer also provided the cafeteria manager with food safety logs from the Institute of Child Nutrition on the day of review.