

## SNP Administrative Review Findings

## Clay Community Schools (1125)

### Program Year 2022

#### Clay Community Schools (1125)

1013 S. Forest Ave.  
Brazil, IN 47834-3182

#### Food Service Contact

Mrs. Patsy Woolery  
Interim Director of Food Service  
(812) 443-4461  
wooleryp@clay.k12.in.us

#### Executive Contact

Mr. Jeffery Fritz  
Superintendent  
(812) 443-4461  
fritzj@clay.k12.in.us

No. of Sites / Reviewed: 10 / 2

Month of Review: March 2022

### Commendations

- \* The kitchen staff were friendly and expressed the desire to follow the regulations. The kitchens, including storerooms and freezer, were clean and organized. Batch cooking for the pizza made it fresh and appealing for the students. The school offered three different choices for entrees, which is really nice to see.

### Resource Management - Clay Community Schools (1125)

#### 709. Does SFA sell non-program foods?

##### **Finding 9000: Addition of many additional items as "extras"**

On the review day at both reviewed schools, the food service staff followed the planned menu, but in addition to the planned menu offered several other extra items daily with the meal, including fruit juice, extra peanut butter, milk, birthday treats, etc. These items are not tracked for non-program revenue tool compliance or included in the nutrient analysis to consider the extra calories that likely make the meals higher in the recommended calorie range for the week. For example, just taking the planned menu as written and including the birthday treat, the number of calories provided for the day's meal was over the range recommended for elementary children.

##### **Corrective Action:**

While it is allowable to serve extras to students, these need to be planned into the weekly menu ranges to ensure menu compliance. The menu planner must review the procedures for adding extras to the planned menu with all kitchen staff (not just the reviewed schools). Please consider the following when adding extras to the meal pattern: Whole fruit and fresh fruits and vegetables are better choices to add as extras because they are more nutrient dense than fruit juice. If there is no charge for all the extra items that are given but not sold, the cost of the extra items must be factored into the non-program revenue calculation. The federal reimbursements received from participation in child nutrition programs should support the components of the reimbursable meal.

On June 17, 2022, the interim food service director provided written corrective action explaining that birthday treats have been removed from future menus. While this covers one of the areas noted during the site review, additional items outside the birthday treats were provided free of charge without being planned into the menu. **For corrective action, provide written procedures the kitchen staff must follow and confirm through site visits that the staff is implementing the procedures as written.**

##### **Technical Assistance:**

Some kitchen staff was concerned about the quality of the food being sent from home and wanted to supplement those meals with extra items. While this is a noble action, perhaps encouraging parents to pack healthy meals or supplement what is sent from home by allowing the child to still go through the line and take a meal using the Offer Versus Serve method would be a way to ensure all students receive quality meals within the guidelines.

### Resource Management Comprehensive Review - Clay Community Schools (1125)

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

##### **Finding 9000: Non-Program Revenue Ratio**

The non-program revenue ratio was lower than the food cost ratio when completing the non-program revenue tool reference period for the school year 2021-2022.

##### **Corrective Action:**

After the review of the non-program revenue was completed, the SFA increased several prices for items sold that went into effect in February 2022. The new prices were plugged into the non-program revenue tool to check if a breakeven or positive return would occur. **Therefore, additional corrective action is not required.**

### General Program Compliance - Clay Community Schools (1125)

**SNP Administrative Review Findings****Clay Community Schools (1125)****Program Year 2022**

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- Assessment of the Local School Wellness Policy**

The SFA uses a policy template from a company that allows customization. When outsourcing with a company to provide language and policy suggestions, SFAs must ensure that the local wellness committee is involved. As a reminder, the triennial assessment must be completed every 3 years. The assessment needs to be done by the end of June 2023. Available resources to complete the assessment can be found at <https://www.in.gov/doe/nutrition/wellness-policies/>.

1110. *On-site observations validate Off-Site Assessment Tool responses to Smart Snacks questions and responses demonstrate compliance with FNS requirements*

**Technical Assistance- Fundraisers**

The schools allow PTO, student council, etc., to sell food items that do not meet Smart Snack requirements. The SFA needs to determine an approval process for fundraisers and/or food items sold outside the cafeteria during the school day. Indiana allows two exemptions per school building, per school year, for fundraisers involving the sale of foods and/or beverages not meeting the nutrition standards for Smart Snacks and occurring during the school day. The maximum duration of an exempted fundraiser is one day. <https://drive.google.com/file/d/1ilvfWWYSXCbl2xXU-hfv1Fyz-44G3b2l/view> Schools are encouraged to consider alternative non-food items to be sold as fundraisers instead of selling food.

1212. *New School Nutrition Programs Director met hiring requirements*

**Technical Assistance- Hiring Requirements for a Food Service Director (FSD)**

The food service director was granted an interim food service director title in 2019 since all of USDA's hiring requirements for Clay Community's enrollment size were not met. The interim flexibility was allowed as long as the FSD actively worked toward an Associate's Degree. However, during the Administrative Review, it was determined that the FSD had not worked on the Associate's Degree for quite some time. USDA does not allow food service directors to hold an interim title indefinitely. The SFA can continue to be Clay Community's interim director if the course load is increased to complete the degree requirements within two years. In addition to the education requirement, the interim FSD will need to begin a detailed training plan with the IDOE. This is a customized plan to give the interim FSD a greater understanding of School Nutrition requirements to run a successful program.

If classes do not start in August 2022 or if the interim FSD decides to stop again, the school needs to hire someone else to serve as the food service director. This person must meet the hiring requirements, maintain 12 hours of applicable foodservice program training each school year, and obtain an approved food safety certification (such as a ServSafe certification). If that is not an option, then the only temporary option is to pay the interim FSD's salary through a non-federal funding source instead of the food service account.

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 food safety plan does not include the required elements. A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes: (i) Standard operating procedures to provide a food safety foundation; (ii) Menu items grouped according to process categories; (iii) Critical control points and critical limits; (iv) Monitoring procedures; (v) Corrective action procedures; (vi) Recordkeeping procedures; and (vii) Periodic program review and revision.

**Corrective Action:**

During the on-site review, the reviewer sent resources to the interim food service director regarding food safety plan development. As a result, the FSD contacted the reviewer on June 17, 2022, explaining all food safety plans were updated and distributed to each school for the new school year. **Therefore, additional corrective action is not required.**

**SNP Administrative Review Findings****Clay Community Schools (1125)****Program Year 2022**

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

**Technical Assistance- Meal Notification**

At the beginning of the school year and multiple times throughout the year, sponsors are required to notify households of their breakfast program. Sponsors should remind households of each school's location, time, and cost of breakfast. This can be achieved by sending households a letter or flyer with the information, posting this information on the website, including a blurb about the breakfast program in the school newsletter, adding an outgoing message about breakfast through an automated calling system, or sending out a notification via email.

School Food Authorities must provide outreach for the Summer Food Service Program before the end of each school year-even if they do not operate the SFSP. Therefore, please visit <https://www.in.gov/doe/nutrition/meal-site-information/> prior to the end of each school year to determine nearby SFSP sites so that you may inform households of availability. Furthermore, all outreach (CEP, breakfast, lunch, summer meals, etc.) should be kept on file for 3 years plus the current program year.

**Other Federal Programs - Clay Community Schools (1125)**

1805. SFA reviewed all SSO sites at least once.

**Technical Assistance: SFA has not conducted a review of each of its Seamless Summer Options sites at least once during the site's operation.**

On the day of the site review, technical assistance was provided regarding site reviews for the seamless summer operations. A site review of each Seamless Summer Options must be conducted at least once during the site's operation. The FSD provided copies of the completed site reviews on June 17, 2022.

1806. Does SFA advertise the availability and location of free meals at the area-eligible site?

**Finding 9240: SFA did not advertise the availability and location of free meals at area-eligible SSO sites to the community.**

During the site review conducted on June 13, 2022, it was determined the SFA did not advertise the schools participating in Seamless Summer Option as an open site to the public. The schools provided meal service in a closed enrolled environment for summer school. If a school is providing meal service for summer school children, it is required the site be an open site.

**Corrective Action:**

The reviewer provided technical assistance regarding the eligibility requirements for meal service during summer school for SSO with the interim FSD. On July 15, 2022, the SFA released a robocall and email to households with the schools participating in SSO, including meal service times for the opportunity for children to participate in SSO operations. **Therefore, additional corrective action is not required.**

**SNP Administrative Review Findings****Clay Community Schools (1125)****Program Year 2022****Clay City Elementary School (0895)**

1013 S. Forest Ave.  
Brazil, IN 47834-3182

**Food Service Contact**

Mrs. Paula Miller  
Manager  
(812) 939-3120

Month of Review: March 2022

Date of Onsite Review: April 27, 2022

**Meal Counting & Claiming - Clay City Elementary School (0895)**

*320. Day of Review- meal count totals are combined and recorded correctly*

**Finding 9068: Meal count totals were not combined and recorded correctly.**

As observed on the Day of Review, meal count totals obtained from each point of service are not combined accurately for the school's total meal count. The problem is considered systemic because the contributing factors are built into the process and would likely recur if the process is not changed.

Breakfast- Meal counts were not taken when the students receive the meal in the morning. Additionally, one class allowed the students to record if they received a breakfast on the Google Sheet used to take the meal count.

Lunch- Meal counts were recorded from the Google Sheet's pre-order. While pre-order counts may help kitchen staff in knowing the approximate number of meals to prepare, they cannot be used as the point of sale meal count. Meal counts must be recorded as the student receives the meal. Changes can occur from the morning submission to lunchtime, resulting in different meal counts because of students coming in late, changing their minds, being elsewhere in the building during lunch, leaving school before lunch, etc.

**Corrective Action:**

Staff who take meal counts must be trained in civil rights and identification of reimbursable meals, including the meal counting process. Meal counts should always be taken as the student receives the meal. While a pre-order is beneficial for anticipating the day's required production, food service staff must verify that each student receives the tray before claiming the meal for reimbursement. Therefore, it is recommended that the students go to the POS where staff verify the tray and record the meal. Another option would be to have someone check the names off on the pre-order when the student receives the meal. Changes to the meal counting process should be addressed immediately since it involves claim reimbursement. Again, meals must be correctly recorded as the student receives the meal.

On June 17, 2022, the interim food service director submitted a written corrective explaining the immediate changes to the meal counting process for breakfast and lunch. For breakfast, the school did not implement Offer vs. Serve for breakfast in the classroom. Instead, each meal was bagged to meet the daily and weekly requirements for grains, fruit, and milk. The cafeteria staff handed out all meals in the classroom while marking the student roster as the student received a meal. For lunch, the kitchen staff continues to use pre-order sheets. However, as the student received the meal, the staff added a check next to the student verifying a meal was received. In addition, all manual rosters were put into the POS by the end of the day.

**Therefore, additional corrective action is not required.**

**Meal Components & Quantities - Clay City Elementary School (0895)**

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

**Finding 9000: Breakfast Fruit Portions**

Breakfast in the classroom is delivered between 8:05-and 8:25 am. Bags contain grain item(s), 4oz juice, and milk. The other fruit option is packed separately. When the staff delivers the bags, they ask the students if they want the other fruit option. But, since this is delivered before the bell rings, not all the students are in the classroom. Therefore, all students need to be offered the other fruit option for a daily minimum of 1 cup of fruit.

SNP Administrative Review Findings

Clay Community Schools (1125)

Program Year 2022

**Corrective Action:**

During the on-site review, the reviewer recommended the staff leave the other fruit option in the classrooms for all students to have access to the full 1 cup requirement. Then, the excess amount can be returned to the kitchen. Another option is to pack all items in the bags (not provide OvS). On June 17, 2022, the interim food service director contacted the reviewer explaining after the on-site review, the breakfast meals were bagged with every component- grain, 1 cup of fruit, and milk. **Therefore, additional corrective action is required.**

403. Day of Review- fluid milk (or allowable substitutions) was available in at least two allowable varieties throughout the serving period on all meal service lines

**Finding 9054: Milk substitutions on Day of Review not allowable.**

Milk substitutions made on the Day of Review were not allowable per 7CFR 210.10. Juice is being substituted for some students in place of the milk component without proper documentation from someone with prescriptive authority.

**Corrective Action:**

During the on-site review, the reviewer provided technical assistance regarding milk substitutions with the interim food service director and site staff. The school receives an approved milk substitution and has made it available to all students unable to consume fluid milk. Furthermore, the school nurse was contacted for medical documentation where the meal pattern could not be met. If nothing was filed, households were contacted. **Therefore, additional corrective action is not required.**

**Technical Assistance:**

At a minimum, schools must notify parents and guardians of the process for requesting meal modifications to accommodate a child's disability, how they will be notified of a decision, and their procedural rights. Back-to-school registration events are a great time to make parents aware of this process and to make the medical statement forms available or, if a student has a medical form on file, to check with the family that the child's medical needs remain the same.

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 the beginning of the service line.**

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

**Corrective Action:**

During the on-site review, the reviewer provided the interim food service director with options on where to obtain meal signage. As a result, the FSD placed an order for signage with a company that would deliver signs before the new school year. **Therefore, additional corrective action is not required.**

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

**Finding 9000: Production Records**

A review of production records at both schools was completed. It was determined that production records were not completed correctly.

- The total purchase units are recorded as the case/pack size. This column should be recorded as the amount of food prepared for that component. So, if you have chicken nuggets, list how many cases were used to prepare the # of prepared servings- 3 cases + 2 bags. Another example would be how many #10 cans were used for 48 servings of peaches= 2 #10 cans.
- All items served as part of the reimbursable meal must be recorded on the production record. Since the production record is pre-printed, staff must manually add these items when things change.
- Fruit and vegetables need to be listed as what is actually being served during those meal services. The kitchen staff is recording fruit and vegetable but not specifying what is being prepared or served.

**Corrective Action:**

During the site reviews, technical assistance was provided to the kitchen staff and interim food service director regarding how to complete production records. The interim FSD director provided additional training with the schools reviewed after the review. In addition, the interim FSD conducted a back-to-school training with managers in July to discuss how to complete production records. **Therefore, additional corrective action is not required.**

**SNP Administrative Review Findings**  
*Program Year 2022*

**Clay Community Schools (1125)**

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 planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) served. Meals served with insufficient portion size, or insufficient quantities of meal components are incomplete and are not reimbursable. The menu planner is reminded to plan menus that meet all components in daily and weekly serving sizes.

- The menu review for lunch provided the PBJ w/yogurt option met daily requirements but not weekly for meat/meat alternate. When the school served PBJ with Gogurt, only a .5oz equivalent serving of yogurt was served. This option was served daily, resulting in the insufficiency for the weekly total- 7.5 oz instead of 8 oz.

**Corrective Action:**

During the site review, the reviewer provided technical assistance regarding crediting. For example, to get a 1 oz equivalent serving of yogurt, 4 oz of yogurt would need to be planned. After the crediting discussion, the cafeteria manager understood the crediting differences rather than just substituting in like items. The manager will discuss substitutions with the interim food service director to ensure crediting is still met. **Therefore, additional corrective action is not required.**

500. *Day of Review- Offer vs. Serve was implemented correctly*

**Finding 9078: The school is not correctly implementing Offer vs. Serve.**

Offer Vs. Serve is not being implemented correctly at lunch. The school is pre-plating all components but milk and the fresh vegetable option. On the day of the review, nearly all students took the milk. The fresh vegetable of the day was on the other side of the cafeteria, away from the meal service line. OVS allows students to decline two of the five components offered in the meal.

**Corrective Action:**

The reviewer provided on-site technical assistance to the site staff and the interim food service director on the review day. As a result, the fresh vegetable was moved to the service line before the POS for students to pick up with their meal. Additionally, the site staff continued to pre-plate the meals, but the staff would make another tray when students declined items.

**Therefore, additional corrective action is not required.**

**Technical Assistance:**

It is recommended that the interim food service director conducts training with all site staff regarding Offer Vs. Serve. Additionally, the FSD is encouraged to provide continual feedback to the site staff by conducting ongoing monitoring to ensure compliance.

**General Program Compliance - Clay City Elementary School (0895)**

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

**Finding 9147: Most recent food safety inspection report is not posted in a publicly visible location.**

**Corrective Action:**

The reviewer provided technical assistance on-site with the cafeteria manager. In addition, the cafeteria manager posted the health inspection in the cafeteria. **Therefore, additional corrective action is not required.**

**Other Federal Programs - Clay City Elementary School (0895)**

1816. *Lunch/supper minimum daily requirements met for age/grade group?*

**Finding 9255: For lunch, the minimum daily requirements of grains/breads, meat/meat alternate, fruits, and vegetables are not being served.**

NSLP minimum daily requirements for vegetables are not being met for the age/grade group being served as required in 7CFR 210.10. On the review day, the school provided 1/2 cup of broccoli with the lunch meal instead of the required 3/4 cup for vegetables.

SNP Administrative Review Findings

Clay Community Schools (1125)

Program Year 2022

**Corrective Action:**

The reviewer provided technical assistance regarding menu planning and portion size requirements on the review day. As a result, the staff added 1/4 cup of carrots before the meal service to meet the 3/4 cup daily minimum for vegetables.

**Therefore, additional corrective action is not required.**

1827. *Meal documentation for the last five days of the review indicates the available required meal component?*

**Finding 9267: Documentation for the last five operating days of the Review Period indicates that some meals were missing required meal components.**

Based on a review of the SSO site's documentation and procedures, such as production and menu records for the last five operating days for the Review Period, not all meals contained all required meal pattern requirements. Therefore, the menu review was expanded for the entire summer operation. In addition, the menu documentation provided insufficiencies in the following areas.

- The vegetable was planned & served consistently at 1/2 cup instead of 3/4 cup.
- The starchy vegetable subgroup was missing.
- The fruit served at breakfast was not consistently recorded on the menus or production records.

**Corrective Action:**

Seamless Summer Option follows the meal pattern requirements of the National School Lunch and School Breakfast programs. Seasonal menus are allowed as part of the menu planning process. However, summer menus should still be planned with the same intention of providing various healthy, nutritious meals to children.

**For corrective action, please explain the changes to the summer menus to meet all the requirements for future operations.**

**Technical Assistance:**

A review of the menus for summer operations provides a lack of variety for breakfast and lunch. Menu planning should encompass variety, color, taste, and texture while meeting the meal pattern guidelines. The Child Nutrition Programs intend to provide a variety of foods daily with nutritious value. Nutritionally vulnerable children depend on meals from the Seamless Summer Option; therefore, variety is important to promote food consumption while ensuring children receive a wide spectrum of nutrients. Future menus should mirror regular school year menus, offering varying entrees daily, along with different vegetables and fruits.

**SNP Administrative Review Findings**

**Clay Community Schools (1125)**

*Program Year 2022*

**Van Buren Elementary School (0923)**

1013 S. Forest Ave.  
Brazil, IN 47834-3182

**Food Service Contact**

Mrs. Rita Boetjer  
Manager  
(812) 448-1362

Month of Review: March 2022

Date of Onsite Review: April 27, 2022

**Meal Components & Quantities - Van Buren Elementary School (0923)**

*403. Day of Review- fluid milk (or allowable substitutions) was available in at least two allowable varieties throughout the serving period on all meal service lines*

**Technical Assistance- Placement of Milk and Juice on Serving Line**

As a reminder, milk must never be considered an alternative choice to juice or water. Milk provides calcium, phosphorus, and several other necessary nutrients that are required for growing children. Juice cannot be put in the milk cooler as in competition with milk. If the juice is offered on the planned menu as a fruit choice, it should be on the serving line with the other fruits. Because of the regulations limiting juice to no more than half of the fruit servings offered during the course of the week, it is highly recommended that juice not be served every day. Whole fresh fruits and canned fruits should be provided for more variety. While breakfast was not reviewed at this school, it was noted that all the fruit sent to the students eating breakfast in the classroom are given juice and dried fruit daily. It is never recommended that the same items be menued daily; menus should be planned to provide variety and moderation in the diet.

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

**Finding 9000: Grain-based dessert offerings exceeded the maximum allowable**

Graham crackers were used to meet the grain requirement with the chef salad option and were also available for extras. The manager mentioned that regular cracker is challenging to find in stock due to supply chain shortages. However, other options, such as a dinner roll, cornbread (items already being served on other menu days), croutons, etc., could be used as options when nonsweet crackers are unavailable.

**Corrective Action:**

The interim food service director must review viable options for kitchen staff when planned menu items are unavailable. It is recommended that the FSD provide a list of acceptable substitutions to menu items when unavailable items are unavailable or have a procedure in place to review menu changes to be approved.

**Please provide written documentation outlining how this support will take place for corrective action. Additionally, it will be required for the interim food service director to make site visits a regular part of the job routine to understand staff needs better.**