

SNP Administrative Review Findings

Lebanon Community School (0665)

Program Year 2024

Lebanon Community School (0665)

1810 North Grant Street
Lebanon, IN 46052-1242

Food Service Contact

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Executive Contact

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No. of Sites / Reviewed: 6 / 2
Month of Review: January 2024

Commendations

- * A nice variety of all food components was offered for lunch at both reviewed schools. Fresh vegetables were offered daily as well.
- * Kitchen and storage areas were clean and well organized.

Technical Assistance

- * It is highly recommended to season cooked vegetables. Currently, some vegetable recipes do not include any kind of seasoning. There are numerous ways to season cooked vegetables, including onion and/or garlic powder, etc. A small amount of salt in cooked vegetables that were previously frozen will enhance flavor as well. One kitchen manager stated the consumption of cooked green beans has gone down as the school year has progressed. Any updates must be executed through standardized recipes.
- * Please update the site information sheet for Stokes Elementary reflecting that breakfast in the classroom service module is no longer utilized.
- * Eleven students identified during the benefit issuance review received a lesser benefit than qualified. Due to a notification error in CNPweb, the SFA was unaware of the increased benefits for these students. The reviewer provided technical assistance onsite regarding how to identify the new changes. The school food service director implemented the new changes on February 16, 2024.
- * If the IDOE civil rights training for Child Nutrition Programs is not utilized, the sponsor must ensure the civil rights training utilized covers all training requirements. See the following checklist:
<https://docs.google.com/document/d/1W1RILhMiVzdBjZrbQVKhq-9IJ2GiKhU0eIn3qUWqIZA/edit>.

Certification and Benefit Issuance - Lebanon Community School (0665)

123. On-site observations validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions and responses demonstrate compliance with FNS requirements

Finding 10159: 30 Day Carryover

Benefits carried over from the prior school year did not expire on the 31st operating day for some households who failed to re-apply for meal benefits during the current school year.

Corrective Action:

As corrective action, the director will give the households 10 days notification of a reduction in benefits. The director will also ensure carryover eligibility expires on the 31st operating day by updating the calendar each year with a reminder. Submit the household notification letters to the State Agency as corrective action.

Technical Assistance:

The prior year's eligibility benefits expire when a new benefit is determined in the current year or on the 31st operating day, whichever comes first. If using an electronic point-of-sale system, check to see if the system has the capability to automatically expire the prior year's eligibility determinations on the 31st operating day. For more information, the 30-Day Carryover Fact sheet can be found here:

<https://docs.google.com/document/d/1o8MXjpnjs248XKWsRrttIU6oFAyczkmdY3SZHq1pgnk/edit>. The USDA Eligibility Guidance Manual can be found here: https://fns-prod.azureedge.us/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf.

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126. Certification: selected applications correctly approved.

Finding 9901: Selected applications correctly approved

Multiple applications were certified incorrectly or utilizing incomplete information.

-One application was approved using an incorrect case number format.

-One application denied benefits due to income was later approved based on a hand-written case number, but the source of the case number was not documented.

Corrective Action:

As corrective action, the SFA has contacted the households to verify the applications for cause. **Additionally, the determining official must review and confirm they have reviewed the "Identifying a Complete Application Fact Sheet" located at the following link: https://docs.google.com/document/d/1O-_4K9RvbHsU2unP3HyswH0T4cFkuSF_QvwmbIM4jRA/edit. Upload a signed and dated copy of the fact sheet.**

129. Household notification of eligibility is consistent with Off-Site Assessment responses

Finding 9000: Notification Letter

Notification was not provided for households approved for benefits via direct certification.

Corrective Action:

As corrective action explain the method the SFA will utilize to provide notification to households approved for meal benefits via direct certification. Please upload the communication template that will be utilized.

Technical Assistance:

Please note that the SFA must increase benefits as soon as possible but no later than three calendar days from the date the benefit is confirmed.

131. Applications denied correctly

Finding 9022: Applications incorrectly denied

For one application, the number of people in the household was incorrectly reported. Two different names were listed on the application, but the total household members were reported as one. This resulted in the incorrect denial of meal benefits.

Corrective Action:

The computer system was not programmed to calculate the number of names. As a result, the SFA must manually ensure the number of household members is correct before processing the meal application. **As corrective action, recalculate the incorrect meal applications and provide the household notice of increase in benefits. Additionally, explain the SFA's procedure for ensuring the household number is correctly determined going forward.**

133. Direct Certifications were correctly certified

Finding 10160: Categorical application categorized as directly certified

While the student eligibility was not affected, one or more categorical applications containing a SNAP, FDPIR or TANF case number was incorrectly categorized as directly certified. Applications for "mixed households," which include children who are eligible based on income and other children who are eligible based on Other Source Categorical Eligibility, are subject to verification and are included in the sample pool. Applications with case numbers for participating children (who were not determined eligible through direct certification) are also subject to verification.

Corrective Action:

As corrective action, the determining official must review the State Agency SNAP and TANF Fact sheet found at the following link: <https://docs.google.com/document/d/1q9R8PlqzyFkKCKBIEBkDDTBCwx7nmYhTdDn9fNwBV6s/edit>. Once reviewed, please upload a signed and dated copy of the fact sheet.

Technical Assistance:

When using an application to establish eligibility, LEAs must give households the opportunity to provide SNAP, TANF, or

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FDPIR case numbers or identifiers for any household member [7 CFR 245.6(a)(6)]. Households receiving benefits under Assistance Programs must list a case number when submitting an application. Determining officials must ensure the Assistance Program's case number or identifier listed on the application is consistent with the format used by the Assistance Program in the State. If the case number seems incorrect, the LEA should contact the household or the local Assistance Program agency to confirm the household's eligibility or verify the application for cause. When a household submits an application indicating Other Source Categorical Eligibility, the applicable programs must be indicated. Also, the LEA official must contact the Other Source Categorically Eligible agency liaison to confirm that the children are eligible for the applicable program.

Verification - Lebanon Community School (0665)

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

On-site observations do not validate Off-Site Assessment Tool responses to Verification questions and/or responses do not demonstrate compliance with FNS requirements. Verified more apps than required. Used number of students as of October 1 instead of number of applications.

Corrective Action:

During the administrative review, the reviewer met with the verifying official and reviewed the process for selecting the correct number of applications to verify. The process is understood; therefore, additional response is not required.

Technical Assistance:

The SFA is reminded to complete and document verification training annually prior to starting the verification process each year.

Meal Counting & Claiming - Lebanon Community School (0665)

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

The current charging policy, as communicated to households that no charging is allowed, is not enforced. The school corporation does want to update the policy to reflect that reimbursable meals only can be charged. The 8500 operations manual does allow for charging of reimbursable meals.

Corrective Action:

Policies regarding the collection of unpaid meal charges should be included in the written meal charge policy that is required 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 an updated meal charge policy that addresses the collection of delinquent funds and a policy for bad debt.** 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.

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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 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 - Lebanon Community School (0665)*710. SFA provided adult meals?***Finding 10162: Covering adult meal cost**

Certain non-foodservice staff receive meals at no cost. Meals for adults without direct program responsibilities must be charged full adult meal price and paid for using non-federal funds. A procedure has not been established to ensure non-federal funds are correctly transferred to the non-profit school foodservice account to cover the cost of these meals.

Corrective Action:

As corrective action, submit to the State Agency a procedure for accurately tracking adult meals served at no cost and for covering the cost of meals served to non-foodservice staff at no charge, including the frequency in which funds will be transferred. Additionally, for the current school year, calculate the number of meals served at no cost for the non-foodservice staff, determine the value of unpaid meals using the current adult meal price, and restore the value to the non-profit food service account using non-federal funds. Supporting documentation for these actions must be submitted to the State Agency.

Technical Assistance:

It is an allowable expense of the non-profit foodservice account, at local discretion, to provide a meal to foodservice staff at no cost. These meals must be tracked in the production record as an adult meal and are not eligible for reimbursement.

General Program Compliance - Lebanon Community School (0665)*808. On-site observations validate Off-Site Assessment Tool responses to Civil Rights questions and responses demonstrate compliance with FNS requirements***Technical Assistance - And Justice for All Poster**

While the State Agency cannot fulfill any requests for "And Justice for All" posters at this time, please remember to hang one in the food service office when they become available.

*810. The USDA non-discrimination statement is on appropriate Program materials***Finding 10125: Non-compliance with the USDA non-discrimination statement**

The USDA non-discrimination statement was missing or used incorrectly on the household notification letters for verification.

Corrective Action:

The full nondiscrimination statement must be used on documents of two or more pages, but on documents of one page or less, the short statement may be used; either statement must be the same font size as the rest of the document. **As corrective action, please update the following program materials with the correct non-discrimination statement: verification notification letters. Submit a copy of the updated program materials to the State Agency.**

Technical Assistance:

The IDOE SCN Civil Rights webpage contains links to the USDA Child Nutrition Program Civil Rights Statements. Please

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bookmark and use the appropriate links to access the long and short civil rights statements.

<https://www.in.gov/doe/nutrition/civil-rights-requirements/>

The correct USDA Short Nondiscrimination Statement: This institution is an equal opportunity provider.

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 of the local school wellness policy:

-The local school wellness policy has not been evaluated and updated by the wellness committee using the triennial assessment.

Corrective Action:

As corrective action the following must occur:

- LEAs must assess the wellness policy every 3 years, at a minimum. This assessment will determine compliance with the wellness policy, how the wellness policy compares to model wellness policies, and progress made in attaining the goals of the wellness policy. The local school wellness policy must be reviewed and updated by the wellness committee. A copy of the assessment must be submitted to the State Agency.

-The LEA must permit participation by the general public and the school community in the review and update of the wellness policy. The policy must be reassessed with input from all interested stakeholders as through the wellness committee. Provide documentation of notification used to inform households of the reassessment of the local school wellness policy. Once the re-assessment occurs, provide documentation of the assessment.

-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:

Wellness policy resources can be found at the following website: <https://www.in.gov/doe/nutrition/wellness-policies/>.

1216. School Nutrition Programs staff met/will meet annual training requirements

Technical Assistance: Professional Standards Training Topics

As a reminder, not all school required trainings can be counted as professional standards hours. Professional standards hours for the child nutrition programs must be trainings that pertain to the program. Examples that would be excluded while important topics but not program related, are human trafficking awareness, bullying recognition and response, and child abuse.

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: Use annual State Agency SFSP and SBP Promotional Reminders

Although the SFA does not currently 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. Additionally, School Breakfast Program outreach can easily be announced in parent newsletters using a fun fact about breakfast and a link to the breakfast menu and serving times a few times a year. Watch for reminders in the Calendar of Due Dates and the SNP Weekly Newsletter, normally released on Wednesdays.

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Lebanon Community School (0665)

Program Year 2024

Lebanon High School (0553)

1810 North Grant Street
Lebanon, IN 46052-1242

Food Service Contact

Ms. Faith Hale
Manager
(765) 483-3142

Month of Review: January 2024

Date of Onsite Review: February 15, 2024

Meal Components & Quantities - Lebanon High School (0553)

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.

Production 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. An insufficient grain serving was noted at the 9-12 grade group for lunch.

The dinner roll served with Salisbury steak and meatloaf credited as 1.25 grain equivalents. Fiscal action will not be assessed for this finding at this time but repeat violations may result in fiscal action assessed during future review(s).

Corrective Action:

As corrective action, the director will offer two dinner rolls (2.5-ounce equivalent total) with the Salisbury steak and meatloaf meals. A corrected menu has also been provided as corrective action. **Additional response is not required.**

Technical Assistance:

The school was provided technical assistance during the on-site visit. The director is reminded to ensure all grain offerings for the 9-12 grade group equal at least a 2-ounce equivalent.

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Stokes Elementary School (0569)

1810 North Grant Street
Lebanon, IN 46052-1242

Food Service Contact

Ms. Tamara Sedwick
Site Manager
(765) 482-0380

Month of Review: January 2024

Date of Onsite Review: February 14, 2024

Meal Components & Quantities - Stokes Elementary School (0569)

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 production record format did not include all required information (i.e., crediting),
- the production record did not detail all choices offered within one or more meal components (i.e., assorted fruit was recorded rather than individual fruit types).

Corrective Action:

As corrective action the following must be completed:

- Submit completed (breakfast and lunch) production records for one week to the State Agency for Stokes Elementary.
- Provide an updated production record template showing all required data is included.
- Provide proof of production record training for staff.

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. A staff member assisting students to select meal items was requiring students to take milk with their breakfast.

Corrective Action:

As corrective action, retrain cashiers in OVS requirements, including the daily enforcement of OVS requirements. Provide written documentation of the training, including the date, the agenda, and a sign-in sheet of attendees.

Technical Assistance:

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

General Program Compliance - Stokes Elementary School (0569)

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

Finding 10156: Posted Health Inspection

The posted health inspection was not the most current inspection.

Corrective Action:

The most current inspection was posted for public viewing on the day of the onsite review. Going forward, the most current inspection will be posted for public viewing. **Additional response is not required.**

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.

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Corrective Action:

As corrective action, the manager reviewed the date marking standard operating procedure from the food safety plan with all kitchen staff on the day of review. Additionally, the undated items were date-marked. **Additional response is not required.**

Technical Assistance:

The best practice for a date marking system would be to include a label with the product name, the day or date, and time it is prepared or opened.