

SNP Administrative Review Findings
Program Year 2024

Loogootee Community School Corp (5525)

Loogootee Community School Corp (5525)
201 Brooks Avenue
Loogootee, IN 47553-1412

Food Service Contact
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Food Service Director
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FSMC: Aramark

Executive Contact
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No. of Sites / Reviewed: 2 / 1
Month of Review: January 2024

Commendations

- * The kitchen and storage areas at Loogootee West Elementary were clean and well-organized.
- * The food service director and staff were well-prepared and organized for the review.

Technical Assistance

- * **FSMC Oversight:** The school corporation must ensure the corporation employee overseeing the FSMC contract has a strong working knowledge of USDA programs. The School Food Authority (SFA) must continue to review all documentation related to services provided by the FSMC, including but not limited to the following: reviewing the itemized monthly statements to ensure there are no questionable or unallowable charges billed to the food service account, reviewing the SFA available USDA Foods for use in menus to ensure the corporation is getting full value from the use of commodities in reimbursable meals and not used for other activities, inspecting all kitchens regularly to ensure foods are stored properly, rotated on FIFO, and secured from theft and spoilage. The following items were recommended to the SFA regarding FSMC billing:
 - For accuracy, the SFA should create a standard operating procedure to review every monthly itemized, detailed billing.
 - The SFA should determine approval procedures for FSMC travel, employee recognition programs, timekeeping records, and/or shared labor between SFAs.
 - The SFA should receive training on how to read the reports provided by the FSMC.
- * Canned fruits, commodity cups, and juice are frequently offered at breakfast. Lunch offerings for fruit and vegetables are often broccoli, baby carrots, celery, apple slices, orange wedges, and canned fruit. Many times, children discard them or do not want to take them. On the day of review, peach cups were offered at both services. It is recommended that the selection of fruit and vegetables varies from day to day and meal to meal. This increases the chance that every child will find something they like and will eat, which enhances the meal's nutritional content and decreases food waste. In addition, it is recommended to reduce the juice offered at breakfast to 2 to 3 times per week. This will help decrease waste and increase the consumption of whole fruits and milk.

Certification and Benefit Issuance - Loogootee Community School Corp (5525)

126. *Certification: selected applications correctly approved.*

Finding 9901: Selected applications incorrectly approved.

One application indicated a higher number of household members than the names that were listed on the application. When the application was approved, the higher number of household members was used in the determination without any additional follow-up.

Corrective Action:

The reviewer provided onsite technical assistance regarding a completed application and how to document follow-up efforts to obtain missing information. In addition, the reviewer provided the food service director with the opportunity to correct the application. The FSD contacted the household to obtain the missing information, and no changes were required to be made to the eligibility determination. The reviewer verified the updated application onsite. **Therefore, an additional response is not required.**

138. *Updates to the Benefits Issuance documents are made accurately and timely*

Finding 9030: Updates to the Benefits Issuance documents not made accurately and/or timely

Changes in eligibility because of transferred students or withdrawn students occurred during the review period. Benefits issuance documents were not always updated accurately or within the required timeframes. The following issues were identified during the review of the benefit issuance:

-One student has not expired from the 30-day carryover and is receiving benefits with no documentation on file for the current

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program year. This contributes to fiscal action.

-The benefit issuance list included a student who was not enrolled as an active student. The student was active last school year but did not enroll this school year.

Corrective Action:

At the time of the review, the school food service director sent a letter of adverse action and provided a copy to the reviewer for the student who was receiving benefits without documentation to support an eligible benefit. Additionally, the household applied during the ten calendar days to expire the benefits, which resulted in determined eligibility of reduced.

For corrective action, the SFA will need to complete the following items:

-The SFA must review the benefit issuance list, removing all inactive students. As students withdraw or do not re-enroll, they should be removed from the benefit issuance list. Please provide a list of students who were removed from the benefits issuance list since the onsite review. Additionally, please provide a copy of the updated benefit issuance list that includes the effective dates of the determined eligibility.

-The SFA must determine a process to expire carryover benefits at the designated timeframe annually. The SFA will need to create a written standard operating procedure that details this process, ensuring carryover benefits are only provided to students for the first 30 operating days or when a new benefit is determined for the school year, whichever comes first.

Verification - Loogootee Community School Corp (5525)

208. Documentation demonstrates a confirmation review was conducted and required procedures were followed

Technical Assistance- Officials in the Benefit Issuance & Verification Process

The SFA uses an electronic free and reduced software system for free and reduced applications, select verification applications, and calculate applications. During the review of the applications for benefit issuance and verification, the reviewer could not identify which user was completing the stages of benefit issuance. The SFA may use an electronic system to complete free and reduced; however, the SFA should be able to identify in the online system that initiated the original approval or denial and verification reviews. It is recommended the SFA contact the software company to understand where this information is housed in the system. An online free and reduced application checklist can be found on the IDOE website. <https://docs.google.com/document/d/1sIGvr6Mj9JeSnShL15IJBFo1ezUzytMXcK4eOC38qw/edit?usp=sharing>

209. Verified applications were properly selected, correctly replaced (if necessary), and correctly verified

Finding 9042: Selected applications not verified correctly.

Based on the verified applications selected for review, the post-verification determination was incorrect for one application. When completing verification, the net income was used instead of gross income to determine benefits. This resulted in the benefits changing from free to paid.

Corrective Action:

At the time of the review, the school food service director sent a letter of adverse action and provided a copy to the reviewer. Additionally, the verifying official completed the verification series (parts 1-3) training on the Moodle website on February 15, 2024, and provided the training completion certificate to the reviewer. **Therefore, an additional response is not required.**

Technical Assistance:

The IDOE Moodle website is found here: <https://moodle.doe.in.gov/>

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

Technical Assistance- Direct Verification of Selected Applications

The verification official did not attempt to complete the verification of the selected applications in CNPweb through direct verification. During the onsite review, the reviewer demonstrated how to use the direct verification section to the food service director and supervisor. Direct verification can help confirm the validity of a student's free or reduced eligibility without needing to contact the household for verification documentation.

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213. SFA's notice of adverse action contained all required information, including notification of appeal rights

Technical Assistance: SFA's notice of adverse action was incomplete

Although the SFA used the IDOE verification results letter template, the letter was not fully completed in the areas that were required. This included meal prices for meals and the date to respond to the request for a hearing. The reviewer provided onsite technical assistance regarding the notification letters, including all information that must be listed prior to being sent to households.

Resource Management - Loogootee Community School Corp (5525)

700. SFA accurately track all revenues and expenses, including Supply Chain Funds?

Finding 10123: Supply Chain Funds are not tracked/were not deposited into the food service account/were spent on unallowable items

The funds received through several USDA Supply Chain Assistance programs were not tracked separately to ensure they were spent on minimally processed foods.

Corrective Action:

During the onsite review, the reviewer provided technical assistance regarding local tracking procedures related to Supply Chain Assistance funding. The reviewer provided the IDOE optional tracker that can be used at the local level, showing the SCA amount received and spent down on minimally processed items such as milk, fresh produce, etc. **For corrective action, the SFA must start tracking the SCA funds locally. Please provide a copy of the SCA tracker document.**

707. SFA receive a transfer of non-federal funds to support paid lunch prices?

Finding 9000: Meal Pricing for Breakfast and Lunch Incorrect in Point-of-Sale

The approved pricing for breakfast and lunch was incorrectly updated for the program year 2024 in the point-of-sale for several meal options. One of the updated prices charged households 40 cents for breakfast instead of the 30-cent maximum. Please see the breakdown below.

-Middle School/High School

- 619 paid lunches were undercharged by 10 cents
- 74 paid breakfasts were undercharged by 10 cents
- 128 reduced breakfasts were overcharged by 10 cents

-Loogootee West Elementary School

- 75 paid lunches were overcharged by 10 cents
- 1 reduced breakfast was overcharged by 10 cents

Corrective Action:

Approved and published meal prices should be charged to the students accordingly. The SFA completed a non-federal restoration of \$69.30 for the undercharged meals and provided documentation to the reviewer on February 29, 2024. Additionally, some of the overcharged meals were credited back to the student account, and documentation was provided to the reviewer.

For corrective action, the remainder of the overcharged meals will need to be credited back to the student account. Please submit documentation of the credit for each of the students associated with an overcharge.

Technical Assistance:

Since the SFA manually updates the pricing in the point-of-sale annually, it is highly recommended to add an internal control to verify the prices have been entered correctly. This can be done by having a second person check the pricing for each meal option available for students and adults.

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Resource Management Comprehensive Review - Loogootee Community School Corp (5525)

764. Catering/School Events

Technical Assistance: Timely payments of catering invoices

Minimal catering occurs for the school nutrition program, but the catering invoices are not paid upon the catering invoice. Currently, the school holds the invoices and pays at an undetermined later date. The catering invoices should be reconciled monthly with the rest of the fund 0800 account.

765. Adult Meals

Finding 9000: Process for Covering Adult Meal Cost

Certain non-food service staff receive meals at no cost. A procedure has not been established to ensure funds are correctly transferred to the non-profit school food service account to cover the cost of these meals.

Corrective Action:

During the onsite review, the treasurer transferred the revenue associated with the identified meals to the NPSFA from the education/operation fund and provided proof of documentation to the reviewer. Additionally, meals served to non-food service staff will be transferred twice a year for identified individuals from a non-federal fund per a written memo provided to the reviewer from the food service director. **Therefore, an additional response is not required.**

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 or point-of-sale as an adult meal and are not eligible for reimbursement.

General Program Compliance - Loogootee Community School Corp (5525)

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 on the school breakfast outreach flyer.

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. The food service supervisor sent another round of breakfast notifications to households on February 7, 2024. The notification included the short statement appropriately. A copy of the flyer was provided to the reviewer. **Therefore, an additional response is not required.**

Technical Assistance:

The IDOE SCN Civil Rights webpage contains links to the USDA Child Nutrition Program Civil Rights Statements. Please 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 and update of the local school wellness policy:

-The review and update of the local school wellness policy did not occur as required.

Corrective Action:

For corrective action, the following must occur:

- **LEAs must conduct an assessment of the wellness policy every three 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.**

-**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.**

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Technical Assistance:

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

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

Technical Assistance- Topics for Training

It is recommended to include other topics for staff training such as breakfast OVS, marketing & appearance of food, meal pattern, crediting, etc. Most training appears to be on safety topics.

1217. *SFA's process and frequency for tracking training hours is sufficient*

Technical Assistance- Professional Standards Tracking & Documentation

The professional standards tracking was completed, but the documentation to support the training being tracked was not fully accurate. It is suggested the SFA house training records by person to validate the tracking. Once training is entered into the tracker, the SFA should put the corresponding documentation to support the training in the employee's training file.

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

Finding 9142: The written food safety plan does not contain all the required elements.

The written food safety plan does not comply with the HACCP program criteria described in 7CFR 210.13(c). Missing elements: description of program overview and facility, identification, and documentation in writing of all menu items according to the process approach to HACCP, and forms used for monitoring and recordkeeping.

Corrective Action:

During the onsite review, the reviewer provided technical assistance regarding the requirements for the food safety plan. **For corrective action, the SFA will need to update the food safety plan to include all elements. Please submit a copy of the revised food safety plan.**

Technical Assistance:

The reviewer provided the following guidance to the food service supervisor and food service director. <https://www.fns.usda.gov/fs/developing-school-food-safety-program-based-process-approach-haccp>

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Loogootee Community School Corp (5525)

Program Year 2024

Loogootee West Elementary School (5997)

201 Brooks Avenue
Loogootee, IN 47553-1412

Food Service Contact

Mrs. Stephanie Roberts
Kitchen Manager
(812) 295-9595

Month of Review: January 2024

Date of Onsite Review: February 8, 2024

Meal Counting & Claiming - Loogootee West Elementary School (5997)

322. *Review Period- daily meal counts by category do not exceed the number of eligible students by category*

Technical Assistance- Free, Reduced, Paid Eligibles

The total number of reported eligible children is from the last day of the month. The total number of eligible children should reflect the highest number of enrolled students in the benefit categories on a given day within the month.

Meal Components & Quantities - Loogootee West Elementary School (5997)

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

Technical Assistance- Offer vs. Serve at Breakfast

The school does not implement OvS at breakfast. On the day of review, students were observed selecting the components and immediately discarding them on the share table. It is recommended to implement OvS at breakfast, which will encourage students to choose the items they intend to consume, thus reducing waste and food costs.

General Program Compliance - Loogootee West Elementary School (5997)

901. *On-site monitoring review(s) were completed prior to February 1*

Technical Assistance- Discussion of On-site Review

Although the onsite review was conducted prior to February 1, the review did not indicate a discussion took place with the site manager. When onsite reviews are completed, the monitor should always discuss the review with the site manager, and both should sign the review.

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, storing, and distributing of purchased and donated foods are appropriately safeguarded against theft, spoilage, and other loss. The following storage violations were noted during the onsite review:

- Inconsistently dating products upon receiving.
- Raw hot dogs were placed on the prep table without documentation of time and temperature tracking.

Corrective Action:

Technical assistance regarding properly storing foods with the cafeteria manager during the onsite review was provided. The cafeteria manager placed the raw hot dogs in the walk-in cooler until they needed to be cooked. The final cooking temperature of the hot dogs was 167.1 degrees. The food service supervisor submitted a written response to the reviewer on February 15, 2024, that explained how foods would be properly prepped and held prior to cooking, procedures to ensure the dating of products, written standard operating procedures for each of the violations, and documentation to support the information was reviewed with site staff. **Therefore, an additional response is not required.**



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No. of Sites / Reviewed: 3 / 1
Month of Review: June 2023

No Findings during Review

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Loogootee Community School Corp (5525)

Program Year 2024

NC Loogootee High School (6003NC)

201 Brooks Avenue
Loogootee, IN 47553-1412

Food Service Contact

Mrs. Stephanie Roberts
Food Service Manager
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Month of Review: June 2023

Date of Onsite Review: June 5, 2023

Seamless Summer Option Review - NC Loogootee High School (6003NC)

1814. Required meal components available on every meal service line to all participating students?

Finding 9253: Based on Day of Review observation, required meal components were missing or non-creditable.

SFA is participating in a non-congregate site. Breakfast and dinner meal types were checked for menu compliance for bulk distribution for five days' worth of meals. Insufficient serving of vegetables (missing 1/2 c) for one day was observed.

Corrective Action:

Technical assistance was provided, and site staff were given the opportunity to increase the portion size. The staff added 1/2 cup of broccoli and/or carrots for each non-congregate bag. Additionally, the food service director followed up with staff on June 12, 2023, to randomly check the serving bag, and all portions were included with at least the minimum daily/weekly serving size. **Therefore, an additional response is not required.**

Technical Assistance:

On the day of review, the reviewer discussed how to pack items in the serving bags for the non-congregate service, i.e., bread items on top of the bag rather than the bottom.