

SNP Administrative Review Findings

Our Lady of Lourdes School (K190)

Program Year 2022

Our Lady of Lourdes School (K190)

30 South Downey Avenue
Indianapolis, IN 46219-6404

Food Service Contact

Ms. Amy Kemezy
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Executive Contact

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Principal
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No. of Sites / Reviewed: 1 / 1
Month of Review: April 2022

Commendations

- * The SFA does a nice job offering a rainbow of fresh fruits and veggies daily.
- * Amy is a new Food Service Director this year and is striving to learn all the ins and outs of school nutrition program management. She reaches out for assistance when needed and readily accepts technical assistance on how to best improve her program operations.

Resource Management Comprehensive Review - Our Lady of Lourdes School (K190)

765. Adult Meals

Finding 9128: Meals served to adults are not priced sufficiently to cover the overall cost of the meals.

Breakfasts and lunches served to teachers, administrators, custodians, and other adults for \$2.00 are not priced so that the adult payment, in combination with any per-meal revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds or funding from voluntary agencies), was sufficient to cover the overall cost of the meals. The overall cost of adult meals must include the value of any USDA Foods (entitlement and bonus) used in the preparation of the meals. The minimum price for adult breakfast and lunch meals must be \$2.47 and \$4.57, respectively.

Corrective Action:

Breakfast and lunch served to adults must be priced so that the adult payment is sufficient to cover the overall cost of the meal, including the value of any USDA entitlement and bonus donated foods used to prepare the meal. Since the nonprofit food service account cannot pay or subsidize adult meals, schools must appropriately set adult meal prices.

As corrective action, the SFA must calculate the number of adult meals sold at the incorrect price, determine the difference, and restore the difference to the food service account using non-federal funds. Supporting documentation for these actions and calculations of adult meals sold during the entire '21-22 school year are required.

Technical Assistance:

Adult meal pricing resource can be found here: https://docs.google.com/document/d/1bkFaCeW7vAkP3PuQd_F7-2sORFEPT87UYek9tGrAlcc/edit, while the USDA Adult Meal Pricing Guidance can be found here: <https://www.fns.usda.gov/cn/pricing-adult-meals-national-school-lunch-and-school-breakfast-programs>

General Program Compliance - Our Lady of Lourdes School (K190)

808. On-site observations validate Off-Site Assessment Tool responses to Civil Rights questions and responses demonstrate compliance with FNS requirements

Finding 9008: Civil Rights information on the Off-site Assessment Tool not validated, or deficiencies found.

Some of the information gathered on the Off-site Assessment Tool regarding the SFA's Civil Rights procedures could not be validated during on-site observations. Discrepancies or deficiencies found on-site: civil rights complaint procedure not provided; no documentation of civil rights training for all foodservice staff.

Corrective Action:

As corrective action, please use the following printable training presentation to train all food service staff on Civil Rights prior to the start of Program Year 2023:

https://docs.google.com/presentation/d/1ySTT_8twuaiM_r2PSoRtEvn6Rs_pqEzLSrO2_46Y5aA/edit#slide=id.p1

In addition, use the following agenda/staff attendance form & submit back to field specialist as proof of staff training:

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<https://docs.google.com/document/d/1sDPkPrBkuNOrC6hd8zBBJ1reciB-s3mZmGd0feBRik/edit?usp=sharing>

The additional resources located in the Technical Assistance section below should be printed and implemented as corrective action for the missing Civil Rights complaint procedure.

Technical Assistance:

Complaint Procedure Template:

https://docs.google.com/document/d/1YyyRM_eaWC_Ail4f379gqdsnMVHjbXgXD_Tg8Lj2xHo/edit?usp=sharing

Complaint Form: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>

Complaint Log: <https://www.in.gov/doe/files/civil-rights-compliant-log-revised-12019.pdf>

General School Nutrition Programs Civil Rights Webpage: <https://www.in.gov/doe/nutrition/civil-rights-requirements/>

1007. On-site observations validate Off-Site Assessment Tool responses to Local School Wellness Policy questions and responses demonstrate compliance with FNS requirements

Finding 9011: Local School Wellness Policy information on the Off-site Assessment Tool not validated, or deficiencies found.

Some of the information gathered on the Off-site Assessment Tool regarding the SFA's Local School Wellness Policy could not be validated during on-site observations. The Wellness Policy provided from the Archdiocese is very outdated and does not contain all the required elements. In addition, the SFA did not have a Wellness Committee in place or a process in which to evaluate the policy on a regular basis at the local level.

Corrective Action:

As corrective action, the SFA is required to reach out to the Archdiocese to ensure they have the most recently updated Wellness Policy for the SFA to implement at the local level. In addition, the SFA is required to review the resources provided below to help form a Wellness Committee who will meet at least once during PY2023 to review the policy and ensure it meets all requirements. Field Specialist will provide follow-up technical assistance during PY2023 to ensure this requirement is being met. No further corrective action needed.

Technical Assistance:

School Nutrition Programs Wellness Policies Webpage: <https://www.in.gov/doe/nutrition/wellness-policies/>

Wellness Policy Minimum Requirements: <https://www.in.gov/doe/files/minimum-requirements.pdf>

Wellness Policy Evaluation Checklist: <https://documentcloud.adobe.com/link/track?uri=urn:aaid:scds:US:c9ced4b1-e08e-44a0-be71-0b647e60b422>

Triennial Assessment Template: <https://www.in.gov/doe/files/triennial-assessment-template.pdf>

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

Technical Assistance: Professional Standards Tracking

Technical Assistance:

The Food Service Director has been tracking her hours as they occur. Other food service staff do not have any training hours tracked. FSD should use the resources below to implement a tracking system for PY2023.

School Nutrition Programs Training Webpage: <https://www.in.gov/doe/nutrition/trainings/>

Professional Standards Summary Flyer: <https://www.fns.usda.gov/sites/default/files/resource->

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[files/Professional Standards Flyer.pdf](#)

IDOE Training Tracker: <https://www.in.gov/doi/files/copy-professional-standards-tracking-idoe-final.xlsx>

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

Finding 9143: A copy of the written food safety plan is not available at each school.

A copy of the food safety plan was not provided. The new Food Service Director indicated she did not have a food safety plan and could not locate a previous plan implemented by the former FSD.

Corrective Action:

As described in 7CFR 210.13(c), a School Food Authority (SFA) must implement a written food safety plan that complies with HACCP program criteria. As corrective action, the SFA is required to review the resources provided below to help draft and implement a Food Safety Plan during PY2023. Field Specialist will provide follow-up technical assistance during PY2023 to ensure this requirement is being met. No further corrective action needed.

Technical Assistance:

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

Writing a HACCP-based Food Safety Plan: <https://theicn.org/resources/1532/writing-a-haccp-based-food-safety-plan-for-schools-workshop/117824/writing-a-haccp-based-food-safety-plan-for-schools-workshop-participants-workbook.pdf>

Food Safety Plan template: <https://iastate.app.box.com/s/vcs46ct6wczzfmrmsa67g8tj1s8ox70m>

1500. *Reports are submitted to the Indiana Department of Education as required*

Technical Assistance-School Nutrition Programs Calendar of Due Dates

Technical Assistance:

The Food Service Director was reminded that the AFR is typically due at the end of August each year.

Use the following Calendar of Due Dates for PY2022-2023 to keep updated on program requirements:

<https://docs.google.com/document/d/1y9oJ3Of6GCteK2M6IDPen8cf35SoO8BsRV8dgoaolw/edit?usp=sharing>

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

Finding 9009: SFSP & SBP Outreach

Summer Food Service Program (SFSP) outreach to households was not conducted by the SFA. Although the SFA does not 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.

Corrective Action:

The SFA agrees to conduct outreach at the end of each school year. The State Agency SFSP website is updated towards the end of May each school year with a link to a map of SFSP open sites. The Food Service Director agreed to send this information to households at or near the end of the school year. No additional corrective action needed.

SNP Administrative Review Findings

Our Lady of Lourdes School (K190)

Program Year 2022

Our Lady of Lourdes School (C605)

30 South Downey Avenue
Indianapolis, IN 46219-6404

Food Service Contact

Amy Kemezy
Food Service Director
(317) 357-3316

Month of Review: April 2022

Date of Onsite Review: May 5, 2022

Meal Counting & Claiming - Our Lady of Lourdes School (C605)

318. *Day of Review- each meal service line provides an accurate count by eligibility category at the point of service*

Finding 9000: Pre-K Meal Counting & Point of Service

The Pre-K student meals were marked at the beginning of the service line before the students had a complete reimbursable meal in hand. However, all other grade level meals were properly recorded at the point of service.

Corrective Action:

The Food Service Director was reminded that all meal counts must be marked once a student has a complete reimbursable meal in hand, not before. Since all other grade levels were correctly recorded at the point of service, no further corrective action is needed.

Meal Components & Quantities - Our Lady of Lourdes School (C605)

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

Finding 9000: Daily Production Records

Some of the daily production records submitted for the menu certification week are incomplete or missing information including # servings planned, # servings prepared, total purchase units, and number of servings left over. All these items are required per USDA production record guidance.

Corrective Action:

Production records for each day of the review period were reviewed with the Food Service Director to illustrate what information was missing and how to correct the finding. The FSD verbally acknowledged that she understood the technical assistance provided and that her daily production records will be filled out properly moving forward. No further corrective action needed.

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.

Based on a review of production records and other supporting food crediting documentation for 1 week during the Review Period, April 25-29, some meals served during the week reviewed did not meet the appropriate daily and weekly meal pattern requirements for the age/grade group(s) being served. The planned menu for the week did not include the starchy and bean/peas vegetable subgroups.

Corrective Action:

The Food Service Director does a good job offering a variety of fresh vegetable options daily but must ensure that all vegetable subgroups are met in their weekly minimum required portion. The Food Service Director updated the menu cycle/vegetable options while reviewer was onsite. No further corrective action needed.

Technical Assistance:

Sugar snap peas fall under the "other" vegetable subgroup category. The "starchy" vegetable subgroup includes, but is not limited to, corn, potatoes, green peas, lima beans, etc. Vegetable Subgroup handout provided for reference:

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:fa2cd3bb-1273-37a1-b3b4-e43f8cb67d24>

*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 planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) being served. Meals served with insufficient portion sizes or insufficient quantities of meal components are incomplete.

The SFA offers a couple of alternate entrées daily. The PBJ uncrustable with a meat stick or cheese stick option credits as 2 oz meat/meat alternate and 1 oz grain equivalent. The Lunchie Munchie with a yogurt tube and meat stick/cheese stick or sunflower seeds option credits as 1.5 oz meat/meat alternate and 1 oz grain equivalent. The entrée salad option credits as 2 oz meat/meat alternate and 1 oz grain equivalent. Over the course of the week, if a child selected one of these alternate entrée options daily, the weekly meat/meat alternate and/or grain ounce equivalent minimum requirements might not be met.

Corrective Action:

Options for increasing the meat/meat alternate and grain components in the alternate entrée choices were discussed with the Food Service Director while onsite. The menu cycle was updated to ensure each option offers at least 2 oz of meat/meat alternate and 2 oz of grain equivalent a day in order to meet the required weekly minimums for each component. No further corrective action needed.

Technical Assistance:

Grains Chart: <https://drive.google.com/file/d/1JBS22MrmqvOIQgj6KdwFoJGjZtVqHiO7/view?usp=sharing>

Grain-Based Desserts Guidance: https://docs.google.com/document/d/1l_jUvAYcU-rECZGZqgJilpXqvw6kubftQETK6cdTdk/edit?usp=sharing

*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, the Pre-K students were told by a teacher helping them through the line that they could have either grapes OR cucumbers. They must be allowed to take both a fruit and vegetable choice. In addition, they were not allowed the opportunity to choose any of the other fruit or vegetable choices on the service line from which the other grades levels were able to choose.

Corrective Action:

The Food Service Director and teacher monitoring the lunch period were reminded that Pre-K students must have the opportunity to take both a fruit and vegetable choice daily. Since the Pre-K students are comingled in the cafeteria with the kindergarten students, they should also have the same fruit and vegetable choices as the kindergarten students. No further corrective action needed.

*501. Cafeteria staff have been trained on OVS***Finding 9079: Cafeteria staff have not been adequately trained on requirements and implementation of Offer vs. Serve.**

Documentation was not provided to verify that cafeteria staff had received Offer vs. Serve training.

Corrective Action:

As corrective action, the Food Service Director will provide cafeteria staff and the teachers who assist with monitoring the lunch service with Offer vs. Serve training prior to the start of Program Year 2023. Please submit an agenda with staff attendance signatures to field specialist as proof of completed training.

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Offer vs. Serve training can be accessed on the Moodle training platform: <https://moodle.doe.in.gov/>

General Program Compliance - Our Lady of Lourdes School (C605)*1407. SFA written food safety plan is implemented***Technical Assistance: Implementation of Food Safety Plan****Technical Assistance:**

While a copy of the written food safety plan was not available for review, staff was observed following basic food safety principles, including the use of hairnets, use of gloved hands, proper hand washing, monitoring food temperatures on the service line, monitoring freezer & refrigerator temperatures, clean food preparation & services areas, etc. In addition, food was stored at least 6 inches off the floor and there were no signs of pests.

*1409. On-site or off-site storage violations were observed***Finding 9150: Storage violations were observed.**

The SFA must ensure that all facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. The First In, First Out (FIFO) inventory management method is not being used. Items in full cases and packages removed from their original cases in both dry storage & freezers were not date-marked.

Corrective Action:

The importance of date marking items as they are received to ensure a FIFO rotation was discussed with the Food Service Director. The Food Service Director acknowledged that a standard operating procedure (SOP) related to receiving and date marking will be included in the food safety plan. No further corrective action needed.