

SNP Administrative Review Findings

Peru Community Schools (5635)

Program Year 2023

Peru Community Schools (5635)

35 West 3rd Street
Peru, IN 46970-1504

Food Service Contact

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Executive Contact

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No. of Sites / Reviewed: 8 / 2
Month of Review: December 2022

Meal Counting & Claiming - Peru Community Schools (5635)

313. On-site observations validate Off-Site Assessment Tool responses to Meal Counting & Claiming questions and responses demonstrate compliance with FNS requirements

Finding 9007: Meal Counting and Claiming information on the Off-site Assessment Tool not validated, or deficiencies found.

Some of the information gathered on the Off-site Assessment Tool regarding the SFA's Meal Counting & Claiming procedures could not be validated during on-site observations. Discrepancies found on-site include an improper point of service and incorrect documentation in CNPweb of Offer vs Serve participation.

Elmwood Primary Learning Center Breakfast & Lunch point of service: The current meal service set up does not have a proper point of service for either meal. At lunch, part of the meal (entrée & vegetable) is being delivered to tables in a foam container by one food service worker, while fruit is being delivered by a second food service worker, and the milk is being delivered by a third food service worker. There is no consistency in serving all components to each child at one table before moving on to the next table. All components need to be served at the same time and meals must be marked once a student has a complete reimbursable meal in front of them. A complete reimbursable lunch meal includes all five components: meat/meat alternate, grain, veggie, fruit, and milk. A complete reimbursable breakfast includes 4 food items from 3 components: grain, fruit, and milk. A meal count taken in the morning by the teacher cannot replace the proper point of service in the cafeteria.

In addition, the Site Info Sheet in CNPweb indicates that breakfast and lunch are Offer vs Serve, but it is not being implemented; CNPweb was updated while Field Specialist was onsite.

Corrective Action:

As immediate corrective action, the SFA was provided time to retrain food service and teaching staff regarding the correct point-of-service procedure. It was agreed upon that training would take place the week of February 20-24, 2023, and the new lunch process would begin February 27, 2023. An unannounced, follow-up visit was conducted on March 24, 2023, where the Field Specialist confirmed that the proper point-of-service was being implemented. No further corrective action is needed.

Technical Assistance:

Technical assistance on the issue was provided to the Food Service Director, Superintendent, and Asst. Superintendent while onsite. To correct the point-of-service, they were advised to return to using the meal service lines to ensure students are served all required components in a uniform manner. The corrected point-of-service will ensure that the cashier is able to properly identify that a student has a reimbursable meal in hand before recording it on the CEP meal count form.

General Program Compliance - Peru Community Schools (5635)

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: proof of food service staff training not provided; complaint procedure incomplete.

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Corrective Action:

Technical assistance was provided to the Food Service Director to ensure that the Civil Rights Complaint Procedure & Complaint Form are available. The resources in the Technical Assistance section below should be posted and implemented as corrective action for the missing Civil Rights complaint procedure. No further corrective action is needed.

Technical Assistance:

Complaint Procedure:

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

Complaint Form: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>

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

810. *The USDA non-discrimination statement is on appropriate Program materials*

Technical Assistance: Use of Full Nondiscrimination on School Website

The IDOE SCN Civil Rights webpage [DOE: Civil Rights Requirements \(in.gov\)](#) has links to the USDA Child Nutrition Program Civil Rights Statements. Please bookmark and use the appropriate links for accessing the long and short civil rights statements.

810. *The USDA non-discrimination statement is on appropriate Program materials*

Technical Assistance: Use of Nondiscrimination Statement on Summer Outreach

The incorrect nondiscrimination statement was used on summer meals outreach. 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.

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 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. Discrepancies or deficiencies found on-site: The Wellness Policy does not meet the minimum requirements.

Corrective Action:

The SFA is required to review the resources provided below and make updates to ensure the policy meets all requirements.

Please provide an updated Wellness Policy or a timeline for when the policy committee will review the policy and make updates, as required.

Technical Assistance:

Wellness Policy webpage: <https://www.in.gov/doe/nutrition/wellness-policies/>

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

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

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

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

Finding 9010: Smart Snacks information on the Off-site Assessment Tool not validated, or deficiencies found.

Some of the information gathered on the Off-site Assessment Tool regarding the SFA's Smart Snacks policies and practices could not be validated during on-site observations. Deficiencies found on-site: Elmwood was advertising "sucker sales" every Friday. If the suckers are not Smart Snack compliant, they cannot be sold during the school day (midnight to 30 minutes after the normal school day ends). School districts are only allowed to have 2 exempt fundraisers per school building per year.

Corrective Action:

Smart Snacks requirements were reviewed with the Food Service Director, Superintendent, and Asst. Superintendent. The local Wellness Policy should address school-based fundraisers and all staff should be educated on the fundraiser policy. As corrective action, the resources below will be reviewed to help gain a better understanding of the Smart Snacks requirements.

Please provide an updated Wellness Policy or a timeline for when the policy committee will review the policy and make updates, as required.

Technical Assistance:

A Guide to Smart Snacks in Schools: <https://www.fns.usda.gov/sites/default/files/resource-files/smartsnacks.pdf>

Indiana's Fundraisers Rule: <https://drive.google.com/file/d/1ilvfWYYSXCbl2xXU-hfv1Fyz-44G3b2l/view?usp=sharing>

Nutrition Standards for All Foods Sold in Schools: https://fns-prod.azureedge.us/sites/default/files/resource-files/allfoods_summarychart.pdf

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

Finding 9000: Professional Standards Training Requirements & Documentation

Training for all food service staff is not being routinely conducted or tracked sufficiently. Documentation of training has been an annual requirement since the Professional Standards requirements since at least 2017. Several certificates of completion for the Food Service Director were provided, but no training records for the remaining food service staff were provided. In addition, there were non-food service employees conducting duties related to the After School Snack Program (ASSP), but training documentation was not available to show they were trained properly on the ASSP.

Corrective Action:

Annual training for all staff with food service responsibilities is a program requirement. **As corrective action, provide a written procedure outlining how staff training will be conducted and documented moving forward to ensure this requirement will be met.**

Technical Assistance:

Any training completed should have a dated agenda, topics discussed, and staff signatures. If handouts are provided during the trainings, copies should be maintained with the training documentation.

Required Professional Development Training Hours:

<https://docs.google.com/document/d/1Ho8j7bMBtNtYwq14INtakNMHpySVN9ALp6iPsCTzk/edit?usp=sharing>

General Training Agenda Template: <https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:893568f0-3317-327d-b7f7-55ef5969d162>

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

Finding 9151: SFA does not submit reports as required to the State agency.

At the time of the onsite review, the Verification Summary Report had not been submitted by due date of 1/16; it was submitted on 2/7 after additional reminders sent by SCN staff.

Corrective Action:

Reporting requirements were discussed with and understood by the Food Service Director. If the SFA understands that reporting deadlines are to be met going forward by using the Calendar of Due Dates for meeting deadlines, no further corrective action is needed.

Technical Assistance:

IDOE's Calendar of Due Dates can be found at:

<https://docs.google.com/document/d/1y9oJ3Of6GCteK2M6IDPen8cf35SoO8BsRV8dqaoLlw/edit>

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Program Year 2023

Elmwood Primary Learning Center (6097)

35 West 3rd Street
Peru, IN 46970-1504

Month of Review: December 2022

Date of Onsite Review: February 1, 2023

Food Service Contact

Mrs. Terry C Fuller
Food Service Director
(765) 472-5121

Other Federal Programs - Elmwood Primary Learning Center (6097)

4. *Validate snack counts – snacks properly counted and claimed? Enter data.*

Technical Assistance: Afterschool Snack Program (ASSP) Attendance Sheet and Meal Counts

If ASSP staff is using the daily attendance sheet to mark meal counts, a copy of that document must be provided to Food Service Director daily as proof of the point of service. Daily sheets should be maintained by the Food Service Director as part of the monthly claim documentation.

7. *Site monitored in first 4 weeks of operation, date, deficiencies/CA?*

Finding 9228: The SFA has not monitored this site's Afterschool Snack Program within the first 4 weeks of operation each year.

Afterschool Snack Program (ASSP) monitoring was not completed by the SFA. The first review should be made within the first four weeks of the start of the program. The second review can take place at any other point during the program year.

Corrective Action:

ASSP monitoring requirements were discussed with and understood by the Food Service Director. The review form provided below will be used to monitor the program moving forward. If implemented as discussed, no further corrective action is needed.

Technical Assistance:

ASSP Review Form for Self-Prepped Snacks: <https://www.in.gov/doe/files/self-prep-snack-review-form.doc>

1700. *ASSP – areas identified requiring TA, CA?*

Finding 9155: Afterschool Snack Program areas required technical assistance or corrective action as noted on the Afterschool Snack Program review.

Technical Assistance:

The ASSP must start after the end of the school day. Currently, students participating arrive in the cafeteria & are served before students are released for the day. The reviewer understood why the ASSP students arrive to the cafeteria earlier than students who are taking the bus home, but they must not be served until the school day is over. This was discussed with the Food Service Director and Assistant Principal & both verbally acknowledged that they would wait to feed the students.

Meal Components & Quantities - Elmwood Primary Learning Center (6097)

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

Finding 9052: Day of Review portion sizes insufficient.

As observed on the Day of Review, the portion sizes of meal components from the planned menu and served on the day of review did not meet the minimum meal pattern requirements for the age/grade group(s) being served. Meals that contain insufficient quantities of meal components are incomplete and are not reimbursable. Insufficient portion sizes observed on the Day of Review: only 1/2 c vegetable served at lunch (mashed potatoes); initially only 1/2 c fruit served at breakfast.

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Corrective Action:

The Food Service Director & staff were advised and given the opportunity to correct the insufficient quantity of 1/2 c fruit at breakfast before the meal service started. Unfortunately, the vegetable at lunch was pre-portioned into a container and served to students before an additional 1/4 c of vegetable could be added to ensure the meal pattern was met for the day.

The menu cycle was updated to ensure at least 1 cup of fruit is planned and served daily at breakfast and 3/4 cup of vegetable is planned and served daily at lunch. If implementation of the updated cycle menu continues, no further corrective action is needed.

404. Day of Review- signage explaining the reimbursable meal was posted near/at the beginning of the service line and did not promote water or any other beverage as an alternative to milk

Finding 9055: No signage explaining what constitutes a reimbursable meal at beginning of service line.

Though reimbursable meal signage was posted on the serving line, it was for Offer vs Serve. If not implementing OVS, signage identifying the meal components for breakfast and lunch should be posted instead.

Corrective Action:

Appropriate breakfast and lunch component signage was provided to the Food Service Director to post in the serving area. No further corrective action is needed.

Technical Assistance:

Breakfast Component Signage: <https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:132da235-e3dc-336b-9563-e647d8165d13>

Lunch Component Signage: <https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:3605d767-7aee-34b9-8ed0-883b425de404>

406. Day of Review- the meal service is structured to comply with the required age/grade group meal pattern requirements when multiple menus and/or age/grade groups are served

Technical Assistance: Preschool Meal Pattern Reminder

Since PreK students eat in the classroom, the Food Service Director was reminded of the Preschool Meal Pattern.

<https://drive.google.com/file/d/1-L2ac281PTOK4-Sui5JCWzwCYqjbt6lz/view?usp=sharing>

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

Technical Assistance: Production Records and Crediting Documentation

The Food Service Director was reminded that production records should be filled out daily and include accurate serving sizes for all components served. In addition, proper crediting documentation (CN labels, PFS, whole grain info, etc.) should be readily available for all menu items.

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

Technical Assistance: Starchy Vegetables

The Food Service Director was reminded that there is an "Other" vegetables category with a weekly minimum requirement of 1/2 c. The "Starchy" vegetable subgroup should not be used to meet the "Other" vegetables requirement. The "Other" vegetables requirement may be met with any additional amounts from the dark green, red/orange, and beans/peas (legumes) vegetable subgroups.

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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 size or insufficient quantities of meal components are incomplete and are not reimbursable. Meals with insufficient quantities of meal components during the week reviewed: at breakfast, a full cup of fruit was not served daily; at lunch, the minimum 3/4 of vegetable was not served on 3 days (12/6, 12/7, 12/8).

Corrective Action:

The breakfast and lunch meal patterns were reviewed with the Food Service Director during the onsite visit. The menu cycle was updated to ensure at least 1 cup of fruit is planned and served daily at breakfast and 3/4 cup of vegetable is planned and served daily at lunch. If implementation continues as discussed and demonstrated, no further corrective action is needed.

General Program Compliance - Elmwood Primary Learning Center (6097)

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

Finding 9105: Documentation of the SFA's on-site monitoring of the school's meal counting and claiming procedures was not available.

Documentation of the SFA's on-site monitoring of the school's counting and claiming procedures for the current Program Year was not available at the school.

Corrective Action:

Technical assistance was provided to the Food Service Director while onsite. She was reminded that all on-site reviews must be completed by February 1st of each program year. The Food Service Director verbally acknowledged understanding of the requirement. If implemented as agreed upon, no further corrective action is needed.

1404. *A copy of the written food safety plan is site-specific and available on-site*

Finding 9145: A copy of the written food safety plan was not available at the reviewed school.

The written food safety plan does not comply with the HACCP program criteria described in 7CFR 210.13(c). The full plan needs site specific info, a list of equipment at each site, comprehensive food safety & sanitation Standard Operating Procedures, and menu items categorized by HACCP process.

Corrective Action:

The SFA is required to review the resources provided below to help ensure their plan meets all requirements. **For corrective action, provide an updated Food Safety Plan or a timeline for when the plan will be reviewed and updated for each school, as required.**

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>

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. All food is not stored at least 6 inches off the floor.

Corrective Action:

The storage violation was discussed with the kitchen manger & corrected immediately. No further corrective action is needed.



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Peru Community Schools (5635)

Program Year 2023

YMCA (80275)

35 West 3rd Street
Peru, IN 46970-1504

Food Service Contact

Mrs. Terry C Fuller
Food Service Director
(765) 327-1304

Month of Review: December 2022

Other Federal Programs - YMCA (80275)

1819. OVS properly implemented? Enter data.

Technical Assistance: Offer vs. Serve

As observed on the follow-up Day of Review on 7/10/23, CNPweb indicated Offer vs. Serve was being implemented, but it was not. CNPweb was updated to reflect the correct information.

1827. Meal documentation for last five days of review period indicate required meal components available? Enter data.

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

Based on a review of the Seamless Summer Option (SSO) site's documentation and procedures, such as monthly menu and production records for the last five operating days for the Review Period (July 2022), not all meals contained all required meal components. The SFSP meal pattern was followed, not the SSO meal pattern. Sponsors operating SSO must follow the NSLP/SBP meal pattern.

Corrective Action:

Technical assistance was provided to the Food Service Director while onsite. The differences between the SFSP meal pattern & SSO meal pattern were discussed. FSD verbally acknowledged that she understood the SSO meal pattern & would follow moving forward when operating under SSO for summer meals. A follow-up meal observation and menu review were conducted on July 10, 2023, to verify that the SSO meal pattern was being followed. No further corrective action is needed.

1828. On-site review conducted at least once during the site's operation, CA, deficiencies corrected?

Finding 9268: The SFA did not conduct an on-site monitoring review at this SSO site at least once during the site's operation.

Based on a review of the SFA's documentation for this site, the SFA did not monitor the site's compliance with meal counting, claiming, menu planning, and food safety requirements at least once during the site's operation.

Corrective Action:

Technical assistance was provided to the Food Service Director while onsite. Monitoring of all SSO sites must be conducted at least once during summer operations. The FSD verbally acknowledged that she understood the SSO monitoring requirement & would complete moving forward. If implemented as agreed upon, no further corrective action is needed.

Technical Assistance:

Seamless Summer Option Site Review Form: <https://docs.google.com/document/d/1Heg3SiB6aHxQJghsJTfXj-IgIDVaol-jGzA2OUX83Rs/edit>