

## SNP Administrative Review Findings

## St James Lutheran School (K260)

### Program Year 2024

#### St James Lutheran School (K260)

615 N 8th St  
Lafayette, IN 47901-1044

#### Food Service Contact

Ms. Rebecca French  
Food Service Director  
(765) 742-6464  
foodservicedirector@stjameslaf.org

#### Executive Contact

Ms. Amanda Goodspeed  
Interim Principal  
(765) 742-6464  
agoodspeed@stjameslaf.org

No. of Sites / Reviewed: 1 / 1  
Month of Review: November 2023

### Commendations

- \* A very nice salad bar is available to students and staff daily.
- \* The food service director was well prepared and organized for the review.
- \* Food is made fresh for each line using batch cooking and many students were complimentary of the meals and cooking skills of the staff.

### Technical Assistance

- \* The director is encouraged to offer additional entrée variety in the weekly breakfast menu. Currently only cereal is offered daily. Additionally, it is recommended to increase daily entrée choices for breakfast and lunch. Participation usually increases with increased variety. The salad bar itself could easily be offered as an entrée option.
- \* A sample and blank electronic salad bar production record (and regular record) was emailed to the director the day of review. Consider utilizing the electronic record to create a master copy that can be partially completed, saved, and then printed daily to save labor time.
- \* The director is encouraged to season hot vegetables such as black beans, peas, etc. A standardized recipe would be required but would ensure consistency in flavor and student acceptance.
- \* The reviewer discussed the requirement to include regular nutrition education along with the FFVP. The director and executive contact discussed several ideas, and some were implemented immediately.
- \* The SFA updated the site information sheet in CNPweb to reflect OVS use for the School Breakfast Program.
- \* Consider utilizing the State Agency's professional standards tracking spreadsheet for tracking staff professional standards progress each year. The spreadsheet can be found here: <https://www.in.gov/doi/files/copy-professional-standards-tracking-idoe-final.xlsx>.
- \* While the salad and fruit/vegetable bar are a very nice option for students and staff, the director should consider limiting the amount of food that can be taken. Many students went back multiple times for pre-portioned bags of fruit which can increase food cost significantly. Consider implementing limits, communicating the limits in daily announcements, and adding signage at the salad bar. Staff should also be trained to ensure extra portions of food beyond the limits (if established) are charged a la carte.
- \* Consider implementing a share table to prevent waste and allow students access to additional food portions that may otherwise be thrown away. Consult with your local health department prior to implementing the share table.

### Certification and Benefit Issuance - St James Lutheran School (K260)

137. *Eligibility determinations are correctly transferred to the Point of Service Benefits Issuance document*

#### **Finding 9029: Eligibility determinations not correctly transferred to the Point of Service Benefits Issuance document**

Two students were assigned benefits without documentation for approval. The director is unsure of the eligibility approval source.

#### **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. Submit the household notification letters to the State Agency as corrective action.**

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**Technical Assistance:**

The reviewer explained the requirement to the director to ensure 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.

Verification - St James Lutheran School (K260)

**Summary of Verification Reviewed for SBOA**

7 CFR Part 245.6(a) requires that each School Food Authority properly select and verify a sample of the approved free and reduced-price applications on file as of October 1 of each school year.

Verification procedure used: Standard, Error Prone

Number of applications on file as of October 1: 20

Number of applications selected for verification: 1

Number of additional applications verified for cause: 0

Number of applications with no response: 0

Number of applications with changes: 0

Number of verified applications reviewed by state agency staff during the review: 1

Based on the method and sample size selected, verification is considered complete, and no additional sampling is necessary.

**Technical Assistance:**

For more information on verification please go to: <https://www.in.gov/doi/nutrition/free-and-reduced-information/verification-and-direct-verification/>

215. SFA completed verification by November 15

**Finding 9048: Verification not completed by November 15.**

For the current school year the SFA did not complete its Verification process prior to November 15. The SFA did not have an extension approved by the SA, allowing the SFA to complete its Verification process by December 15.

**Corrective Action:**

**As corrective action the verifying official must complete the Verification 101 training in Moodle. Please submit the training certificate to the State Agency as proof of corrective action. Going forward the verification process must be completed by November 15 each year.**

**Technical Assistance:**

Moodle trainings can be found at the following link: <https://moodle.doe.in.gov/>.

Meal Counting & Claiming - St James Lutheran School (K260)

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.**

Pre-k meals were not counted at the point-of-service. The meal order was used as the claim for reimbursement.

**Corrective Action:**

The meal order sheet already contains a column for marking that the meal is served. Starting the day of review, each pre-K and preschool classroom will bring the meal order sheet back to the classroom for service. Each meal will be marked once served using the "served" column. The preschool director was also informed of the change in procedure. The checks marked

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in the "served" column will be used in the claim for reimbursement. **Since the procedure was corrected the day of review, additional response is not required.**

**Technical Assistance:**

The requirement to mark the meal count at the point-of-service was explained to the director the day of review.

Resource Management - St James Lutheran School (K260)

705. SFA have internal controls to ensure only allowable costs charged?

**Finding 9000: Unallowable Costs**

Concerns were expressed by multiple staff about the regular use of kitchen supplies and equipment by other organizations within the school and church. For example, the kitchen purchases dish machine detergent and all groups use it (some even use it daily). Additionally, supplies such as potholders, bags, etc. go missing.

**Corrective Action:**

It is unallowable to use Federal funds for supplies that are utilized outside of the School Nutrition Programs. Supplies purchased with federal funds may only be used solely for the purpose of the School Nutrition Programs. As corrective action the SFA can do one of the following:

- 1) prohibit the use of kitchen supplies by any organization outside of the School Nutrition Programs.
- 2) Supplies utilized by additional organizations outside of the School Nutrition Programs must be purchased with general funds. Indirect costs could be assessed (if funds are sufficient) to cover the Program's portion of shared supplies.

**As corrective action, please explain which approach will be utilized to ensure only allowable costs are charged to the School Nutrition Programs. Write and submit your policy/procedure for this approach. Additionally, write and submit a procedure to ensure supplies meant for use only in the School Nutrition Programs are safeguarded from theft and misuse.**

**Technical Assistance:**

Indirect cost calculation is determined by a formula specific to the Child Nutrition Programs. Please consult with the SCN Finance team prior to considering the assessment of indirect costs.

Resource Management Comprehensive Review - St James Lutheran School (K260)

766. Assessing Compliance with the Nonprogram Foods Revenue/Cost Ratio

**Finding 9000: Non-program Food Revenue**

The SFA has not assessed its compliance with non-program food revenue.

**Corrective Action:**

**As corrective action the non-program food revenue tool must be completed and submitted to the State Agency. The SFA must use 5 days as a minimum reference period.**

**Technical Assistance:**

The non-program food revenue tool to utilize for a reference period can be found at the following link:

<https://docs.google.com/spreadsheets/d/1yERVzWRoukH4jqhAQ-RFBhzMIWEKRyQB/edit#gid=1454493429>. Additional guidance can be found at the following link: <https://www.in.gov/doe/nutrition/financial-management/#Revenue from Non Program Foods>.

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## General Program Compliance - St James Lutheran School (K260)

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

**Finding 10124: Civil rights complaint procedures were incomplete or not being followed**

Civil rights complaint procedures for the FNS School Meal Programs have not been established or adopted by the SFA.

**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](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>

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

**Finding 9000: Wellness Policy**

The following inaccuracies were noted with the content of the wellness policy:

-The wellness policy posted on the website is not the most current version.

-Many goals are listed under the incorrect category within the wellness policy. For example, most goals under nutrition education appear to be "other school-based activities that promote student wellness". Physical activity goals appear to be under "other activities".

-Nutrient content limit listed for foods sold to students is inaccurate. The sodium limit for snacks has changed from 230 mg to 200 mg per serving. Also, trans fat content is not combined with saturated fat. Saturated fat content per serving must be less than 10% and trans-fat, per the nutrition facts label, must contain zero grams per serving.

-The sodium limit for all entrees sold to students, regardless of type, is limited to 480 mg.

**Corrective Action:**

**As corrective action the local school wellness policy committee must review and update the wellness policy to ensure all information is updated and accurate. Committee meeting notes and agenda as well as the updated policy must be provided as corrective action.**

**Technical Assistance:**

Keep in mind entrées served as part of the reimbursable meal and sold a la carte the day of service or day after service is exempt from smart snack standards. All smart snacks resources can be found at the following link:

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

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

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

**Finding 10137: Wellness Policy Requirements**

The local school wellness policy does not contain the minimum required elements. The following elements are missing: allowing for stakeholder participation in the review and update of the local school wellness policy. The current policy states that the review of the wellness policy is conducted by the school board.

**Corrective Action:**

At a minimum, LEAs must permit participation in the development, implementation, evaluation and update of the wellness policy by the general public and the school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators).

**As corrective action the local school wellness policy committee (including stakeholder participation) must review**

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and update the wellness policy to include all required stakeholders. Committee meeting notes and agenda as well as the updated policy must be provided as corrective action.

*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 include stakeholders.
- Potential stakeholders were not made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness policy.
- The results of the most recent assessment of the local school wellness policy are not available to the public.

**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 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/doi/nutrition/wellness-policies/>.

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St James Lutheran School (K260)

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St. James Lutheran School (D435)

615 N 8th St  
Lafayette, IN 47901-1044

Food Service Contact

Ms. Becky French  
Food Service Director  
(765) 742-6464

Month of Review: November 2023

Date of Onsite Review: December 6, 2023

Meal Components & Quantities - St. James Lutheran School (D435)

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

**Finding 9000: Production Records**

Production records were incomplete on some days during the month of review. Incomplete information included milk component, portion size, portions planned, prepared, and served.

**Corrective Action:**

The requirement to complete all columns of the production record for all items served as part of a reimbursable meal was explained to the director the day of review. **As corrective action, please submit one week of completed production records for breakfast and lunch.**

**Technical Assistance:**

Sample completed production records were emailed to the director the day of review. It is recommended to complete electronic master copies of the production records for each day of the menu cycle to save time in completing the record each day.

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

**Finding 9000: Standardized Recipes**

Standardized recipes were not available for all menu items with more than one ingredient. Missing recipes included walking taco, hot vegetables (black beans, corn, etc.).

**Corrective Action:**

**As corrective action, submit standardized recipes for the above-mentioned recipes.**

**Technical Assistance:**

Standardized recipe resources were emailed to the director.

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) being served. The fruit portion offered for breakfast was insufficient as only 1/2 cup was planned.

Grain servings for the week were insufficient as a 1 grain cereal was offered daily without an additional item.

**Corrective Action:**

**As corrective action, the director has added a second fruit option to the menu and will record on the production record going forward. Updated menus and completed breakfast production records for one week must be submitted as corrective action.**

**Technical Assistance:**

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

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**General Program Compliance - St. James Lutheran School (D435)**

1408. *Temperature logs are available*

**Finding 9149: Temperature logs unavailable for review.**

FNS requires each school in the SFA to maintain temperature logs for a period of six months. Temperature logs unavailable for: equipment. Equipment temperatures are checked but not recorded on a log.

**Corrective Action:**

A temperature log was emailed to the director the day of review. The log was posted and immediately utilized. Going forward, all equipment temperatures will be checked and logged daily. The SFA agrees to the corrective action as written. **Additional response is not required.**

**Technical Assistance:**

The requirement to record equipment temperatures was explained to the director the day of review.