



SNP Administrative Review Findings

Eman Schools (K396)

Program Year 2025

Eman Schools (K396)

11965 Allisonville Road
Fishers, IN 46038-2315

Food Service Contact

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Executive Contact

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No. of Sites / Reviewed: 3 / 1
Month of Review: March 2025

Commendations

- * All Eman staff members were so accommodating and helpful. The staff was eager and willing to learn and understand program requirements throughout the review process.

Technical Assistance

- * Technical assistance was conducted on standardized recipe requirements.
- * Technical assistance was provided on how to use the smart snack calculator.
- * At least 80% of all grains offered over the course of a week must be whole grain-rich (WGR). The remaining 20% or less of grains must be enriched. Sweet grains and "extras" are also required to meet the 80/20 WGR rule.
- * The instructions and the example of the 9-12 grade production record were reviewed with the food service director (FSD).
- * The USDA meal pattern grade group chart was used to review the breakfast and lunch meal pattern requirements with the FSD.
- * Offer vs. Serve (OVS) signage must always be posted at the beginning of the line in an area where the students can view.
- * SFA must annually inform eligible households about the availability and location of free meals for students via the Summer Food Service Program.

Resource Management - Eman Schools (K396)

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

Technical Assistance- Documentation of Labor Cost

Some staff have dual jobs within the Eman Schools. If staff perform work outside the School Nutrition Program, the sponsor needs to track the labor for the School Nutrition Program directly (i.e., complete it by time log). Without this type of documentation, labor would not be an allowable direct expense. For salaries and wages to be allowed under all federal programs, all employees who are paid with federal funds must maintain time and effort records. It is important to understand that the standards regarding time distribution exist in addition to the standards for payroll documentation. LEAs must document both time and attendance (reflecting the time period for which the employee worked, as documented in the payroll system), as well as time and effort (reflecting the federal programs on which the employee spent effort during his or her workday).

Resource Management Comprehensive Review - Eman Schools (K396)

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 were figured correctly. However, the point-of-sale price was not updated from the prior year, resulting in an insufficient amount being transferred from the school's general fund to the non-profit school foodservice account. The adult lunch price is set at \$5.00, but the school is charging \$4.75.

Corrective Action:

For corrective action, calculate the number of meals served to adults and restore the difference to the non-profit school food service account using non-federal funds. Supporting documentation for these actions must be submitted to the State Agency. Documentation has been received and uploaded into the review tool. **No further action is required.**

Technical Assistance: It is an allowable expense of the non-profit foodservice account, at local discretion, to provide foodservice staff a meal at no cost. These meals must be recorded as adult meals and not eligible for reimbursement.



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769. Indirect Cost Rate Agreement

Technical Assistance- Indirect Costs

Recently provided guidance states that the 10% de minimis indirect cost rate for unrestricted grants is not applicable to school corporations, public or private. Since private schools do not have a data source reported to the Office of School Finance, the unrestricted indirect cost rate cannot be calculated. Therefore, indirect cost rates for non-public schools can no longer be approved.

General Program Compliance - Eman Schools (K396)

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:

- a) Has not identified at least one person as responsible for monitoring the local wellness policy.
- b) Has not set nutritional guidelines for foods and beverages sold on the school campus during the school day.
- c) Has not set nutritional guidelines for foods and beverages not sold but made available on the school campus during school hours.
- d) Has not developed at least two goals for nutrition education.
- e) Has developed only one of the two needed goals for physical activity.
- f) Has not developed at least two goals for other school-based activities that promote student wellness.
- g) Potential stakeholders were not made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness policy
- h) 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 local school wellness policy committee must review and update the wellness policy. Submit the committee meeting notes and agenda, as well as the updated wellness policy and corrected three-year evaluation.

Technical Assistance:

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

1213. New School Nutrition Programs Director met food safety certification training requirements

Finding 9000: Food Safety Certification

At the time of the review, the ServSafe certification had expired for the FSD.

Corrective Action:

SFA Directors must obtain food safety certification every five years. For corrective action, submit a copy of the certification obtained.

Technical Assistance: This mandatory certification was reviewed during the exit meeting.

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

Finding 10126: Professional Standards Training Requirements and 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. No staff member has met their required number of hours for the year or has a documented/organized plan to meet their minimum hours for the year.

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. **For the employees identified as needing training during the review, provide proof of training, such as certificates or an agenda of topics covered with attendee names and signatures.**



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

Required Professional Development Training Hours:

<https://docs.google.com/document/d/1Ho8j7bMBtNtIYwq14INtakNMHpySVN9ALp6iPsCTzk/edit?usp=sharing>

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

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. *Repeat Finding

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 & Facility, Standard Operating Procedures, Menu Items Process Approach including Critical Control Points and Critical Limits, Monitoring Procedures, Corrective Action Procedures, Recordkeeping Procedures, and Periodic Program Review and Revision. Also, the plan was not specific to the sites.

Corrective Action:

A school food safety plan should be site-specific and apply to every location where food is prepared, stored, or served. A school food safety plan should be customized to the specific school's equipment, staff, and physical location. **For corrective action, please provide an updated food safety plan, including all the missing elements, to the State Agency.**

Technical Assistance:

Food safety plan development guidance can be found at https://fns-prod.azureedge.us/sites/default/files/Food_Safety_HACCPGuidance.pdf. Food service staff should be regularly trained on procedures within the food safety plan. School food safety resources can be found at the following webpage: <https://theicn.org/icn-resources-a-z/food-safety/>.

1403. Review of agricultural food components indicates violations of the Buy American provision

Technical Assistance- USDA Buy American Provision Updated Policy Guidance

USDA has recently updated guidance to program sponsors regarding Buy American requirements to become effective PY 2025-2026 school year. For additional information, go here: <https://www.fns.usda.gov/cn/buy-american-provisions>.

To watch a recorded webinar on updates to the Buy American requirements, go here: <https://www.fns.usda.gov/cn/buy-american-provisions/webinar>.

To download a copy of the USDA Buy American tool, go here:

<https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Ffns-prod.azureedge.us%2Fsites%2Fdefault%2Ffiles%2Fresource-files%2FSP23-2024a.xlsx&wdOrigin=BROWSELINK>.

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 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. **As corrective action, the director must review the USDA Policy Memo SP 07-2014 referenced in the technical assistance section below. Submit a signed copy of the memo to the state agency as proof that the memo was reviewed.**

Technical Assistance:

USDA Policy Memo SP 07-2014, SFSP 07-2014 Expanding Awareness and Access to Summer Meals can be read at the following link: https://fns-prod.azureedge.us/sites/default/files/resource-files/SP07_SFSP07-2014os.pdf.



SNP Administrative Review Findings

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Program Year 2025

Eman Main Campus (B160)

11965 Allisonville Road
Fishers, IN 46038-2315

Food Service Contact

Dr. Fakhry Rasheed
Food Director
(732) 877-9601

Month of Review: March 2025

Date of Onsite Review: April 8, 2025

Meal Counting & Claiming - Eman Main Campus (B160)

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

Finding 9000: Breakfast Serving Line

The breakfast line is not set up efficiently. Students were confused about what items could be paired together and included in the meal options, resulting in difficulty at the point of sale.

Corrective Action:

The breakfast serving procedures must be changed to ensure all breakfast food items are accessible and that all breakfasts are being counted. **For corrective action, develop written procedures for serving breakfast and submit the procedures along with photos of the serving line display that will ensure that all breakfast food items are accessible and being claimed.**

Technical Assistance:

During the exit meeting, it was suggested that the breakfast service be moved to the kitchen serving line to better control the students.

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

Finding 9000: Efficient Serving Lines

For breakfast, many students refused to give their names for the breakfast count. During lunch, approximately half the students had to be asked for their point-of-service (POS) cards to be counted for their lunch. The cashier is located sitting behind the serving line during lunch, making it hard for students to see that something is needed from them.

Corrective Action:

Accurate meal counts for both breakfast and lunch must be recorded daily. **For corrective action, develop and provide a copy of the written procedures that will be followed for recording accurate daily meal counts.**

Technical Assistance:

As discussed during the exit meeting, having the cashier who gathers POS cards during lunch sit right outside the exit door would be ideal for an accurate lunch count. As for breakfast, a best practice is to move the breakfast service into the kitchen serving line.

Meal Components & Quantities - Eman Main Campus (B160)

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.

As observed on the day of review, breakfast signage explaining what constitutes a reimbursable meal is not identified near or at the beginning of the meal service line.

Corrective Action:

Meal signage must explain to students what constitutes a reimbursable breakfast. The reviewer provided signage during the on-site review, and the FSD posted breakfast signage in the meal service areas. **Therefore, an additional response is not required.**

Technical Assistance:

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



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

Finding 9000: Breakfast Menus

At the time of the review, the SFA does not complete or publicize a breakfast menu.

Corrective Action:

A breakfast menu must be documented to help ensure staff are following the breakfast meal pattern, have food supplies on hand, show the public what is planned, etc. **For corrective action, submit a past month of breakfast menus and a future planned month of menus.**

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 records are not completed correctly, and sometimes are not fully completed.

Corrective Action:

A correctly completed production record, along with a blank master production record with the instructions, was reviewed with the SFA during the onsite review. **As corrective action, submit two weeks of fully completed breakfast and lunch production records from the site reviewed to the State Agency.**

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

Finding 9000: Findings Noted in the Breakfast Menu Certification Week

After review of the breakfast meal pattern documentation, the following errors were determined:

- Breakfast menu certification week did not have at least 1 cup of fruit or vegetable served daily
- Did not meet at least 80% of the grains as whole grain-rich

Corrective Action:

For corrective action, submit two weeks of production records and menus demonstrating that these requirements have been met.

Technical Assistance: At least 80% of all grains offered over the course of a week must be whole grain-rich (WGR). The remaining 20% or less of grains must be enriched. Sweet grains and “extras” are also required to meet the 80/20 WGR rule. This is required for schools or facilities that operate the School Breakfast Program and/or National School Lunch Program. A product is considered WGR if at least 50% of the grain ingredients (by weight) are whole grain. The rest of the grain ingredients must still be enriched.

For breakfast, SFAs must offer 1 cup of fruit daily and 5 cups of fruit weekly. Schools may substitute vegetables for fruit at breakfast. 100% full-strength juice may be served. Juice credits as the fluid volume served. For example, 4 fl. oz. is equal to ½ cup of fruit. No more than half the fruit offerings over the week at both breakfast and lunch can be in the form of juice.

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

Finding 9000: Findings Noted in the Lunch Menu Certification Week for Grades 9-12

After review of the lunch meal pattern documentation, the following errors were determined:

- Did not meet at least 80% of the grains as whole grain-rich.
- Insufficient daily vegetables- ½ cup instead of 1 cup
- Missing dark green, red/orange, beans, peas, lentils, and other vegetable subgroups

Corrective Action:

As corrective action, provide revised menus showing that the meal pattern is met for the daily and weekly requirements for the 9-12 grade group being served. Additionally, for the submitted menu, complete and submit the Lunch Menu Planning Template for Grades 9-12 for all the meal components.



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Meal Pattern Technical Assistance: Meal pattern requirements can be found here:

<https://www.in.gov/doi/nutrition/national-school-lunch-program/>. Lunch Menu Planning Template can be found here:

https://docs.google.com/spreadsheets/d/1X1AKDB2kCx0th7T_TJ2FWKLuEtQ39oM35T7t4N_oF9E/edit?usp=sharing.

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

Finding 9078: School is not properly implementing Offer vs. Serve (OVS).

As observed on the Day of Review, the OVS procedure during both breakfast and lunch was not conducted properly. Staff were not aware of the OVS minimum requirements. Five meals were disallowed at breakfast for not meeting the minimum selection requirements, which were counted as reimbursable meals.

Corrective Action:

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

Technical Assistance:

Technical assistance was provided during the on-site visit. IDOE Moodle: <https://moodle.doe.in.gov/>.

Dietary Specifications - Eman Main Campus (B160)

603. Technical assistance and/or corrective action were found to be necessary upon completion of the off-site portion of the Dietary Specifications Assessment Tool

Finding 9000: Standardized Recipes

The SFA does not have or utilize standardized recipes for all foods prepared. A standardized recipe is required when two or more ingredients are combined.

Corrective Action:

The SFA must create or obtain standardized recipes for all foods containing two ingredients or more. **For corrective action, the SFA will review the USDA Recipe Standardization Guide for School Nutrition Programs and submit written documentation stating this guide has been viewed. Documentation must be signed and dated. Additionally, provide two recipes that have been standardized for use in your school meal programs.**

Technical Assistance: The USDA Recipe Standardization Guide for School Nutrition Programs can be found at

<https://theicn.org/cicn/usda-recipe-standardization-guide-for-school-nutrition-programs/>.

603. Technical assistance and/or corrective action were found to be necessary upon completion of the off-site portion of the Dietary Specifications Assessment Tool

Finding 9000: Crediting Documentation

Crediting documentation was not available for items served during the week of review.

Corrective Action:

If a commercially prepared combination food item (such as ravioli) does not have a Child Nutrition (CN) Label, contact the manufacturer for a Product Formulation Statement (PFS). If a food item does not have a CN label or PFS, the food item should not be used to meet requirements in the School Breakfast and Lunch Programs. The SFA must have crediting documentation (CN label or Product Formulation Statement) for processed foods served to ensure the meal pattern requirements are met. **As corrective action, the SFA will submit lunch crediting documentation for one week along with the menu.**

General Program Compliance - Eman Main Campus (B160)

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

Finding 9103: On-site review of the school's meal counting and claiming procedures was not completed prior to February 1.

The SFA did not conduct an on-site review of the school's meal counting and claiming procedure prior to February 1 of the current Program Year. The on-site review occurred after February 1 without State agency approval of an extension.



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Corrective Action:

For corrective action, the onsite monitoring forms must be completed and provided to the state agency. Also, develop a detailed timeline indicating when onsite reviews will be completed annually for each site and meal type. Submit a copy of the timeline to the State agency.

Technical Assistance:

This on-site review requirement was thoroughly discussed during the on-site administrative review process.

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

Finding 9147: Food Safety Inspection Report

The most recent food safety inspection report is not posted in a publicly visible location.

Corrective Action:

The most recent food safety inspection report is required to be posted in a publicly visible location. **For corrective action, submit documentation showing that the most recent health inspection has been posted.**

1407. *SFA written food safety plan is implemented*

Finding 9000: On-Site Food Safety Violations

Several onsite food safety violations were observed during the meal service observations:

- Some food items in storage are not dated.
- Trash is stored beside food.
- All food is not stored at least 6 inches off the floor.
- All temperatures of cooling units are not monitored.
- The thermometers are not being calibrated.

Corrective Action:

For corrective action, develop and include in the food safety plan standard operating procedures (SOPs) addressing each of the food safety violations that occurred during the administrative review. Submit copies of the SOPs to the State Agency.

Technical Assistance: SOP guidance can be found at https://docs.google.com/document/d/1Myu0CMzd-3sTvPFGHPr-ATCkYx4Sfi1y6lFqn9_EnCQ/edit?tab=t.0.

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: dry storage, freezer, milk cooler, reach-in cooler, reach-in freezer, and calibration of thermometers.

Corrective Action:

Temperatures must be monitored and logged daily for all refrigeration and freezer equipment, as well as the storeroom.

Submit logs with at least one week of monitored temperatures to the State Agency as corrective action.

Technical Assistance: Sample food safety logs can be found at the following website: <https://theicn.org/icn-resources-a-z/food-safety/>.