



Indiana Department of Education

Dr. Katie Jenner, Secretary of Education

December 6, 2021

Mr. Jordan Habayeb, Managing Director of Operations

Adelante Schools, 49-9130

1202 E Troy Ave

Indianapolis, IN 46203

Dear Mr. Habayeb,

The Healthy Hunger Free Kids Act of 2010 (HHFKA) requires state agencies to hold participating institutions to regulatory standards. School Food Authorities must be reviewed a minimum of once every three years. This correspondence documents the Administrative Review of USDA School Nutrition Programs that was conducted within Adelante Schools on November 3, 2021. The results of the Administrative Review are a matter of public record and as per USDA requirements will be posted on the Indiana Department of Education, School and Community Nutrition website within 30 days of the closure of the review.

The Administrative Review was conducted by Gretchen Huntzer, School Nutrition Specialist. Administrative Review included the following program areas: National School Lunch Program and School Breakfast Program. In addition to a comprehensive review of program operations at the corporate level, site reviews also took place at Adelante Schools.

The Administrative Review is based on two performance standards listed below as well as several general areas.

Performance Standard Number One-Certification/Counting/Claiming-Part 210.18(b)(1) states, "all free, reduced-price, and paid meals claimed for reimbursement are served only to children eligible for free, reduced-price, and paid lunches, respectively; and counted, recorded, consolidated and reported through a system which consistently yields correct claims."

Performance Standard Number Two-Part 210.18(b)(2)(ii) states, "Meals claimed for reimbursement contain full portion offerings of all food items/components, both daily and weekly, as required by Program regulations."

The detailed results of the review are attached to this cover letter. The SFA is reminded to continue self-monitoring of all program areas and provide opportunities for employee training to ensure continued compliance.

Corporation Verification Requirement

Verification is not required for School Food Authorities participating in CEP corporation-wide, even if claiming meals on Seamless Summer Option for program year 2022.

Administrative Review Results

Additional corrective action is needed. A detailed description of the findings and the necessary corrective action can be found in the attached Administrative Review Report. Please provide a detailed response in writing by **January 7, 2022**. Corrective action can be entered in the Administrative Review Tool under the menu E-Reviews then select Corrective Action Responses or be submitted via email to your field specialist. If you submit your corrective action in the AR tool, please let your field specialist know that you did so. We ask that due to the ongoing relocation of our office, please do not send any corrective action through normal USPS mail.

Fiscal Action Waived for each NSLP and SBP:

Fiscal action has been calculated and is found to be under the state agency guidelines for granting waivers for errors less than \$600 in the National School Lunch Program, including After School Snack and Fresh Fruit & Vegetable Programs, and the School Breakfast Program, therefore all fiscal action is currently waived.

The success of all Indiana School Nutrition Programs is important to us. School food service programs should continue to look at ways to improve the quality and variety of foods offered to students as a part of a reimbursable meal. Providing multiple choices within components gives students the freedom to select a full meal they will enjoy while providing good nutrition. We appreciate your participation in this endeavor and strongly encourage job specific employee training to maintain ongoing federal compliance.

Should you have any questions regarding program requirements or would like additional technical assistance, please contact Gretchen Huntzer at gpentzer@doe.in.gov or 317-719-3661 or you may contact me once Gretchen starts her new family leave.

Sincerely,



Marcia Yurczyk, *Assistant Director*
School & Summer Monitoring Programs

Enclosures

Administrative Review Report

SNP Administrative Review Findings**Adelante Schools (9130)****Program Year 2022****Adelante Schools (9130)**

1202 E. Troy Ave
Indianapolis, IN 46203-5239

Food Service Contact

Ms. Tiffany Barnett
Director of Operations
(317) 998-5636
FSMC: Indianapolis Public Schools

Executive Contact

Mr. Jordan Habayeb
Managing Director of Operations
(317) 998-5636

No. of Sites / Reviewed: 1 / 1
Month of Review: September 2021

General Program Compliance - Adelante Schools (9130)*810. The USDA non-discrimination statement is on appropriate Program materials***Finding 9000: Non-Discrimination Statement Not Included on Program Materials**

The USDA non-discrimination statement is not included on program materials. The statement is not included with the student handbook when discussing the school meals programs and is not linked within the website.

Corrective Action:

The USDA non-discrimination statement must be included on all materials that discuss the USDA Child Nutrition Program. The handbook and all materials advertising meal service must include the non-discrimination statement. The reviewer discussed this issue with program staff and corrections were made immediately. If implemented fully, no additional response is needed for this finding.

*1214. School Nutrition Programs Director met/will meet annual training requirements***Director Training Requirements****Technical Assistance:**

Although waived for this year, the named FSD is required to obtain 12 hours of training annually. Please keep this in mind each year. Training can be obtained via recorded webinar, live webinar or in-person training. Proof of training is required to please keep all certificates and acknowledgement of professional standards hours obtained on file and ensure each staff member has the appropriate number of hours. As a reminder, even if there is a vendor providing meals, the person employed by the school who is named the food service contact should have working knowledge of program compliance.

*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.**

The Annual Financial Report (AFR) was not submitted to IDOE on time.

Corrective Action:

Reporting requirements were discussed with and understood by Program administrators. The AFR was submitted while the reviewer was conducting the administrative review. No further action required.

Technical Assistance:

To ensure timely report submissions, see the IDOE's Calendar of Due Dates which can be found at https://docs.google.com/document/d/1gQejacWaNHz_tozqZFehNz0p59JDFW21J9SHz5-BPE/edit.

SNP Administrative Review Findings

Adelante Schools (9130)

Program Year 2022

Adelante Schools (9993)

1202 E. Troy Ave
Indianapolis, IN 46203-5239

Food Service Contact

Ms. Tiffany Barnett
Manager of Operations
(317) 226-4272

Month of Review: September 2021

Date of Onsite Review: November 3, 2021

Meal Counting & Claiming - Adelante Schools (9993)

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

Finding 9000: Inaccurate Meal Counting Practices

Breakfast meals in the middle school are counted prior to the student receiving the meal at the point of service. Meals cannot be counted for reimbursement at any place except at the point where the meal is handed to the student and the person recording the meals must ensure all required components are taken prior to counting the meal.

Corrective Action:

The FSD discussed this corrective action with the site staff while the reviewer was on site. Through immediate corrective action the reviewer confirmed that meals will be counted as each student receives it. If implemented fully, no additional action or response is needed.

320. Day of Review- meal count totals by category are combined and recorded correctly

Technical Assistance: Individual student participation in USDA nutrition programs is always optional

Technical Assistance:

Students were being required to take a meal at breakfast by some teachers. While it is a best practice to ensure every student is nourished and ready to learn, participation in the school meals programs is voluntary. No student can be required to take a meal if they do not wish to participate.

325. Review Period- meal counts by category were correctly used in the claim for reimbursement

Finding 9074: School meal counts by category are not used correctly in the SFA's claim for reimbursement.

The sum of the school's daily meal counts by category for the review period did not match the State agency's validated meal counts. The problem is considered non-systemic because the contributing factors are unusual, not part of the normal operating procedure and the system does not require changes to achieve accurate results.

Specific issue: Breakfast meal counts

On September 10, there was a math error resulting in 10 fewer meals being claimed than the actual meal count.

On September 13, one breakfast line did not count meals at the point of service. One hundred twenty-two (122) meals were claimed, but there were no individual hashmarks on the meal count sheet showing the meals were marked as the students received them. The above meal counting errors resulted in an over claim of 112 breakfast meals for the month of September.

Corrective Action:

The difference between the SFA Count and the State agency validated count has been assessed. The sponsor must ensure that meals are counted every day at the point of service (the place where the student receives the meal) for all meal service lines. Meals that are not counted at the point of service cannot be claimed for reimbursement. The reviewer provided detailed technical assistance at the time of review and in the exit conference. If the process is put in place as discussed, no further action is necessary. Fiscal action has been calculated and is found to be under the state agency guidelines for granting waivers for errors less than \$600 in the School Breakfast Program, therefore all fiscal action is currently waived.

SNP Administrative Review Findings
Program Year 2022

Adelante Schools (9130)

Meal Components & Quantities - Adelante Schools (9993)

400. Day of Review- all required meal components were available to all students during the entire meal service

Technical Assistance: All Breakfast Meal Items must be Offered

Technical Assistance:

At breakfast, all planned fruit items were not displayed on the serving line. A full cup of fruit, normally divided into 2 half cup servings) must be offered. On the day of review, only juice was featured as the fruit option and raisins were only offered as an alternate to the juice upon request. Students must be able to choose which (or both) fruit options they would like with their meal. Signage must be available to inform students to take at least one of the fruit options, but must explain that they may take both if they want. Please ensure at the elementary level, both options are presented equally and at the middle school, the raisins are put out with the other fruit as an option to be taken. If one or the other fruit option is completely gone, an additional 1/2 cup of fruit must be placed on the line. Production records should reflect the alternate item. Students must have the ability to take 1 cup of fruit at breakfast, keeping in mind that juice can only be offered to meet 1/2 of the fruit requirement.

401. Day of Review- all meals observed and counted for reimbursement contained all of the required meal components

Finding 9000: Meals counted as reimbursable but missing required component

One breakfast meal was counted as reimbursable without a required fruit serving. Please ensure all staff helping with meal service understand OVS requirements including the requirement to take at least 1/2 cup of fruit to make a reimbursable meal.

Corrective Action:

Please review all OVS requirements with staff who assist in meal service, including the requirement that at least 1/2 cup of fruit be taken to create a reimbursable meal. Please provide proof that training for OVS has been conducted with all meal service staff including teachers who help at breakfast.

403. Day of Review- fluid milk (or allowable substitutions) was available in at least two allowable varieties throughout the serving period on all meal service lines

Finding 9053: Milk variety not offered throughout serving period on Day of Review.

As observed on the Day of Review, at least two required milk varieties were not available throughout the serving period on all meal service lines. At breakfast, only white milk is offered.

Corrective Action:

Students must have the choice of two different milk varieties at breakfast and lunch. Keep in mind, another option could be to offer two different kinds of unflavored milk such as skim unflavored and 1% unflavored at breakfast if sugar consumption is a concern. After discussion with program staff, students will be offered the choice of chocolate or white milk at both meal services. If implemented fully, no additional response is needed for this finding.

Technical Assistance:

Make sure that enough of each type is provided at the point of service. Every student who goes through the line must have the choice. Since milk is served every day, keeping an ample supply of all varieties on hand is advisable. This will take some trial and error, but documenting the types of milks served daily on production records is a best practice for forecasting milk usage..

SNP Administrative Review Findings**Adelante Schools (9130)****Program Year 2022**

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*

Technical Assistance: Juice served as a beverage option instead of a fruit

Technical Assistance:

Juice was served out of the milk cooler rather than on the line as a fruit choice. USDA is very clear that milk is the only beverage option with the meal and juice and water are not to be offered next to or with the assumption of beverage option. Please ensure juice served daily at lunch (if menued) is offered as a fruit choice within the serving line and not included in the milk cooler as a beverage option.

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

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

On the Day of Review, one or more cashiers did not demonstrate a clear understanding of OVS and its requirements. In some cases students selected a reimbursable meal, but the cashier made the student select an additional item(s).

Corrective Action:

Please have staff review OVS requirements for reimbursable meals and ensure that students are not required to take too much food if they do not wish. Please provide proof that all staff have been retrained in OVS requirements.

502. *Day of Review- signage explaining the OVS reimbursable meal was posted near/at the beginning of the service line*

Finding 9080: No signage explaining what constitutes a reimbursable meal under Offer vs. Serve.

As observed on the Day of Review, signage explaining what constitutes a reimbursable meal under Offer vs. Serve (including the requirement that students must select at least ½ cup fruit or vegetable) is not identified near or at the beginning of the meal service line(s).

Corrective Action:

All schools implementing OVS must have meal service signage on the serving line. Signage should outline the items/components available at the meal as well as instructions for how to choose a reimbursable meal. Signage can be made on-site or purchased as a commercially designed product. If OVS signage has been obtained and posted, no additional corrective action is needed.

Technical Assistance:

The school was provided technical assistance during the on-site visit as well as resources for obtaining OVS signage.

General Program Compliance - Adelante Schools (9993)

811. *The USDA "And Justice for All" poster is displayed in a prominent location and visible to recipients of benefits*

Technical Assistance:

The large 11x17 size poster is required at meal service time. Please request additional larger posters from the IDOE office. The larger size must be used at breakfast on the carts. The reviewer requested additional signs to be sent to the SFA while conducting the review. If the additional posters have not yet been received, please use the poster ordering instructions provided in the review exit conference.