

Indiana Department of Education

SNP Administrative Review Findings

Believe Circle City High School (9140)

Program Year 2022

Believe Circle City High School (9140)

2540 North Capitol Avenue Indianapolis, IN 46208-5628

No. of Sites / Reviewed: 1 / 1 Month of Review: April 2022 **Food Service Contact**

Ms. Teagan M Vonderheit Dean of Operations (317) 692-1692

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Ms. Kimberly M Neal Founder/Executive Director (317) 643-2523

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Meal Counting & Claiming - Believe Circle City High School (9140)

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 or deficiencies found on-site: SFA indicated they are not Offer vs. Serve but are implementing it at both breakfast and lunch.

Corrective Action:

As corrective action, the SFA must update CNPweb to accurately reflect that Offer vs. Serve is being implemented at breakfast and lunch. In addition, the SFA must provide both Meal Counting & Claiming and Offer vs. Serve training for all food service staff and individuals responsible for recording meal counts prior to the start of Program Year 2023. As proof of completed training, please submit to field specialist a detailed training agenda with staff attendance signatures and/or certificates of completion. Both trainings can be accessed on the Moodle training platform: https://moodle.doe.in.gov/

314. SFA is following the approved SFA-SA agreement

Finding 9049: SFA not following the approved SFA-SA Agreement and/or Application.

The SFA is not following their approved SFA-State agency Application, including the Point of Service procedures and implementation of Offer vs. Serve.

Corrective Action:

See Finding 9007 for corrective action.

Resource Management - Believe Circle City High School (9140)

721. New SFA – processes and procedures ensure compliance with Nonprofit School Food Service Account requirements?

Technical Assistance: Resource Management

Technical Assistance:

- * Discussed importance of having processes and procedures in place for ensuring compliance with FNS requirements concerning maintenance of the Nonprofit School Food Service Account, including compliance with allowable costs.
- * Discussed nonprogram revenue; currently not selling any nonprogram foods to students or adults.

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General Program Compliance - Believe Circle City High School (9140)

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

Technical Assistance: Use of Nondiscrimination Statement

Technical Assistance:

For any information related to USDA child nutrition programs that is sent to households or the public, the full nondiscrimination statement must be use in the same size font as the other information. Keep in mind, the full discrimination statement only must be used on documents of two or more page. On documents of one page or less, the short statement may be used as long as it is the same size font.

In addition, the full nondiscrimination statement needs to be placed somewhere on the school's website where the information regarding school meals is located. We recommend that a webpage for Child Nutrition be originated where the monthly menu, policies related to CEP, a copy of the Wellness Policy, a charging policy (where applicable), and reminders of the value of eating breakfast and summer meal site outreach can be posted.

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

Technical Assistance: Wellness Policy

Technical Assistance:

It is recommended to hold a Wellness Committee meeting to review the Wellness Policy at least annually. Within the next two years, the committee should also complete the triennial assessment.

Resources:

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: USDA Professional Standards

Technical Assistance:

This is a reminder that annual training to meet the training hours required by USDA is to be tracked accordingly. You can use the IDOE training tracker below, or keep the completed trainings organized by year in each employee's file folder. IDOE Trainings are now housed under the Moodle Platform at https://moodle.doe.in.gov/.

Resources:

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-files/Professional Standards Flyer.pdf

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

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1501. Records are retained for 3 years

Technical Assistance: Recordkeeping

Technical Assistance:

This is just a reminder that all records related to participation in USDA Child Nutrition Programs are to be kept a minimum of three years plus the current year, sometimes longer if a detailed audit has not been conducted or if there are unresolved issues related to years that are closed out. This includes meal count sheets, menus and production records, training documents, invoices from vendor, and any other documents generated for or paid out of the nonprofit food service account.

Use the following Calendar of Due Dates for PY2022-2023 to keep updated on program requirements: https://docs.google.com/document/d/1y9oJ3Of6GCteK2M6IDPen8cf35SoO8BsRV8dqoaoLlw/edit?usp=sharing

Other Federal Programs - Believe Circle City High School (9140)

1802. Changes in dates of operation from approved dates?

Technical Assistance: Change in SSO Operating Dates Beyond the Regular School Year

Technical Assistance:

On the day of the SSO site visit (beyond the regular school year), it was noted that it would be their last day serving (July 15) due to flooding in the school, which has prevented them from continuing their learning lab & summer meal program. Initial approval was to serve through 7/22/22. Operating days in CNPweb should be updated to reflect the change.

1805. SFA reviewed all SSO sites at least once?

Technical Assistance: SSO Beyond the Regular School Year & Monitoring

Technical Assistance:

When operating the Seamless Summer Option (SSO) beyond the regular school year, monitoring should be completed, as operations tend to be different than during the regular school year. Monitoring form can be found here: https://docs.google.com/document/d/1Heg3SiB6aHxQJghsJTfXi-IgIDVaoI-jGzA2OUX83Rs/edit

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Program Year 2022

Believe Circle City High School (9994)

2540 North Capitol Avenue Indianapolis, IN 46208-5628

Month of Review: April 2022

Date of Onsite Review: May 19, 2022

Believe Circle City High School (9140)

Food Service Contact

Ms. Teagan M Vonderheit Dean of Operations (317) 692-1692

Meal Counting & Claiming - Believe Circle City High School (9994)

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

Technical Assistance: Accurate Meal Counts

Technical Assistance:

The use of a clicker is not advised for breakfast & lunch point of service; a meal count form is recommended instead. The food service staff member recording meal counts must ensure students are taking the required components for a reimbursable meal, including at least ½ c serving of a fruit or veggie at both breakfast & lunch, before they record the meal on the meal count form.

Meal Components & Quantities - Believe Circle City High School (9994)

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

Finding 9000: Missing Components and Insufficient Quantities of Required Components

On day of review, the first few students through the breakfast line were not required to take a fruit, but meals were recorded on the clicker. In addition, the first lunch service period did not offer a full cup of vegetables; only a ½ c bagged carrots was on the service line. The second meal service period had both the bagged carrots and bagged grape tomatoes to ensure the required 1 cup portion of vegetable was offered.

Corrective Action:

See sponsor level Finding 9007 for corrective action.

Technical Assistance:

Field Specialist stopped the breakfast service line to remind food service staff of the fruit/vegetable component requirement and what constitutes a reimbursable meal under Offer vs. Serve. The food service staff member recording the meal count was reminded to speak up & ensure students take all required components before counting it as a reimbursable meal.

The Dean of Operations was provided guidance on optimizing the flow of the service line to ensure students select reimbursable meals. The current set up is very disorganized with students approaching the line from every direction. Students should be required to slow down as they come through the service line and stop at the cashier in order for them to properly check their trays for all required components before counting it as a reimbursable breakfast or lunch. Crowd control posts might help distinguish the service line from the rest of the cafeteria/gym area and help students slow down. Signage directing students to the start of the service line is also recommended. The purchase of stanchions to assist in the movement through the serving line is an allowable expenditure from the food service account.

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: Reimbursable Meal Signage

Technical Assistance:

On the day of the meal service review, it was observed that food service staff is allowing students to take both the hot entrée option & cold entrée option at breakfast, and multiple entrée items at lunch. It is recommended for food service staff to be retrained on the planned IPS menu to ensure they understand the different entrée options being offered to students daily.

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Technical Assistance, continued:

Though reimbursable meal signage is posted on the serving line, it is recommended to include additional signage that identifies the different entrée options daily at both breakfast & lunch. Signage with guidance for students to select 1 entrée, up to 2 fruit choices, up to 2 veggie choices, and 1 milk choice is recommended. This will help guide students in selecting the required reimbursable meal components and ensure students are not taking additional items, as they are not being charged accordingly for the extra entrées and milk.

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

Technical Assistance:

Production records are missing some required information. Though meals are vended from IPS, the SFA must ensure all components & their accurate serving sizes are listed daily. This information is not included on the IPS menu. IDOE Production Record Template provided for reference: https://www.in.gov/doe/files/Interactive-Food-Production-Record-for-Breakfast-and-Lunch.xlsx

SFA was reminded that proper crediting documentation (CN labels, PFS, whole grain info, etc.) should be readily available from IPS & maintained to ensure meal pattern compliance.

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, one or more cashiers did not demonstrate a clear understanding of OVS and its requirements. Meals were counted as reimbursable under OVS when a meal was incomplete due to required meal components being selected in insufficient portion sizes. Meals were counted as reimbursable under OVS when a meal was incomplete due to missing the minimum number of required meal components.

Corrective Action:

See sponsor level Finding 9007 for corrective action.

501. Cafeteria staff have been trained on OVS

Technical Assistance: Offer vs. Serve Training

Technical Assistance:

Though training documentation indicated food service staff has been trained on Offer vs. Serve, re-training will be conducted prior to the start of Program Year 2023 due to findings noted on the day of review. See sponsor level Finding 9007 for details.

General Program Compliance - Believe Circle City High School (9994)

1405. Two food safety inspections are received each school year from the local health department

Technical Assistance: Annual Letter to Board of Health

Technical Assistance:

SFA was reminded of the requirement to request two food safety inspections annually.

Health Department Letter Template:

 $\frac{https://docs.google.com/document/d/1iwP5jVuzNualqEwBAiAxDW7pDF3Hrgos/edit?usp=sharing\&ouid=1147778186467021980}{90\&rtpof=true\&sd=true}$

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

Finding 9147: Most recent food safety inspection report is not posted in a publicly visible location.

Most recent health inspection needs to be posted in a visible location, such as next to the And Justice for All poster in the cafeteria.

Corrective Action:

Finding corrected while onsite. No further corrective action needed.

Other Federal Programs - Believe Circle City High School (9994)

1814. Required meal components available on every meal service line to all participating students? Enter data.

Finding 9253: Based on Day of Review observation, required meal components were missing or non-creditable.

As observed on the Day of Review, all required meal components were not available to all participants on all meal service lines throughout the meal service. Milk was not available for the lunch service due to staff stating milk was busted open and discarded.

Corrective Action:

The SFA did not reach out to the Field Specialist to request approval for a meal pattern exception for the day. As corrective action, the SFA will not be allowed to claim any meals served on 7/15/22.

Technical Assistance:

The SFA was reminded that when the meal pattern cannot be met for the day, such as with the quality issue noted above, the SFA still has a responsibility to acquire the necessary component prior to the meal service. If unable to pick up the component from a local store, the SFA should notify their Field Specialist as soon as possible to seek approval for an exception for the day.

1815. Observed meals counted for reimbursement contain all required components? Enter data.

Finding 9254: Based on Day of Review observation, meals counted for reimbursement did not contain all of the required components.

As observed on the Day of Review, only a 1/2 c of broccoli was offered on the service line. No other vegetable was offered to meet the 1 c requirement.

Corrective Action:

As corrective action, the Dean of Operations will provide food service staff Meal Pattern training prior to the start of Program Year 2023. Please submit a detailed training agenda with staff attendance signatures to field specialist as proof of completed training. Meal Pattern training can be accessed on the Moodle training platform: https://moodle.doe.in.gov/.

Technical Assistance:

SFA was reminded of the SSO meal pattern requirement to offer 1 full cup of vegetables daily. The packing/delivery list for the day's menu indicated baby carrots were delivered, but they were not served. SFA did not have an explanation for why they were not served.

1819. OVS properly implemented? Enter data.

Finding 9259: Offer vs. Serve is not being properly implemented.

Staff taking the point of service meal count did not demonstrate a clear understanding of OVS and its requirements.

Corrective Action:

As this is similar to what was observed during the regular school year onsite review, see sponsor level Finding 9007 for required corrective action.

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1820. Accurate count at POS on each meal service line?

Technical Assistance: Meal Counting

Technical Assistance:

The Dean of Operations was reminded of previous guidance on optimizing the flow of the service line to ensure students select reimbursable meals. The current set up is very disorganized with students approaching the line from every direction. Students should be required to slow down as they come through the service line and stop at the cashier in order for them to properly check their trays for all required components before counting it as a reimbursable breakfast or lunch.

1821. Day of Review meal count compared to 5-day average count. Enter 5-day data.

Finding 9000: Other Finding

Meal counts for 7/8, 7/11, 7/12 & 7/13 were requested for review, but were not provided while onsite. Observation and Recommendation Report left with SFA requested that they be sent to field specialist on Monday, 7/18, but they were not provided.

Corrective Action:

As corrective action, SFA must submit the required meal count sheets for the dates listed above.

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