

SNP Administrative Review Findings

Circle City Prep Charter School (9150)

Program Year 2022

Circle City Prep Charter School (9150)

4002 N. Franklin Road
Indianapolis, IN 46226-5297

Food Service Contact

Ms. Courtney J Eckerle
Director of Operations and Finance
(317) 643-4209
FSMC: Taher, Inc.

Executive Contact

Ms. Megan Murphy
Head of School
(317) 643-4209

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

Meal Counting & Claiming - Circle City Prep Charter School (9150)

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

Technical Assistance:

The answers to a couple off-site questions do not comply with USDA regulations for meal counting and claiming. For field trip meals, the meals must be counted at the point of service – as they are handed out to the students. Leftover meals cannot be backed out of the entire count to create a meal count for the day.

General Program Compliance - Circle City Prep Charter School (9150)

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: Special dietary needs are not correctly accommodated.

Corrective Action:

Milk substitutions made without a doctor's note must be nutritionally equivalent to milk. Only when a doctor assigns a substitution that is not nutritionally equivalent to milk, can the food service department provide the alternate. The manager and director need to complete the assigned Special Dietary Needs Milk training. Provide proof the training has been completed as corrective action.

Technical Assistance:

Students without a doctor's note must receive a complete and compliant meal. Only when there is a doctor's note outlining specific substitutions can an accommodation outside of the meal pattern be served. See our webpage for additional resources for accommodating special dietary needs: [Special Dietary Needs \(in.gov\)](https://www.fns.usda.gov/civil-rights/usda-nondiscrimination-statement-other-fns-programs)

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

Technical Assistance:

The website does not contain the civil rights statement. Please include, at minimum, a link to the long form civil rights statement. <https://www.fns.usda.gov/civil-rights/usda-nondiscrimination-statement-other-fns-programs>

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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:

The wellness policy outlines that students will have 20 minutes to eat their meal after receiving it. The entire meal service period is only 20 minutes and there seemed to be significant food waste due to lack of time to eat. It is recommended that the meal serving period should be extended to 30 minutes to accommodate those at the end of the serving line. Additionally, studies have shown that students eat more and better when recess is before meal service. A best practice might be to have students go to recess prior to lunch to ensure students eat their meal.

1214. School Nutrition Programs Director met/will meet annual training requirements

Technical Assistance:

Don't forget that all food service staff must have the required training hours each year. Food Service Director and Manager that are SFA staff and need 12 (FSD) and 10 (Manager) hours of training annually. Food service staff were provided with resources for training at the time of review. While mandatory training requirements have been waived this current school year, the value of ongoing training cannot be overstated.

1216. School Nutrition Programs staff met/will meet annual training requirements

Technical Assistance:

Kitchen staff were new and began after off-site questions for the review were answered so the answers didn't match the current staffing situation. The staff were not trained prior to undertaking job duties. At a minimum, staff must be trained on civil rights and all other USDA requirements at the onset of their employment.

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 was not submitted to IDOE on time. The AFR is due in September each year and has not yet been completed for Program Year 2021.

Corrective Action:

Reporting requirements were discussed with and understood by program administrators. The sponsor will complete the report as soon as possible. Once completed, no additional corrective action response is needed for this finding.

Technical Assistance:

To stay on track with due dates for reporting, IDOE's Calendar of Due Dates can be found at https://docs.google.com/document/d/1gQejacWaNHaz_tozqZFehNz0p59JDFW21J9SHz5-BPE/edit.

1602. On-site observations validate Off-Site Assessment Tool responses to SFSP and SBP Outreach questions and responses demonstrate compliance with FNS requirements

Technical Assistance:

Regardless of participation in the Summer Food Service Program (SFSP), SFAs are required to promote the program and



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conduct outreach by notifying households of the availability of SFSP locations in their area. IDOE typically puts a reminder and suggested language for this notification in the weekly email toward the end of the school year.

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Circle City Prep Charter School (1126) Food Service Contact

4002 N. Franklin Road
Indianapolis, IN 46226-5297

Ms. Courtney Eckerle
Director of Operations and Finance
(317) 643-4209

Month of Review: October 2021

Other Federal Programs - Circle City Prep Charter School (1126)

3. POS snack counts by student/benefit category maintained?

Finding 9220: Point-of-service snack counts by student/benefit category are not maintained.

Snacks are not counted at the point of service.

Corrective Action:

If served within the classroom, each classroom must have a point of service snack count sheet provided to them which should be completed as snacks are served. The sheet must be filled out by the teacher/adult as students should not be allowed to count meals for reimbursement. Please provide the written procedure as to how snacks will be counted at the point of service for reimbursement.

6. Day of review Menu, Meal Patterns, Production records.

Finding 9225: After School Snack Program production records are not completed daily and maintained for a minimum of 3 years.

Production records are not maintained for the program. Currently, the kitchen manager provides a number of snacks in bulk, but the SFA separates out the snacks for each classroom and collects all the leftover product. No product is returned to the kitchen, so the SFA is billed for the total number of snacks provided and not the number actually served.

Corrective Action:

Production records showing the number of snacks prepared, served, and leftover must be maintained. Please provide one month's worth of corrected production record as corrective action.

Technical Assistance:

Afterschool Snack Program production team should compare the number of snacks returned within the bag with the number of snacks claimed for reimbursement. If the numbers do not add up, additional meal count training should be provided to the teacher(s) identified as having discrepancies. This will ensure meals/snacks are counted and records are recorded correctly.

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.

The Afterschool Snack Program has not been monitored for compliance.

Corrective Action:

Please complete one monitoring visit as soon as possible and submit the completed monitoring form as corrective action.

Technical Assistance:

To meet the monitoring requirement of a minimum of two per year, one additional monitoring visit must be conducted before the end of the school year but will not need to be submitted to the State Agency. Retain all forms with program documents.

Meal Counting & Claiming - Circle City Prep Charter School (1126)

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

Finding 9066: Inaccurate meal counts by eligibility category at the POS.

As observed on the Day of Review, each meal service line does not provide an accurate count by eligibility category at the point of service.

Breakfast: K-2 students have a breakfast meal at their desk upon arrival. This does not allow meals to be counted at the point of service. A leftover number is subtracted from the meals available and that is the count used for claiming purposes, which is not an allowable method for determining meal counts. Students must be able to decline breakfast, and therefore it shouldn't be placed on their desk prior to the student arriving.

Lunch: The person documenting meal counts was not located at the end of the meal serving line. The person had other duties and took the count after children were seated. This does not allow for an accurate point of service count nor a full check to ensure all components were taken prior to claiming the meal.

Corrective Action:

Required trainings were assigned to food service staff: Meal Counting for Managers (in InTeam) has been assigned to Stephanie and Meal Counting for Directors was assigned to Courtney. Please provide proof the training has been completed. Please provide written procedures for breakfast meal service to ensure point of service counting is taking place.

Technical Assistance:

Point of service meal counting is defined as the moment a reimbursable meal is served for claiming purposes. There have been no waivers allowing alternate meal counting methods to be used. Staff was provided technical assistance at the time of review to ensure compliance with meal counting regulations.

324. *Review Period- there were no questionable patterns in the reported meal counts by category*

Finding 9000: Meal Counting Procedures

On the month of review there are several days with missing meal counts. There are chunks of the meal count form that have no tally marks and other areas where one line is drawn through several numbers. This shows that meals are not counted as each individual student receives a meal.

Corrective Action:

Meal Counting for Managers has been assigned to Stephanie in inTEAM and Meal Counting for Directors was assigned to Courtney. Please provide proof the training has been completed.

Technical Assistance:

Point of service meal counting is required for all meals. Each point of service must have a meal count form completed by a responsible adult. Meals can only be counted when a complete meal or snack is taken by the student. Students should always have the option to decline participation in meal service and cannot be required to take a meal if they do not want it.

Meal Components & Quantities - Circle City Prep Charter School (1126)

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

Technical Assistance:

Each student who goes through the line at breakfast must have the option to select which milk option they would like. For grades K-2, some teachers were handing students a milk, so the choice was not available and for grades 3-5, the 1% option was placed below the skim milk option and inaccessible until the skim milk was gone. Student must have the ability to select the kind of milk they want during the meal service. Two varieties of milk are required to be available to all students during the meal service.

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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, signage explaining what constitutes a reimbursable meal is not identified near or at the beginning of the meal service line(s).

Corrective Action:

The SFA must provide information on what constitutes a reimbursable meal. There are several commercially available products as well as free resources. Provide confirmation that signage is now in place on the serving line.

Technical Assistance:

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

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

Finding 9000: Production Records do not Meet USDA requirements

Production Records do not meet USDA requirements. Missing requirements include: total purchase units. All areas on the USDA template production record template are required to be on any alternate form used.

Corrective Action:

Please provide an updated production record that will be used moving forward that contains all the required areas. Using the IDOE template production record and completing it fully is the ideal way of ensuring compliance with this requirement.

Technical Assistance:

Alternate production records should be submitted to field specialist for approval prior to usage. The current production record in use is not organized in a logical way and is hard to follow for both State Agency reviewers and site staff. Please consider an alternate format that moves away from having one record for an entire week as well as the use of vertical columns divided by menu component/item. To ensure they are correct, production records should be easy to read and complete.

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 for the Review Period were reviewed to determine whether the portion sizes of meal components were planned and served to meet the minimum meal pattern requirements for the age/grade group(s) being served. Production records were not completed fully or correctly.

Corrective Action:

For corrective action, please submit one week of completed production records using a compliant record. All areas must be completed fully and correctly.

Technical Assistance:

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

General Program Compliance - Circle City Prep Charter School (1126)

1300. *Potable water is free and available to all students during lunch and breakfast*

Finding 9164: Free potable water is not available to all students for lunch in each location where lunches are served during the meal service and for breakfast when breakfast is served in the cafeteria.

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Corrective Action:

The school will provide access to free water at meal serving times. Because students do not have their water bottles during mealtimes, cups will be provided with a water jug in the cafeteria. If implemented as written, no further action is necessary.

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

Technical Assistance:

At the start of the school year, a letter must be sent annually to the local health department requesting two inspections. Documentation was not available to substantiate the SFA has requested two food safety inspections for the current year even though the health department typically visits at least twice annually.

1502. Records are retained for 3 years

Finding 9000: Record Retention

Records are not properly maintained in the kitchen. Records from the past 3 years plus the current operating year must be maintained and accessible.

Corrective Action:

In talking with the SFA, they will collect production records each month and store them for the required 3 years plus the current operating year. This will ensure that the FSMC/Vendor does not take records with them if their contract ends and the records will be accessible by the SFA at all times. If implemented as discussed, no additional action is required for this finding.