

**SNP Administrative Review Findings****Eman Schools (K396)***Program Year 2020***Eman Schools (K396)**11965 Allisonville Road  
Fishers, IN 46038-2315**Food Service Contact**Mr. Fakhry Rasheed  
Food Director  
(317) 845-9466**Executive Contact**Dr. Shaker S Rashid  
Principal  
(317) 845-9466No. of Sites / Reviewed: 3 / 1  
Month of Review: December 2019**Certification and Benefit Issuance - Eman Schools (K396)***126. Certification: selected applications correctly approved***Finding 9017: Correct implementation of application approval process**

The application approval process is not implemented correctly. Applications with missing information were approved for meal benefits.

**Corrective Action:**

The SFA cannot approve applications with missing information. Information was obtained while the reviewer was on-site. The SFA approving official will take the application approval training on the inTEAM website.

*129. Household notification of eligibility is consistent with Off-Site Assessment responses***Finding 9902: Household notification of eligibility not compliant with regulations**

The notification of eligibility sent to households did contain the required information or was not sent as required.

**Corrective Action:**

The SFA must utilize an approval letter to notify households of the eligibility. The letter must contain all required components as put forth by the USDA. The approving official was shown where to find the IDOE form letters for use.

If the IDOE letters are used, no further response is needed for this finding.

*133. Direct Certifications were correctly certified***Finding 9024: Direct Certifications were not correctly certified**

Direct certification documentation for selected students was reviewed for completeness and accuracy. Some students were certified for free meals incorrectly. One household was certified for free meals incorrectly. The household should have been reduced.

**Corrective Action:**

Please indicate the date that the household was changed to reduced from free status.

*135. Direct Certification lists are retained on file by the SFA***Finding 9026: Direct Certification lists are not retained on file by the SFA**

The SFA is not keeping Direct Certification lists on file.

**Corrective Action:**

The SFA must keep all DC lists run from the IDOE Direct Certification website on file for three years plus the current operating year.

The SFA expressed understanding of this requirement at the time of review. No further response is needed.

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

**SNP Administrative Review Findings****Eman Schools (K396)****Program Year 2020****Finding 9029: Eligibility determinations not correctly transferred to the Point of Service Benefits Issuance document**

Based on a review of documentation for selected students, certified eligibility is not always transferred correctly to the benefit issuance system (tickets, rosters, tokens, electronic POS terminal).

**Corrective Action:**

The SFA must determine how eligibility will be transferred to the point of sale paper in a timely and accurate manner. Please describe how this will be corrected.

**Technical Assistance:**

It is recommended that the SFA purchase a point of sale software system that can be updated centrally when a new eligibility is determined. This would ensure timely and accurate changes.

**Verification - Eman Schools (K396)**

207. *SFA completed verification and verified applications on file match FNS-742*

**Finding 9036: Verified applications on file do not match number reported on FNS-742.**

The SFA's response to question #200 of the Off-site Assessment Tool and the number of Verified applications reported on the FNS-742 are inconsistent with the number of Verified applications on file. The number of applications pulled for verification was based on total number of free and reduced students and not number of applications.

**Corrective Action:**

The SFA verification official is to take the inTEAM Verification training module before conducting verification again.

209. *Verified applications were properly selected, correctly replaced (if necessary), and correctly verified*

**Finding 9039: Applications not properly selected for verification.**

The applications selected for verification were not appropriately selected for the sample size option used. The SFA selected students who were directly certified for verification.

**Corrective Action:**

The SFA verification official will take the inTEAM Verification training module prior to conducting verification again.

210. *Direct Verification of selected applications was conducted according to requirements*

**Finding 9043: Requirements for directly verifying applications not met.**

The SFA did not follow requirements for directly verifying selected applications. The SFA verification official only attempted to Directly Verify students who were already Directly Certified.

**Corrective Action:**

The SFA verification official will take the inTEAM Verification training module prior to conducting verification.

211. *SFA's verification notification letter included all required information*

**Finding 9044: Verification notification letter does not contain all required information.**

The SFA's verification notification letter does not include all required information. Households were notified via email without inclusion of the required language for notification.

**Corrective Action:**

The SFA was shown where to find the verification notification letters for use in future program years.

If the IDOE letters are used, no further response is needed.

**Meal Counting & Claiming - Eman Schools (K396)**

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

**SNP Administrative Review Findings****Eman Schools (K396)****Program Year 2020****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: and edit check is not conducted prior to the submission of a claim.

**Corrective Action:**

The SFA must record an edit check prior to the submission of a claim for reimbursement. One edit check is required for each site. This should also help with the meal claiming errors noted during the review.

**Technical Assistance:**

<https://www.doe.in.gov/sites/default/files/nutrition/nslp-reviews02edit-check-daily-meal-counts.pdf>

**Resource Management Comprehensive Review - Eman Schools (K396)****754. Nonreimbursable Meals****Finding 9000: Negative Account Balances**

The SFA did not report enough income to cover the cost of the paid and reduced price meals. The SFA stated that they do not require households to be current in paying for meals if they do not qualify for free meals.

**Corrective Action:**

The SFA must show how the money that was not reported will be paid to the food service account. Looking forward, please describe how you will ensure that negative account balances are tracked by household and how the monies will be collected.

**Technical Assistance:**

The SFA financial manager was given a spreadsheet covering the difference in income and number of paid meals sold. Please refer to the spreadsheet when outlining your plan to pay the food service account for the lost income.

**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 9011: Local School Wellness Policy 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 Local School Wellness Policy could not be validated during on-site observations. Discrepancies or deficiencies found on-site:

**Corrective Action:**

Please respond with an outline for when the SFA will comply with the requirement to have a wellness committee in place. Additionally, please outline how the wellness committee will assess the current policy and make updates/additions in the missing areas for compliance.

**1213. New School Nutrition Programs Director met food safety certification training requirements****Finding 9000: Other Finding**

The SFA food service director has not attained the required food safety certification.

**Corrective Action:**

Please show proof the Food Service Director has obtained the required food safety certification.

**1214. School Nutrition Programs Director met/will meet annual training requirements****Finding 9000: Training Records- Food Service Director**

The food service director did not have any documentation showing training that had been completed for the program year.

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

**SNP Administrative Review Findings**

**Eman Schools (K396)**

**Program Year 2020**

**Finding 9000: Training Documentation- Site Staff**

Site staff have had no training aside from civil rights training.

**Corrective Action:**

Site staff must be trained the required number of hours each year. Please submit completed training hours so far and if the required number of hours has not been met, please show how the hours were met by June 30, 2020. Outline training plans for the 2020-21 School Year.

*1219. Employees outside of the School Nutrition Programs with School Nutrition Program duties received appropriate training*

**Finding 9000: Training Documentation- Employees Outside Food Service**

The approving and verification official had not been trained in requirements for application approval or verification prior to taking over those duties.

**Corrective Action:**

Please submit proof that the applications and verification official has taken the Free and Reduced Applications Process, Direct Certification, and Verification training modules within the inTEAM online training tool.

*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.**

The written food safety plan does not comply with the HACCP program criteria described in 7CFR 210.13(c). The plan is not tailored to meet each site's needs and does not contain all the necessary standard operating procedures.

**Corrective Action:**

The SFA will work with the state reviewer to create food safety plan templates for each site as needed.

*1500. Reports are submitted to the Indiana Department of Education as required*

**Finding 9000: Charging Policy**

The charging policy is not enforced as written.

**Corrective Action:**

Please describe how the charging policy will be enforced as it is written.

*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 & SBP Outreach**

**Technical Assistance:**

Each SFA must advertise the School Breakfast Program throughout the school year. Proof that the program was promoted must be retained by the food service department. Additionally, at the end of each school year, each SFA must advertise that summer meals are available. Please look for suggested language in upcoming weekly newsletters and promote the program.

**SNP Administrative Review Findings****Eman Schools (K396)****Program Year 2020****Eman South Campus (J062)**11965 Allisonville Road  
Fishers, IN 46038-2315**Food Service Contact**Mr. Fakhry Rashid  
Director of Food Programs  
(732) 877-9601

Month of Review: December 2019

Date of Onsite Review: January 17, 2020

**Meal Counting & Claiming - Eman South Campus (J062)***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 type of meal service line does not provide an accurate count by eligibility category at the point of service. At breakfast, no meals were counted at the point of service. At lunch, the meals were counted when the children had received only a portion of their lunch. There was no oversight to see that children had taken complete meals.

**Corrective Action:**

Please describe how the meal counting procedure has been changed in order to ensure complete meals are counted and claimed.

*325. Review Period- meal counts by category were correctly used in the claim for reimbursement***Finding 9074: School's meal counts by category 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 does not match the State agency's validated meal counts for the school for the review period. The SFA's claim for the school for the Review Period does not match the State Agency's validated meal counts by category for the school for the Review Period. The problem is considered systemic because the contributing factors are built into the process and would likely recur if the process is not changed.

**Corrective Action:**

The difference between the SFA Count and the State agency validated count, by category, has been calculated into fiscal action. Please describe how the meal counting procedure has been corrected to ensure correct claims for reimbursement are filed.

**Meal Components & Quantities - Eman South Campus (J062)***401. Day of Review- all meals observed and counted for reimbursement contained all of the required meal components***Finding 9000: Meal Pattern Compliance**

None of the meals counted on the day of review contained the required components to create a meal. All 18 breakfast meals and 99 lunch meals have been disallowed.

**Corrective Action:**

The SFA must ensure that all meals taken are counted at the point of service. The point of service is the point where all meal components are taken. Please describe how the meal counting system has been corrected. Please submit proof that site staff have been trained in meal counting and claiming procedures including meal pattern compliance.

*402. Day of Review- the minimum daily quantity requirements are met for the age/grade group being served***Finding 9052: Day of Review portion sizes insufficient.**

As observed on the Day of Review, the portion sizes of meal components from the planned menu and served on the day of review did not meet the minimum meal pattern requirements for the age/grade group(s) being served. The vegetable portion for the day was only 1/2 cup. The issue was corrected during meal service at the request of the reviewer.

**Corrective Action:**

The SFA must plan menus that meet meal pattern requirements. Understanding of how food items credit is integral to meal pattern compliance. Please submit proof that the menu planner has taken training to show crediting of foods.

**SNP Administrative Review Findings**

**Eman Schools (K396)**

**Program Year 2020**

**Technical Assistance:**

There is a Crediting Foods Course on inTEAM.

*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.**

**Technical Assistance:**

Although the sponsor had two types of milk available, only chocolate milk was pre-portioned and available to students. The milk was portioned and poured without additional help available for students who could have wanted white milk. Children must have the option of both milk choices. The SFA must portion out white milk along with the chocolate milk.

*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). Additionally, the juice option for the day was promoted as a beverage option and not clearly outlined as the fruit.

**Corrective Action:**

The SFA must have signage that explains what is included with the meal and the requirement that all components are taken. Signage cannot include the promotion of any other beverage other than milk as the beverage of choice. Please ensure signage is posted in all cafeterias.

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

**Finding 9075: Production records/supporting documentation indicate weekly meal pattern requirements for the age/grade group(s) not met.**

Based on a review of production records and other supporting food crediting documentation for 1 week during the Review Period, some meals served during the week reviewed did not meet the appropriate daily and weekly meal pattern requirements for the age/grade group(s) being served. Meals missing required meal components during the week reviewed: the nachos served with a non-creditable cheese product did not have additional meat/meat alternate served with the meal. The meal did not contain the required meat/meat alternate component. All meals served SFA-wide have been disallowed.

**Corrective Action:**

The SFA must plan menus that are in compliance with meal pattern requirements. Please show that the menu planner has obtained training in meal pattern requirements and fully understands the requirement for all grade groupings.

*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. Production 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.**

- Production records are not completed fully or by the staff at the site.
- Not meeting 50% whole grain requirement.
- The cheese sauce offered with the cheese nachos does not credit as a meat/meat alternate.
- Recipes are not used in food service production and were not available for review. The food service manager produced recipes that have never been given to site staff and recipes that show crediting, but are not followed.
- Some items served did not have a CN label or product formulation statement to show crediting. (Cheese Sauce, Marco's Pizza, granola bars, mini muffins, donuts, honey bun)
- The currently used granola bar at breakfast only credits at .25oz equivalent grain.
- Portion control devices are not used to ensure correct serving amounts at breakfast or lunch.



**SNP Administrative Review Findings**

**Eman Schools (K396)**

*Program Year 2020*

- The menu planned for day of review did not meet meal pattern requirements.
- The Pizza on the day of review was cut into 12 slices instead of 8 as per the information provided

**Corrective Action:**

Please state how the SFA will ensure that menus are planned to meet meal pattern requirements.

**General Program Compliance - Eman South Campus (J062)**

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

**Finding 9101: Justice For All poster not displayed in prominent location.**

The USDA "And Justice for All" poster was not displayed in a prominent location where it is visible to recipients of benefits.

**Corrective Action:**

The SFA must post the "And Justice For All" poster in a prominent location. When new sites are added, the SFA must request additional signage for the new sites. The SFA understands this requirement and will post the civil rights poster in a prominent location within the meal service area.

No further response is needed.

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

**Finding 9105: Documentation of the SFA's on-site monitoring of the school's meal counting and claiming procedures was not available.**

Documentation of the SFA's on-site monitoring of the school's counting and claiming procedures for the current Program Year was not available at the school.

**Corrective Action:**

Please review each site and provide the monitoring forms as corrective action.

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)**

Free water was not available to students in the meal service area. The location of the potable water must be in the meal service area or immediately adjacent to the meal service area.

**Corrective Action:**

Please confirm that free water is available to students in the cafeteria.

**Technical Assistance:**

The SFA may correct this issue by utilizing a water cooler, pitchers or small bottles of water for consumption. The water available cannot be served in place of or promoted over milk as the beverage choice and should not be served on the reimbursable meal line.

1404. *A copy of the written food safety plan is site-specific and available on-site*

**Finding 9145: A copy of the written food safety plan was not available at the reviewed school.**

A copy of the local wellness policy was not available on site.

**Corrective Action:**

The SFA will work with the state agency reviewer to update the local Food Safety Plan.

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.**

The SFA did not request at least two food safety inspections for each site.

**SNP Administrative Review Findings**

**Eman Schools (K396)**

**Program Year 2020**

**Corrective Action:**

The SFA must show that two food safety inspections have been requested for all three locations.

*1409. On-site or off-site storage violations were observed*

**Finding 9150: Storage violations were observed.**

The SFA must ensure that all of its facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. Temperature is not appropriately maintained for the refrigerator. The cold holding storage did not have a thermometer available to check temperature.

**Corrective Action:**

Please confirm that all cold holding storage areas have thermometers within them to show current temperatures. Each site must record the holding temperature for each piece of equipment as stated in the local food safety plan.

*1502. Records are retained for 3 years*

**Finding 9000: Record Keeping**

The SFA is not maintaining accurate records to show program compliance. Records for the program are not stored centrally and many could not be accessed for the review.

**Corrective Action:**

Please describe how records will be maintained in order to ensure that records are kept for three years plus the current operating year.