

SNP Administrative Review Findings

**HIM By HER Collegiate School for the Arts
(8990)**

Program Year 2022

**HIM By HER Collegiate School for the Arts
(8990)**
4501 East 32nd Street
Indianapolis, IN 46218-2207

Food Service Contact
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Executive Contact
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Executive Director
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No. of Sites / Reviewed: 1 / 1
Month of Review: February 2022

Commendations

- * Students enjoyed the fruit infused water offered during breakfast and lunch service.
- * High quality foods such as all beef patties and whole pulled chicken were served to students.
- * Meal documentation for the menu review was nicely organized in time for the review.

Technical Assistance

- * CEP eligibility for next year was discussed with the sponsor. Resources for CEP and direct certification were emailed the day of review.
- * The weekly newsletter sign-up link was sent to the director the day of review.
- * To make the serving line usable some suggested equipment ideas were emailed to the SFA. It is suggested to utilize a cafeteria shelf with sneeze guard for the steam table (instead of a full salad bar sneeze guard) and to add a solid tray slide for the serving side of the steam table and salad bar. Consider placing the milk cooler first in line, the steam table last, and the fruit and vegetable bar in the center of the line. This will allow staff to ensure students select a fruit or vegetable under OVS should the sponsor wish to implement OVS.
- * Foodservice staff were advised that the "breakfast jump starts" used do not contain the full fruit component as required by the School Breakfast Program meal pattern. An additional 1/2 cup of fruit and 8 fluid ounces of milk must be served to students to create a reimbursable meal.
- * The SFA noted that the meal consolidation is not documented. A claim consolidation spreadsheet was provided to the SFA the day of review to assist with documenting the claim consolidation and ensuring claims are accurate. The SFA was advised to sign the form and perform a double check for which a signature should also be documented.
- * Milk substitution requirements discussed the day of review.
- * When professional standards training requirements resume for program year 22-23 please utilize the following spreadsheet to track training hours for each foodservice worker and for non-foodservice staff with duties related to the program.
<https://www.in.gov/doi/nutrition/professional-standards/>
- * The SFA is reminded of the requirement to monitor the Afterschool Snack Program within the first four weeks of operation and again at least one more time within the school year.
- * The SFA is reminded of the requirement to inform households of the availability of meals during summer months through the Child Nutrition Summer Feeding Programs. This requirement is for all SFA's whether operating a summer program. Notification can be made via newsletter, social media post, call, etc. Please maintain accurate record keeping showing that annual compliance for advertisement has occurred. See the April 20, 2022 weekly newsletter for additional information.

Resource Management Comprehensive Review - HIM By HER Collegiate School for the Arts (8990)

754. Non-reimbursable Meals

Finding 9000: Non-Reimbursable Meals

On the day of review students without a reimbursable meal (some students did not want milk; OVS is not utilized) were not charged a la carte pricing for their food items.

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It is recommended that OVS is implemented but if the sponsor chooses not to implement OVS the full meal must be selected or the student must be charged for a non-reimbursable meal.

755. Allowable Costs**Finding 9117: Unallowable general expenses charged to the nonprofit school food service account.**

Based on the SFA's accounting records for the current school year, the charges to the nonprofit school foodservice account for the food service consultant were not reasonable, necessary and/or allocable. The amount the SFA paid for the food service consultant was over 25% of the total funds received for the current school year. This is considered excessive, and therefore unreasonable, especially since the SFA can seek out consultants from the Indianapolis area and then pay very limited amounts for travel. Additionally, many of the services offered and charged by the consultant are services that the State Agency provides for free, especially the completion of the application process within CNPweb.

Corrective Action:

Based on the invoices submitted by Nutrition Industry Consulting Excellence/Jonathan Dickl, the amount of expenses deemed unreasonable included \$4,481.42 (for travel billed 7/23/2021-2/28/2022) and is considered an unallowable expense. If this amount was paid from the nonprofit food service account, it must be restored using nonfederal funds. Additionally, the amount billed for administrative labor during this same period was \$15,575. This is excessive and unreasonable. State Agency field staff provide support for questions related to CNPweb entries and renewal. The SFA would be much better off using that money toward hiring a local food service director who would be on site during the school day, and the day-to-day operation of the food service would be their responsibility, thus freeing up other administrators to do their other tasks. For corrective action, provide a detailed explanation for why an out of state consultant was used, confirm whether these expenses were paid out of the food service account and if so, restore the unallowable \$4,481.42 expenses for travel to the food service account. Show evidence that this transfer has been made. Provide a detailed plan for hiring an on-site food service director instead of paying for consulting fees.

General Program Compliance - HIM By HER Collegiate School for the Arts (8990)**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. : The civil rights complaint procedure as described by the SFA in the pre-review questions is insufficient. All Civil Rights complaints made as a part of participation in USDA meal programs of must always be forwarded to USDA.

Corrective Action:

The state agency complaint procedure will be adopted to ensure civil rights complaints are handled appropriately. The SFA agrees to the corrective action as written. Additional response is not required.

Technical Assistance:

The complaint procedure, form, and log can be found here: <https://www.in.gov/doe/nutrition/civil-rights-requirements/>.

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:**

This is just a reminder that the committee for the wellness policy should include stakeholders such as parents and community members as well as school staff. The wellness policy should be reviewed annually and communicated to parents through the school website. An assessment of the wellness policy must be conducted every 3 years so next school year, this should be

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completed by the committee. We have resources available, including an evaluation assessment, on our website, found here:
<https://www.in.gov/doe/nutrition/wellness-policies/>

1400. The written food safety plan contains required elements, and a copy is available at each school

Finding 9143: A copy of the written food safety plan is not available at each school.

Foodservice staff were unable to locate the plan in the kitchen the day of review. A copy was provided to the State Agency during the review.

Corrective Action:

As corrective action the SFA agrees to provide a copy of the food safety plan to kitchen staff. Additional response is not required.

Technical Assistance:

The requirement was explained the day of review.

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 required annual financial report and verification summary report were not submitted as required by the due date established by the State Agency.

Corrective Action:

Reporting requirements were discussed with program administrators. The annual financial and verification summary report have since been submitted. The sponsor must also explain how they will ensure reports are submitted prior to State Agency established deadlines going forward.

Technical Assistance:

IDOE's Calendar of Due Dates can be found at
https://docs.google.com/document/d/1gQejacWaNHaz_tozqZFehNz0p59JDFW21J9SHz5-BPE/edit.

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HIM By HER Collegiate School for the Arts (9991)

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Indianapolis, IN 46218-2207

Food Service Contact

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Month of Review: February 2022

Date of Onsite Review: March 10, 2022

Other Federal Programs - HIM By HER Collegiate School for the Arts (9991)

4. Validate snack counts – snacks properly counted and claimed?

Finding 9221: Snacks are not being properly counted and claimed.

The snack counts claimed for reimbursement for the review period could not be validated. Meal counts as recorded on the daily meal count sheets to not match the total claimed for reimbursement.

Corrective Action:

As corrective action the SFA agrees to implement a double check of meal counts and to utilize an electronic consolidation spreadsheet to ensure accuracy in claim totals. The SFA agrees to the corrective action as written. Additional response is not required.

Technical Assistance:

A customized consolidation spreadsheet was sent to the SFA the day of review.

5. On-site observation – Snack counts reasonable, Meal Service operation compliant?

Finding 9223: As observed on the Day of Review, the snack meal service operation was not in compliance with all program requirements.

All snacks served March 10th, the day of review, were disallowed as a point of service was not utilized. An accurate snack count could not be determined.

Corrective Action:

As corrective action please provide the following:

- An explanation of how a point of service count has been implemented in each classroom where snacks are served.
- Training documentation as proof that all teachers distributing and counting snack have been provided with appropriate training.
- The person providing the training to teachers must also provide proof that a recent afterschool snack program training was taken in the IDOE online training portal.
- Provide the meal count consolidation sheet for March, showing snacks for March 10th were not claimed for reimbursement.

Technical Assistance:

The requirement was explained the day of review.

11. DOR and Review Period Snacks missing components.

Finding 9000: Non-reimbursable snack

The snacks served four days during the month of review were not reimbursable. Fruited gelatin and juice were served but are considered one meal component (fruit and juice). A second, different component was not served. Per meal count sheets, 640 snacks are disallowed.

Corrective Action:

As corrective action an updated menu must be provided showing two different components are served each snack in the

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appropriate portion sizes. Substitutes must be approved by the menu planner.

Technical Assistance:

The requirement was explained the day of review.

Meal Counting & Claiming - HIM By HER Collegiate School for the Arts (9991)

322. *Review Period- daily meal counts by category do not exceed the number of eligible students by category*

Finding 9070: Meal counts exceeded number of free, reduced price and/or paid eligible students.

On two days during the month of review the number of reimbursable meals recorded on the meal count sheets exceeded the number of students enrolled. No acceptable explanation was provided by the school. Meals exceeding the number eligible cannot be validated by the reviewer and therefore must be disallowed.

Corrective Action:

As corrective action the SFA must conduct an edit check each month and compare each day's meal counts to the number of students enrolled. The SFA must ensure the number recorded on the meal count sheet never exceeds the enrollment. This would indicate an error in meal counting, such as adult meals being claimed for reimbursement. When meal counts exceed the average daily attendance, they must be evaluated as well as this would still be considered an unusually high meal count. The SFA must submit a completed edit check for April or May as corrective action as claims for these months have yet to be filed. **As a reminder, the April claim must be submitted by June 29th to meet the 60 day submission requirement.**

Technical Assistance:

A meal count consolidation form with a line to compare enrollment was sent to the SFA the day of review.

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 documented within the review and could contribute to fiscal action. As corrective action the SFA agrees to utilize a consolidation spreadsheet as well as a double check of meal counts for accuracy. Additional response is not required.

Technical Assistance:

An excel spreadsheet to use for meal count consolidation was emailed to the sponsor the day of review.

Meal Components & Quantities - HIM By HER Collegiate School for the Arts (9991)

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 the breakfast fruit/vegetable meal component as served on the day of review did not meet the minimum meal pattern requirements for the age/grade group(s) being served. If not participating in Offer Versus Serve, fruit servings on each student's tray at breakfast must equal 1 cup.

Corrective Action:

The insufficient portion was corrected at the start of service, which ensured all meals were reimbursable. As corrective action foodservice staff must take the meal pattern training in Moodle. Training documentation must be submitted as corrective

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action.

Technical Assistance:

The school was advised and given the opportunity to correct the insufficient quantity of the fruit/vegetable meal component before the meal service started.

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 breakfast meal is not identified near or at the beginning of the meal service line. The lunch signage was posted, however.

Corrective Action:

Meal pattern signage was sent to the sponsor the day of review. The SFA agrees to print and post the signage therefore, additional response is not required.

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 Record Documentation

Some production records were not completed thoroughly or accurately. The following issues were noted:

- Some portion sizes were not listed on production records and recipes were not provided to determine portion sizes for menu items. As a result, actual component contributions and in some case portion sizes served could not be determined.
- Planned, prepared, served, and leftover portions recorded on production records, do not accurately meal service activity.

Corrective Action:

As corrective action, production record and standardized recipe training must be taken by foodservice staff. Documentation of the training must be submitted to the State Agency.

Technical Assistance:

Training for standardized recipes can be found under the crediting training in Moodle: <https://moodle.doe.in.gov/>. An ICN production record training can be found here: <https://www.youtube.com/watch?v=1b5RITqAPH8>.

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 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. Meals served with insufficient portion size or insufficient quantities of meal components are incomplete and are not reimbursable. The menu planner is reminded to plan menus that meet all components in both the daily and weekly serving sizes. Portion sizes for some fruits and vegetables were insufficient per production records.

Corrective Action:

As corrective action meal pattern training must be taken via Moodle. Please submit training certificates as documentation.

Technical Assistance:

The school was provided technical assistance during the on-site visit. It is recommended to provide kitchen staff with a planned menu that includes specific portion sizes.

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411. *Review Period- the school has complied with the planned menu, or changes made are acceptable substitutions*

Finding 9000: Crediting

Legumes and potato products were miscategorized on the production record in many instances as a grain serving.

Corrective Action:

Legumes and potato products (except for potato chips) credit as a vegetable serving within the NSLP meal pattern in the legume and starchy vegetable subgroups, respectively. As corrective action, crediting foods training must be taken through Moodle. Documentation must be provided to the State Agency.

Technical Assistance:

Training resources were provided during the review.

General Program Compliance - HIM By HER Collegiate School for the Arts (9991)

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.

Corrective Action:

As corrective action the SFA must confirm the most current food safety inspection has been posted in a publicly visible location.

Technical Assistance:

The requirement was explained to the SFA the day of review.

1407. *SFA written food safety plan is implemented*

Finding 9000: HACCP Plan was provided; it was unclear if employees had been trained on all aspects of the plan.

A HACCP plan was provided, but there was no evidence that employees had been trained on the specific topics within it. The last page of the plan record should list the names of the employees and the training dates. Training on all HACCP related topics is required annually for all employees and should be provided during the school year for new employees. Additionally, the HACCP plan should include an inventory of equipment.

Corrective Action:

Review the HACCP plan with food service employees and make sure a copy of the plan is available in the kitchen for daily access. Record the names of the employees and the training dates. Additionally, make a list of kitchen equipment, train employees on the use of the equipment and provide annual training to food service staff.

Technical Assistance:

Requirements were discussed the day of review.

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

Finding 9150: Storage violations were observed.

The SFA must ensure that all its facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. The following storage violations were noted during the onsite visit:

-a significant amount of ice was buildup in the walk-in freezer where fans were dripping

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- boxes were stored on the floor of the storeroom
- items out of original boxes and original packaging were not dated and in some cases not sealed
- shelves under work tables contained visible food debris and needed cleaning
- walk-in units were in need of cleaning such as sweeping, etc.

Corrective Action:

While it is understood the new kitchen staff have likely inherited the kitchen in its current state, corrective action must be implemented to ensure food safety requirements are met. As corrective action the SFA must confirm all storage violations were corrected. The State Agency did observe that the ice buildup has been cleaned up, but please provide confirmation that the other items noted have been addressed and a normal cleaning routine has been established.

Technical Assistance:

It is recommended to implement a cleaning schedule. Additionally, food safety basics is recommended through the Institute of Child Nutrition <https://theicn.org/school-nutrition-programs/>.

1502. *Records are retained for 3 years*

Finding 9000: Technical Assistance - Record Retention

As a reminder, please retain all records, including meal counts, menus and production records, training records, food safety inspections, food/non-food invoices, employee records, and any records providing proof/evidence for support of the claims for reimbursement.