

SNP Administrative Review Findings

The Path School (8980)

Program Year 2022

**The Path School (8980)**

653 N Somerset Ave  
Indianapolis, IN 46222-3327

**Food Service Contact**

Shawnta Butler  
Food Service Manager  
(317) 226-4267  
FSMC: Indianapolis Public Schools

**Executive Contact**

Ms. Alicia Hervey  
Principal / Founder  
(317) 226-4267

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

**Commendations**

- \* Staff involved in school foodservice were friendly, eager to learn, and open to suggestions.

**Technical Assistance**

- \* Although milk variety was available, the SFA was reminded on the day of review to keep both milk options stocked on the serving line throughout the entire meal service.
- \* A candy gram fundraiser operated by an individual teacher was in progress the day of review. The SFA was reminded the day of review that fundraisers involving food sold to students to consume during the school day fall under Smart Snacks regulations. Each site is allowed two days per year to sell food items that do not meet Smart Snacks standards; however, the school should address this in their wellness policy and ensure all staff in the school understand the requirements. All fundraisers should ideally be pre-approved by school administration. Smart Snacks resources were emailed to the SFA contacts the day of review.
- \* While the planned menu was offered to students it did appear that some students took more food than the planned portion during the breakfast meal service. For example, some students selected both the hot entrée and the pop tart. It was clarified with the vendor that the menu was not being served as planned. Please work with your vendor to clarify what items are meant to be served together. This will help keep food cost under control.
- \* The production record provided by IPS through their software program was printed in such a way that all content could not be viewed. Please work with your IPS contact to print a production record that documents all required information.

**Resource Management Comprehensive Review - The Path School (8980)**

750. Year End Available Balance

**Finding 9000: Resource Management**

The non-profit foodservice account balance could not be validated due to insufficient documentation. The documentation provided did not include the detail needed from the general ledger and it appears that the federal reimbursement from June 2021 was not accounted for as part of the income reported for program year 2021.

**Corrective Action:**

As corrective action the SFA must work with their accounting contacts to ensure the non-profit foodservice account balance is accurately reflected in the annual financial report and in the SFA's non-profit foodservice account ledger. As corrective action updated, detailed documentation must be provided to the State Agency reflecting accurate figures in the non-profit foodservice account. The annual financial report (AFR) should be updated to reflect any changes.

**Technical Assistance:**

The reviewer discussed the negative balance reported in the AFR with the director of operations. It was noted that meals served prior to the SFA's approval to operate could be the reason for the negative balance. Since the sponsor was first approved to operate in September 2020, student meals served prior to September 2020 were not reimbursable and cannot be documented as non-profit foodservice account expenditures. Expenditures for student meals and foodservice labor in August 2020 should have been paid for from the general fund directly rather than transferring money to the foodservice fund to cover these expenses.

757. Allowable Costs Test

**SNP Administrative Review Findings****The Path School (8980)****Program Year 2022****Finding 9000: Allowable Costs Test Unable to be completed**

The allowable costs test could not be completed due to insufficient documentation.

**Corrective Action:**

As corrective action the SFA must provide the State Agency with one full months' worth of foodservice expenses (invoices, paystubs, etc.) from October 2020 and the detailed general ledger documenting all recorded expenses for that time period.

**Technical Assistance:**

The reviewer and director of operations discussed what was needed to complete the allowable costs test. A checklist was also sent to the director of operations via email prior to the review.

**General Program Compliance - The Path School (8980)**

*808. On-site observations validate Off-Site Assessment Tool responses to Civil Rights questions and responses demonstrate compliance with FNS requirements*

**Finding 9000: USDA Civil Rights Statement missing in Scholar Handbook**

The USDA non-discrimination statement was not included in the school meal section of the Scholar Handbook.

**Corrective Action:**

As corrective action the SFA agrees to include the USDA non-discrimination statement on all materials that mention the Child Nutrition Programs. Additional response is not required.

**Technical Assistance:**

The non-discrimination statement required for the USDA Child Nutrition Programs is different from the non-discrimination statement required by the United States Department of Education. Civil rights requirements including the USDA non-discrimination statements can be found here: <https://www.in.gov/doi/nutrition/civil-rights-requirements/>.

*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: Procedures to accept complaints alleging discrimination against the Child Nutrition Programs are insufficient as complaints must be forwarded to USDA.

**Corrective Action:**

Corrective action required to address discrepancies or deficiencies in the SFA's Civil Rights procedures identified from the Off-site Assessment Tool: As corrective action the SFA agrees to adopt the prototype complaint procedures to ensure any complaints against the Child Nutrition Programs are handled in a manner consistent with USDA requirements. The civil rights complaint procedures, forms, and logs will be printed and maintained for future reference. Additional response is not required.

**Technical Assistance:**

Technical assistance provided to address discrepancies or deficiencies in the SFA's Civil Rights procedures identified from the Off-site Assessment Tool: Prototype Child Nutrition Program civil rights complain procedures, forms, and logs can be found here: <https://www.in.gov/doi/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*

**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: The responses to the off-site questions indicate that the SFA is unaware of the wellness policy developed for their school. As a result, a copy of the policy and proof of communication to the household regarding the policy content could not be provided.

**SNP Administrative Review Findings****The Path School (8980)****Program Year 2022****Corrective Action:**

Corrective action required to address discrepancies or deficiencies in the SFA's Local School Wellness Policy identified from the Off-site Assessment Tool: SFAs are required to annually inform and update parents, students, staff, and the community about the content and implementation of the local wellness policy, including the assessment of the policy and provide a way for additional stakeholders to be able to participate. As corrective action you must explain how this will be completed. Most schools post the wellness policy to the website or include it in the school policy manual.

**Technical Assistance:**

The reviewer provided the SFA with a copy of the wellness policy from the sponsor's file. The sponsor is also reminded that every three years you must evaluate the local wellness policy with an evaluation tool and notify the public of the results. The assessment will determine:

- to what extent the Local Educational Agency (LEA) is in compliance with the district policy;
- the extent to which the local wellness policy compares to model school wellness policies;
- the progress made in attaining the goals of the local wellness policy.

The evaluation tool must be maintained as documentation.

*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 in the school kitchen.**

At the time of the review the SFA did not have a written food safety plan.

**Corrective Action:**

As corrective action the SFA must create a written food safety plan and submit it to the State Agency. Additionally, a copy must be maintained at the school for reference in the kitchen area.

**Technical Assistance:**

A food safety plan template can be found at the Institute of Child Nutrition. The link and additional food safety resources were emailed to the SFA.

*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**

Some of the information gathered on the Off-site Assessment Tool regarding the SFA's SFSP & SBP Outreach procedures could not be validated during on-site observations. Discrepancies or deficiencies found on-site: breakfast notification was not provided to households.

**Corrective Action:**

To the maximum extent practicable, school food authorities must inform families about the availability breakfasts for students. Information about the School Breakfast Program must be distributed just prior to or at the beginning of the school year. In addition, schools are encouraged to send reminders regarding the availability of the School Breakfast Program multiple times throughout the school year. As corrective action, please send out a mid-year reminder of breakfast availability to households. Submit a copy as corrective action. Additionally, please explain your communication plan to meet this requirement each school year moving forward.

**Technical Assistance:**

Technical assistance provided to address discrepancies or deficiencies in the SFA's SFSP & SBP Outreach procedures identified from the Off-site Assessment Tool: The USDA School Breakfast toolkit has been emailed to the SFA foodservice contacts.

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Indianapolis, IN 46222-3327**Food Service Contact**Shawnta Butler  
Food Service Manager  
(317) 226-4267

Month of Review: October 2021

Date of Onsite Review: December 9, 2021

**Meal Components & Quantities - The Path School (9971)***401. Day of Review- all meals observed and counted for reimbursement contained all of the required meal components***Finding 9000: Non-reimbursable meals served.**

Three meals observed for breakfast on the day of review were not reimbursable. Two meals did not contain a fruit component due to the misunderstanding that yogurt is not a fruit. One meal only contained two items.

**Corrective Action:**

As corrective action the cafeteria manager and staff must take the following INTeam trainings: crediting foods, OVS-Breakfast, and OVS-Lunch. Quiz results from the training must be submitted to your field specialist.

**Technical Assistance:**

As technical assistance the reviewer provided training on the crediting of various food items such as yogurt and the planned processed items.