

SNP Administrative Review Findings

Phalen Academy (9925)

Program Year 2023

Phalen Academy (9925)

2323 North Illinois Street
Indianapolis, IN 46208-5760

Food Service Contact

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FSMC/Vendor: Real Taste

Executive Contact

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No. of Sites / Reviewed: 6 / 3
Month of Review: January 2023

Technical Assistance

* **Louis B Russell Jr School 48**

*During the site review, the lights were off, and staff was speaking harshly to students, creating an unpleasant environment in which to eat for the first group of students.

*Leftovers of some meals go to break room/teachers. Discussed these would need to be sold. The vendor does all ordering. Adjustments must be made in meal preparation when there are anticipated low participation days such as half days as observed on the day of review.

*Paperwork was scattered. It is recommended to file paperwork, meal counts and production records specifically, daily. Invoices from the vendor should also be filed on a regular basis.

*It was noted during the review that food service employees made poor use of time. Staff initially served breakfast meals in two locations but once school started the service was limited to the cafeteria. A foodservice staff member waited on the main floor for 25 minutes with a crate of food reserved for late students. In the meantime, she sent all students to the cafeteria instead of serving from her crate of meals. After breakfast service, staff did not have any food to prepare as all meals were cold, pre-boxed lunches. The kitchen lead indicated she was behind on production records for February. Staff must make better use of time to ensure all paperwork requirements are met. Otherwise, staff should be ensuring the kitchen is maintained in a clean and orderly state.

*Fruit variety is lacking at breakfast. Juice and craisins are served daily, which is not the intention of the Program.

* **George & Veronica Phalen**

*Food service staff must ensure that they are asking students what kind of milk they would like with their breakfast.

*Currently, the meal signage displayed is Offer vs Serve signage. GVP is not an offer vs, serve site, so general meal pattern requirement signage is needed.

Meal Counting & Claiming - Phalen Academy (9925)

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:

1. Meal counts are not accurate, therefore claims for reimbursement are not accurate.
2. There is evidence of duplication of meal count sheets and changing the dates.
3. Meal counts are not being entered correctly in CNPweb.
4. Edit checks are not being conducted prior to entering claims for reimbursement.
5. The average daily attendance used in the claim for reimbursement must be accurate for the month. This is NOT the average daily meal participation, but the actual daily school attendance averaged for the month.
6. The eligibility information reported in the site claim for reimbursement should be the highest DAILY enrollment for the month. There are many months that this is reported incorrectly for this year and last year, resulting in an error in the internal claim edit checks for calculating the claims for reimbursement.

SNP Administrative Review Findings

Phalen Academy (9925)

Program Year 2023

Corrective Action:

Technical assistance on the meal counting & claiming issues was provided to the Phalen leadership team, including the COO, VP of Enrollment, site Operations Managers, and food service consultant. As immediate corrective action for the meal counting issues, the SFA was provided time to retrain FSMC/food service staff regarding the correct point-of-service procedures. It was agreed upon that training would take place the week of March 6-10, 2023, and the new lunch process would begin March 13, 2023. Unannounced follow-up visits were conducted on March 15 & 16 to confirm that the proper point-of-service was being implemented; however, Field Specialists continued to observe meal counting issues. The SFA was provided additional technical assistance and time to retrain staff. Additional unannounced visits were conducted on April 13 and May 16 to ensure meal counting compliance.

As corrective action for the meal claiming issues and lack of required claim-supporting documentation including meal count sheets, edit checks, and production records, written procedures must be developed and implemented by the SFA so that when there is a change in staff or vendor, the process for recordkeeping will not be disrupted. The written procedures must be provided to the State Agency as corrective action.

As a result of this finding a recalculation of meals for Program Year 2022-2023 has been conducted and is included in a separate area of this report.

Resource Management Comprehensive Review - Phalen Academy (9925)

757. Allowable Costs Test

Finding 9118: Sample of expenses charged to nonprofit school foodservice account not reasonable and necessary.

The State agency reviewed a sample representing 10% of expenses for using the SFA's monthly invoices from the vendor. The following recorded expenses did not represent an activity or function recognized as reasonable and necessary for the operations of the school food service programs: Charging \$10/case of water (48 ct-8 ounce) is excessive and unreasonable and therefore is deemed unallowable. If the SFA is contracting with the vendor for water, it should be billed separately from the food service bill and paid separately using nonfood service funds.

Corrective Action:

USDA only requires potable water to be available in the cafeteria during lunch and breakfast. It is not required for breakfast in the classroom. This can easily be met by having a water dispenser located in or near the cafeteria, a pitcher of water and cups, or similar set up. The requirement does not allow for the SFA to purchase water for the entire school for use all school day. Therefore, the total amount of money paid for water for the 2022-2023 year to date must be reimbursed to the food service account from a nonfederal source.

As corrective action, calculate the amount paid to the FSMC/vendor for water, then restore that amount to the nonprofit food service account using non-federal funds. Please provide proof of the financial transaction to the State Agency.

765. Adult Meals

Technical Assistance: Program and Non-Program Adult Meals

Technical assistance was provided to the Phalen leadership team regarding providing Program Adult meals & Non-Program Adult meals. A Program Adult is an employee with job duties specific to the meal service operations, which includes FSMC/Vendor staff serving and monitoring the meal services at each school. Non-Program Adults do not have any duties related to the meal service operations. Whether Program or Non-Program, all adult meals should be recorded on the daily meal count sheets.

Program Adult meals are an allowable expense to the nonprofit food service account (NPFSA), but not claimable for reimbursement. Non-Program Adult meals are not an allowable expense and must be paid for accordingly. Non-Program Adult meals must be priced sufficiently using the following guidance for Non-Pricing Programs:

https://docs.google.com/document/d/1bkFaCeW7vAkP3PuQd_F7-2sORFEPT87UYek9tGrAlcc/edit

SNP Administrative Review Findings**Phalen Academy (9925)****Program Year 2023**

All sponsors should have a process in place to collect & track of the money received for Non-Program Adult meals & ensure it is recorded as nonprogram revenue to the nonprofit food service account.

General Program Compliance - Phalen Academy (9925)

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: Civil Rights training documentation was not available for review for FSMC/vendor staff; PLA Civil Rights Complaint Form contains outdated long nondiscrimination statement.

Corrective Action:

Civil Rights training was required to be completed for all Phalen school operations managers as well as FSMC/vendor staff. While documentation was provided showing Phalen staff completed the training, the FSMC staff did not provide records. The sponsor's contract with the current FSMC/Vendor ended June 16, 2023.

Please provide documentation that Phalen staff and the new vendor staff have completed Civil Rights training for the 2023-2024 school year.

Technical Assistance:

The current USDA Full Nondiscrimination Statement can be accessed here:

<https://www.fns.usda.gov/civil-rights/usda-nondiscrimination-statement-other-fns-programs>

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). Missing elements: the plan provided was from Tindley Accelerated Schools where the FSMC/Vendor preps/stores some food, but the plan for Phalen Academy should be unique to its operations and include site specific staffing info, a list of equipment at each site, comprehensive food safety & sanitation Standard Operating Procedures, and menu items categorized by HACCP process.

Corrective Action:

The SFA is required to review the resources provided below to help ensure their plan meets all requirements and that copies are available in all school kitchens. If this has been completed, no additional corrective action is necessary.

The State Agency will assess ongoing compliance with this finding in a follow-up review during PY2024.

Technical Assistance:

IDOE School Nutrition Programs Food Safety webpage: <https://www.in.gov/doe/nutrition/food-safety/>

Writing a HACCP-based Food Safety Plan: <https://theicn.org/resources/1532/writing-a-haccp-based-food-safety-plan-for-schools-workshop/117824/writing-a-haccp-based-food-safety-plan-for-schools-workshop-participants-workbook.pdf>

Food Safety Plan Template: <https://iastate.app.box.com/s/vcs46ct6wczzfmrmsa67g8tj1s8ox70m>

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.

Each school should have a copy of the food safety plan readily available. Staff should know where the plan is located and be initially trained on the food safety and sanitation procedures upon hire and on a continued, regular basis.

SNP Administrative Review Findings

Phalen Academy (9925)

Program Year 2023

Corrective Action:

See Finding 9142 above for corrective action.

1401. SFA-contracted and/or self-operated warehouses are storing all foods (commercial and USDA) properly

Finding 9144: SFA-contracted and self-operated warehouses are not storing all foods (commercial and USDA) properly.

The SFA must ensure that all its contracted and self-operated warehouses are storing foods properly. Violations observed: all food is not stored at least 6 inches off the floor. The food storage facility is unclean and/or disorderly. Canned goods were observed with dents. The First In, First Out (FIFO) inventory management method is not being used.

Corrective Action:

Technical assistance on the food safety & sanitation issues observed were provided to the Phalen leadership team. An SFA-appointed Food Service Director was hired following the onsite review to help address the issues and monitor the FSMC moving forward. If there is complete understanding of the role of the internal food service director in maintaining oversight of all food service facilities, no additional corrective action is necessary.

The State Agency will assess ongoing compliance with this finding in a follow-up review during PY2024.

1501. Records are retained for 3 years

Finding 9000: Oversight of FSMC Contract

Overall SFA monitoring of FSMC/Vendor contract is lacking. Phalen Academy is expected to oversee the FSMC/Vendor operations on a regular basis; this is why an internally housed food service director is required, regardless of being self-op or contracting with a FSMC or vendor.

Corrective Action:

Technical assistance was provided to the Phalen leadership team. The sponsor must consistently review its food service management company/vendor operations to assess compliance with program requirements. At least annually, the FSMC/Vendor Monitor Review form must be completed at each food service management company food preparation site. An SFA-appointed Food Service Director was hired following the onsite review to help address the issues and monitor the FSMC/Vendor moving forward. If the SFA-appointed FSD continues to monitor the FSMC/Vendor contract as currently demonstrated as of 6/1/2023, no additional corrective action is necessary.

The State Agency will assess ongoing compliance with this finding in a follow-up review during PY2024.

Technical Assistance:

IDOE Procurement/FSMC & Vendors Webpage: <https://www.in.gov/doi/nutrition/procurement/procurement-fsmc-and-vendors-nslp/>

FSMC Vendor Monitor Review Form: <https://www.in.gov/doi/files/food-service-management-company-vendor-monitor-review-2020-usda-foods-004.pdf>

1501. Records are retained for 3 years

Finding 9152: SFA not retaining Program records for a minimum of 3 years.

The SFA is not retaining the appropriate records regarding program management for 3 years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits. Meal count sheets and production records requested as part of the onsite review were not readily available. The FSMC/Vendor staff routinely removed documentation and kept off-site.

Corrective Action:

The Phalen leadership team & FSMC owner were provided technical assistance regarding the School Nutrition Programs records retention guidelines. An SFA-appointed Food Service Director was hired following the onsite review to help address the issues and monitor the FSMC moving forward.

SNP Administrative Review Findings
Program Year 2023

Phalen Academy (9925)

As corrective action, please provide written procedures outlining how program documentation for all Phalen Academy sites, such as daily meal counts, production records, training documentation, vendor invoices, attendance records and edit checks will be collected and retained to support the monthly claims for reimbursement.

Technical Assistance:

Record Retention Factsheet:

https://docs.google.com/document/d/1pv9_WHvEMp9GbR3723kwdKVUMMKo5Zq1PjXZ7O3Zw2Q/edit?usp=sharing

SNP Administrative Review Findings**Phalen Academy (9925)****Program Year 2023****George & Veronica Phalen Academy
(5496)**2323 North Illinois Street
Indianapolis, IN 46208-5760**Food Service Contact**Paul P Farrington
Food Service Administrator
(317) 797-8078

Month of Review: January 2023

Date of Onsite Review: March 2, 2023

Meal Counting & Claiming - George & Veronica Phalen Academy (5496)*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.**

Month of Review was January '23. Several dates exceeded attendance eligibles. Review expanded to look at August-December meal counts as well, which exceeded attendance eligibles by a significant amount. This shows a daily meal count was not being taken at the point where the student receives the meal for breakfast or for lunch. In addition, a proper Edit Check was not completed prior to filing the monthly claim for reimbursement. No acceptable explanation was provided by the SFA. This will lead to significant fiscal action.

Corrective Action:

See Sponsor-Level Finding 9007 for corrective action. The State Agency has completed a recalculation of meal counts for breakfast and lunch for the August 2022 – April 2023 claims for reimbursement and are outlined in the fiscal action report.

The SFA has developed a practice for obtaining valid meal counts at the point of service and edit checks are being conducted. If this practice continues, no additional corrective action is necessary.

The State Agency will assess ongoing compliance with this finding in a follow-up review during PY2024.

Technical Assistance:

Meal counts must be taken at the point where the student receives the meal. An edit check comparing the daily attendance to the meal count must be completed prior to the monthly claim submission.

*324. Review Period- there were no questionable patterns in the reported meal counts by category***Finding 9073: Questionable patterns in the reported counts of free, reduced, and paid meals for the Review Period.**

There were patterns in the reported counts of free meals for the Review Period that appear questionable for the population of students participating in the NSLP and SBP. There is evidence of duplication/photocopying of meal count sheets & re-dating them throughout the months reviewed. The explanation provided by the school for the questionable meal count patterns was not acceptable.

Corrective Action:

See Sponsor-Level Finding 9007 for corrective action.

*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:

See Sponsor-Level Finding 9007 for corrective action.

SNP Administrative Review Findings

Phalen Academy (9925)

Program Year 2023

Meal Components & Quantities - George & Veronica Phalen Academy (5496)

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

Finding 9002: Meal components missing on Day of Review.

As observed on the Day of Review, meal service line missing components prior to the beginning of the meal service. A grain was not planned with the lunch meal originally.

Corrective Action:

Site staff was advised and given the opportunity to add the missing meal component before the meal service started.

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. Some breakfast bags were missing raisins to fulfill the 1 cup of fruit requirement.

Corrective Action:

Site staff was advised and given the opportunity to add the missing meal component to ensure all students received a fully compliant breakfast. **No additional corrective action is needed.**

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

Technical Assistance: Availability of Water/Use of Bottled Water

Water bottles were in the milk cooler next to the milk. Milk is a required component, and no other beverage should compete with it during the meal service. A potable water cooler/fountain was in the cafeteria for students to access. The purchase of bottled water from the FSMC/vendor is not warranted and should be discontinued.

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, January 2023, it appears that some meals served during the week reviewed did not meet the appropriate daily and/or weekly meal pattern requirements for the age/grade group(s) being served.

Production records have not been completed correctly. If a required component is not documented on the production record, it demonstrates that the food item was not served. In addition, proper crediting documentation (CN labels, PFS, grain documentation, standardized recipes) was not readily available to confirm how some menu items credited towards the meal pattern.

Eighty (80) percent of the grains offered over the course of the week must be whole grain rich. Based on the limited grain documentation provided and a review of products in dry storage, it appears the vendor has not been planning/purchasing whole grain rich cereals, breads, pastas, and some breakfast products, such as Pop-Tarts.

Corrective Action:

Technical assistance was provided to the FSMC/Vendor owner and Phalen leadership team related to meal pattern compliance. The FSMC owner was provided instructions to access the Moodle training website to complete the courses noted in the TA section below. In addition, he was asked to provide the Moodle training certificates & proof of staff training to the Field Specialist. He verbally acknowledged that he understood what was expected of him and would complete the trainings and retrain his staff. Training documentation was not received. The sponsor's contract with the FSMC/Vendor ended June 16, 2023.

SNP Administrative Review Findings**Phalen Academy (9925)****Program Year 2023**

Since the SFA has obtained a new vendor, it is imperative that meal pattern compliance is met daily. As corrective action, please provide a copy of the current menu and production records for one week.

Technical Assistance:

Moodle Course to Complete: <https://moodle.doe.in.gov/>

1. Meal Counting & Claiming: complete the "Counting for Directors" module.
2. Meal Pattern
3. Grains
4. Production Records

Additional Resources:

Production Record Instructions: <https://www.in.gov/doe/files/Food-Production-Record-Instructions-for-Breakfast-and-Lunch.pdf>

K-5 Example: <https://www.in.gov/doe/files/Grades-K-5-Lunch-Production-Record-Example.pdf>

9-12 Example: <https://www.in.gov/doe/files/Grades-9-12-Lunch-Production-Record-Example.pdf>

Interactive/Editable template: <https://www.in.gov/doe/files/Interactive-Food-Production-Record-for-Breakfast-and-Lunch.xlsx>

General Program Compliance - George & Veronica Phalen Academy (5496)

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:

A poster was provided and was corrected on the day of review.

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

Finding 9000: On-Site Monitoring Procedures

Though on-site monitoring was completed by the food service consultant by February 1, the visits for School 48 & GVP were conducted on the same day. It is not possible to observe lunch service in two different locations with mealtimes that overlap. The monitor should stay for the entire duration of the meal services being observed.

In addition, on the monitoring form, Q10 related to edit checks was answered with a N/A due to CEP. Edit checks apply to all sponsors and sites, regardless of CEP status. All sites must complete proper edit checks to ensure that daily meals counts do not exceed the number of students eligible.

As corrective action, please provide written procedures for conducting on-site monitoring and confirm that the person(s) conducting the monitoring are fully trained in program requirements.

Corrective Action:

Technical assistance was provided to the Phalen leadership team and food service consultant while onsite.

SNP Administrative Review Findings
Program Year 2023

Phalen Academy (9925)

1407. *SFA written food safety plan is implemented*

Finding 9148: Observations on the Day of Review do not indicate compliance with the SFA's written food safety plan. Proper HACCP principles not observed: refrigerator and freezer temperatures not adequately monitored; food preparation and service areas unclean.

Corrective Action:
See Sponsor-Level Finding 9142 for corrective action.

1408. *Temperature logs are available*

Finding 9149: Temperature logs unavailable for review. FNS requires each school in the SFA to maintain temperature logs for a period of six months. Though temperature logs for the month of review were complete, logs from prior months were incomplete and inconsistent.

Corrective Action:
Site staff was reminded that temperature logs are to be maintained for at least six months.

As corrective action, please provide a copy of temperature logs from a current site for a recent month.

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

Finding 9150: Storage violations were observed. The SFA must ensure that all facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. All food is not stored at least 6 inches off the floor. The food storage facility is unclean and/or disorderly. The First In, First Out (FIFO) inventory management method is not being used. Multiple boxes of grain products were found with severe mold inside the packaging.

Corrective Action:
The moldy grain products were discarded while field staff were onsite. The other food safety issues were discussed with the FSMC staff onsite and Phalen leadership during the exit interview. An SFA-appointed Food Service Director was hired following the onsite review to help address the food safety & sanitation issues and monitor site operations moving forward.

As corrective action, describe how sites are being inspected by Phalen staff on a regular basis. If written procedures are available, please provide a copy.

SNP Administrative Review Findings

Phalen Academy (9925)

Program Year 2023

James & Rosemary Phalen Leadership Academy (9961)
2323 North Illinois Street
Indianapolis, IN 46208-5760

Food Service Contact
Paul P Farrington
Associate Director
(317) 797-8078

Month of Review: January 2023
Date of Onsite Review: March 2, 2023

Meal Counting & Claiming - James & Rosemary Phalen Leadership Academy (9961)

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

Finding 9000: Use of Clickers to Record Meal Counts

At breakfast, the use of a clicker to count meals and then transfer the total to a meal count sheet is not an accurate process.

Corrective Action:

As immediate corrective action, the site staff & Phalen leadership team were instructed to discontinue use of the clicker at breakfast. A CEP meal count form is to be utilized moving forward. After accurately recording the meals served, the meal count form is to be signed and dated by the meal count taker. A follow-up visit was conducted on May 16, 2023, to ensure the proper point of service at breakfast and lunch was being implemented. **If this practice continues, no further corrective action is necessary.**

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.

Month of Review was January '23. Complete meal count sheets for the month were not provided, only the week of Jan 9-13. After multiple requests for the full month, meal count sheets were dropped off that had just been completed by site staff based on the "JRP Jan 2023 Claim Consolidation" spreadsheet; therefore, State Agency staff was unable to determine if these meal counts were accurate. Review expanded to look at August-December meal counts as well, which exceeded attendance eligibles by a significant amount. This shows a daily meal count was not being taken at the point where the student receives the meal for breakfast or for lunch. In addition, a proper Edit Check was not completed prior to filing the monthly claim for reimbursement. No acceptable explanation was provided by the SFA. This will lead to significant fiscal action.

Corrective Action:

See Sponsor-Level Finding 9007 for corrective action.

Technical Assistance:

Meal counts must be taken at the point where the student receives the meal. An edit check comparing the daily attendance to the meal count must be completed prior to the monthly claim submission.

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

Finding 9073: Questionable patterns in the reported counts of free, reduced, and paid meals for the Review Period.

There were patterns in the reported counts of free meals for the Review Period that appear questionable for the population of students participating in the NSLP and SBP. There is evidence of duplication/photocopying of meal count sheets & re-dating them throughout the months reviewed. The explanation provided by the school for the questionable meal count patterns was not acceptable.

Corrective Action:

See Sponsor-Level Finding 9007 for corrective action.

SNP Administrative Review Findings**Phalen Academy (9925)****Program Year 2023**

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:

See Sponsor-Level Finding 9007 for corrective action.

Meal Components & Quantities - James & Rosemary Phalen Leadership Academy (9961)

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

Finding 9002: Meal components missing on Day of Review.

As observed on the Day of Review, required meal components were not available on every reimbursable meal service line to all participating students. Corn dogs were the planned entree for the day, but they ran out near end of the 3rd lunch period. Chicken nuggets were subbed in place of the corn dog, but an additional grain was not offered to meet 2 oz eq grain found in corn dog.

Corrective Action:

Due to the pre-portioning of the entree & vegetables into a clamshell, reviewers could not determine how many chicken nugget meals were served during the last lunch period. Site staff was advised of the grain issue and reminded that substitutions to the planned menu must credit towards the meal pattern in the same way.

See corrective action under George & Veronica Phalen Academy Finding 9075.

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, January 2023, it appears that some meals served during the week reviewed did not meet the appropriate daily and/or weekly meal pattern requirements for the age/grade group(s) being served.

Production records have not been completed correctly. If a food item has not been documented on the production record, it appears that it was not served. In addition, proper crediting documentation (CN labels, PFS, grain documentation, standardized recipes) was not readily available to confirm how some menu items credited towards the meal pattern.

Eighty (80) percent of the grains offered over the course of the week must be whole grain rich. Based on the limited grain documentation provided and a review of products in dry storage, it appears the vendor has not been planning/purchasing whole grain rich cereals, breads, pastas, and some breakfast products, such as Pop-Tarts.

Corrective Action:

See corrective action under George & Veronica Phalen Academy Finding 9075.

SNP Administrative Review Findings

Phalen Academy (9925)

Program Year 2023

501. Cafeteria staff have been trained on OVS

Finding 9079: Cafeteria staff have not been adequately trained on requirements and implementation of Offer vs. Serve.

No documentation provided related to the FSMC/vendor staff receiving OVS training.

Corrective Action:

The sponsor's contract with the current FSMC/vendor ended June 16, 2023.

If using OVS in any schools during the 2023-2024 school year, as corrective action, please provide documentation showing that food service staff has been recently trained in OVS procedures.

502. Day of Review- signage explaining the OVS reimbursable meal was posted near/at the beginning of the service line

Technical Assistance: Extra Servings of Food

Extra milk and/or servings of food should be tracked; students at JRP were taking multiple extra items outside of what is included in a reimbursable lunch. These items are expected to be paid for using nonfederal funds and should not be supported by the nonprofit food service account. Should there be additional questions as to how this should be handled, please discuss with your field specialist.

General Program Compliance - James & Rosemary Phalen Leadership Academy (9961)

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

Finding 9000: On-Site Monitoring Procedures

On the monitoring form, Q10 related to edit checks was answered with a N/A due to CEP. Edit checks apply to all sponsors and sites, regardless of CEP status. All sites must complete proper edit checks to ensure that daily meals counts do not exceed the number of students eligible.

Corrective Action:

Technical assistance was provided to the Phalen leadership team and food service consultant while onsite.

See corrective action under George & Veronica Phalen Academy, #901, Finding 9000.

1407. SFA written food safety plan is implemented

Finding 9148: Observations on the Day of Review do not indicate compliance with the SFA's written food safety plan.

Proper HACCP principles not observed: refrigerator and freezer temperatures not adequately monitored; food preparation and service areas unclean; quat sanitizer test strips were not available to ensure sanitizing solution is at the proper concentration.

Corrective Action:

See Sponsor-Level Finding 9142 for corrective action.

1408. Temperature logs are available

Finding 9149: Temperature logs unavailable for review.

FNS requires each school in the SFA to maintain temperature logs for a period of six months. Though temperature logs for the month of February were complete, logs from prior months were incomplete and inconsistent.

Corrective Action:

Site staff was reminded that temperature logs are to be maintained for at least six months.

See corrective action under George & Veronica Phalen Academy Finding 9149.

SNP Administrative Review Findings**Phalen Academy (9925)****Program Year 2023***1409. On-site or off-site storage violations were observed***Finding 9150: Storage violations were observed.**

The SFA must ensure that all facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. The food storage facility is unclean and/or disorderly. Canned goods were observed with dents. The First In, First Out (FIFO) inventory management method is not being used. There is no uniform manner of date-marking products in storage. Frozen fish sticks that the manufacturer stated must be kept frozen were being stored in a milk cooler.

Corrective Action:

The food safety issues were discussed with the FSMC staff onsite and Phalen leadership during the exit interview. An SFA-appointed Food Service Director was hired following the onsite review to help address the food safety & sanitation issues and monitor site operations moving forward.

See corrective action under George & Veronica Phalen Academy Finding 9150.

SNP Administrative Review Findings

Phalen Academy (9925)

Program Year 2023

Louis B Russell Jr School 48 (5548)

2323 North Illinois Street
Indianapolis, IN 46208-5760

Food Service Contact

Paul P Farrington
Food Service Administrator
(317) 797-8078

Month of Review: January 2023

Date of Onsite Review: March 1, 2023

Meal Counting & Claiming - Louis B Russell Jr School 48 (5548)

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

Finding 9000: Use of Clickers to Record Meal Counts

The number from the clickers was not accurately transferred to the meal count sheet. Two of the numbers were not marked on the count sheet. This was corrected by the reviewer and an underclaim of meals would have occurred without correction. This process does not result in accurate meal counting and claiming.

Corrective Action:

Usage of the clicker and transferring the number to the meal count sheet is not an accurate process. The usage of the daily meal count form or a point-of-sale system is recommended. The total meals served section must be completed immediately following meal serving and the school administrator could/should sign meal count sheets at the end of each day. **The sponsor has discontinued the use of clickers and is using a CEP meal count sheet; if this practice continues, no further corrective action is necessary.**

320. *Day of Review- meal count totals by category are combined and recorded correctly*

Finding 9068: Meal count totals by category not combined and recorded correctly.

The meal count was originally not accurate. The clicker count added up to 257 and the meals marked on the count sheet totaled 255. The reviewer allowed the SFA to correct the meal count on the count sheet.

Corrective Action:

Effective Monday March 6th, clickers are no longer allowable, and meals must be marked directly onto the meal count sheet. Phalen administration must circle the last number served and write the total number served on each meal count sheet. Meal count sheets must stay with the SFA and cannot be sent to the vendor. The SFA is responsible for consolidating the meal count for the claim for reimbursement. **If this practice continues as noted in Finding 9000 above, no further corrective action is necessary.**

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.

Month of Review was January '23. All but 1 day at lunch exceeded attendance eligibles. Review expanded to look at August-December meal counts as well, which exceeded attendance eligibles by a significant amount. This shows a daily meal count was not being taken at the point where the student receives the meal for breakfast or for lunch. In addition, a proper Edit Check was not completed prior to filing the monthly claim for reimbursement. No acceptable explanation was provided by the SFA. This will lead to significant fiscal action.

Corrective Action:

See Sponsor-Level Finding 9007 for corrective action.

Technical Assistance:

Meal counts must be taken at the point where the student receives the meal. An edit check comparing the daily attendance to the meal count must be completed prior to the monthly claim submission.

SNP Administrative Review Findings

Phalen Academy (9925)

Program Year 2023

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

Finding 9073: Questionable patterns in the reported counts of free, reduced, and paid meals for the Review Period.

There were patterns in the reported counts of free meals for the Review Period that appear questionable for the population of students participating in the NSLP and SBP. There is evidence of duplication/photocopying of meal count sheets & re-dating them throughout the months reviewed. The explanation provided by the school for the questionable meal count patterns was not acceptable.

Corrective Action:

See Sponsor-Level Finding 9007 for corrective action.

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:

See Sponsor-Level Finding 9007 for corrective action.

Meal Components & Quantities - Louis B Russell Jr School 48 (5548)

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

Finding 9077: School did not comply with planned menu for the Review Period

Two juices offered many days for breakfast when the planned menu includes dried fruit and a juice. This exceeds the maximum juice limit of 50% of fruit choices for the week.

Corrective Action: The reviewer went over the meal pattern and provided technical assistance to the FSMC owner several times throughout and before the review started. The sponsor's contract with the FSMC/vendor ended June 16, 2023. **A new vended meals contractor was obtained through the procurement process and menus will be monitored by the internal FSD to ensure ongoing compliance. Therefore, if this practice continues, no further action is necessary.**

Technical Assistance:

The school was provided technical assistance during the onsite visit.

General Program Compliance - Louis B Russell Jr School 48 (5548)

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 posted the day of review.

Corrective Action:

Reviewers provided copies of the poster during the administrative review. The SFA agrees to ensure a copy is posted near the serving line at each site. **No additional corrective action is necessary.**

SNP Administrative Review Findings
Program Year 2023**Phalen Academy (9925)**

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

Finding 9000: On-Site Monitoring Procedures

Though on-site monitoring was completed by the food service consultant by February 1, the visits for School 48 & GVP were conducted on the same day. It is not possible to observe lunch service in two different locations with mealtimes that overlap. The monitor should stay for the entire duration of the meal services being observed.

In addition, on the monitoring form, Q10 related to edit checks was answered with a N/A due to CEP. Edit checks apply to all sponsors and sites, regardless of CEP status. All sites must complete proper edit checks to ensure that daily meals counts do not exceed the number of students eligible.

Corrective Action:

Technical assistance was provided to the Phalen leadership team and food service consultant while onsite.

See corrective action under George & Veronica Phalen Academy, #901, Finding 9000.

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

Finding 9000: Bottled Water

Bottled water is purchased by the pallet using foodservice funds. The water is used for meals and to use in classrooms. Since water fountains have been open in the building starting in school year 22-23, this is no longer an allowable cost to the Program.

Corrective Action:

Potable drinking water requirements, and ways to execute the requirement were discussed with the operations manager the day of review. It is allowable to use funds to purchase cups to use at the filling station.

See Sponsor-Level Finding 9118 related to Allowable Costs for corrective action.

1407. *SFA written food safety plan is implemented*

Finding 9148: Observations on the Day of Review do not indicate compliance with the SFA's written food safety plan.

Based on a review of temperature logs from the month of review, proper HACCP principles not observed: hot food is not held to adequate temperatures. Holding temperatures as low as 80-100 degrees.

Corrective Action:

See Sponsor-Level Finding 9142 for corrective action.

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. All food is not stored at least 6 inches off the floor. Food items such as chips and apple crisps were stored on the floor. Paper goods including trays were also stored on the floor. Equipment needed to be wiped down more thoroughly. The reviewer also found a live roach in the kitchen.

Corrective Action:

During the day of review, the FSMC staff was provided technical assistance regarding storing items at least 6 inches off the floor and corrected the issue immediately. Going forward the SFA agrees to ensure all food items and paper good are stored off the floor to ensure the items are safeguarded from pests, etc. The kitchen must also be cleaned thoroughly and regularly to prevent pest infestation. The school must also receive regular pest control. The food safety issues were discussed with

SNP Administrative Review Findings**Phalen Academy (9925)*****Program Year 2023***

Phalen leadership during the exit interview as well. An SFA-appointed Food Service Director was hired following the onsite review to help address the food safety & sanitation issues and monitor site operations moving forward.

See corrective action under George & Veronica Phalen Academy Finding 9150.

