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REQUEST FOR VARIANCE

State Form 51104 (R / 5-13)
Food Protection Program

MAY 21 2014

INDIANA STATE DEPARTMENT OF HEALTH
Telephone: 317/234-8569 FAX: 317/233-9200

FOOD PROTECTION PROGRAM
INDIANA STATE DEPT. OF HEALTH

1. Individual Submitting Request: Date: 05 / 20 / 2014

Name: Jane E. Cookson, R.D. Telephone: (317) 226 - 4772 Fax: (317) 226- 4677

Mailing Address: 4125 Producers Drive Email: cooksonj@myips.org
Number and Street

Indianapolis IN 46218
P.O. Box City State ZIP Code

2. Person/Organization Seeking Variance:

Name: Same As Above Email: _____

Mailing Address: _____
Number and Street

P.O. Box City State ZIP Code

3. Food Establishment(s) for Which Variance is Sought
 Include the following information for each food establishment: *(List here or attach additional pages if necessary.)*

- Physical Location *(If different than mailing address):* SUPER School at IPS Frederick Douglass School 19
- Mailing Address: 2020 Dawson Street, Indianapolis, IN 46203
(Number, Street, City, State, and ZIP Code)
- Telephone Number: (317) 226 - 4219 Fax Number: (317) 226 - 4672
- Person at each retail food establishment most responsible for supervising: Millie Kisseo - (317) 226 - 4219

4. State how the proposal varies from each rule requirement, citing relevant rule sections by number:
(Attach additional pages if necessary.)

WAREWASHING EQUIPMENT REQUIREMENTS Section 269
 MANUAL WAREWASHING Sections 270 through 276

In lieu of washing and sanitizing all vegetable bar service equipment on site, the soiled pans and tongs will be rinsed of gross product at the school, placed in a closed transport container, and returned to the IPS Foodservice Center each night. The pans and tongs will be washed and sanitized in a ware washer at the Center and placed in a sanitized, closed container for transport back to School 19.

5. Explain how the potential public health hazards and/or nuisances will be alternatively addressed by the proposal. Include supporting studies, Hazard Analysis Critical Control Point (HACCP) Plan(s), standard sanitation operating procedures, and/or any other evidence: *(Attach additional pages, if necessary.)*

Written procedures specific to the following will be enforced:

1. Storage and use of vegetable bar pans and utensils at the school.
2. Transporting dirty pans and utensils from the school to the IPS Food Center where they will be washed and sanitized.
3. Transporting clean pans and utensils in sanitized containers from the Food Center to the school.

6. List how the proposal demonstrates the following (if applicable to the request):

- A) How the proposal differs from what is common and usual in similar industry situations:
In most schools, ware washing is completed on-site in a three-compartment sink or utilizing ware washing equipment.
- B) How the proposal is unique and not addressed in existing rules or law:
This proposal is unique to school districts use a pre-plate satellite system of serving meals as opposed to on-site food preparation.
- C) How the proposal does not diminish the protection of public health:
This proposed ware washing system will not diminish the health and safety of the students at IPS School 19. The students will select food served in pans and with utensils that have been properly washed and sanitized and stored in a safe, clean manner.
- D) How the proposal is based on new scientific or technological principle(s):
NA
- E) How the implementation of the variance would be practical:
Attached.

7. Explain how the person/organization seeking the variance will assure that all provisions of a granted variance will be enacted at each food establishment for which a variance has been granted:

- 1. The Director of Foodservice will assign a Central Office Operations Manager to train and supervise the foodservice staff at the school the proper storage and usage of pans and utensils for the vegetable bar.
- 2. Central Office Foodservice staff, in conjunction with School 19 Administration, will train students how to serve themselves from a vegetable bar.
- 3. Managers at the Food Center will supervise the staff and enforce ware washing procedures using ware washing equipment with hot water sanitizing.
- 4. The Director of Foodservice will train and supervise the delivery drivers on the proper handling of the containers of dirty pans and utensils returned to the Food Center from the school and on the proper handling of the sanitized containers of clean pans and utensils returned to the school from the Food Center.

8. List all affected parties known by the person/organization seeking a variance, including all affected regulatory authorities: (Attach additional pages if necessary.)

Marion County Public Health Department

9. Attach copies of any related variances, waivers or opinions issued by other governmental agencies.

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10. Signature of Individual Making Request:

Jana E. Cookson, R.D.

Printed Name, Title: Jana E. Cookson, RD Director of Foodservice, Indpls Public Schools

6. E) How the implementation of the variance would be practical:

Due to limited space and a lack of accessible utility connections, the installation of ware washing equipment or manual ware washing in situ is not feasible. The IPS Foodservice Department is well versed in the Food Code regulations for transporting foods and supplies in a safe, sound, and temperature controlled manner. An ample supply of cleaned and sanitized pans and tongs will be available at the school in the event the vegetables or equipment becomes contaminated during service and must be discarded and replaced on the vegetable bar.

The variance would allow the students at School 19 to self-select fresh vegetables for lunch each school day. It is hoped this will lead to an increased consumption of fresh vegetables and instill life long healthy eating habits in the students of IPS School 19.