



SNP Administrative Review Findings

Program Year 2026

MSD of North Posey County (6600)

101 North Church Street
Poseyville, IN 47633-9026

No. of Sites / Reviewed: 4 / 1

Month of Review: September 2025

MSD of North Posey County (6600)

Food Service Contact

Mrs. Stacy Newman - Smith
District Food Service Director
(812) 673-4247
snewman@northposey.k12.in.us
FSMC: Opaa!

Executive Contact

Mr. Todd Slagle
Superintendent
(812) 874-2243
tslagle@northposey.k12.in.us

Commendations

- * The kitchen surfaces, equipment, walk-in cooler and freezer, and storeroom were well-maintained and clean.
- * A review of the menu documentation demonstrated that a nice variety of entrées was offered to students at North Posey Junior High School.
- * Staff were friendly and eager to learn. Staff were willing to work with the reviewer to immediately correct some issues when noted during the on-site review.

Certification and Benefit Issuance - MSD of North Posey County (6600)

126. *Certification: selected applications correctly approved.*

Finding 9901: Selected applications correctly approved

Multiple applications were approved with missing information. Four applications were accepted and approved without the adult household member's signature.

Corrective Action:

During the review, the households were contacted and given the opportunity to sign the applications. All applications were updated and provided to the reviewer onsite. **For additional corrective action, complete free and reduced application processing training in Moodle and submit the training certificate to the state agency.**

Technical Assistance:

Errors were reviewed with the determining official on the day of review.

DOE Moodle: <https://moodle.doe.in.gov/>

127. *Correct income eligibility guidelines used to certify applications*

Finding 9018: Incorrect income eligibility guidelines used to certify applications

While the SFA is using the current year's income eligibility guidelines (IEG) to process applications for free and reduced-price meal benefits, one line was mistakenly duplicated when the new guidelines were updated in the electronic system. This resulted in one application being approved for reduced benefits when it would have otherwise qualified for free benefits.

Corrective Action:

During the review, the SFA corrected the error in the IEGs in the electronic system. Additionally, corrections have been made to certification errors, and the household was sent a letter notifying them of the change in eligibility. **For additional corrective action, the SFA must refund the household to the date the greater benefit should have been effective. Provide documentation of the refund and transaction history to support the refund amount determined.**

Technical Assistance:

The SFA is strongly encouraged to implement a second check process when the IEGs are updated in the system annually.

Verification - MSD of North Posey County (6600)

208. *Documentation demonstrates a confirmation review was conducted and required procedures were followed*

Finding 9037: Confirmation review not conducted as required.

Documentation demonstrating that a confirmation review took place was not on file at the SFA.

Corrective Action:

For corrective action, provide a written standard operating procedure (SOP) indicating the process that will be implemented for completing the confirmation review, when confirmation reviews will be conducted, the job title of the person responsible for completing confirmation reviews, and what training the confirming official will complete to understand the requirements of the free and reduced processing moving forward.



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Technical Assistance:

Technical assistance was provided onsite to ensure that a confirmation review takes place moving forward. The confirming official must be someone other than the original application processor(s). This step serves to ensure that the selected meal applications were approved correctly by the initial processor(s).

215. SFA completed verification by November 15

Finding 9048: Verification not completed by November 15.

For the previous school year, the SFA did not complete its verification process prior to November 15. The SFA did not have an extension approved by the State agency, allowing the SFA to complete its verification process by December 15. Further, the verification process for the current school year had not been started at the time of review (October 21, 2025).

Corrective Action:

For corrective action, the SFA must complete the Verification training module in Moodle. Submit the certificate(s) of completion to the State agency. Additionally, the SFA must complete the verification process for the current school year. To validate completed verification, submit the required documentation (including applications, letters, and household information) to the State agency.

Technical Assistance:

Moodle verification training module - <https://moodle.doe.in.gov/course/view.php?id=411>.

Additional resources and information regarding verification are located on the IDOE website - <https://www.in.gov/doe/nutrition/free-and-reduced-information/verification-and-direct-verification/>.

Meal Counting & Claiming - MSD of North Posey County (6600)

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

Technical Assistance - Meal Charge Policy

The SFA's written meal charge policy differs from the policy and procedures communicated to households on the SFA's website. Additionally, the practices implemented at the local school level are inconsistent with the SFA's written meal charge policy. The SFA should update its written meal charge policy to ensure that its current practice aligns with the policy.

Please utilize the following charge policy development checklists to ensure a comprehensive policy is developed: <https://ospi.k12.wa.us/sites/default/files/2023-08/mealchargepolicychecklist.pdf>.

Resource Management - MSD of North Posey County (6600)

705. SFA have internal controls to ensure only allowable costs charged?

Finding 9000: Insufficient Documentation to Support FSMC Invoices

During the onsite review, it was identified that documentation supporting the invoices from the food service management company (FSMC) was insufficient. Additionally, the contract states the FSMC will bill the SFA when food is used. Usage was not consistently calculated for all charges on the invoice. Furthermore, the SFA received an invoice for July, despite no meal service operations having occurred during that month. Since the SFA should only be billed when food and supplies are used, there should not have been an invoice for July, as usage did not occur. The FSMC has been consistently billing the SFA when food is purchased rather than used.

Corrective Action:

FSMC invoices must provide a detailed breakdown of administrative costs and other charges, as well as reflect any relevant rebates, discounts, and credits.

For corrective action, the following must be completed:

- The SFA must develop and implement a standard operating procedure (SOP), outlining internal procedures for reviewing FSMC invoices. Submit the SOP to the State agency.



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- To ensure proper contract oversight, the SFA personnel reviewing monthly FSMC invoices should be someone other than the SFA food service director (FSD) since the SFA FSD is not completely separate from FSMC roles and responsibilities.
- The SFA must request complete supporting documentation from the FSMC. The SFA must reconcile all invoices to ensure all costs are allowable, supported, and align with the executed FSMC contract. Submit copies of the supporting documentation and SFA invoice review for the July-September 2025 FSMC invoices.
- Costs related to transfers must be clearly identified and outlined in the monthly FSMC invoice.
- Request technical assistance from the SCN Finance procurement specialist (scnfinance@doe.in.gov) to determine if a contract update is needed prior to contract renewal since the agreed upon billing method is not utilized. The SFA must ensure that food billed when purchased is not also billed when used.

Technical Assistance:

It was also observed that the FSMC is not billing the SFA in a timely manner. The onsite review took place near the end of October, and the SFA had not yet received an invoice for the month of August. The SFA had to request the invoice from the FSMC for review purposes. For financial management, a best practice is to reconcile invoices on a monthly basis. The SFA should work with the FSMC to ensure invoices are received in a timely manner.

Resource Management Comprehensive Review - MSD of North Posey County (6600)

763. Non-Program Food Participation

Technical Assistance - Drink Station

As observed on the day of review, the FSMC provided a drink station for free to all students, which contained a lemonade option. Lemonade and fruit punch drink mixes have been determined to contain calories, which must be figured into the weekly nutritional analysis. Lemonade, fruit punch, and other drink mixes should be purchased with non-federal funds since these beverages are not part of the reimbursable meal.

766. Assessing Compliance with the Nonprogram Foods Revenue/Cost Ratio

Technical Assistance - Calculation of Adult Meal Cost

The adult meal cost reported in the non-program food revenue tool was calculated incorrectly. The full value of USDA foods was not included in the calculation of non-program adult meal costs. Additionally, the cost of adult meals was based on the cost of elementary meals. When adults receive the high school portion sizes, the meal cost should reflect the increased portion sizes.

767. Nonprogram Revenue and Food Cost Ratio

Finding 10174: Revenue ratio was less than its food cost ratio.

The SFA found that its revenue ratio was less than its food cost ratio and did not take action to adequately resolve the deficit.

Corrective Action:

The SFA must take additional steps to ensure compliance with non-program food revenue requirements. Such steps may include:

- Sufficiently increase non-program food prices,
- add sufficient funds to the SFA's non-profit school food service account,
- and/or take other actions to adequately resolve the problem.

For corrective action, please explain what actions have been taken to ensure compliance with non-program food revenue. Additionally, provide to the State agency documentation of the actions, such as:

- Point-of-sale price listing showing a la carte price increases,
- deposit of non-federal funds and plans to regularly maintain the non-federal fund contribution to the non-profit school foodservice account,



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- and an updated non-program food revenue tool showing compliance as a result of increased prices or the addition of non-federal funds.

Technical Assistance:

USDA non-program food revenue guidance can be found at the following websites: <https://www.in.gov/doe/files/sp20-2016s-non-program-food-guidance.pdf>; <https://fns-prod.azureedge.us/sites/default/files/cn/SP39-2011r.pdf>

General Program Compliance - MSD of North Posey County (6600)

1007. *On-site observations validate Off-Site Assessment Tool responses to Local School Wellness Policy questions and responses demonstrate compliance with FNS requirements*

Finding 10140: Wellness Policy Review and Update

The following findings were noted regarding the review and update of the local school wellness policy:

- The result of the most recent assessment of the local school wellness policy is not publicly available.

Corrective Action:

For corrective action, provide proof that the results of the most recent assessment have been communicated to the public, including progress toward meeting the goals of the policy.

Technical Assistance:

Wellness policy resources can be found at the following website: <https://www.in.gov/doe/nutrition/wellness-policies/>.

As a reminder, LEAs must conduct an assessment of the wellness policy every 3 years, at a minimum. This assessment will determine compliance with the wellness policy, how the wellness policy compares to model wellness policies, and progress made in attaining the goals of the wellness policy. The local school wellness policy must be reviewed and updated by the wellness committee.

Additionally, the LEA must permit participation by the general public and the school community in the review and update of the wellness policy. The policy must be re-assessed with input from all interested stakeholders as through the wellness committee.

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

Technical Assistance - Allowable Professional Development Topics

Professional standards are designed to ensure that school nutrition program personnel in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) possess the necessary knowledge and skills to manage and operate these programs effectively. Only training that fosters proper administration and operation of the school nutrition programs counts toward the training standards. To identify appropriate training topics for various school nutrition program personnel, visit <https://www.fns.usda.gov/tn/professional-standards/training-objectives-topics>.

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

Finding 10114: Non-foodservice staff conducting duties related to food service had not been trained annually

At the time of the review, non-food service employees who were responsible for duties related to program requirements had not received training. The school's data specialist is involved in the direct certification and verification processes but has not received training on these topics.

Corrective Action:

Annual training for all staff with food service responsibilities is a program requirement. For corrective action, explain how the SFA will ensure requirements will be met each year. For employees identified as needing training during the



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review, provide proof of training, such as certificates or an agenda with topics covered, including attendee names and signatures.

Technical Assistance:

Training courses are available on Moodle - <https://moodle.doe.in.gov/>.

Additional training resources can be found here - <https://www.in.gov/doe/nutrition/trainings/>.

1403. *Review of agricultural food components indicates violations of the Buy American provision*

Technical Assistance - USDA Buy American Provision Updated Policy Guidance

USDA has recently updated guidance to program sponsors regarding the Buy American provision. The following are some of the Buy American requirements that have been codified in regulations: Two limited exceptions when non-domestic foods may be purchased by school food authorities; A new threshold for school food authorities that use exceptions (in SY 2025-26, the non-domestic food purchases cap will be 10 percent); The requirement for SFAs to maintain documentation to demonstrate the use of exceptions. Visit the following website to view additional requirements: <https://www.fns.usda.gov/cn/buy-american-provisions>. A recorded webinar on updates to the Buy American provision can be found here: <https://www.fns.usda.gov/cn/buy-american-provisions/webinar>. A copy of the USDA Buy American tracking tool can be downloaded here: <https://www.fns.usda.gov/sites/default/files/resource-files/SP23-2024a.xlsx>.

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

Technical Assistance - Reporting Deadlines

SFA's have a responsibility to meet reporting requirements. The most recently submitted Verification Summary Report (VSR) was not submitted to IDOE on time.

IDOE's Calendar of Due Dates can be found at

https://docs.google.com/document/d/1gQejacWaNHaz_tozqZFehNz0p59JDFW21J9SHz5-BPE/edit.

1501. *Records are retained for five years*

Finding 9152: SFA is not retaining Program records for the minimum timeframes.

The SFA is not retaining the appropriate records regarding program management for five years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits.

All verification documentation must be maintained as proof that the process was completed accurately and in the required timeframe. When a student's eligibility status changed due to verification, the SFA did not maintain sufficient documentation for the 2024-2025 program year to demonstrate that the eligibility change occurred in the POS and within the appropriate timeframe.

Corrective Action:

For corrective action, a standard operating procedure (SOP) must be created that identifies the position responsible for providing oversight to ensure the Verification process is completed correctly, that all documentation supporting the process is accessible within the recorded retention timeframe, and that it is maintained onsite. Submit a copy of the SOP to the State agency.

Technical Assistance:

Record Retention Guidelines can be found here:

https://docs.google.com/document/d/1pv9_WHvEMp9GbR3723kwdKVUMMKo5Zq1PjXZ7O3Zw2Q/edit?tab=t.0



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MSD of North Posey County (6600)

North Posey Junior High School (6973) Food Service Contact

101 North Church Street
Poseyville, IN 47633-9026
Mrs. Rhonda Szubinski
Kitchen Manager
(812) 673-4620

Month of Review: September 2025

Date of Onsite Review: October 21, 2025

Meal Components & Quantities - North Posey Junior High School (6973)

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

Technical Assistance - Fruit and Vegetable Bar Signage

Signage explaining the serving sizes on the fruit and vegetable bar should be posted for students. There was no explanation of how many servings students were allowed to take. Additionally, no clarification was provided regarding what constitutes a serving. For example, fresh orange wedges were available on the day of the onsite review. Tongs were provided for portioning; however, no explanation was available, so students knew how many orange wedges were equal to 1/2 cup. This resulted in most students selecting less than 1/2 cup of oranges. In this example, signage should explain to students that four orange wedges equal 1/2 cup of fruit.

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 located near or at the beginning of the breakfast meal service line. Breakfast is served from a grab-and-go cart in the front entrance of the building. No signage was posted on the cart or in the serving area.

Corrective Action:

During the review, staff posted the necessary signage on the breakfast cart. **Therefore, no further action is required.**

406. Day of Review- the meal service is structured to comply with the required age/grade group meal pattern requirements when multiple menus and/or age/grade groups are served

Finding 9058: Age/grade group meal pattern requirements not being met for multiple menus and/or multiple age/grade groups served.

As observed on the Day of Review, when the school is serving multiple menus and/or age/grade groups, it has not structured the meal service to meet the specific meal pattern requirements for each menu type and/or age/ grade group being served. There is no overlap in the grades 7-8 and grades 9-12 meal pattern requirements for lunch. Therefore, separate lunch menus should be made for each grade group that meet the requirements for each. Additionally, separate production records must be maintained to show meal pattern compliance.

Corrective Action:

For corrective action, the SFA must submit one week of completed lunch production records demonstrating the separation between the two meal patterns. Additionally, the SFA must complete Production Record training in Moodle. Submit the certificate of completion to the State agency.

Technical Assistance:

IDOE Moodle: <https://moodle.doe.in.gov/>.

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

Technical Assistance - Multiple Serving Line Options



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As a reminder, students selecting any of the available meal service options and lines should also have access to the hot vegetables being served to ensure compliance with weekly vegetable subgroup requirements.

General Program Compliance - North Posey Junior High School (6973)

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

Technical Assistance: Justice For All poster not displayed in prominent location.

During the on-site review, "And Justice for All" poster was not displayed on the breakfast cart. The reviewer provided technical assistance, explaining that while posters are not available, the SFA could make copies of the current posters on hand. The FSD immediately made copies and posted them.

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

Finding 9103: On-site review of the school's meal counting and claiming procedures was not completed prior to February 1.

The SFA did not conduct an on-site review of the school's meal counting and claiming procedure prior to February 1 of the previous Program Year. The SFA Food Service Director (FSD) conducted monitoring of the FSMC but did not conduct onsite monitoring for NSLP or SBP.

Corrective Action:

For corrective action, the SFA must complete onsite monitoring for each of its schools. Submit the completed forms to the State agency.

Technical Assistance:

It is a best practice to complete onsite monitoring for the schools at the start of each school year, but it must be completed annually by February 1st. The monitoring form can be found at the following link:

https://docs.google.com/document/d/1KKDtCZqDTHq0cwTn8nHEEOWHWD_UDjprHFRoHk4KTzc/edit?usp=sharing.

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

Finding 10186: School food safety plan

The school food safety plan is not site-specific. While the school had a food safety plan onsite, the Description of Program Overview and Facility Demographics page had not been completed.

Corrective Action:

A school food safety plan should be site-specific and apply to every location where food is prepared, stored, or served. A school food safety plan should be customized to the specific school's equipment, staff, and physical location. During the review, the SFA completed the Description of Program Overview and Facility Demographics page for the site. **Therefore, no further action is required.**

Technical Assistance:

Food service staff should receive regular training on procedures outlined in the food safety plan. School food safety resources can be found at the following webpage: <https://theicn.org/icn-resources-a-z/food-safety/>.

1405. *Two food safety inspections are received each school year from the local health department*

Technical Assistance - Food Safety Inspections

The SFA should request two inspections from the local health department for all sites operating any School Nutrition Program. A template letter is available on the IDOE website here –

<https://docs.google.com/document/d/1iwP5jVuzNualqEwBAiAxDW7pDF3Hrgos/edit>.

Additional information on food safety can be found here - <https://www.in.gov/doe/nutrition/food-safety/>.