



SNP Administrative Review Findings

Program Year 2025

Northeast Dubois County Schools (2040)

5379 E Main Street
Dubois, IN 47527-9671

No. of Sites / Reviewed: 3 / 1

Month of Review: January 2025

Northeast Dubois County Schools (2040)

Food Service Contact

Mrs. Joyce A. Hulsman
Food Service Director
(812) 678-2251
jhulsman@nedubois.k12.in.us

Executive Contact

Dr. Tara Rasche
Superintendent
(812) 678-2781
trasche@nedubois.k12.in.us

Commendations

- * The head cook at the reviewed school was friendly and accommodating to reviewer questions. The head cook was very engaged, listening to reviewer feedback and asking questions.
- * Food items were appealing and nicely displayed in the merchandiser at the reviewed school.
- * All income applications were accurately processed.

Certification and Benefit Issuance - Northeast Dubois County Schools (2040)

129. Household notification of eligibility is consistent with Off-Site Assessment responses

Finding 9902: Household notification of eligibility not compliant with regulations

The notification of eligibility sent to households did not contain the required information. While the SFA uses template letters provided by the State Agency, they are not the most current and up-to-date templates.

Corrective Action:

For corrective action, the SFA must update the letters in the free and reduced system so the most current letters are used and sent to households. Provide proof that all notification letters have been updated.

Technical Assistance:

Annually, the State Agency provides updated template letters for SFAs to use. SFAs are responsible for ensuring the most current versions are in use. Current template letters can be found here: https://www.in.gov/doe/nutrition/free-and-reduced-information/free-and-reduced-forms/#Free_and_Reduced_Notification_Letters

131. Applications denied correctly

Technical Assistance - Contact to Households

When additional information and/or clarification is needed from households, only staff members who are directly involved with the processing of free and reduced applications should make contact with the households. Household information provided to determine eligibility is confidential and should not be available to other school staff members.

Further information regarding the disclosure of Free and Reduced information is located at the following links:
https://docs.google.com/document/d/1mNrZCDfcUE_t4FiiDh0SwT4DhvsLDA7PM8ny1-c3jQo/edit?tab=t.0
https://docs.google.com/document/d/1iOZyw1S45MusJBmaHy2_RqlPBfZY4u7VkBjORbn2e-g/edit?tab=t.0
<https://www.in.gov/doe/nutrition/free-and-reduced-information/disclosure-appeal-process/>

Additionally, when household contact is made, detailed notes regarding the discussion should be documented and maintained. The date of contact, name of the household member contacted, and a description of the discussion should be documented and signed or initialed by the SFA staff member making contact.

136. Benefits are provided to students in a manner that assures confidentiality and prevents overt identification; eligible students are not required to work for meals

Technical Assistance - Overt Identification

Student eligibility is confidential information and should not be readily disclosed. While the SFA's electronic point-of-service system prevents overt identification, cashiers must ensure confidentiality is maintained.



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Verification - Northeast Dubois County Schools (2040)

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 detailed response 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 requirements of the free and reduced processing will be moving forward.

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).

211. SFA's verification notification letter included all required information

Finding 9044: Verification notification letter does not contain all required information.

The SFA's verification notification letter does not include all required information. While the SFA uses a template letter provided by the State Agency, it is not the most current and up-to-date template letter.

Corrective Action:

For corrective action, the SFA must update its system so that the most current letters are used and sent to households. Provide proof that all notification letters have been updated.

213. SFA's notice of adverse action contained all required information, including notification of appeal rights

Finding 9000: Verification Results Notification

The SFA does not notify households of the outcome of verification even when there is no change in eligibility.

Corrective Action:

For corrective action, the SFA must notify the selected households of the verification results. During the review, letters were mailed to the households. **Therefore, no additional response is required.**

Technical Assistance:

A template Verification Results notification letter is available at the following link:

https://docs.google.com/document/d/1ZCQwk6m_94QaMWwfzaeHpGGtyfGnUUYSqCS028_Kws/edit?tab=t.0

215. SFA completed verification by November 15

Finding 9048: Verification not completed by November 15.

For the current school year, the SFA did not complete its Verification process prior to November 15. The SFA did not have an extension approved by the SA, allowing the SFA to complete its Verification process by December 15.

Corrective Action:

Due to an error with the electronic system used by the SFA, an incorrect number of applications was selected for verification. The SFA later recognized this error when submitting the Verification Summary Report. Steps were taken to correct the error, and additional applications were verified after the November 15 deadline. **For corrective action, the SFA must revise the Verification Summary Report to reflect accurate data regarding the total number of applications that were subject to verification.**



Meal Counting & Claiming - Northeast Dubois County Schools (2040)

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

Finding 9000: Charging Procedures Not Enforced

The SFA is not following the written procedures outlined in the local meal charge policy. Inactive meal accounts with negative balances have not been recovered, nor has a transfer been made from non-federal sources to repay the Nonprofit School Food Service Account for the loss.

Corrective Action:

For corrective action, the SFA must review the inactive meal accounts with negative balances and determine what is considered uncollectable. The bad debt policy must be applied to uncollectable debt, and a transfer and/or deposit showing non-federal funds used to cover bad debt must be provided to the State Agency.

Technical Assistance:

SFAs must make reasonable efforts to collect unpaid meal charges classified as delinquent debt. When local officials determine all collection efforts for delinquent debt have been exhausted, the debt must be reclassified as "bad debt." The NSFSA may not absorb this revenue loss but must be restored using non-federal funds. These funds may come from the school district's general fund, special funding from state or local governments, school or community organizations, or any other non-federal sources.

Resource Management - Northeast Dubois County Schools (2040)

700. *SFA accurately track all revenues and expenses, including Supply Chain Funds?*

Finding 10123: Supply Chain Funds are not tracked.

The funds received through several USDA Supply Chain Assistance programs were not tracked separately to ensure they were spent on domestic and minimally processed foods.

Corrective Action:

During the onsite review, the reviewer provided technical assistance regarding local tracking procedures related to Supply Chain Assistance funding. The reviewer provided the IDEO optional tracker that can be used at the local level, showing the SCA amount received and spent down on minimally processed items such as milk, fresh produce, etc. For corrective action, the SFA must start tracking the SCA funds locally. The SFA provided a copy of the SCA tracking. **Therefore, no further response is required.**

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

Technical Assistance - Documentation of Labor Costs

Some staff have dual jobs within the Northeast Dubois County School Corporation. If staff perform work outside the School Nutrition Program, the sponsor needs to track the labor for the School Nutrition Program directly (i.e., complete it by time log). Without this type of documentation, labor would not be an allowable direct expense. For salaries and wages to be allowable under all federal grant programs, all employees who are paid with federal funds must maintain time and effort records. It is important to understand that the standards regarding time distribution exist in addition to the standards for payroll documentation. LEAs must document both time and attendance (reflecting the actual daily time for which the employee worked, as documented in the payroll system), as well as time and effort (reflecting the federal programs on which the employee spent effort during his or her workday).



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

Technical Assistance - Internal Controls/Separation of Duties

Each step in the flow of cash at the reviewed school, from receipt to deposit, did not have a clear separation of duty. Only one individual was responsible for the entire cash flow process with no additional checks or internal controls in place. Internal controls are policies and procedures meant to ensure the integrity of accounting and other information and to promote accountability while preventing fraud. Internal controls can usually be satisfied by ensuring multiple individuals are involved and sign off on a procedure, such as making a purchase or submitting data to an agency, and having detailed backup documentation to be able to demonstrate what occurred. Additional information can be found here:

<https://www.in.gov/doe/files/final-fiscal-v2-handbook.pdf>.

Resource Management Comprehensive Review - Northeast Dubois County Schools (2040)

764. Catering/School Events

Finding 9000: Foods Purchased for Outside Organizations

The SFA is allowing outside organizations to purchase food items from vendors using customer accounts that have been created for cafeteria use. This has led to outside organizations receiving commodity discounts. Entitlement funds are intended for use in school nutrition programs and cannot be passed on to outside organizations.

Corrective Action:

For corrective action, the SFA must create written procedures detailing how invoices will be created and verified to ensure that costs are recovered appropriately. Submit these written procedures to the State Agency.

Additionally, funds must be restored to the nonprofit school food service account for the commodity allowances passed on to outside organizations. Invoices from program year 2024 were reviewed, and it was determined that \$266.80 is required for restoration. Funds used for restoration must be from a non-federal source. **Submit documentation of the restoration.**

764. Catering/School Events

Technical Assistance - Catering Invoice

When providing catering to outside organizations, the SFA must ensure that they are charging an amount that, at a minimum, covers the cost of the goods being sold, including labor. Written procedures for creating and verifying invoices will assist in ensuring costs are being recovered appropriately.

General Program Compliance - Northeast Dubois County Schools (2040)

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 Buy American requirements to become effective PY 2025-2026 school year.

For additional information, go here: <https://www.fns.usda.gov/cn/buy-american-provisions>.

To watch a recorded webinar on updates to the Buy American requirements, go here: <https://www.fns.usda.gov/cn/buy-american-provisions/webinar>.

To download a copy of the USDA Buy American tool, go here:

<https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Ffns-prod.azureedge.us%2Fsites%2Fdefault%2Ffiles%2Fresource-files%2FSP23-2024a.xlsx&wdOrigin=BROWSELINK>.



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Northeast Dubois County Schools (2040)

Northeast Dubois Intermediate School Food Service Contact

(1549)
5379 E Main Street
Dubois, IN 47527-9671

Mrs. Krystal Moon
Cafeteria Manager
(812) 678-2181

Month of Review: January 2025

Date of Onsite Review: February 6, 2025

Meal Components & Quantities - Northeast Dubois Intermediate School (1549)

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

Finding 10139: Production Records *Repeat Finding

The following issues were noted with production records:

- a) The production record did not detail all choices offered within the milk component.
- b) Production records were incomplete. Crediting information was missing for some menu items; the amount of food prepared and the amount of purchase units were not completed.
- c) Production records are not completed until the following day.

Corrective Action:

For corrective action, completed breakfast and lunch production records for one week from the reviewed sites must be submitted to the State Agency. Additionally, the SFA must complete production record training and provide proof of production record training for all staff.

410. Review Period- planned menu quantities meet the meal pattern requirements

Technical Assistance - Food Variety in Menus

The intent of the Child Nutrition Program is to provide a variety of nutrient-dense foods to students each day. Production records for the review period and onsite observations indicate that students are offered applesauce and apple juice each day for breakfast. Consider planning breakfast menus with more variety in mind. Providing a wide variety of foods from the four components would ensure exposure to more nutrients.

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. *Repeat Finding

Production records were reviewed for the review period to determine whether the portion sizes of meal components from the menu planned and served during the review period meet the minimum meal pattern requirements for the age/grade group(s) being served.

At lunch, an insufficient grain serving for the week reviewed was found. Additionally, weekly vegetable subgroup requirements were not met for the dark green and red/orange vegetable subgroups. Finally, the weekly limit for fruit juice was exceeded.

At breakfast, an insufficient grain serving for the week reviewed was found.

Corrective Action:

For corrective action, please explain how the breakfast and lunch menus will be corrected to meet all meal pattern requirements. Corrected menus must be submitted to the State Agency.

Technical Assistance:

The school was provided technical assistance during the onsite visit. The menu planner is reminded to plan menus that meet all components in both the daily and weekly serving sizes.



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410. Review Period- planned menu quantities meet the meal pattern requirements

Finding 10171: Standardized Recipes

Standardized recipes were not available for menu items served during the review period and the day of review for items that contain two or more ingredients.

Corrective Action:

For corrective action, standardized recipes must be developed for all items that contain two or more ingredients. Submit copies of completed recipes to the State Agency.

Technical Assistance:

A standardized recipe template with instructions can be found here:

<https://drive.google.com/drive/folders/1TogadACpRuCsyZRu2doy9-9TDKwpKn8K>.

General Program Compliance - Northeast Dubois Intermediate School (1549)

1105. Foods and beverages sold to students during the school day meet Smart Snacks standards

Finding 9160: Foods and beverages sold to students not compliant with Smart Snacks standards.

Some foods and beverages sold to students during the school day, including a la carte foods and beverages sold during meal services, including food items sold during non-exempt fundraisers, do not meet Smart Snacks standards.

Cookies sold to students in the cafeteria are not whole grain. Additionally, vegetable trays paired with ranch dressing do not meet Smart Snack standards as the calories, saturated fat, and sodium exceed limits.

Corrective Action:

For corrective action, the SFA must complete training on Smart Snack standards. Provide proof that training has been completed. Finally, documentation must be provided to support the changes made to ensure all items sold to students during the school day are Smart Snack compliant.

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

Technical Assistance- Water

A water fountain/water bottle fill station is located in the hallway right outside the cafeteria to fulfill the water availability requirements during meal service. However, it was observed that most children do not bring water bottles with them to the cafeteria during meal service. It is recommended that cups be made available for children who want water to lessen the trips to the fountain.

1406. The most recent food safety inspection report is posted in a publicly visible location

Finding 9147: Food Safety Inspection Report

The most recent food safety inspection report is not posted in a publicly visible location.

Corrective Action:

The cafeteria manager posted the health inspection in the cafeteria in between the meal service lines. **Therefore, an additional response is not required.**

Technical Assistance:

During the on-site review, technical assistance was provided, and the reviewer allowed the cafeteria manager to correct the posting.



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1408. Temperature logs are available

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Finding 9149: Temperature logs unavailable for review.

FNS requires each school in the SFA to maintain temperature logs for a period of six months. Temperature logs are unavailable for the milk cooler, ice cream cooler, pass-through, and merchandiser.

Corrective Action:

Temperatures must be monitored and logged daily for all refrigeration and freezer equipment, as well as the storeroom. **For corrective action, submit logs of at least one week of monitored temperatures to the State Agency.**

Technical Assistance:

Sample food safety logs can be found at the following website: <https://theicn.org/icn-resources-a-z/food-safety/>.

1502. Records are retained for 3 years

Technical Assistance - Site Info Sheet

The reviewed site recently had a change in staff. The SFA is responsible for ensuring that the information reported in CNPweb is up to date. The SFA is reminded to revise the site info sheet to indicate the current food service contact at the site.