SNP Administrative Review Findings

Brown County Schools (0670)

Program Year 2026

Brown County Schools (0670)
357 E Main
Nashville, IN 47448-7061

Food Service Contact
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FSMC: Chartwells

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No. of Sites / Reviewed: 5 / 1
Month of Review: January 2026

Commendations

* The school food authority (SFA) did a great job documenting and tracking professional standards. A yearly training plan is in place for all staff and manager meetings are well documented.
* The reviewed school did a great job recording menu changes and substitutions on daily production records.

Technical Assistance

* During the review, adults were observed eating from the share cart/table. Adults are not permitted to remove items from a share cart/table for their personal consumption. All food consumed by adults must be purchased. Foods placed on the share cart/table are for students only or may be donated.

  A sign explaining that share cart/table items are for students only was posted during the review. It is highly recommended for the SFA visit schools regularly to ensure adults continue to follow share table procedures.
* FSMC Oversight: The school corporation must ensure the corporation employee overseeing the FSMC contract has a strong working knowledge of USDA programs. The School Food Authority (SFA) must continue to review all documentation related to services provided by the FSMC, including but not limited to the following: reviewing the itemized monthly statements to ensure there are no questionable or unallowable charges billed to the food service account, reviewing the SFA available USDA Foods for use in menus to ensure the corporation is getting full value from the use of commodities in reimbursable meals and not used for other activities, inspecting all kitchens regularly to ensure foods are stored properly, rotated on FIFO, and secured from theft and spoilage. The following items were recommended to the SFA regarding FSMC billing:
  -For accuracy, the SFA should create a standard operating procedure to review every monthly itemized, detailed billing.
  -The SFA should determine approval procedures for FSMC travel, employee recognition programs, timekeeping records, and/or shared labor between SFAs.
  -The SFA should receive training on how to read the reports provided by the FSMC.

Certification and Benefit Issuance - Brown County Schools (0670)

123. On-site observations validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions and responses demonstrate compliance with FNS requirements

Technical Assistance - Hearing Official

It's reported that the determining official and the hearing official are the same person. Since this person cannot have participated in the decision being appealed, the hearing official must be someone who is not involved in the free and reduced process.

126. Certification: selected applications correctly approved. This serves as a reminder to the reviewer that FA must include the MOR and the Month of the on-site review.

Finding 9901: Selected applications correctly approved
Multiple applications were certified incorrectly or were approved with missing information. This contributed toward fiscal action calculations.

Corrective Action:
Corrections must be made to certification errors, and the households must be sent a letter notifying of the change in eligibility. For additional corrective action, complete and provide the following:
-Develop written procedures for conducting a second check of randomly selected meal applications. Submit the established

procedure and implementation date to the state agency.
-Provide documentation that corrected benefits have been updated at the point of sale.
-Provide copies of benefit change notification letters sent to households.
-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 the day of review.

Fact sheets for application processing are available on IDOE's website here: https://www.in.gov/doe/nutrition/free-and-reduced-information/fact-sheets-and-training/#Application_Processing.

130. Household notification of denied benefits is consistent with FNS requirements

Finding 9021: Denial of benefits notification to household not consistent with FNS requirements
Notification sent to denied households did not include instructions on how to appeal. While a sentence referring to appeal rights was included in the letter, it was not complete and missing information for who to contact and how. The same error was also present in verification notification of results letters.

Corrective Action:
For corrective action, the SFA must update the results letter for free and reduced notifications as well as verification and submit copies to the State Agency.

Technical Assistance:
Technical assistance was provided to the food service director and the determining official during the on-site review. It's understood that the letters are updated annually. Visit the following link for the most current notification letters: https://www.in.gov/doe/nutrition/free-and-reduced-information/free-and-reduced-forms.

133. Direct Certifications were correctly certified

Finding 9024: Direct Certifications were not correctly certified
Direct certification documentation for selected students was reviewed for completeness and accuracy. Some students were certified for free meals incorrectly. When a student was certified for reduced meals based on Medicaid, they were awarded a free benefit instead. This contributed toward fiscal action calculations

Corrective Action:
Corrections must be made to certification errors, and the households must be sent a letter notifying of the change in eligibility.
For additional corrective action, complete and provide the following:
-Provide documentation that corrected benefits have been updated at the point of sale.
-Provide copies of benefit change notification letters sent to households.

133. Direct Certifications were correctly certified

Finding 10160: Categorical application categorized as directly certified
While the student eligibility was not affected, one or more categorical applications containing a SNAP, FDPIR or TANF case number was incorrectly categorized as directly certified. Applications for “mixed households,” which include children who are eligible based on income and other children who are eligible based on Other Source Categorical Eligibility, are subject to verification and are included in the sample pool. Applications with case numbers for participating children (who were not determined eligible through direct certification) are also subject to verification.

Corrective Action:
For corrective action, the determining official must review the State Agency SNAP and TANF Fact sheet found at the following link: https://docs.google.com/document/d/1q9R8PIqzyFkKCKBlEBkDDTBCwx7nmYhTdDn9fNwBV6s/edit. Once reviewed, please upload a signed and dated copy of the fact sheet in the corrective action responses section of the administrative review tool.

Technical Assistance:
When using an application to establish eligibility, LEAs must give households the opportunity to provide SNAP, TANF, or FDPIR case numbers or identifiers for any household member. Households receiving benefits under Assistance Programs must list a case number when submitting an application. Determining officials must ensure the Assistance Program's case number or identifier listed on the application is consistent with the format used by the Assistance Program in the State. If the case number seems incorrect, the LEA should contact the household or the local Assistance Program agency to confirm the household's eligibility or verify the application for cause. When a household submits an application indicating Other Source Categorical Eligibility the applicable programs must be indicated. Also, the LEA official must contact the Other Source Categorically Eligible agency liaison to confirm that the children are eligible for the applicable program.

138. Updates to the Benefits Issuance documents are made accurately and timely

Finding 9030: Updates to the Benefits Issuance documents not made accurately and/or timely
Changes in eligibility as a result of resubmitted applications occurred during the review period. Benefit issuance documents were not updated accurately or within required timeframes. An application was submitted and processed on 9/18/2025. The benefit was not applied until 10/19/2025.

Corrective Action:
For corrective action, the SFA must develop a standard operating procedure (SOP) detailing the process that will be implemented to ensure benefits are applied timely. Submit the written SOP to the State agency.

Verification - Brown County Schools (0670)

209. Verified applications were properly selected, correctly replaced (if necessary), and correctly verified

Finding 9042: Selected applications not verified correctly.
Based on the verified applications selected for review, the post-verification determination was incorrect for one application.
-One application included consistent overtime in 4 weeks of pay stubs. This amount was not included in the income calculation, and the SFA did not follow up with the household to determine if income should be reported differently than submitted for Verification.

Corrective Action:
For corrective action, complete the following:
-Contact the household for additional documentation, and submit documentation (applications, letters, household information submitted, etc.) to the State agency.
-Notify the household of adverse action, and update the eligibility in the point of service. Submit a copy of the letter and documentation showing the benefit was updated in the POS.
-Revise the FNS 742 Verification Summary Report in CNPweb and submit a copy to the State agency.
-Complete the Verification training in Moodle and submit a copy of the training certificate as proof of completion.

Technical Assistance:
Verification How To Fact Sheet: https://docs.google.com/document/d/1k2SIeVd6qN9NNMT-hBbRQtLiED2TkirtEN5nvrF_bOM/edit?tab=t.0
Moodle- https://moodle.doe.in.gov/

210. Direct Verification of selected applications was conducted according to requirements

Technical Assistance - Direct Verification of selected applications

After applications are pulled for verification and the confirmation review has been conducted, the SFA should attempt to directly verify the application using the Direct Verification feature within CNPweb. If the application can be directly verified for the benefit approved on the application, save the printout or take a screenshot and retain it with the verification documents.

This process eliminates the need to contact the household for additional information. If the application cannot be directly verified, follow the normal verification process by sending a notification letter.

212. SFA met follow-up requirements if the household failed to respond to the verification request

Finding 9035: SFA did not follow up as required when households failed to respond to a Verification request.
Follow-up was not conducted for households that failed to respond prior to determining the verification results.

Corrective Action:
SFAs are required to conduct at least one follow-up attempt when households selected for verification do not respond to the initial request. For corrective action, the verification review official must complete the Verification training in Moodle and submit a copy of the training certificate as proof of completion.

Technical Assistance:
If the household does not respond to the verification request, the LEA must make at least one additional attempt to obtain documentation of eligibility. The attempt can be made through the mail, by telephone, by email, or in person, and before the due date indicated.
Verification How To Fact Sheet: https://docs.google.com/document/d/1k2SleVd6qN9NNMT-hBbRQtLiED2TkirtEN5nvrF_bOM/edit?tab=t.0
Moodle- https://moodle.doe.in.gov/

215. SFA completed verification by November 15

Finding 9048: Verification not completed by November 15.
For the 2025-2026 school year, the SFA did not complete its Verification process prior to November 15. The State agency did not approve an extension that would have allowed the SFA to complete its Verification process by December 15. At the time of review, the SFA had not completed its verification process.

Corrective Action:
For corrective action, the SFA must complete a detailed timeline to ensure Verification will be completed annually each school year. Submit the timeline to the State agency.

Technical Assistance:
Technical assistance was provided to the SFA during the onsite review. The verification process was explained, and resources were provided. Guides and resources for the verification process are available at the following link - https://www.in.gov/doe/nutrition/free-and-reduced-information/verification-and-direct-verification/#Annual__Traditional__Verification.

Meal Counting & Claiming - Brown County Schools (0670)

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 is not enforcing its local meal charge policy. Students and staff are permitted to charge over the established limit stated in the 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.

314. SFA is following the approved SFA-SA agreement

Finding 9049: SFA not following the approved SFA-SA Agreement and/or Application.
The SFA is not following their approved SFA-State agency application, including the point-of-service procedures. Discrepancies between approved documentation and observations on site: the SFA is serving meals at an early education center that has not been reported to the SA as a site. These meals are being claimed under each elementary school site. CNPweb requires site-based claiming, so consolidation from two sites should not occur.

Corrective Action:
For corrective action, please complete the following:
1. The early education center site must be added to CNPweb. This can be done through the CNPweb help form. Please complete the site application for the early education center and begin site-based claiming starting March 2026. Also, revise Brown County High School's site application and remove Pre-K.
2. The SFA must offer meal service to all enrolled children. Therefore, if infants attend the early education center, meal service must also be offered.
3. Develop a written procedure that explains how and who paperwork must be turned in after each service day. This procedure should be reviewed with the early education center staff prior to implementation. As a reminder, claims should not be completed until all paperwork has been received. Please submit the updated procedure explaining the paperwork submission.

Resource Management - Brown County Schools (0670)

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

Finding 9000: FSMC Invoice Review
The FSMC invoice from October 2025 was reviewed. Several line items were questioned, requiring additional review and invoice documentation, however, the FSMC was unable to provide most of the requested invoice documentation. Documentation for the following was not provided for review:

- Dept Kitchen & Bar: invoice in the amount of $25.20
- Postage/Freight: invoice in the amount of $14.25
- Outside Services: both invoices totaling the amount of $109.98
- Computer Expense: all invoices totaling the amount of $453.00
- Maint SoftwareMid: all invoices totaling the amount of $461.95
- General Liability: invoice in the amount of $903.93
- Insurance Other: invoice in the amount of $0.57
- Training: all invoices totaling the amount of $55.50

Total amount of costs questioned: $2,024.38

Corrective Action:
For corrective action, provide a detailed invoice for each of the line items listed above. If invoices are unavailable for the questioned costs, the costs are considered disallowed and the SFA must restore funds to the non-profit school food service account (NSFSA) in the total amount of all questioned costs. The restoration must be made using non-federal funds.

General Program Compliance - Brown County Schools (0670)

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.

Brown County Jr. High School (0587)
357 E Main
Nashville, IN 47448-7061

Food Service Contact
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Manager
(812) 988-6605

Month of Review: January 2026
Date of Onsite Review: February 25, 2026

Other Federal Programs - Brown County Jr. High School (0587)

4. Validate snack counts – snacks properly counted and claimed?

Finding 9221: Snacks are not being properly counted and claimed. *Repeat Finding
The snack counts claimed for reimbursement for the review period could not be validated. Snacks are counted manually at the point of service. The following day, staff transfer the counts from the manual count sheets to the electronic POS. Since this occurs the following day, snack counts are recorded for the day after the service occurred. The claim for reimbursement is based off of reports pulled from the electronic POS. The problem is considered systemic because the contributing factors are built into the process and would likely recur if not changed. This resulted in an underclaim for the MOR.

Corrective Action:
For corrective action, the sponsor must create and submit a written standard operating procedure for snack meal counting, including how claims for reimbursement will be prepared. Also, provide proof staff serving the snack have been trained in this procedure.

Technical Assistance:
All meal counts must be recorded at the time of service (when a complete snack is given to each child).

11. DOR and Review Period Snacks missing components. Snack meal pattern technical assistance for new requirements. Enter data

Technical Assistance- Afterschool Snack Program Meal Pattern

Effective July 1, 2025, the final rule updated NSLP afterschool snack program (ASSP) meal pattern requirements for K-12 children to align with CACFP snack requirements. Some updates to the meal pattern include the separation of the fruit/vegetable component into a fruit component and a vegetable component, a weekly juice limit, whole-grain requirements, product-specific sugar limits, grain-based dessert restriction, etc. View the ASSP meal pattern and links to additional resources here: https://docs.google.com/document/d/1FDA6kzBIRnpgB1iQ0666Y1L3WVZ2rqcXtcKFospl8P4/edit?tab=t.0.

Dietary Specifications - Brown County Jr. High School (0587)

605. Dietary Specifications (Calories, Saturated Fat, Sodium, and Trans Fat) were met for the appropriate age/grade group being served. How is the SFA working towards transitional standards for sodium? Add sugar limit technical assistance here.

Technical Assistance- School Nutrition Standards

USDA Final Rule, Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans has established added sugar limits for the following products served in the School Nutrition Programs effective July 1, 2025: breakfast cereals, yogurt, and flavored milk. Weekly added sugar limits are to be implemented beginning July 1, 2027. Additional information and updates to school nutrition standards can be found at the following link: https://www.fns.usda.gov/cn/school-nutrition-standards-updates.

General Program Compliance - Brown County Jr. High School (0587)

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. 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. The plan was missing the following, specific to this site:

Description of Program Overview and Facility:

- Type(s) of facility
- Average Daily Participation for the programs being operated at the site
- Employee list for the site
- Equipment List
- Table of Contents

Corrective Action:

For corrective action an updated, site-specific plan must be developed and submitted to the state agency.

Technical Assistance:

Food service staff should be regularly trained on procedures within the food safety plan. School food safety resources can be found at the following webpage: https://theicn.org/icn-resources-a-z/food-safety/.