INDIANA
DEPARTMENT *of*
EDUCATION

Hamilton Southeastern Schools (3005)
13485 Cumberland Road
Fishers, IN 46038-3602

Food Service Contact
Mrs. Karen E Ogden
Director of Nutrition and Food Services
(317) 594-4100
kogden@hse.k12.in.us

Executive Contact
Mr. Matt Kegley
Superintendent
(317) 594-4100
mkegley@hse.k12.in.us

No. of Sites / Reviewed: 23 / 4
Month of Review: October 2025

Commendations

* All reviewed schools with storage areas were clean and neat with minimal inventory.
* The State agency commends the kitchen staff at all reviewed schools for maintaining cleanliness and organization, ensuring the high standards of food safety for all students.
* The managers at reviewed schools were organized, friendly, and cooperative during their meal service observations.
* The State agency commends the staff for effectively developing and implementing mixed-grade menus. During onsite meal service observations, the USDA meal pattern requirements for each age group served were consistently met.
* The State agency recognizes the effective use of clear signage and innovative marketing strategies to help students identify and select reimbursable, nutritious meals.
* The documentation for free and reduced benefits was well organized and maintained, and all benefits extended to students through a household member were clearly documented.
* The food service staff were well prepared and highly organized for their 2026 Administrative Review. Their detailed notes explaining why events unfolded as they did were greatly appreciated and proved invaluable during the review. The staff were accommodating, professional, and diligent in ensuring compliance with the School Nutrition Program requirements.

Technical Assistance

* The State agency now has an additional monitor review form that may be implemented to help school cafeterias be successful in meeting requirements. This link was provided to the food service director during the onsite process. https://docs.google.com/document/d/1t84ef5Bz5x2Q4QFM4mQ0xkq9-Rk81UPbUBO-eWrBNVU/edit?tab=t.0
* The United States Department of Agriculture (USDA) regulations 7 CFR Part 15b require substitutions or modifications in meals through the Child Nutrition Programs for children who are unable to eat the normally provided meal because of a medical need, disability, and/or impairment. https://www.in.gov/doe/nutrition/special-dietary-needs/
* All food service personnel on duty and anyone entering the kitchen when food is exposed, including staff on the serving line, should wear hair restraints, such as a hat or hairnet.
* The menu planners are encouraged to avoid offering too many grains during breakfast because the additional calories could result in exceeding the daily or weekly calorie allowance. Consider reducing the biscuit portion by half, serving only 1 meat or meat alternate portion, or reducing portion sizes, etc. By reducing portion sizes, the sodium and fat content will be reduced. Additionally, the breakfast meal cost would be lower, and the requirements would still be met.

Verification - Hamilton Southeastern Schools (3005)

207. SFA completed verification and verified applications on file match FNS-742.

Finding 9036: Verified applications on file do not match number reported on FNS-742.
The SFA's response to question #200 of the Off-site Assessment Tool and the number of Verified applications reported on the FNS-742 (Verification Summary Report) are inconsistent with the number of Verified applications on file. The report stated that 17 had been verified; however, only 14 were on file as verified.

Corrective Action:
For corrective action, the SFA must revise the FNS 742 in CNPweb verification report after verifying three additional households. Additionally, 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:
During the verification season next school year, be on the lookout for live webinars that will be offered regarding the verification process. Also, please reference the online Verification How-To Fact Sheet:
https://docs.google.com/document/d/1k2SleVd6qN9NNMT-hBbRQtLiED2TkirtEN5nvrF_bOM/edit?tab=t.0
The verification training can be found at Moodle- https://moodle.doe.in.gov/.

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

Technical Assistance - Direct Verification of selected applications

On the SFA's 2026 Verification Summary Report direct verification was noted as not being conducted. When the field specialist explained what it entailed, the food service director stated it was conducted. Therefore, for clarification on what direct verification involves, this technical assistance will serve as a reference. 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.

Resource Management Comprehensive Review - Hamilton Southeastern Schools (3005)

750. Year End Available Balance

Finding 9000: 8400 Fund Account not Established
The SFA has not established the prepaid 8400 account. All prepaid dollars and refunds to households are held within the 0800 fund.

Corrective Action:
Each school corporation must have an 8400 – Prepaid School Lunch fund established. After students have charged meals, the school corporation should disburse the amount charged from the 8400 fund using expenditure code 31900 other Food Services. The School Corporation should then receipt this same amount into the 0800 fund using the appropriate food service receipt accounts in the 1611-1623 range. For corrective action, the SFA must establish the 8400 fund to properly manage prepaid funds and issuing refunds to households related to prepaid dollars. At a minimum, each month the SFA should reconcile the 8400 and 0800, using transfers to document actual sales to children and adults. Submit supporting documentation to the State agency.

Technical Assistance:
During the review, the reviewer sent documentation provided by State Board of Accounts regarding the setup and requirements of the 8400 fund.

-When a student puts money into their individual meal account, it should not be considered income to the child nutrition program until that student goes through the lunch line and charges a meal to their account.
-When a student brings in a deposit, the receipt should be recorded to fund 8400 using receipt account 1630 Special Functions.
-After the student has charged meals, the school corporation should disburse the amount charged from Fund 8400 using expenditure account 31900 Other Food Services and receipt this same amount into Fund 800 using the Food Services receipt accounts 1611-1623 at the time established in a written school policy to ensure accurate monthly reporting.

752. Limitation on Net Cash Resources

Technical Assitstance-2025 Spend Down Plan

As of May 2026, only $235,893.37 has been spent on the $1,244,164.27 approved 2025 spend down plan. The SFA is advised to monitor the amount of funds in the Nonprofit School Food Service Account (NSFSA) so that the account does not exceed an average 6-month operating expenses once again this school year.

755. Allowable Costs

Finding 10233: Student Debt
The bad debt policy states that debt is considered uncollectible after 1 year; however, a review of account records showed that student debt older than one year remains outstanding and has not been written off or otherwise addressed in accordance with the established policy.

Corrective Action:
The SFA must identify all student meal debt that meets the definition of uncollectible according to the approved bad debt policy. The total amount of uncollectible debt must be restored to the Nonprofit School Food Service Account (NSFSA) using non-federal funds. For corrective action, the SFA must submit a copy of the restoration, along with the supporting documentation used to determine the uncollectible amount, to the State agency.

Technical Assistance:
The SFA was reminded that its written bad debt policy must be followed consistently. Student meal debt identified as uncollectible according to the SFA's policy should be properly written off and accounted for using non-federal funds. It is recommended to regularly review ageing accounts to ensure student debt is addressed within established timeframes and to update procedures as needed to maintain compliance.

757. Allowable Costs Test

Technical Assistance: Development of a Student Charge Policy for Safeguard Purposes

The State agency highly recommends creating a practical student charge policy that includes clear limits, either a maximum number of meals, or a maximum dollar amount that may be charged per student. Without these safeguards, to requirement to rely on general funds or other non-federal funds to cover student bad debt (as is being done currently) will continue indefinitely.

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 charged to the Nonprofit School Food Service Account (NSFSA) for the program year 2025, using the SFA’s detailed general ledger. The review identified questioned costs charged to the Fund 0800.
-A food invoice was charged twice to the NSFSA.
-Fringe benefits for employees that were associated with catering outside of the NSFSA were charged to 0800.

Corrective Action:
The SFA must restore to the NSFSA all unallowable costs identified during the review using non-federal dollars. For corrective action, submit documentation of the restoration to the 0800 using non-federal sources. Additionally, please create a written standard operating procedure that requires more than one person to review the monthly reconciliation of all costs charged to the NSFSA. Submit the written standard operating procedure to the State agency.

Technical Assistance:
All costs charged to the NSFSA must be allowable, reasonable, and fully supported by appropriate documentation. Further

guidance regarding allowable and unallowable costs can be found here - https://drive.google.com/file/d/1a_BfYVubI9CAgle2B5pSjqHqq5qDX2c-/view?utm_name=.

General Program Compliance - Hamilton Southeastern Schools (3005)

808. On-site observations validate Off-Site Assessment Tool responses to Civil Rights questions and responses demonstrate compliance with FNS requirements

Finding 9000: Lactose Intolerant Students' Milk Substitutes
Students are charged an extra fee for milk substitutes provided as part of the reimbursable meal.

Corrective Action:
SFAs may not charge children with disabilities an extra fee for a modified meal will not receive additional reimbursement to cover the extra costs sometimes associated with providing a reasonable modification.
For corrective action, all school student accounts for school year 2025-26 must be reviewed to ensure this protected class is not charged an additional price for meal modifications. Any student who has been charged an additional price must have the funds restored to their student meal account for the school year 2026-27. Proof of the restoration of funds must be submitted to the State agency. Lastly, every manager and cashier within the district is to be trained so that no student requiring meal modifications may be charged for a milk substitute. Submit documentation to the State agency as proof that the training occurred.

Technical Assistance:
Technical assistance was provided during the onsite review. Reimbursement for a modified meal is based strictly on a child's eligibility for free, reduced price, or paid meals, regardless of the extent of the meal modification. Children with disabilities can often be accommodated with little extra expense or involvement, and in many cases, the SFA is able to absorb any additional expenses involved in making the modification. When necessary, however, SFAs may use funds from the nonprofit school food service account to cover the additional costs. When the nonprofit school food service accounts are not a viable option, the general fund or special education funds (if specified in the child's IEP) may be used to offset the cost. Additional information and resources regarding special dietary needs can be found on IDOE's website here: https://www.in.gov/doe/nutrition/special-dietary-needs/.

810. The USDA non-discrimination statement is on appropriate Program materials

Finding 9000: Milk Allergy Students
Students with milk allergies or intolerances were required to have medical statements before they could receive a milk substitute with a reimbursable meal. If there is a medical need/disability/impairment and a complete meal can be accommodated within the meal pattern, such as providing a milk substitute nutritionally equivalent to cow's milk, SFAs are not required to obtain a medical statement signed by a health care provider with prescriptive authority. A written request from a parent/guardian would be acceptable. Further, once the need is known for the accommodation, whether outside or within the meal pattern, sponsors cannot delay implementation until they receive the proper documentation and must accommodate the student as soon as possible.

Corrective Action:
For corrective action, develop a standard operating procedure (SOP) for accommodating students with special dietary needs. Include the SOP as part of the district's annual Back to School In-service Training for food service staff. Finally, submit this SOP to the State agency along with the signed training documentation that staff were trained in this requirement.

Technical Assistance:
During the onsite meal service observations, staff members were trained on this requirement. More information about this and other special dietary requirements can be found on the State agency website at https://docs.google.com/document/d/1e2k_EzKBSPS843Vgc9cOCModxjpPUfEoglwTV4-X0Ik/edit?tab=t.0.

1400. The written food safety plan contains required elements, and a copy is available at each school

Finding 9000: Food Safety Checklist
The SFA did not have documentation of the "daily food safety checklist" that is referenced in multiple places throughout the food safety manual. Also, a description of the equipment at each school and list of employees was not included in the site-specific food safety manuals.

Corrective Action:
For corrective action, establish effective record-keeping procedures that document a historical record of each facility's food safety performance. Further, update each site-specific food safety plan to include employee lists at each site and site-specific equipment lists. Submit to the State agency one example of each of these changes for each school reviewed.

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/.

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.

1501. Records are retained for five years

Finding 9000: Invalid Onsite Monitoring Forms
All SY 2025-26 site monitoring forms have not been signed or dated by the school representative at any school for any of the 21 school visits. They are only signed and dated by the site supervisor. Without a signature and date from both parties, all site monitoring visits are considered invalid.

Corrective Action:
For corrective action, develop a standard operating procedure (SOP) for accurately and thoroughly completing onsite monitoring forms. The SOP must include the requirement for a signature and date from both the school representative and the administrator conducting the onsite monitoring review. Submit the SOP to the State agency.

Technical Assistance:
Technical assistance was provided during the onsite review.

1602. On-site observations validate Off-Site Assessment Tool responses to SFSP and SBP Outreach questions and responses demonstrate compliance with FNS requirements

Technical Assistance-School Breakfast Program Outreach

For the SBP outreach, the menu is posted on the website and displayed on school monitors. The school provided breakfast information handouts during registration and sent email alerts regarding breakfast service. These are all great outreach methods. Studies show that eating breakfast is vital to helping students learn and be successful. Plus, it helps with behavior issues. In October, out of the 20,470 students enrolled, on average only 8% of the students ate breakfast each day. The availability of breakfast and the importance of eating a healthy breakfast should be advertised in every way possible. Studies show students do better in their schoolwork and their overall behavior improves. Eating breakfast is a win for all students and advertising should be a top priority. Breakfast does not have to be served from the cafeteria before school. Consider serving breakfast in the classroom, Grab N' Go in the hallway utilizing kiosks, or Second Chance Breakfast during a small break in the morning. All these serving methods have shown increases in breakfast participation.

1602. On-site observations validate Off-Site Assessment Tool responses to SFSP and SBP Outreach questions and responses demonstrate compliance with FNS requirements

Technical Assistance-SFSP Outreach

Each summer, the SFA's Summer Food Service Program participation runs only for a portion of the season. Therefore, the SFA should conduct outreach at the end of each school year, so households know where to receive SFSP meals once operations end. The State agency SFSP website is updated toward the end of May each school year with a link to a map of SFSP open sites. Additionally, this information is posted in the weekly school nutrition newsletter.

Cumberland Road Elementary School (2470)
13485 Cumberland Road
Fishers, IN 46038-3602

Food Service Contact
Mrs. Valerie Schallig
Cafeteria Manager
(317) 594-4170

Month of Review: October 2025
Date of Onsite Review: November 24, 2025

Meal Components & Quantities - Cumberland Road Elementary School (2470)

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

Technical Assistance-Leftover Foods

While the kitchen staff do a nice job of batch cooking foods in an effort to prevent waste, in the event there is leftover food, the sponsor should explore ways to utilize these leftover foods for later use.

402. Day of Review- the minimum daily quantity requirements are met for the age/grade group being served

Finding 9000: Vegetable Serving During Lunch
A total of one cup of vegetable was planned for the students to receive, but students were not allowed to select the entire vegetable component.

Corrective Action:
For corrective action, the staff at Cumberland Road Elementary School must complete the meal pattern training module in Moodle. Submit completed training certificates to the State agency as proof the training has been completed.

Technical Assistance:
The school was provided technical assistance during the onsite visit.
Moodle can be accessed at the following link: https://moodle.doe.in.gov/.

500. Day of Review- Offer vs. Serve was properly implemented

Finding 9078: School is not properly implementing Offer vs. Serve.
As observed on the Day of Review, one or more cashiers did not demonstrate a clear understanding of OVS and its requirements. When a student selected a reimbursable meal, the student was made to select an additional item.

Corrective Action:
As corrective action, retrain cashiers in OVS requirements, including the daily enforcement of OVS requirements. Provide written documentation for the training, including the date, the agenda, and a sign-in sheet of attendees.

Technical Assistance:
The school was provided technical assistance during the on-site visit.

General Program Compliance - Cumberland Road Elementary School (2470)

1407. SFA written food safety plan is implemented

Technical Assistance-Using Hand Sanitizing on Gloved Hands

Disposable gloves should be changed regularly instead of using sanitizer on gloves.

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

Technical Assistance-Ice Cream Freezer

The ice cream freezer should be regularly defrosted to allow the unit to function more efficiently.

FOCUS (2472)
13485 Cumberland Road
Fishers, IN 46038-3602

Food Service Contact
Ms. Molli Swinford
Manager
(317) 594-4840

Month of Review: October 2025
Date of Onsite Review: November 19, 2025

No Findings during Site 2472 Review

Hamilton Southeastern Junior High (2489)
13485 Cumberland Road
Fishers, IN 46038-3602

Food Service Contact
Ms. Staci Thompson
Cafeteria Manager
(317) 594-4120

Month of Review: October 2025
Date of Onsite Review: November 19, 2025

Meal Components & Quantities - Hamilton Southeastern Junior High (2489)

500. Day of Review- Offer vs. Serve was properly implemented

Finding 9000: School is not properly implementing Offer vs. Serve. *Repeat Finding
As observed on the Day of Review, all cashiers did not demonstrate a clear understanding of Offer vs. Serve and its requirements at breakfast service only. While all breakfasts observed were reimbursable, the cashiers referred to their cheat sheet and seemed uncertain on whether the breakfast was a reimbursable meal or not. Additionally, many students had to be told to return for juice, fruit, or vegetable. The request seemed very unexpected and confusing to many students and is an indicator that OVS rules may not be regularly implemented.

Corrective Action:
As corrective action, retrain cashiers in OVS requirements, including the daily enforcement of OVS requirements. Provide written documentation for the training, including the date, the agenda, and a sign-in sheet of attendees.

Technical Assistance:
The food service staff and FSD were provided with technical assistance during the on-site visit. After the breakfast meal service observation, the field specialist gathered all applicable food service staff and the food service director and demonstrated with breakfast food items how breakfast OVS works.
Training courses are available on Moodle: https://moodle.doe.in.gov/.
Additional OVS information can be found here: https://www.in.gov/doe/nutrition/offer-versus-serve/.

500. Day of Review- Offer vs. Serve was properly implemented

Technical Assistance-Excessive Serving of Grains

The breakfast meal pattern has daily and weekly minimums that must be met. At least nine ounces of grain must be offered over the course of a week. Therefore, most days two grains are offered. One breakfast menu includes an omelet sausage sandwich, which credits as two ounces of grain and two ounces of meat/meat alternate for a total of four ounces. The students' breakfast choice was a juice, an omelet sausage sandwich, and a pop tart. Although acceptable with OVS, this one meal totals five ounces of grain when only nine grains are required for the week. This practice increases the calories, sodium and fat offered to students as well as increases the total meal cost.

Harrison Parkway Elementary School (2481)
13485 Cumberland Road
Fishers, IN 46038-3602

Food Service Contact
Mrs. Renae Lukac
Cafeteria Manager
(317) 915-4210

Month of Review: October 2025
Date of Onsite Review: November 18, 2025

Meal Counting & Claiming - Harrison Parkway Elementary School (2481)

317. Day of Review- meal counting system prevents overt identification and eligible students are not treated differently than other students

Finding 9062: Overt identification of students receiving F/R benefits.
As observed during the Day of Review, the meal counting system as implemented does not prevent overt identification of students receiving free and reduced-price benefits. Free and reduced students were made to select reimbursable meals while paid students were charged a la carte for items and not consistently given the opportunity to select a reimbursable meal.

Corrective Action:
For corrective action, staff must be trained on what constitutes overt identification. Provide signed and dated training records confirming completion of this training. Cashiers should not be able to see or know students' free, reduced or paid status. Additionally, all students should be advised of the opportunity to select a full meal while the ability to charge items a la carte should be based solely on whether students have money in their online account or in-hand.

In addition, the SFA must remove the free, reduced, or paid status details from every register used at the point of sale. The FSD should limit access to this private information to only need to know staff members. Submit signed and dated documentation verifying that the free, reduced, or paid information has been removed from all point-of-sale registers and that it is accessible only to a limited group of individuals. Also, include a list of the specific job titles of those who are authorized to access the free, reduced, or paid information.

Technical Assistance:
Overt identification is defined as any action that can reveal a child's eligibility for free or reduced-price school meals. School food authorities (SFAs) must ensure that eligibility status is never disclosed at any stage of the meal program.

Only individuals with 'need to know' status may receive eligibility information without parent consent. 'Need to know' individuals include those who process free and reduced applications and conduct verification. More information regarding disclosure can be reviewed in this resource:
https://docs.google.com/document/d/1mNrZCDfcUE_t4FiiDh0SwT4DhvsLDA7PM8ny1-c3jQo/edit.