



SNP Administrative Review Findings

Project School, Bloomington (6215)

Program Year 2026

Project School, Bloomington (6215)

349 South Walnut
Bloomington, IN 47401-3511

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

Food Service Contact

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FSMC: BFFoodsystems

Executive Contact

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Commendations

- * Staff were willing to work with the reviewer to immediately correct some issues when noted during the onsite review.

Technical Assistance

- * Vendor Oversight: The School Food Authority (SFA) must ensure the school employee overseeing the vendor contract has a strong working knowledge of USDA programs. The SFA must review all documentation related to services provided by the vendor, including but not limited to the following:
 - reviewing delivery slips to confirm that what was delivered and received matches what was ordered; and
 - reviewing the itemized weekly statements to ensure there are no questionable or unallowable charges billed to the food service account.

The following was recommended to the SFA regarding Vendor billing:

- For accuracy, the SFA should create a standard operating procedure to review every weekly itemized, detailed billing.
- The SFA should receive training on how to read the reports provided by the Vendor.

Certification and Benefit Issuance - Project School, Bloomington (6215)

126. *Certification: selected applications correctly approved.*

Technical Assistance - Application Approval Process

The "For School Use Only" section on the second page of all Free and Reduced income applications must be completed and signed by the determining official. This step demonstrates how the application was processed and the eligibility determination made.

140. *Direct Certification – updates to Benefits Issuance documents are made accurately and timely upon receipt of DC updates*

Finding 9032: Direct Certification – updates to Benefits Issuance

The SFA did not make timely and accurate changes to the benefit issuance documents upon receipt of direct certification updates.

Corrective Action:

During the review, corrections were made to certification errors, and the household was sent a letter notifying them of the change in eligibility. Further, the household was refunded back to the date the free benefit should have been effective.

For additional corrective action, complete and provide the following:

- **Complete Free and Reduced application processing training in Moodle and submit the training certificate to the State agency.**

Technical Assistance:

To complete training in Moodle, please visit <https://moodle.doe.in.gov/>. More information and resources regarding direct certification can be found here - <https://www.in.gov/doe/nutrition/free-and-reduced-information/direct-certification/>.

Verification - Project School, Bloomington (6215)



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

Finding 9000: Verification Results Misreported on Verification Summary Report

On the most recently submitted Verification Summary Report (VSR), the SFA misreported the results of verification. The verified application was originally approved for reduced price benefits and changed to paid as a result of verification. However, the VSR reports that the verified application was originally approved for free benefits and changed to paid as a result of verification.

Corrective Action:

For corrective action, the SFA must revise and update the Verification Summary Report to reflect true and accurate verification data.

Technical Assistance:

Instructions and resources for submitting the VSR can be found on IDOE's website here: https://www.in.gov/doi/nutrition/free-and-reduced-information/verification-and-direct-verification/#Verification_Summary_Report

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. Further, responses to the offsite assessment tool indicate that the determining official is also the confirming official.

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.

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).

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

Technical Assistance - Verifying All Reported Sources of Income

The SFA did not verify all reported income sources. Proof of reported income under Public Assistance/Child Support/Alimony from the household was not requested. Once paystubs were reviewed and the household was determined to be over the income limit, further documentation was not requested for review.

When an application is verified, the school must review written evidence for all reported sources of income. All household income, including earnings from work (wages, tips, bonuses), welfare, child support, alimony, and other cash income, must be considered. The failure to verify all income, or to ensure that households include all income on the application, contributes to inaccuracies in the program.

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.



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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.

214. *Updates to the Benefits Issuance list were made in the appropriate timeframes when verification resulted in changes to student eligibility*

Finding 9047: Change in benefits due to verification

When a student's eligibility status changed due to verification, benefits were not decreased. It was determined that the household selected for verification is over the income limit for free or reduced-price benefits. Per the student's transaction history report received March 4, 2026, the student's status was not changed to paid.

Corrective Action:

Households must be notified of any reduction in benefits and informed of their right to reapply at any time. If benefits are decreased, a notice of adverse action must be sent, and SFAs must provide ten days' advance notification to households that receive a reduction or termination of benefits before the actual reduction or termination takes effect.

The SFA sent a letter of adverse action to the household on March 2, 2026. **For further corrective action, please provide documentation supporting the student's eligibility change at the point of service.**

Technical Assistance:

Verification How To Fact Sheet - https://docs.google.com/document/d/1k2SleVd6qN9NNMT-hBbRQtLiED2TkirtEN5nvrF_bOM/edit?tab=t.0

The reviewer provided step-by-step technical assistance during the on-site review. Before each major step of the process for Program Year 2027, it is highly recommended to attend the webinars on verification. 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](https://www.in.gov/doe/nutrition/free-and-reduced-information/verification-and-direct-verification/#Annual%20Traditional%20Verification).

Meal Counting & Claiming - Project School, Bloomington (6215)

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

Technical Assistance - Edit Checks

An edit check is a mandatory requirement for schools participating in the National School Lunch Program and School Breakfast Program to verify the accuracy of daily meal counts before submitting monthly reimbursement claims. It involves comparing daily meal counts (free, reduced-price, and paid) against the highest possible number of eligible students present to prevent over-claiming.

Edit check resources can be found under the recordkeeping section of the following website:
<https://www.in.gov/doe/nutrition/national-school-lunch-program/>.

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

Finding 10150: Delinquent Funds and Bad Debt Policy

The local school meal charging policy does not contain a policy for bad debt.

Corrective Action:

Policies regarding the collection of unpaid meal charges should be included in the written meal charge policy that is required of all SFAs participating in the Federal school meal programs no later than July 1, 2017 (see SP-46, Local Meal Charge Policies, July 8, 2016). It is up to the district to determine at what point the debt will be considered uncollectable and reclassified as bad debt. All districts are required to have a Bad Debt Policy.

For corrective action, complete the following:



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- a) Provide to the State agency an updated meal charge policy that addresses the collection of delinquent funds and a policy for bad debt. The policy must state that the loss will not be absorbed by the non-profit school foodservice account and will be restored using non-federal funds.
- b) Once the school's bad debt definition has been determined, the SFA must evaluate all negative student and adult meal debt, current and inactive, determine what is unrecoverable, and restore funds in that amount to the non-profit school foodservice account. Proof of calculations and restoration must be provided to the State agency.

Technical Assistance:

Please utilize the following charge policy development checklists to ensure a comprehensive policy is developed:

<https://osp.k12.wa.us/sites/default/files/2023-08/mealchargepolicychecklist.pdf>.

Unpaid meal charges, like any other money owed to the NSFSA, are considered "delinquent debt" when payment is overdue, as defined by state or local policies. When local officials determine that further collection efforts for delinquent debt are useless or too costly, the debt must be reclassified as "bad debt." Further guidance for unpaid meal charges and clarification on the collection of delinquent meal payments can be found here: <https://www.fns.usda.gov/cn/unpaid-meal-charges-clarification-collection-delinquent-meal-payments>.

Resource Management Comprehensive Review - Project School, Bloomington (6215)

758. SFA have a positive or zero balance in the nonprofit school food service account?

Technical Assistance - Paid Lunch Equity (PLE) Requirements

The SFA's Nonprofit School Food Service Account (NSFSA) ended in a negative balance as of June 30, 2024. The SFA transferred nonfederal funds to bring the NSFSA to a zero-dollar balance; however, this transfer did not occur until the next program year. Each year, schools are allowed to request an exemption from the PLE requirement if their NSFSA is not negative. This transfer process artificially inflated the balance in the account to make it appear that it was not negative. As a reminder, the SFA is responsible for maintaining financial viability of its NSFSA. Transfers for a negative balance at the end of the school year must be permanent and once funds are transferred into the NSFSA, they are treated like Federal funds. If this is a procedure that occurs regularly, there should be a policy in place that outlines this process.

Moving forward, the SFA should assess the need to raise paid lunch prices using the PLE Tool or a comparable mechanism. With the NSFSA operating at a deficit, it does not seem that the program is self-sustaining. The SFA should explore actions to increase revenue and reduce expenditures in the food service program.

General Program Compliance - Project School, Bloomington (6215)

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 results of the most recent assessment of the local school wellness policy are not available to the public.

Corrective Action:

As corrective action the following must occur:

-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/doi/nutrition/wellness-policies/>.

1217. SFA's process and frequency for tracking training hours is sufficient



Program Year 2026

Technical Assistance - Tracking Professional Standards Training

Completed hours should be entered into a tracking mechanism. It is suggested to use IDOE's training tracker - <https://www.in.gov/doe/files/copy-professional-standards-tracking-idoe-final.xlsx>.

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

Finding 9142: The written food safety plan does not contain all the required elements.

The written food safety plan does not comply with the HACCP program criteria described in 7CFR 210.13(c). Missing elements: description of program overview and facility, list of menu items grouped by process, periodic program review and revision.

Corrective Action:

For corrective action, please complete the following:

- a) Review and update the food safety plan. Submit the updated plan to the State agency.
- b) Provide staff with food safety plan training. Submit proof that training has been completed.

Technical Assistance:

Food safety guidance can be found at the following webpage - https://www.in.gov/doe/nutrition/food-safety/#Food_Safety_Plan_General_Information

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>.



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**Project School, The Bloomington
(6215)**

349 South Walnut
Bloomington, IN 47401-3511

Food Service Contact

Ms. Angie Fish
Food Service Director
(812) 558-0041

Month of Review: January 2026

Date of Onsite Review: February 11, 2026

Meal Counting & Claiming - Project School, The Bloomington (6215)

325. *Review Period- meal counts by category were correctly used in the claim for reimbursement*

Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.

The sum of the school's daily meal counts by category for the review period does not match the State agency's validated meal counts for the school for the review period. The problem is considered systemic because the contributing factors are built into the process and would likely recur if the process is not changed. The SFA uses a manual method for breakfast meal counting. The manual breakfast counts are then transferred to the electronic Point of Service (POS) where monthly reports are generated. For the review period, the SFA submitted the claim for reimbursement before having all manual breakfast counts entered into the POS resulting in an underclaim.

Corrective Action:

On March 12, 2026, the FSD revised the January 2026 claim for reimbursement to include the underclaim. **As corrective action a double-check procedure must be developed and submitted to the State agency. The procedure must be implemented prior to submitting each claim for reimbursement. Each person checking the meal counts must sign and date the consolidation sheet to indicate the counts have been checked and are accurate.**

Technical Assistance:

Breakfast counts taken manually should always be entered into the electronic POS the same day service occurred or the following day at the latest. This task should not be deferred until the end of the month. Further, it is highly suggested the SFA implement a second check procedure to ensure manual counts are correctly counted, consolidated and entered accurately into the electronic POS.

Dietary Specifications - Project School, The Bloomington (6215)

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?*

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 - Project School, The Bloomington (6215)

1408. *Temperature logs are available*

Finding 9149: Temperature logs unavailable for review. *Repeat Finding

FNS requires each school in the SFA to maintain temperature logs for a period of six months. Temperature logs unavailable for: cooking temperatures.

While cooking temperatures are being taken, they are not being recorded and maintained on any type of log. This is a direct repeat finding from the administrative review that occurred in program year 2022.

Corrective Action:

Temperatures must be monitored and logged daily for all refrigeration and freezer equipment, dry storage areas and cooking temperatures. **Submit logs with at least one week of monitored temperatures to the State agency as corrective action.**



Technical Assistance:

Sample food safety logs can be found at the following website: <https://theicn.org/icn-resources-a-z/food-safety/>.
The cooking temperature log template was located in the school's food safety plan and shown to the FSD.

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

Finding 9150: Storage Violations

The following storage violations were observed during the onsite review: All food is not stored at least 6 inches off the floor and The First In, First Out (FIFO) inventory management method is not being used.

Corrective Action:

For corrective action, staff must be trained on the correct standard operating procedure to ensure storage violations do not occur. Additionally, provide the State agency with a dated training agenda and sign-in sheet as proof that staff were trained.

Technical Assistance:

The SFA must ensure that all facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss.