INDIANA DEPARTMENT of EDUCATION

SNP Administrative Review Findings

South Henry School Corp (3415)

Program Year 2026

South Henry School Corp (3415)
6972 South State Road 103
Straughn, IN 47387-9720

No. of Sites / Reviewed: 2 / 1
Month of Review: December 2025

Food Service Contact
Mrs. Amy Milner
Business Manager
(765) 987-7882
amilner@shenry.k12.in.us
FSMC: Chartwells

Executive Contact
Mrs. Sarah Lynch
Superintendent
(765) 987-7882
slynch@shenry.k12.in.us

Commendations

* The kitchen was extremely clean.
* Kitchen surfaces, equipment, walk-in cooler and freezer and storeroom were well maintained and clean. Nice job cleaning tables and serving lines in between serving groups.
* The newly remodeled cafeteria is nicely updated and perfectly suited for the farm community that serves the South Henry School Corporation. This atmosphere makes it so inviting to the students.

Technical Assistance

* The School Food Authority (SFA) should never allow the Food Service Management Company (FSMC) to view their banking records. Further, the SFA should not allow the FSMC staff to use their login and passwords in areas where it is not permitted. This important practice helps maintain clear checks and balances.
* SFAs with FSMCs are required to meet monthly to review the detailed monthly expenses. The SFA is to randomly select charges that may be questionable to ensure no charges have been issued that are not in the current agreement between the two parties.

Certification and Benefit Issuance - South Henry School Corp (3415)

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 - Zero Income Reported on Applications

Households reporting no income are eligible for free meals in the following ways:

1. If $0, “zero” or “no income” is written next to the household members, the application must be approved for free meals based on face value. Flag this application to Verify for Cause.

2. Schools must process applications when income fields are left blank and do not have a $0, “zero”, or “no income” written next to the household members. The application must convey to the applicant that any income field left blank is a positive indication of no income and certifies that there is no income to report. Approve the application based on face value. Flag this application to Verify for Cause.

A "No Income Application Fact Sheet" with more information can be found at
https://docs.google.com/document/d/1OTjRS4eh3vu5a8tobkFvU3Hye1GTrbCg2lHzS68Ld5w/edit?tab=t.0

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
Some applications were certified incorrectly or were misclassified. This contributed toward fiscal action calculations.

Corrective Action:
Corrections have been made to certification errors, and the households were sent a letter notifying of the change in eligibility.
-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 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. Assistance with processing application can be found at https://www.in.gov/doe/nutrition/free-and-reduced-information/fact-sheets-and-training/#Application_Processing

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. Corrections have been made to certification errors, and the households were sent a letter notifying of the change in eligibility.

Corrective Action:
Before performing any duties related to free and reduced meal applications and direct certification, the free and reduced application processor must receive thorough training and ongoing monitoring. As corrective action, the SFA must complete the following:

1. Develop a standard operating procedure (SOP) to formalize the requirement that the free and reduced processor will receive all applicable training on an ongoing basis. Include the job title of the person responsible for closely monitoring the free or reduced processor.
2. The current free and reduced processor must complete the Moodle Free and Reduced Training at https://moodle.doe.in.gov/login/index.php.
3. Submit the SOP and the completed training certification to the State agency.

Technical Assistance:
The State agency free and reduced guidance links and be found at https://www.in.gov/doe/nutrition/free-and-reduced-information/ and https://www.in.gov/doe/nutrition/free-and-reduced-information/.

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

Finding 9000: Updating the Benefit Issuance Document
During the review, it was observed that when students leave the district, they are not always removed from the total active enrollment. Updating the benefit issuance (BI) document to reflect withdrawn students is crucial for maintaining program integrity, ensuring fiscal accuracy, and complying with USDA administrative regulations. The BI document, which lists student eligibility for free or reduced-price meals, must be kept current to avoid errors in meal counting and claiming reimbursements.

Corrective Action:
For corrective action, the SFA must develop a standard operating procedure that details how the benefit issuance document will be updated upon a student enrolling or withdrawing from the district. Additionally, staff must be trained on the SOP. Individual(s) who will be following this SOP must sign off on this requirement. Submit the SOP to State agency.

Technical Assistance:
The importance of this requirement was discussed onsite and during the exit meeting.

Resource Management - South Henry School Corp (3415)

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

Finding 9000: Disallowed Expenses Charged to the SFA by the FSMC
After reviewing the FSMC's detailed operating expense report for the month of review, the following expenses are disallowed and should not be charged to the SFA:
- Christmas gifts to food service staff
- FSMC Technology invoice
- FSMC Training invoice
- FSMC Mystaff invoice
- Vehicle expense for dietitian
- Phone per diem for employee
- General liability insurance

Corrective Action:
For corrective action, the SFA must develop a standard operating procedure that includes a monthly meeting to occur before the SFA pays the FSMC monthly invoice. Also, include that the detailed invoice is to be reviewed line by line and that a minimum of ten invoices be pulled for validation. Submit this SOP to the State agency. Moving forward, these specific fees should not be charged. For this school year, detailed invoices must be reviewed. When these fees are charged, the FSMC must reimburse the SFA's nonprofit school food service account. A list of each month, fees charged and amount must be submitted with your corrective action.

Technical Assistance:
All costs billed directly to the SFA must be supported by a detailed invoice from the third-party company. Costs that cannot be supported with a direct invoice are considered indirect costs and are therefore unallowable. Indirect costs should be absorbed by the administrative and management fees charged by the FSMC.

A technical assistance phone meeting was held with the Director of Finance and Business for South Henry School Corporation, the assigned field specialist, and the Assistant Director of School and Summer Nutrition Monitoring Programs. The guidance document, "General Expenditures: Examples of Allowable and Unallowable Costs," was also shared with the Director of Finance and Business for South Henry School Corporation.

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

Technical Assistance - Sales Tax

Indiana public schools are generally tax exempt from paying any Indiana sales tax on purchases. The monthly operating ledger should be reviewed monthly for this purpose.

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

Finding 9000: Transferring/Selling Food between Schools
Transferring food between SFAs that share the same FSMC is not permissible. The SFA must be able to ensure that the nonprofit school food service account is not improperly charged.

Corrective Action:
For corrective action, the SFA must establish a standard operating procedure that makes this practice unallowable. Train applicable staff on the SOP and have the staff sign and date a copy of the SOP. Submit a copy of the signed SOP to the State agency.

Technical Assistance:
During the exiting meeting this finding was discussed thoroughly.

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

Finding 9000: Validation of the Bad Debt Pay Off
The submitted documentation to validate that donors were used to pay off bad student debt consisted only of a list of names. When additional documentation was requested, only deposit slips showing a single amount were provided. The deposit slips did not display each check individually, and the statement that all donation checks were processed through the lunch service line remain unverified. This documentation failed to confirm that the debt over $20,000 had been paid with federal or non-federal funds.

Corrective Action:
Federal funds cannot be used to cover the cost of bad debt. For corrective action, the SFA must submit the individual checks paid by each donor along with documentation supporting that the amount was deposited into the nonprofit school food service account.

Technical Assistance:
During the review, a thorough discussion occurred about this topic and its requirements.

Resource Management Comprehensive Review - South Henry School Corp (3415)

765. Adult Meals

Finding 9000: Annual Adult Pricing Calculation
The SFA was not aware how the adult meal prices were determined each year. Breakfast and lunch served to adults under the School Nutrition Programs must be priced so that the adult payment is sufficient to cover the overall cost of the meal, including the value of any USDA entitlement and bonus donated foods used to prepare the meal. Since the nonprofit food service account cannot pay for or subsidize adult meals, School Food Authorities (SFAs) must appropriately set adult meal prices.

Adult Lunch Meal Calculation for Pricing SFAs:
Include the highest price a student pays, plus the federal reimbursement for a paid meal, including the 9 cents menu certification rate, plus the federal cash-in-lieu of commodities rate. If the SFA receives the 2 cents severe need lunch rate, include this amount.

Adult Breakfast Meal Calculation for Pricing SFAs:
Include the highest price a student pays, plus the federal reimbursement for a paid meal. USDA Food value is not included in the breakfast meal price.

Corrective Action:
For corrective action, using the information provided above, the SFA must show the calculations used to establish adult pricing for the school year 2025-26. Submit the calculations to the State agency.

Technical Assistance:
Adult meal price guidance is issued annually prior to the start of each school year. Current pricing guidance is located here: https://docs.google.com/document/d/1bkFaCeW7vAkP3PuQd_F7-2sORFEPT87UYek9tGrAlcc/edit?tab=t.0

768. Unique Situations

Finding 9000: Non-Program Revenue Tool
The SFA did not assess its compliance with the requirements for revenue from non-program foods.

Corrective Action:
The SFA must assess compliance with the revenue from non-program foods. As corrective action, the SFA must complete the 5-day reference period using the non-program food revenue tool. Please submit the non-program food revenue tool with documentation to support the figures used.

Technical Assistance:
Non-Program Revenue Tool can be found at https://docs.google.com/spreadsheets/d/1yERVzWRoukH4jqhAQ-RFBhzMIWEKRyQB/edit?usp=drive_link&ouid=110759398141739829682&rtpof=true&sd=true.

The non-program food revenue tool to utilize for a reference period can be found at the following link: https://docs.google.com/spreadsheets/d/1yERVzWRoukH4jqhAQ-RFBhzMIWEKRyQB/edit#gid=1454493429.

Additional guidance can be found at the following link: https://www.in.gov/doe/nutrition/financial-management/#Revenue_from_Non_Program_Foods.

General Program Compliance - South Henry School Corp (3415)

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

Finding 10152: Civil Rights Training
One or more foodservice employees have not completed civil rights training within the last 12 months.

Corrective Action:
As corrective action, please submit documentation of the employee's completed civil rights training.

Technical Assistance:
All staff members and volunteers who complete tasks for the school food service program must complete civil rights training annually. Civil Rights Training can be found within the Moodle website at https://www.in.gov/doe/nutrition/trainings/#Moodle.

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

Finding 10138: Wellness Policy Communication
The SFA has not annually informed and updated parents, students, staff, and the community about the content of the local wellness policy.

Corrective Action:
As corrective action, provide documentation showing the local school wellness policy has been communicated to the school community.

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

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:

- Potential stakeholders were not made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness policy.
- An assessment of the local school wellness policy has not been conducted in the last three years.

Corrective Action:
As corrective action the following must occur:
- LEAs must assess 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. A copy of the assessment and updated wellness policy must be submitted to the State Agency.
-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. Provide documentation of notification used to inform households of the re-assessment of the local school wellness policy. Once the re-assessment occurs, provide documentation of the assessment.
-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/.

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

Finding 10146: Professional Standards Documentation
Professional Standards Documentation for most of the food service staff was submitted after the exit meeting. Some staff did not submit any training documentation. A tracker was not used to summarize the staff's progress for the school year.

Corrective Action:
As corrective action, the SFA must complete a USDA Professional Standards Tracker summarizing the entire district's food service staff's training hours. Submit the completed tool to the State agency.

Further, the SFA must develop a standard operating procedure that details the following:
- annually reviewing the Professional Standard Hours Requirements for staff members in the South Henry Food Service Back to School Training,
- an established date that all staff are to have half of their minimum hours completed by,
- an established date that all staff are to be fully completed with their training hours,
- include the chart of the required hours for each type of employee in the SOP.

Submit the SOP with all staff signatures and date of acknowledgment of the policy to the State agency.

Technical Assistance:
Professional Standards https://www.in.gov/doe/nutrition/professional-standards/
USDA Professional Standards Tracker https://www.in.gov/doe/files/copy-professional-standards-tracking-idoe-final.xlsx

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

Finding 10114: Non-Foodservice Staff Training
At the time of the review, there were non-food service employees conducting duties related to program requirements who had not been trained in Civil Rights.

Corrective Action:
Annual training for all staff with food service responsibilities is a program requirement. As corrective action, explain how the SFA will ensure requirements will be met each year. For employees identified as needing training during the review, provide proof of training, such as certificates or an agenda listing covered topics, 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.

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 SFSP 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 participation ends. The State Agency SFSP website is updated towards 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.

SNP Administrative Review Findings — South Henry School Corp (3415)

Program Year 2026

Tri Jr-Sr High School (2773)
6972 South State Road 103
Straughn, IN 47387-9720

Food Service Contact
Mrs. Angie Zentz
Kitchen Manager
(765) 987-7988

Month of Review: December 2025
Date of Onsite Review: January 21, 2026

Meal Components & Quantities - Tri Jr-Sr High School (2773)

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

Technical Assistance-Unlimited Fruit and Vegetables Bar During Lunch

As observed on the day of review, students are allowed unlimited servings from the fruit and vegetable bar free of charge to the students, but this does increase the overall cost to the corporation through the management company contract. Any extra foods provided as part of a reimbursable meal need to be included in the weekly dietary specifications.

Items offered on the fruit and vegetable bar, particularly pea salad and potato salad, contribute additional calories, saturated fat, and sodium. Fresh produce items with no additional accompaniments also contributes additional calories. Serving size limits should be established to control the amount of calories, saturated fat, and sodium students have access to and ensure that weekly dietary specifications are met, and to control program costs.

403. Day of Review- fluid milk (or allowable substitutions) was available in at least two allowable varieties throughout the serving period on all meal service lines

Technical Assistance - Dietary Substitutions

Food substitutions and/or other reasonable modifications to a student's meal may be necessary to meet the dietary needs of students who meet the USDA definition of a disability, such as a food intolerance, allergy, or other medical condition. A medical statement signed by a licensed medical authority may be required to accommodate a special dietary need and ensure a student is accommodated safely and properly. Milk-substitution requests should be accommodated with an acceptable milk alternative. Juice cannot be substituted for milk unless instructed to do so by the parent or guardian, and the information is retained on file. https://www.in.gov/doe/nutrition/special-dietary-needs/#Milk.

Dietary Specifications - Tri Jr-Sr High School (2773)

603. Technical assistance and/or corrective action were found to be necessary upon completion of the off-site portion of the Dietary Specifications Assessment Tool

Technical Assistance-Offering Excessive Starchy Vegetables Weekly

Technical assistance was conducted regarding awareness of planning/offering an excessive amount starchy vegetables on menus. This is noted as a concern since documentation submitted for the week of menu certification demonstrates that 3 5/8 cups of starchy vegetables were offered (when only 1/2 cup is required) throughout the five days. The food service director was reminded that starchy vegetables are typically calorie dense and can lead to noncompliance with the weekly calorie limits.