

SNP Administrative Review Findings

Traders Point Christian School (K382)

Program Year 2024

**Traders Point Christian School (K382)**

5770 Whitestown Parkway  
Whitestown, IN 46075-9516

**Food Service Contact**

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**Executive Contact**

Mrs. Debra Byely  
Head of School  
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No. of Sites / Reviewed: 2 / 1  
Month of Review: November 2023

**Commendations**

- \* The certification and benefit issuance process was implemented without error.
- \* The director is to be commended for implementing the School Breakfast Program for the first time as well as for increasing the variety of menu offerings.

**Technical Assistance**

- \* The SFA was reminded that household income does not need to be converted to annual if only one frequency is reported.
- \* When possible, batch cook food and cook foods closer to serving time. Consider preparing/cupping up cold foods first.
- \* The director was reminded that since the smoothie contains juice, the juice carton offered daily with the other meal options cannot be selected with the smoothie.
- \* It was noted during the review that some surfaces in the kitchen need deep cleaning (i.e., shelving under worktables). Consider utilizing a deep cleaning schedule to ensure surfaces are cleaned regularly.
- \* Consider displaying a sample meal to show upper school students what is included with their meal each day. Additional efforts are needed to ensure upper school students understand what is included with a reimbursable meal.
- \* Ensure the director has support from administration with assistance in staffing and finding subs as well as to ensure equipment needs are met.
- \* It was determined during the administrative review that transitional kindergarten students are considered pre-K students and not kindergarten students. Therefore, if only pre-K and transitional kindergarten students eat together in one meal service, the pre-K meal pattern must be utilized as the co-mingling exception would not apply.

**Resource Management Comprehensive Review - Traders Point Christian School (K382)**

*751. Expenses Exceeded Revenues*

**Finding 9114: \*Repeat Finding**

Based on the SFA's Statement of Revenues and Expenses for the most recently completed program year, the SFA had total Nonprofit Food Service Expenses greater than its Total Nonprofit Food Service Revenues. AFR validation revealed a 22-23 ending balance of -\$116,360.31. Sufficient funds were not transferred into the nonprofit school food service account from allowable non-Federal sources to make up the difference. The SFA is reminded that while an annual budget may be proposed, the actual revenue generated for participation in USDA child nutrition programs must remain in the food service account and carried over to future years when there is a net gain.

**Corrective Action:**

**As corrective action, the SFA must submit a written agreement along with a payment plan sufficient to bring the non-profit school foodservice account current. Proof of transfer (journal entry) must be submitted to the State Agency each time a transfer occurs. Additionally, going forward, the SFA must ensure accuracy in the NPSFSA by performing a monthly second party review with the food service director to ensure all revenue, expenditures, and balances in the non-profit school foodservice account are accurate.**

**Technical Assistance:**

It is unallowable to run the school foodservice program with a negative balance multiple years in a row. The requirement to bring the account to current was discussed during the review. Since this was a repeat finding, and the corrective action did not occur as required for the last review, a follow-up review will be conducted in the following program year to ensure the corrective action took place as required. The following is recommended to increase revenue to the non-profit school foodservice account:

- Increase a la carte sale options at both schools

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- Calculate average entrée cost and consider pairing lower cost grains when higher priced meat/meat alternates are offered and vice versa.
- Consider replacing equipment requiring frequent repair and extensive maintenance such as the milk cooler.
- Consider applying for equipment grants as they become available.
- Increase breakfast participation by offering a breakfast after the bell program.
- To ensure the menu can be served as planned, which will help maintain participation, have designated cafeteria substitutes hired to cover employee absences.
- Branding the school cafeteria and providing uniform shirts for foodservice workers may increase meal participation and instill as sense of pride in the work performed.

**753. Internal Controls****Finding 9000: Internal Controls**

Internal controls/procedures must be written for the following situations:

- a policy for bad debt and negative balances,
- a process for supplementing adult meal cost as a benefit to staff transferring funds to the non-profit food service fund,
- a process to ensure finance and food service are working together to create the school foodservice budget and a plan for the foodservice fund to remain financially viable. (All revenue, expenditures, and the foodservice fund balance should be provided to the director monthly to ensure accuracy.)

The procedures must be developed in collaboration with the head of school and food service director.

**Corrective Action:**

**Please submit final copies of the above listed internal controls and policies as corrective action.**

**Technical Assistance:**

The CFO, director, and reviewers discussed that it may be more fiscally responsible to move money budgeted for equipment repairs to the purchase of new equipment. Additionally, it was noted that when creating the budget, revenue and participation are dependent upon, and will vary greatly, with the number of serving days each month. The SFA is reminded that while an annual budget may be proposed, the actual revenue generated for participation in USDA child nutrition programs must remain in the food service account and carried over to future years when there is a net gain.

**755. Allowable Costs****Finding 9117: Unallowable general expenses charged to the nonprofit school food service account.**

It was determined that meals for the early childcare center were served but not charged to households in program year 2023 nor had the cost been covered by non-federal funds. The SFA claimed all early childcare meals under the paid rate rather than processing meal benefits. It is an unallowable cost to provide meals at no cost to students at the expense of the non-profit school foodservice account. As of the start of the administrative review, the LEA had not covered the unallowable expenditure.

**Corrective Action:**

On December 18, 2023, the LEA transferred \$55,308.75 from the general fund to cover the cost of the unallowable meals. A copy of the journal transaction has been provided as corrective action. Going forward, non-federal funds must be used to cover payment of universal free meals programs. **Additional response is not required.**

**Technical Assistance:**

During the review, as well as through additional technical assistance provided July 27th with the director and CFO, the requirement to obtain payment for full price student meals provided at no cost was explained. The SFA is also reminded that funds generated from the result of participating in USDA programs are dedicated program funds and must be used only for allowable expenditures as outlined in program regulations and policies.

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767. Nonprogram Revenue and Food Cost Ratio

Technical Assistance - Nonprogram Revenue

While the SFA demonstrates compliance with the nonprogram revenue 5-day assessment, it is important to note that the ratio of cost to revenue was very close. The food service director should continue to monitor food costs and revenue to ensure that compliance is maintained. At the very least, reviewing a la carte food costs prior to the beginning of the school year and ensuring that prices are two to three times the cost of the product cost will assist in ongoing compliance.

General Program Compliance - Traders Point Christian School (K382)

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

Finding 10137: Wellness Policy Requirements

The local school wellness policy does not contain the minimum required elements, indicating the review and update of the local school wellness policy did not occur as required. The following elements are missing or inadequate:

- The nutritional guidelines for all food and beverages sold to students must include/address smart snacks standards.
- The nutritional guidelines for non-sold food and beverages are vague and should be specific to each school.
- Food and beverage marketing is not addressed.
- Goals are missing in the nutrition education, nutrition promotion, physical activity.
- Other school-based activities that promote student wellness is missing.

Corrective Action:

As corrective action, the local school wellness policy committee must review and update the wellness policy. Committee meeting notes and agenda as well as the updated policy must be provided as corrective action.

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 and most recent review of the local wellness policy.

Corrective Action:

As corrective action, and once the wellness policy is updated, provide documentation showing the local school wellness policy and the most recent review has been communicated to the school community.

Technical Assistance:

It is a best practice for sponsors to create a school wellness webpage to post the policy, communicate the opportunity to participate in the evaluation, and post the results of the evaluation.

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

Finding 9009: SFSP & SBP Outreach

Summer Food Service Program (SFSP) outreach to households was not conducted and/or documented by the SFA. Although the SFA does not operate the SFSP, all program sponsors operating School Nutrition Programs must inform households of the availability of SFSP meals through other sponsors. The State Agency provides language through the Weekly Newsletter in early May for sponsors to use to meet this requirement.

Corrective Action:

The SFA agrees to conduct outreach at the end of each school year. 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. **For corrective action, the food service director is**

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required to complete the End of Year Updates and Reminders training in Moodle. Please submit the training completion certificate.

**Technical Assistance:**

Summer Food Service Program Meal Site Information is available at the following website:

<https://www.in.gov/doe/nutrition/meal-site-information/>.

SNP Administrative Review Findings

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Traders Point Christian Academy  
(C375)

5770 Whitestown Parkway  
Whitestown, IN 46075-9516

Food Service Contact  
Mrs. Heather Edwards  
Director of Dining Services  
(317) 769-2450

Month of Review: November 2023

Date of Onsite Review: December 13, 2023

Meal Components & Quantities - Traders Point Christian Academy (C375)

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

**Finding 9000: Production Records**

Milk is not recorded on production records for breakfast or lunch; however, purchase records do support the service of milk daily.

**Corrective Action:**

**As corrective action, staff training on production records must be completed and documented. Additionally, completed production records must be submitted for one week for breakfast and lunch.**

**Technical Assistance:**

The requirement to include all menu items on the production records, and complete all columns associated with the menu items was explained on the day of review. A sample completed production record can be found here:

<https://www.in.gov/doe/files/Grades-K-5-Lunch-Production-Record-Example.pdf>

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

**Finding 9081: Review of Productions records expanded to the entire Review Period.**

Based on a review of production records and other supporting food crediting documentation for the entire Review Period, some meals served during the Review Period did not meet the appropriate daily and weekly meal pattern requirements for the age/grade group(s) being served. Review Period meals missing required meal components: grain at breakfast.

**Corrective Action:**

As corrective action, a full grain serving has been added to the smoothie entrée. The menu was corrected the day of review and corrected going forward for the month of January. An updated menu was uploaded into CNPweb. **Additional response is not required.**

**Technical Assistance:**

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

General Program Compliance - Traders Point Christian Academy (C375)

1104. Foods sold to students meet Smart Snacks standards

**Technical Assistance- Smart Snacks**

The day of review, the bacon served as part of the breakfast sandwich was sold a la carte. Smart snacks compliance had not been calculated for the bacon. Bacon is generally considered an uncreditable food item unless product formulation is available as proof of crediting.

1407. SFA written food safety plan is implemented

**Finding 9148: Observations on the Day of Review do not indicate compliance with the SFA's written food safety plan.**

The reviewer observed teachers serving students unwrapped, ready-to-eat foods with bare hands. A serving utensil had not been provided or requested. Additionally, hair restraints were not utilized at the start of food preparation.

**Corrective Action:**

As corrective action, an explanation of meal service protocols must be supplied to teachers. Documentation of the communicated protocols must be provided as corrective action. Hair restraints requirement was communicated to staff the day of review. As additional corrective action, review the personal hygiene standard operating procedure with food service

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staff. Also, ensure the SOP is included in the food safety plan and submit a signed and dated agenda regarding the personal hygiene review. <https://theicn.org/resources/181/food-safety-standard-operating-procedures/105694/personal-hygiene-4.docx>