



May 24, 2019
Michelle Jund
Immanuel Lutheran School
2055 Filer Ave. East
Twin Falls, ID 83301

Dear Mrs. Jund,

On February 1, 2019, State Department of Education (SDE) Coordinators Heather Blume and Lynda Westphal conducted an Administrative Review of the Immanuel Lutheran School for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- USDA Foods

The State agency (SA) would like to commend Pamela DeWitte and the food service staff of Immanuel Lutheran School for their hard work operating the school nutrition programs.

Overview

The Richard B. Russell National School Lunch Act, amended by the addition of Section 201 to the Healthy Hunger Free Kids Act of 2010, requires a unified accountability system designed to ensure that participating school food authorities (SFA) comply with USDA requirements. The objectives of the Administrative Review are to:

- Determine whether the SFA meets program requirements
- Provide technical assistance
- Secure any needed corrective action
- Assess fiscal action and, when applicable, recover improperly paid funds

Review Frequency and Scope of Review

The Healthy Hunger-Free Kids Act mandates State agencies conduct an Administrative Review a minimum of one time during a three-year cycle to evaluate Critical and General Areas of Review, including:

- Performance Standard 1: Meal Access and Reimbursement
- Performance Standard 2: Meal Pattern and Nutritional Quality
- General Areas of Review: Resource Management, Food Safety, Local School Wellness Policy, Smart Snacks, Civil Rights, Buy American, Professional Standards, and other areas of general program compliance.

These were the SA determined findings and the SFA response to the findings:

Finding and Corrective Action Plan (CAP)

Finding 1 Local Wellness Policy

The Local School Wellness Policy must be in compliance with the USDA Final Rule established in July 2016, including the requirement that report(s) on the progress towards goals stated in the wellness policy be publicly available. The final rule requires LEAs to fully comply with the requirements of the final rule by June 30, 2017.

Corrective Action: Please provide a plan for how and when the wellness policy language will be brought into compliance with Federal requirements. Ensure the wellness assessment (e.g., Idaho Wellness Policy Progress Report) is available to the public; posting to the school /district website and/or in a school newsletter would support this requirement.

Due Date for CAP Completion: February 18, 2019

Corrective Action Response: The SFA uploaded a plan on February 14, 2019 and the SA confirmed the local wellness policy and progress report were posted to the school website.

Finding 2 Meal Counting and Claiming

A discrepancy was found in the free and paid student meal counts for the month of December.

Corrective Action: Determine whether MealTime retroactively changes meal counts based on eligibility status and provide an explanation for the discrepancy.

Due Date for CAP Completion: February 18, 2019

Corrective Action Response: The Food Service Director provided an explanation on April 25, 2019 identifying the students whose meals were claimed incorrectly and providing a plan to prevent such occurrences in the future.

Finding 3 Meal Components and Quantities

CNP Contractor CN Resources (CNR) conducted the menu review and found that occasionally the production records are missing the planned quantities to be used and actual number of servings prepared.

Corrective Action:

Provide the date that the finding was brought into compliance or the planned date of completion as well as the names and titles of the SFA representative(s) that will ensure compliance. Provide a statement that the SFA will maintain completed production records for all meal services. The records must be kept on file for a minimum of 3 years plus the current school year. Lastly, provide 1 week of completed production records for all meal services at the reviewed site(s).

Due Date for CAP Completion: February 18, 2019

Corrective Action Response:

After speaking with CNR, the SFA understands how to completely fill out a production record and will fill out all columns with the correct information. The SFA provided the completed production records to CNR after the SA completed the on-site review and CNR provided the full week of completed production records to the SA on February 2, 2019.

Finding 4 Certification and Benefit Issuance

One application, impacting two students, was determined as free, when it should have been reduced.

Corrective Action: Notify the family that the status will change in 10 days, and then update the eligibility status to reduced status once the 10 days adverse action period have passed. Upload the updated benefit issuance list once the eligibility statuses have changed.

Due Date for CAP Completion: February 18, 2019

Corrective Action Response: The Food Service Director sent a letter to the household and updated eligibility statuses after 10 days passed.

Finding 5 Verification

One verified application was verified on net and not gross income. This resulted in the verification being incorrectly completed.

Corrective Action: Notify the family that the status will change in 10 days, and then update the eligibility status to reduced status once the 10 days adverse action period have passed. Upload the updated benefit issuance list once the eligibility statuses have changed.

Due Date for CAP Completion: February 18, 2019

Corrective Action Response: The Food Service Director sent a letter to the household and updated eligibility statuses after ten days passed.

Finding 6 SFA On-Site Monitoring

Each SFA with more than one school must perform no less than one on-site review of the lunch counting and claiming system in use in each school under its jurisdiction by February 1 of each year. (7 CFR 210.8)

Corrective Action: Complete the SFA-Onsite Monitoring Review for the Child Development Center using the updated template in the Download Forms section of MyIdahoCNP. Upload the completed report into the Corrective Action module of MyIdahoCNP.

Due Date for CAP Completion: February 18, 2019

Corrective Action Response: The Food Service Director completed the review and uploaded the report on February 12, 2019.

Finding 7 Resource Management

The financials were not provided prior to the review and could not be reviewed. It was determined however that the SFA is over the three month operating balance.

Corrective Action: Provide an itemized ledger of the food service account and complete a corrective action plan for reducing excessive operating balance. Submit the CAP in the Financial Report section of MyIdahoCNP (under the Applications Module). Email the State agency when this has been completed.

Due Date for CAP Completion: February 11, 2019

Corrective Action Response: The Food Service Director generated the financial report and submitted it to the State agency on May 9, 2019.

Based on the administrative error of 9.68% associated with certification and benefit issuance, the SFA will be required to conduct a second review of applications beginning school year 2019-20, and continuing until further notice. A second review of applications requires a re-evaluation by the Confirming Official of the eligibility determination made by the Determining Official, based on the information provided by the household on the application. Depending on the outcomes of this second review, the SFA may be required to complete this process until the next administrative review. A Second Review of Applications Report will need to be filed as well while this requirement is in place. Please reference the Independent Review of Applications section in the Eligibility Manual, a copy of which is available in MyIdahoCNP Download Forms.

Failure to complete Corrective Action or request an extension by the due date may result in payment being withheld until complete.

Commendations

- Outstanding job meeting all the meal pattern requirements. All daily and weekly meal component and food quantity requirements were met.
- The school has great staff. They are very friendly and helpful. Love the “what to eat” wall in the cafeteria!!

Technical Assistance (TA)

Certification and Benefit Issuance

- Three children had inaccurate eligibility statuses in the POS at the beginning of December. While these were corrected prior to State agency review, ensure that eligibility statuses are entered accurately.

Meal Components and Quantities

- CNR completed the menu review and provided the following TA:
 - During the review, production records were discussed with the SFA. The SFA must ensure that all sites are keeping accurate and complete production records for the meals they produce. The records must be completed throughout meal service and maintained every day. At a minimum, the production records should include the name of the item, the recipe or item number, the portion size, the number of planned portions, the component contribution amount and the number of actual servings. All kitchen staff should be trained on completing production records so that everyone can complete the records. All columns should be completed after each meal service.

Offer versus Serve (OVS)

- Entrees were given to the students automatically. Ensure staff ask children whether they would like the entrée prior to providing, in order to reduce food waste.

Civil Rights

- Ensure the Civil Rights complaint log is dated annually, with a new log or another line on the current log started each year. If no complaints were received during the school year, best practice is to write "No complaints" on the log at the end of the school year; keep on file (three years plus the current year).
- Several students with food allergies do not have an accommodation statement. Get the statement to ensure the children are kept safe when it comes to food allergies and intolerances.
- A procedure for receiving and processing Civil Rights complaints must state that all complaints associated with Child Nutrition Programs are forwarded to the State agency within three working days. Please add this procedure to your civil rights file, a compliant procedure is located on the State agency civil rights web page. (7 CFR 210.15(a)(6)).

Procurement

- A separate procurement review was completed by Keddington & Christensen, LLC for SY1819. A final report came from the State agency, please follow the guidance provided on April 24, 2019.

Fiscal Action

Due to the application errors found during the review, fiscal action resulted in \$23.20. However, since this amount falls under the State agency disregard threshold, no financial adjustment will occur.

Your review is now closed.

No fiscal action will be taken as a result of this review. Should you wish to appeal any of these findings, please follow the appeal procedures on the [State Agency Appeal Procedures](#) document located on the SDE webpage.

If you wish to discuss any of these findings, please contact me at (208) 332-6820.

Thank you for your continued support of the Child Nutrition Programs!

Sincerely,



Heather Blume, MS, RD, LD, SNS
NSLP Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Pamela DeWitte, Child Nutrition, Immanuel Lutheran School

Civil Rights

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- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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