



April 7, 2020

Tammy Emerich, Principal
St. Joseph School
825 W. Fort St.
Boise, ID 83702

Dear Mrs. Emerich,

On December 3, 2019, State Department of Education (SDE) Coordinators Heather Blume and Financial Specialist Melissa Cook conducted an Administrative Review of St. Joseph School for the following United States Department of Agriculture (USDA) programs:

- School Breakfast Program (SBP)
- National School Lunch Program (NSLP)
- USDA Foods

The State agency (SA) would like to commend Karen Page, and the staff of St. Joseph 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 and Idaho was granted a waiver to conduct these reviews on a five-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:

Findings and Corrective Action Plan (CAP)

Finding 1- Meal Pattern

1. For the week of menu review, the lunch menu did not meet the minimum daily and weekly requirements for grain. A grain was offered daily, however the minimum daily and weekly requirements were not met. Non-creditable grains were served.
2. For the week of menu review, the lunch menu did not meet the minimum daily and weekly requirements for meat/meat alternate. A meat/meat alternate was offered daily, however the minimum daily and weekly requirements were not met.

Corrective Action:

1. Provide a written statement that the daily and weekly meat/meat alternate and daily and weekly grain requirements are now met. Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance.
2. Submit any necessary documentation to demonstrate that the menu findings listed under step one are now corrected. This documentation may include: production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.

Due Date for CAP Completion: October 17, 2019

Corrective Action Response:

1. The grab 'n go now meets requirements as of October 10, 2019 by adding a cheese stick (commodity GOVST1A 1E918) for the meat/meat alternate. The Food Service Director added 0.75oz whole grain baked cheddar cheese gold fish to meet the grain requirements.
2. The Food Service Director attached the production record to show the grab 'n go and sent nutrition facts for the gold fish added in the grab 'n go.
3. The school did not serve any gluten free pizza on October 11, 2019

CNR Note: Documents were submitted as part of the corrective action response. Moving forward they will only serve gluten free menu items to students with a physician's note. They have added a cheese stick and crackers to the grab 'n go meal to meet weekly grain and meat/meat alternate requirements with this meal choice.

Finding 2 – Food Safety

Temperature logs were not maintained on a daily basis for all refrigerators, milk coolers, and freezers.

Corrective Action:

1. Provide the date that the finding was brought into compliance or the planned date of completion.
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.

3. Provide a written statement that the SFA understands the requirements for food safety documentation, including that all temperature documents will be maintained for a minimum of six (6) months.
4. Submit a copy of the completed temperature logs to show compliance, beginning October 15, 2019 through October 21, 2019.

Due Date for CAP Completion: October 22, 2019

Corrective Action Response:

1. The finding was brought into compliance on October 17, 2019. The Food Service Director had August and September on the clipboard but they were not complete. She was showing October as completed. She attached what was available for October completed up to date.
2. The Food Service Director will make sure that all temperature logs are in compliance from here forward.
3. Plan for continued compliance was uploaded into MyIdahoCNP.
4. Attached the temperature logs from October 1, 2019 - October 16, 2019 in MyIdahoCNP

Finding 3 – Professional Standards

No professional standards tracking log was provided to indicate training hours are tracked for all child nutrition employees on an annual basis.

Corrective Action: Develop a plan for tracking training hours in order to comply with the Professional Standards requirements. Explain this plan and the frequency of the tracking (monthly, quarterly, etc.) system to the State agency.

Due Date for CAP Completion: December 19, 2019

Corrective Action Response: The Food Service Director uploaded a completed professional standards tracking log and description of how training will be tracked on December 16, 2019.

Finding 4 – Meal Counting and Claiming

The meal count report indicates a different number of reimbursable meals served than the claim total.

Corrective Action: Contact the vendor to confirm which numbers in the report should be consolidated for the claim. Correct the status of reimbursable versus non-reimbursable meals, if necessary. Provide a written synopsis of what was done to correct the problem and submit the daily meal counts by free, reduced, and paid status to the State for the month of October and December.

Due Date for CAP Completion: December 19, 2019

Corrective Action Response: The Food Service Director contacted the vendor the day after the onsite review and the issue was resolved December 4, 2019.

Finding 5 – Civil Rights

While all staff were trained on civil rights, no civil rights complaint log was maintained and no civil rights procedure was found.

Corrective Action: Print the civil rights complaint log and update annually to indicate whether complaints were received, or not. Customize the sample complaint procedure for St. Joseph School and keep with civil rights binder.

Due Date for CAP Completion: December 19, 2019

Corrective Action Response: The complaint log and procedure were printed and placed in the Civil Rights binder while SA reviewers were onsite, December 3, 2020.

Finding 6 – Resource Management

Unallowable costs were charged to the child nutrition account.

Corrective Action: Reverse the charges that were identified as unallowable and upload a record that these journal entries occurred. Provide a plan to ensure that unallowable costs are not charged to the food service account in the future and upload documentation indicating who was trained on the new protocol.

Due Date for CAP Completion: December 19, 2019 – extended by request until January 10, then again until January 13, and finally to January 24. Federal payments were suspended on February 10, 2020 when the requested corrective action was not received by the final extended due date.

Corrective Action Response: Documentation was provided on February 20, 2020 to confirm that unallowable expenses paid out of the food service account were refunded to the school food service account. The Food Service Director also submitted a plan to properly allocate shared expenses on February 21, 2020.

Finding 7 – Offer Versus Serve

No documentation was provided to indicate that staff had received training on Offer vs Serve.

Corrective Action: Please train staff on Offer vs Serve. All staff training should include an agenda and sign-in sheet and training documentation must be maintained on file at the SFA for three years plus the current year. Training for OVS is available through the State agency training portal and a training log is available in MyIdahoCNP Download Forms.

Due Date for CAP Completion: December 19, 2019

Corrective Action Response: The Food Service Director uploaded a completed professional standards tracking log and description of how training will be tracked on December 16, 2019.

Finding 8 – Non-Program Food Revenue

The Non-Program Food Revenue Tool was not completed for review prior to the on-site visit.

Corrective Action: Complete the newly updated Non-Program Food Revenue Tool (titled “SY19-20 NPFRT” in Download Forms) for the week selected for the menu review and upload into the Corrective Action module.

Due Date for CAP Completion: December 19, 2019 – extended by request until January 10, then again until January 13, and finally to January 24. Federal payments were suspended on February 10, 2020 when the requested corrective action was not received by the final extended due date.

Corrective Action Response: The Food Service Director emailed a completed copy of the NonProgram Food Revenue Tool on April 1, 2020.

Commendations

- The kitchen staff was receptive to TA and had positive attitudes for change when reviewer was onsite.
- Lunch was a flavorful, freshly prepared meal including a fresh salad and vegetables and fresh fruit choice of grapes and apple with choice of fat free chocolate milk or low-fat plain. Beautiful to look at and delicious!

Technical Assistance (TA)

Certification and Benefit Issuance

- When students are directly certified, be sure to inform the family in writing including the appropriate information.

Meal Components and Quantities

- CN Resource completed the menu review and provided the following TA:
 - During the Administrative Review the results of the menu review were provided to the SFA in a detailed Menu Review Results Report. The SFA was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.
 - The federal regulations require minimum daily amounts of meat/meat alternate to be served. The daily 1 oz. eq. was not met for grades K-8. The gluten free pizza product offered on Friday does not have a CN label or Product Formulation Statement (PFS), therefore meat/meat alternate crediting could not be determined as met. Choose a product with a CN label or PFS to confirm meal pattern crediting.
 - The federal regulations require weekly minimum amounts of meat/meat alternate to be served. The weekly requirement of 8 oz. eq. (grades K-5) and 9 oz. (grades 6-8) was not met. If the students choose the Grab N' Go Lunch each day, the menu offers a minimum of 5 oz. eq. of meat/meat alternate throughout the week. Consider offering a 1 oz. string cheese or 4 oz. yogurt as a side to the PB Jamwich daily, to increase total weekly meat/meat alternates offered to the students.
 - The federal regulations require daily minimum amounts of grains to be served. The daily minimum of 1 oz. eq. was not met each day. The gluten free items served this week, which include the hot dog bun, tortilla used for chicken fajita wrap, hamburger bun, pasta, and pizza are not creditable grains according to USDA standards. Therefore, all gluten free meals served did not meet grain requirements. The primary ingredient in the buns and tortilla was tapioca starch, which is not a creditable grain. The primary ingredient in the pasta and pizza dough was corn or rice flour, which was not enriched or whole grain and therefore also not a creditable grain. Consider replacing these items with other, creditable grain-based options such as oatmeal, brown rice, enriched white rice, or buckwheat as the primary ingredients in order to be creditable. The gluten free pizza product offered on Friday does not have a CN label or Product Formulation Statement (PFS), therefore grain

- crediting could not be determined. Choose a product with creditable grains and a CN label or PFS to confirm meal pattern crediting. Reference the link below for the USDA Whole Grain Resource, which outlines the whole grain-rich criteria for school meals. <https://www.fns.usda.gov/tn/whole-grain-resource-national-school-lunch-and-school-breakfast-programs-0>
- The federal regulations require weekly minimum amounts of grains to be served. The weekly requirement of 8 oz. eq. for grades K-8 was not met. If the students choose the Grab N' Go Lunch each day, the menu offers a minimum of 5 oz. eq. of grain throughout the week. Consider offering a side of 1 oz. whole grain-chips or crackers (non-sweet) as a side to the PB Jamwich daily, to meet the weekly grain requirement. Additionally, replacing the gluten free items with creditable grains as suggested above will also help to meet daily weekly requirements.
 - A manufacturer's Product Formulation Statement (PFS) is a document that provides a way for a manufacturer to demonstrate how a product may contribute to the meal pattern requirements. A PFS is typically provided for processed products that do not have a CN Label. USDA does not approve a manufacturer's PFS. Program operators are ultimately responsible for ensuring menu items meet meal pattern requirements. Reference the link below for a helpful checklist used to evaluate a manufacturer's PFS. <https://fns-prod.azureedge.net/sites/default/files/cn/manufacturerPFStipsheet.pdf>
 - Production records did not provide adequate information as recorded. It is a requirement of the federal regulations to maintain complete production records. The gluten free menu items were not included on the production records daily. Ensure all menu items offered are recorded on daily production records with the planned and served number of students recorded. Serving sizes did not match what was actually offered, per communication with the SFA. For example, Fruit Punch indicates that 1 ½ cups is offered, when ½ cup was planned. Ensure all menu items are included on the production records with accurate planned serving sizes.

Food Safety

- CN Resource completed the menu review and provided the following TA:
 - During the review, the food safety plan was discussed with the SFA. The SFA must have a food safety plan that complies with requirements and the SFA must ensure that all elements of the plan are implemented. The SFA should be following the procedures as outlined in the plan and maintaining all required records. Have all written policies include signatures and dates for adoption and personalize to school name rather than reflect (sample) in the written materials. Remove any SOPS that do not apply to the school food service operation, such as transport of food to remote sites.
 - Thermometers need to be calibrated and logs maintained per facilities written food safety plan. Internal food temperatures need to be measured with probe style thermometers; infrared equipment only measures surface temperatures.
 - During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publicly visible location at

- the site.. Inspections were available and the Food Service Director posted the most current on day on onsite review. A photocopy of the inspection posted with original filed is a best practice.
- During the review, temperature logs were discussed with the SFA as temperature logs for August and September had not been maintained with daily recording of temperatures. The SFA must maintain temperature logs for all food storage areas, in accordance with the requirements of the local health department. The completed temperature logs must be kept on file for a minimum of six (6) months.

Smart Snacks

- All fundraisers, both exempted and compliant, must be tracked. Per state policy, a maximum of 10 exempted fundraisers per school site per year may be approved by the school administrator. An exempted fundraiser can be for a maximum of four consecutive school days. All exempted fundraisers beyond 10 must be pre-approved by the State agency using the Request form. (7CFR 210.11) Details available at <http://www.sde.idaho.gov/cnp/sch-mp/snacks.html>

Procurement

- A separate procurement review was completed in SY19-20, follow the guidance provided in the closure letter.

Fiscal Action

Fiscal action was below the \$600 threshold and was disregarded.

Your review is now closed.

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

Sincerely,



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

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Karen Page, Food Service Manager, St. Joseph School

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- (3) email: program.intake@usda.gov.

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