



SHERRI YBARRA
SUPERINTENDENT OF
PUBLIC INSTRUCTION

650 W. STATE STREET
P.O. BOX 83720
BOISE, IDAHO 83720-0027

OFFICE: 208-332-6800
FAX: 208-334-2228
SPEECH/HEARING
IMPAIRED: 1-800-377-3529

May 8, 2017

Mr. Javier Castaneda
Heritage Community Charter School
1803 E. Ustick Rd
Caldwell, ID 83605

Dear Mr. Castaneda,

On February 23, 2017, State Department of Education (SDE) Coordinators Jennifer Butler and Heather Blume conducted an Administrative Review of Heritage Community Charter School for the following United States Department of Agriculture (USDA) programs:

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

The State agency (SA) would like to thank Miguel Ramirez, Food Service Manager and Angel Carrion, IT Director and Data Analyst as well as the entire staff of Heritage Community Charter 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 (HHFKA), 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- Certification and Benefit Issuance

There were three applications (affecting six children) that need more information. The Benefit Issuance List must be updated to accurately reflect the benefits approved on one application (two students). Two applications (affecting four students) need to be changed from free to reduced status. One application (affecting one student) was verified incorrectly and must be changed from free to denied status. One application (affecting one student) was missing to validate the status listed on the Benefit Issuance List.

Timeframe for CAP completion: March 10, 2017

SFA Response to CAP: Per the MyIdahoCNP upload dated March 13, 2017; the missing application was found and uploaded. The letters that were sent to the families affected were also uploaded. An updated Benefit Issuance List was uploaded on April 26, 2017

Finding 2- Local School Wellness Policy

A report on the progress toward goals stated in the Local School Wellness Policy must be publicly available. Posting to the school /district website and/or in a school newsletter would support this requirement.

Timeframe for CAP completion: March 10, 2017

SFA Response to CAP: The Idaho Wellness Policy Progress Report was completed and uploaded into MyIdahoCNP on March 13, 2017.

Finding 3- Food Safety

Each SFA must have a written food safety plan for compliance with Hazard Analysis Critical Control Point (HACCP) program criteria found in 7 CFR 210.13(c). SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared or served for the purposes of the NSLP, SBP or other FNS programs. This means the food safety program should contain standard operating procedures for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria, as applicable. This food safety plan must be trained on annually and documented with an agenda and dated sign-in sheet.

Timeframe for CAP completion: March 10, 2017

SFA Response to CAP: A copy of the kitchen's newly adopted HACCP-based food safety procedure manual was uploaded into MyIdahoCNP on March 13, 2017.

Finding 4- Resource Management

Per 210.14(f), SFAs are required to ensure that all revenue from the sale of non-program foods accrues to the non-profit school food service account; and that revenue available to support the production of reimbursable school meals does not subsidize the sale of non-program foods. SP 20-2016 Nonprofit School Food Service Account Non-program Food Revenue Requirements memorandum provides guidance on the revenue requirements including options for assessing

compliance to fulfill the requirements in section 206 of the Healthy, Hunger-Free Kids Act of 2010.

Timeframe for CAP completion: March 10, 2017

SFA Response to CAP: Per the MyIdahoCNP upload dated March 13, 2017, adult and second student meals were increased to \$3.65. The Alternate Assessment for pricing a la carte milk was completed and uploaded on March 22, 2017.

Finding 5- Civil Rights

School Foodservice Authority staff that interacts with program applicants or participants (i.e., cafeteria staff, Free and Reduced Application approval staff) and their supervisors as well as the Hearing Official must have annual civil rights training. Executive Director Javier Castaneda is listed as the Hearing Official and so must have USDA Civil Rights Training, located under the “Training” tab of the [CNP Resource Center website](#).

Timeframe for CAP completion: March 10, 2017

SFA Response to CAP: The training agenda and sign-in sheet for Civil Rights were completed on March 8, 2017, per the MyIdahoCNP upload dated March 13, 2017.

Commendations

- Miguel’s uniform is very professional and supports respect for the kitchen.
- Staff wore appropriate hair restraints as required per Idaho Food Code.
- Miguel was open to new ideas and receptive to technical assistance. He had a list of questions ready for SA reviewers to ensure he could get TA on issues of concern.
- Food was nicely displayed on the food line and the fruit and salad bar, and looked very appealing.
- The kitchen is very organized and clean, and the staff is hard working.
- Miguel worked efficiently to supply updated, completed production records and requested product formulation statements for missing products. He was very responsive to requests for information!
- He was very organized. All of the production records, copies of labels, and recipes were provided prior to site visit. It was nice to see the program and staff growth from three years ago.

Technical Assistance (TA)

Certification and Benefit Issuance

- While a list was maintained to identify directly certified (DC) students, it was not the list generated by the State agency DC portal. Ensure the appropriate date and heading is included in the list.
- The Benefit Issuance List does not include the date the eligibility was established. The list must be updated to reflect the dates for issued benefit status.
- Per the Eligibility Manual, when determining Free and Reduced Applications, income amounts should not be converted unless various income frequencies are reported. Income

should only be converted to annual when various income frequencies are reported. Please make use of the Income Eligibility Guidelines chart.

- If the household provided only annual income on an application, the LEA must ensure that the amount is an accurate reflection of the household's current income and that it qualifies under the Special Situations portion of the Eligibility Manual. The determining official may need to contact the household for further clarification of the information provided on the application. Remember to make notes on applications to document follow up (date, who was spoken to, information collected, and initial).

Verification

- When performing Verification of Free and Reduced Applications, the Confirming Official must check the application prior to sending out the letter for Verification and complete the applicable section of the Official Use Only box. After the income documentation is received and reviewed, the Verifying Official must complete and sign the applicable section of the Official Use Only box.

Civil Rights

- No complaint log was maintained. Please print a Civil Rights complaint log and ensure it is dated annually, with a new log started each year. If no complaints were received, best practice is to write "No complaints" on last year's log and keep this on file (three years plus the current year).
- The Public Release provided for the AR indicates that the site operates CEP; this is incorrect. This same error was discovered at renewal and a corrected Public Release was provided at that time. Please be aware of the difference and ensure that the correct version is submitted.

Local School Wellness

- Please update the wellness policy that is listed on the website to the policy that is currently in use by Heritage Community Charter School.

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 the [Smart Snacks Resources Link](#)

Professional Standards

- The United States Department of Agriculture has established minimum Professional Standards for school nutrition professionals who manage and operate the National School Lunch and School Breakfast Programs, effective July 1, 2015. The standards provide annual training requirements for all school nutrition professionals. It is required that some form of documentation be kept on file to show Professional Standards compliance; options include the [FNS Online Tracking Tool](#) and two Professional Standards tracking resources available in MyIdahoCNP under Download Forms in the Professional Standards section.

Your review is now closed.

The total fiscal action is \$22.00 for breakfast and \$104.72 for lunch. Since these amounts are below the \$600 threshold for each program, fiscal action will be disregarded. Should you wish to appeal any of these findings please follow the appeal procedures on the [State Agency Appeal Procedures](#) document. 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
Child Nutrition Program Coordinator

Cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Miguel Ramirez, Food Service Manager, Heritage Community Charter School

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