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May 10, 2017

Nancy Corgiat
Holy Spirit Catholic School
540 N 7th
Pocatello, ID 83201

Dear Ms. Corgiat,

On March 29, 2017, State Department of Education (SDE) Coordinators Tamara Donovan and Lynda Westphal conducted an Administrative Review of Holy Spirit Catholic School for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- USDA Foods

Holy Spirit Catholic School was the school site reviewed.

The State agency (SA) would like to thank Dawn Bird and the staff of Holy Spirit Catholic School for their 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

- Two students were listed as paid meal status on the benefit issuance list, but should have been receiving free meals due to qualifying through Direct Certification. Update the benefit issuance list and send a notification letter to the households. Provide a copy of the updated benefit issuance list and a copy of the letters to the SA.
- Two free and reduced income applications (three students) were incomplete/unclear. One contained a discrepancy in the documented number in the household and the actual number of names listed; the other application noted two different income frequencies for one income. Contact the households, correct/complete the applications and determine if there is a change in benefit status. If there is a change, send the household a letter of notification and update the benefit issuance list; a change resulting in decreased benefits shall be made ten calendar days after the date the SFA makes the final decision on the child's eligibility status.

Due Date for CAP Completion: April 13, 2017

SFA Response to CAP: While the SA was on-site, the benefit issuance list was updated and the notification letters were prepared for the DC students. Regarding the incomplete/unclear applications, the determining official contacted the two households for clarification; meal benefit status did not change.

Based on an administrative error of 8.82% associated with certification and benefit issuance, the SFA will be required to continue to conduct a second review of applications for school year 2017-18, and continue 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, as well as the completion of the Second Review of Applications Report in MyIdahoCNP. Depending on the outcomes of this second review, the SFA may be required to complete this process until the next administrative review. Please reference the Independent Review of Applications section in the Eligibility Manual.

Finding 2- Meal Components and Quantities Repeat finding

- Meals offered to students must meet vegetable subgroup, meal component, and whole grain-rich daily and weekly requirements. (7 CFR 210.10). See additional detail under Meal Components and Quantities technical assistance. Meal pattern compliance worksheets are available at the USDA compliance worksheets website.
 - The week of review lunch menu did not meet the minimum weekly requirement of 3-¾ cups of vegetables and the daily requirement of ¾ cup for the K-8 age grade group. The minimum requirements for the dark green, red/orange, and beans/peas subgroups were not met. No dark green vegetables were offered. On the day of SA review, the SA provided a vegetable subgroup handout, meal pattern handout, and a production record template via email to the Food Service Director (a copy was provided on a thumb drive during annual mandatory NSLP training in August 2016). Upload documentation (e.g., production records, product formulation statements, Food

- Buying Guide crediting) showing that daily and weekly vegetable requirements and vegetable subgroup requirements are met in the April menu.
- The week of review lunch menu did not meet the 9 ounce equivalent (oz eq) minimum weekly requirement for meat/meat alternate (m/ma) for the K-8 age grade group. Also, one day during the week of review, the daily requirement of 1 oz eq m/ma for the K-8 age grade group and 1.5 oz eq m/ma for the preschoolers was not met. Upload documentation (e.g., product formulation statements, CN labels, Food Buying Guide crediting) showing daily and weekly meat/meat alternate minimum requirements are met in the April menu.
 - One day during the week of review, lunch had an insufficient amount of the grain component. Provide documentation (e.g., product formulation statements, CN labels, ingredient list on the label, Exhibit A crediting, production records, etc.) showing all grain items on the April menu are whole grain and that daily and weekly grain requirements are met.
 - On the day of SA review, the following non-whole grain rich items for use in the Child Nutrition Program were in food storage: "wheat bread", "wheat hamburger buns", Krusteaz cornbread, Spanish rice, and rice pilaf mixes. Upload labels of new whole grain products that will replace these items. Non-whole grain rich items may only be counted as "extra" and do not credit toward the meal pattern.

Due Date for CAP Completion: April 13, 2017 Extended to: April 27, 2017

SFA Response to CAP: On April 12, 13, 23, 24, 25, and May 7, 2017, menu information was provided. The SA reiterated how to complete a production record and reviewed the need for supporting information to document meal pattern compliance. The FS Director requested and was granted a CAP extension to provide needed documentation of food items on the menu. TA was provided on the day of cadre on-site review and on the day of SA on-site review. Ongoing, extensive TA was provided to the SFA by the SA, via repeated phone calls and email, regarding topics including completing production records, meal compliance, whole grain crediting, ounce equivalents, food safety, standardized recipes, ingredient information, CN labels, product formulation statements, *The Food Buying Guide*, websites, training opportunities, and civil rights (the SA was informed that a new Food Service Director had been hired). TA was provided to the outgoing and incoming FS Directors. Due to the time involved in trying to get food item documentation, the changing of the menu plan, etc., and follow up for the April menu, and to help ensure that compliant menus were offered in May, the SFA opted to offer the targeted week's menu as a one week cycle menu in May. Whole grain labels were provided to the SA.

Commendations

- Independent contractor Kerry McKaig, who performed the menu review, offered the following commendations: "Thank you to the volunteer who prepared the lunch so that the Food Service Director could work with the reviewer - lunch was delicious! The staff does a great job taking and recording food temperatures. The sample tray displayed on the line was very helpful."
- The staff serving the meal on the day of SA review followed good food safety practices, using hair nets, gloves, and properly portioning the broccoli and cantaloupe onto the trays. They were also very friendly with the students. Good Job!

Technical Assistance (TA)

Certification and Benefit Issuance

- The SA recommends that free and reduced income applications be date stamped upon receipt to allow students to receive benefits as of the date of receipt as opposed to the date of determination (SP11-2014). Additionally, the date stamp will document that eligibility was determined within the ten operating day window.
- Per the Eligibility Manual, when determining free and reduced applications, income should not be converted unless various income frequencies are reported. Please make use of the Income Eligibility Guidelines chart.
- Please use the "Official Use Only" section on the free and reduced income application to document the confirmation review (date and signature of the Confirming Official).
- Make notes on applications to document follow up (date, name of person contacted, information collected, and official's initials) in the event of an unclear or incomplete application.
- Benefit issuance notification letters must contain the updated non-discrimination statement. Please see letter templates in MyIdahoCNP under Download Forms.

Civil Rights

- Update your non-discrimination statement to the correct USDA non-discrimination statement available at the [SA website](#). The short non-discrimination statement reads, "This institution is an equal opportunity provider."

Verification

- Keep copies of the original letter and any follow-up letters sent to families in the verification file along with a copy of the application and other verification documentation. Make sure the letters include documentation of the date(s) they were sent.
- Please use the "Official Use Only" section on the free and reduced income application to document the verification review (date and signature of the Verifying Official).

Resource Management

- Review of October 2015 invoices documented the purchase of the following food items that were not listed as whole grain: rice, bread, hamburger buns, breadsticks, tortillas, pasta, chicken nuggets. Ensure compliant whole grains are offered every day at lunch.

Food Safety

- It appears that some Child Nutrition Program food is co-mingled with other groups' food. Please designate an area so this food is kept separate to help prevent confusion.

Dietary Specifications and Nutrient Analysis

- Independent contractor Kerry McKaig provided the following TA:
 - Adjust recipes to add clarity and standardize all recipes.
 - Ensure production records and back up documentation are accurate and are in alignment with production records and daily & weekly menu contribution reports.
 - Update daily / weekly menu contribution reports (crediting for grain and m/ma oz eq and whole grain oz eq) as needed if using a new or different food product.

- Follow standardized recipes to provide consistent nutrient content and food quality, predictable yields, food cost control, and efficient purchasing procedures.
- Accurately and fully complete production records (in detail) to record the total amount of all food prepared instead of using "as needed". It is required to include food prepared as well as food served, amount leftover and what was done with leftovers.

Meal Components and Quantities

- Keep crediting information for all food products (product formulation statements, CN labels, recipes, etc.) for three years plus the current year to document how each food item contributed toward meeting the meal pattern.
- Ensure the production records include the starting and ending milk numbers. Production records must match the amount claimed (February 9, 2017, was off – the production record had 74 meals served and the claim had 81).
- All grain must be whole grain in order to credit towards USDA meal pattern requirements; “wheat bread” used in the peanut butter and jelly sandwich served on the day of SA review was not whole grain-rich (but a whole grain was offered). Two tablespoons of peanut butter credits as 1 oz eq m/ma to meet K-8 daily requirement. Three tablespoons of peanut butter or two tablespoons peanut butter and one 1 oz cheese stick is required to meet the 1.5 oz eq m/ma daily crediting requirement for preschool children.
- Yogurt cannot count as a fruit; yogurt may credit as m/ma.
- SA discouraged the use of four-way salad mixed in equal parts with romaine to credit toward the dark green vegetable subgroup; in order to credit as $\frac{3}{4}$ cup dark green vegetable, a 3 cup portion would need to be served. Instead consider 1 $\frac{1}{2}$ cups of spinach or romaine lettuce (leafy greens credit as half), or $\frac{3}{4}$ cup of broccoli. A vegetable subgroup handout was provided.
- Per Kerry McKaig:
 - The lunch menu did not meet the minimum daily 1 oz eq m/ma requirement on Monday, February 6, 2017; the 4 ounce serving of chicken noodle soup provided .25 oz eq m/ma. Suggested adding a one ounce cheese stick with the soup or modifying the recipe. The lunch menu also did not meet the minimum weekly 9 oz eq m/ma requirement. Suggested two servings of pancake on a stick instead of one or serving a 1 oz eq cheese stick on Thursday to meet the m/ma requirements.
 - The lunch menu did not meet the minimum daily requirement of 1 oz eq grain on Tuesday, February 7, 2017, with the one taco shell providing .25 oz eq grain according to the label and Exhibit A. Suggested switching to a 1 oz eq whole wheat flour tortilla or 2 taco shells and tortilla chips. The Food Service Director contacted a supplier about possibly switching to a crispito that is 1 oz eq m/ma and 1 oz eq grain.
 - The lunch menu did not meet the minimum weekly requirement of 3 $\frac{3}{4}$ cups of vegetables and the daily requirement of $\frac{3}{4}$ cup. The minimum requirements for the dark green, red/orange, and beans/peas subgroups were not met. No dark green vegetables were offered. Suggested offering $\frac{3}{4}$ cup broccoli or 1 $\frac{1}{2}$ cups romaine salad per week instead of the current four way salad; increasing the carrots to $\frac{3}{4}$ cup serving on Wednesday; increasing the serving of refried beans on

Tuesday to ½ cup from ¼ cup; increasing the green beans and the potatoes to ¾ cup servings.

Offer versus Serve (OVS)

- Ensure daily completion of the "What's for lunch" poster to help students identify what constitutes a reimbursable meal.
- Please document staff training on OVS. All staff training should include an agenda and sign-in sheet and training documentation should be maintained on file at the SFA for three years plus the current year.

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. Training should be tracked for regular volunteer food service staff as well.
- The Food Service Director was unable to locate her food safety certification and was unable to provide the date of last training. Food Safety in Schools (formerly known as Serving it Safe) is free and available at the Institute of Child Nutrition website.
- On April 4, 2017, the SA notified the principal via email: USDA professional standards requirements state that newly hired Food Service Directors must have at least 8 hours of food safety training within 5 years prior to or within 30 days of start date (USDA Professional Standards Booklet attached for more information).

Local School Wellness Policy

- On July 29, 2016, the USDA Food and Nutrition Service (FNS) finalized regulations to create a framework and guidelines for written wellness policies established by LEAs. (§210.30) The final rule requires LEAs to fully comply with the requirements of the final rule by June 30, 2017. Federal legislation requires school districts to implement a local wellness policy that must include language:
 - Permitting parents, students, school board, PE teachers, school health professionals, school food service staff, administrators, and community members to participate in the development, implementation, review, and update of the local wellness policy.
 - Identifying wellness policy leadership of one or more LEA and/or school official(s) who have the authority and responsibility to ensure each school complies with the wellness policy.
 - Specifying measurable goals for nutrition education, nutrition promotion, physical activity, and other school-based activities to promote student wellness that are written with consideration for evidence-based strategies.

- Addressing nutrition guidelines for all foods and beverages sold on the school campus during the school day and for providing school meals that adhere to Federal meal pattern requirements.
 - Identifying nutrition standards for non-sold foods and beverages available during classroom and school celebrations.
 - Stating a policy for food and beverage marketing that allows the marketing and advertising of only those foods and beverages that meet Smart Snacks in School nutrition standards.
 - Addressing an evaluation conducted once every three years of the wellness policy and the extent to which schools are in compliance, how the district policy compares to model wellness policies, and the progress made in attaining local wellness policy goals.
 - Identifying a way to share the wellness policy content and implementation with the public.
- For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs [School Wellness website](#).
 - Heather Blume, Coordinator of Nutrition Assessment and Promotion at the State Department of Education, is an excellent resource for guidance and questions related to the Wellness Policy: hblume@sde.idaho.gov, 208.332.6902.

Your review is now closed.

Due to the Meal Components and Quantities finding, total fiscal action was \$396.12. Since this is below the \$600 threshold, fiscal action will be disregarded. Should you wish to appeal these findings please follow the appeal procedures on the [State Agency Appeal Procedures](#) document. If you would like to discuss any of these findings, please contact me at (208) 332-6820.

Thank you for your support of the Child Nutrition Programs.

Sincerely,



Tamara Donovan, RD, LD, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Dawn Bird, Food Service Director, Holy Spirit Catholic School
Emily Melick, 2017-18 Food Service Director, Holy Spirit Catholic School

“This institution is an equal opportunity provider”