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December 14, 2016

Sarah Quilici
St. Joseph School
825 W Fort St
Boise, ID 83702

Dear Dr. Quilici,

On November 17, 2016, State Department of Education (SDE) Coordinators Tamara Donovan and TJ Goodsell conducted an Administrative Review of St. Joseph School for the following United States Department of Agriculture (USDA) programs:

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

St. Joseph School was the school site reviewed.

The State agency (SA) would like to commend Karen Page and the entire staff of St. Joseph 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- Meal Components and Quantities

Production records were not consistently completed with all information needed. On some planned meal days, the amount of food needed in meal preparation to ensure that all students received the intended equivalent meal component was not properly documented (e.g., on Monday, October, 10, 2016, there was no documentation regarding the measured amount of meat or pasta being prepared for the Chicken Alfredo entrée). Complete production records are necessary in order to confirm that adequate food was prepared to meet the meal pattern requirements. While all components were available daily, records must reflect planned portions, served portions, leftover portions, and disposition of those items, and must indicate how the food items on the menu are meeting the USDA meal pattern for the age/grade group being served (7 CFR 210.10). Upload one week's worth of completed production records for breakfast and lunch in MyIdahoCNP under Review Attachments for the timeframe of November 28 through December 2, 2016. Please upload/e-mail daily for SA review.

Timeframe for CAP completion: December 8, 2016

SFA Response to CAP: On December 1 and 2, 2016, the SA received completed production records containing planned portions, served portions, food temperatures, and leftover amount and plan. The SA reminded the Food Service Director to identify "bags" in the proper unit amount (e.g., pound for lettuce) for clarity of documentation.

Finding 2- Civil Rights

School Foodservice Authority staff that interacts with program applicants or participants as well as the Hearing Official must have annual civil rights training. The principal is listed as the Hearing Official, so must have USDA civil rights training.

Upload a dated sign in sheet to provide documentation that the Hearing Official received civil rights training.

Timeframe for CAP completion: December 8, 2016

SFA Response to CAP: On December 1, 2016, a dated sign in sheet was uploaded, documenting that the Hearing Official received civil rights training.

Finding 3- Resource Management Non-Program Food Revenue Tool

Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 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. The SA provided on-site TA on November 18, 2016.

Complete the non-program food revenue tool and upload into Review Attachments in MyIdahoCNP.

Timeframe for CAP completion: December 8, 2016

SFA Response to CAP: On December 7, 2016, the Food Service Director uploaded the non-program foods revenue tool and on December 12, 2016, a copy of the a la carte pricing chart was provided per SA request. Non-program foods are priced with at least a 38% mark up. Adult meals are priced at \$3.75, which is above the minimum of \$3.65 set by the SA.

Commendations

- The Local Wellness Policy Final Rule was recently published. St. Joseph's wellness policy is an excellent example of evaluating, establishing, and maintaining healthy school environments.
- The Food Service Director did a nice job of communicating with students regarding what comprises a reimbursable (less costly) meal; a large number of a la carte selections were made by students.
- The salad bar was presented beautifully and seemed to be well-liked by students.
- Food storage areas were very well maintained, clean and organized.
- Students were well-mannered and polite. The meal service provided an opportunity for students and parents to enjoy a wholesome environment.

Technical Assistance (TA)

Meal Components and Quantities

- The State agency provided technical assistance on reviewing the number of grams per serving needed (28 grams) to ensure that a one ounce (oz) equivalent (eq) grain is on the menu per the USDA meal pattern requirement. The production record for the beef taco served on Tuesday, October 11, 2016, listed one oz eq grain for one taco shell. Per the product formulation statement, three taco shells equal 32 grams; therefore students need to be served three taco shells to meet the oz eq grain requirement. Use Exhibit A to confirm gram weighs since some items require less grams to credit.

Offer Versus Serve

- Per the Food Service Director, staff had been trained on Offer vs Serve. All staff training must be documented (an agenda and sign-in sheet would suffice) and training documentation should be maintained on file at the SFA for three years plus the current year.
- Please remember to complete the breakfast poster; permanent marker suggested since menu items are the same each day.

Food Safety

- The Food Service Director must have current food safety training; the last food safety certificate is dated October 17, 2011; the Food Service Director plans to complete training before the end of the 2016 calendar year. Food Safety in Schools (formerly known as Serving it Safe) is available through the Institute of Child Nutrition on-line and free <http://www.theicn.org/ResourceOverview.aspx?ID=327> (7 CFR 210.30 Professional Standards Regulations).

- Best practice is to label all food items received with inventory tracking dates (mm/dd/yy) to ensure that the "First in, First out" method for inventory control is being used. For items removed from original packaging, label for identification as well as inventory dates, especially in regards to a food recall and allergen information.
- The most recent food safety inspection report must be posted in a location visible to the public (7 CFR 210.13(b)). The current posted document is dated November 10, 2015, with expiration of December 31, 2016. The copy of the most recent inspection has not been received; the SFA will follow up with the local health department inspector to ensure that the most current certificate reflecting an inspection date of September 12, 2016, is available for posting.

Civil Rights

- The SA assisted in creating a civil rights binder to ensure the required elements are present (procedure, log, complaint forms). The SFA's procedure for receiving and processing civil rights complaints should ensure all complaints associated with Child Nutrition Programs are forwarded to the State agency within three working days (CFR210.15(a)(6)).
- Ensure the civil rights complaint log is dated annually, with a new log started each year. If no complaints were received, best practice is to write "No complaints" on the log at the end of the school year and keep this on file for three years plus the current year.
- Remember to include the current USDA non-discrimination statement on Child Nutrition Programs materials. Please note the USDA short non-discrimination statement is for all documents that are only one page or one sheet of paper in length: "This institution is an equal opportunity provider." Menus provided to the students and posted on the website must be updated to include the proper short statement.

Local School Wellness Policy

- An annual report on the progress towards 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.

Smart Snacks

- All fundraisers, both exempted and compliant, must be tracked. Per state policy, a maximum of ten 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 ten must be pre-approved by the State agency using the request form (7CFR 210 (b)(2)). Details available at <http://www.sde.idaho.gov/cnp/sch-mp/snacks.html>

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 at <http://www.fns.usda.gov/school->

[meals/professional-standards](#) and two Professional Standards tracking resources available in MyIdahoCNP under Download Forms in the Professional Standards section. The Food Service Director printed training tracking logs while the SA was on-site.

Your review is now closed.

At this time there will be no fiscal action. Should you wish to appeal 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 support of the Child Nutrition Programs.

Sincerely,

A handwritten signature in blue ink that reads "Tamara".

Tamara Donovan, RD, LD, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Karen Page, Food Service Director, St. Joseph School

“This institution is an equal opportunity provider”