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March 28, 2017

Dr. Jennifer Beller
St. Mary's School
412 N. Monroe
Moscow, ID 83843

Dear Dr. Beller,

On January 12, 2017, State Department of Education (SDE) Coordinator TJ Goodsell conducted an Administrative Review of St. Mary's School for the following United States Department of Agriculture (USDA) program:

- National School Lunch Program (NSLP)

St. Mary's School was the site reviewed.

The State agency (SA) would like to commend Heather Lannigan and the entire staff of St. Mary's School for their hard work operating the school nutrition program.

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 Counting and Claiming

As part of the Administrative Review, the State agency (SA) must ensure that the School Food Authority (SFA) is compliant under Performance Standard 1: “The SFA must have a meal counting and claiming system that accurately counts, records, consolidates and reports the number of reimbursable meals claimed, by category (i.e., free, reduced-price or paid). The meal counting and claiming process must include a mechanism, whether manual or electronic, for counting meals and consolidating meal totals. The mechanism must include an internal control system that validates the total meal counts prior to the submission of the Claim for Reimbursement to the SA.”

- The SFA’s system does not properly count students’ eligibility by category
- The SFA does not have a back-up system for counting and claiming, or the back-up system cannot render accurate meal counts for eligible meals

Meal counts did not equal the number of reimbursable meals served to eligible children. The current counting method is unallowable, as it does not yield accurate counts. The State agency was able to determine that in November 2016 the correct total number of reimbursable meals were claimed, however there were several errors in the meal eligibility of the claim that actually resulted in an under claim of \$3.26. The SA further investigated the month of January by counting the totals hand entered on the FS-4 Daily Meal Count Record and determined that a similar error pattern would contribute to systemic claiming errors. The SFA was provided a personalized meal counting and claiming spreadsheet that can be used to mitigate future errors or the SFA can choose to implement a different meal counting and claiming method, such as an electronic POS. Whatever method is chosen, the SFA will need to provide a written plan to the State agency to ensure that future systemic counting/claiming errors are mitigated.

Timeframe for CAP completion: March 13, 2017

SFA Response to CAP: On March 9, 2017, the SFA uploaded a copy of a site-specific spreadsheet that was created to handle the unique needs of the school. The SA approved the plan for using this tool which includes the ability for teachers to order student meals while protecting the eligibility status of individual students, count and claim for reimbursement those students who participated in the meal service and track milk sales and adult meals.

Commendations

- The School Lunch Coordinator does an extraordinary job managing the food service department for St. Mary’s School. She was very diligent in providing the required documentation in advance of the review in order to assist the State agency with completion in a timely manner.
- Food service helpers are very cordial and well trained in OVS and food safety.
- Students were very respectful and polite; the overall atmosphere of the cafeteria was enjoyable.

Technical Assistance (TA)

Civil Rights

- 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.” The USDA long non-discrimination statement is for usage on all documents of more than one page or one sheet of paper and is available at the [State agency](#) website.

Food Safety

- Sponsors are required to request two food safety inspections from the local health department each year. Health inspection requests were submitted during the renewal process and on October 27, 2016, an inspection took place; results are posted as required. According to paperwork on file, the previous inspection was dated April 9, 2015 (more than one year before the most recent inspection). While it appears possible that the inspector dated the report incorrectly, the State agency recommends careful monitoring of inspections in the future (two per year). All documentation should be maintained for three years plus current. (7 CFR 210.13(b))
- The Idaho Department of Health & Welfare updated the Food Code to come in line with the current FDA Food Code. This includes a new requirement that all food safety plans must include a procedure for cleaning up bodily fluids. A HACCP Bodily Fluid Cleanup sample is located in MyIdahoCNP in the Download Forms section under the Food Safety heading.

Professional Standards

- Part time staff should complete at least eight hours of food safety training, not more than five years prior to their starting date or completed within 30 days of their starting date. (7 CFR 210.30 Professional Standards Regulations) Currently Gary's certification will expire 8/2017 and John's has already expired. Information can be found on the [ServSafe](#) website.

Meal Components and Quantities Lunch

- Meals offered to students must meet vegetable subgroup and whole grain-rich requirements. (7 CFR 210.10) Targeted week of review, October 10 – 14th (meals provided by Moscow SD) was found to be missing the starchy vegetable sub group. The error was corrected on site during the Moscow SD meal compliance review with the assistance of a State agency contractor for the month of November's menu. It is the responsibility of SFAs receiving vended meals to ensure that all meals served to students and claimed for reimbursement are compliant with the National School Lunch meal pattern.
- The planned menu (provided by Moscow SD) for the week October 10 – 14th did not have the minimum weekly requirement of ½ cup dark green vegetable. Only ¼ cup of dark green was planned for October 13th. The tossed salad had ¼-cup dark green equivalent planned per salad and the students generally are not allowed seconds.
- On November 7, 2016, the Moscow FSD revised the menu for the weeks of 11/7, 11/14, and 11/28 and created a recipe for ¾-cup fresh broccoli & carrots, which has ½-cup broccoli and ½-cup carrots. The item was added to the menu on 11/10 and 11/18. For the

week of 11/28, the FSD planned ½ cup steamed broccoli, which was offered on 12/01/16. It is the responsibility of SFAs receiving vended meals to ensure that all meals served to students and claimed for reimbursement are compliant with the National School Lunch meal pattern.

Your review is now closed.

At this time, there will be no fiscal action. 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 continued support of the Child Nutrition Programs.

Sincerely,

A handwritten signature in blue ink that reads "TJ Goodsell". The signature is written in a cursive style.

TJ Goodsell, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Heather Lannigan, School Lunch Coordinator, St. Mary's School

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