



October 11, 2017

Mrs. Virginia Acevedo, Executive Director  
Bannock Youth Foundation/MK Place  
110 South 19<sup>th</sup> Avenue  
Pocatello, ID 83201

Dear Director Acevedo,

On September 6, 2017, State Department of Education (S.D.E.) Coordinator Teresa Goodsell conducted an Administrative Review of Bannock Youth Foundation/MK Place for the following United States Department of Agriculture (U.S.D.A.) programs:

- National School Lunch Program (N.S.L.P.)
- School Breakfast Program (S.B.P.)
- U.S.D.A. Foods
- Afterschool Snack Program (A.S.S.P.)

The site reviewed was the Bannock Youth Foundation/MK Place.

The State agency (S.A.) would like to commend Michell Shropshire and the entire staff of Bannock Youth Foundation/MK Place 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 (S.F.A.) comply with U.S.D.A. requirements. The objectives of the Administrative Review are to:

- Determine whether the S.F.A. 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 S.A. determined findings and the S.F.A. response to the findings:

## Findings and Corrective Action Plan (C.A.P.)

### **Finding 1 – Meal Components and Quantities - Breakfast**

2% milk was offered and 2% milk is not allowable in the school meals programs. At least two choices of fluid milk from the following list must be offered throughout the week during meal service on all reimbursable meal service lines: flavored or unflavored fat-free milk, low-fat (1%) milk, fat-free or low-fat lactose-reduced milk, fat-free or low-fat lactose-free milk, fat-free or low-fat buttermilk, and fat-free or low-fat acidified milk. (7CFR 210.10(c)). *This was technical assistance provided during the last review. A finding in this area requires fiscal action.*

**C.A.P.:** 2% milk is not allowed in school meal programs and two varieties of allowable fluid milk must be offered. Sponsor must demonstrate understanding of the requirement and ensure that production records indicate that only allowable milk options have been provided to students as part of the S.B.P., N.S.L.P. and A.S.S.P.

**Timeframe for C.A.P. completion:** September 21, 2017

**Sponsor Response to C.A.P.:** Sponsor provided visual evidence while State agency reviewer was onsite that 2% milk is no longer being purchased or available in refrigerators. Only allowable varieties of milk are offered to students during reimbursable meal service.

### **Finding 2 – Food Safety**

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. Staff must receive training on this process during annual HACCP training.

**C.A.P.:** 1) Include a copy of the bodily fluids cleanup protocol in your existing HACCP plan.  
2) Provide staff training that includes acknowledgement of the required process.

**Timeframe for C.A.P. completion:** September 21, 2017

**Sponsor Response to C.A.P.:** 1) Copy of HACCP plan, which includes bodily fluids cleanup protocol, was uploaded. 2) A bodily fluid cleanup training was conducted. The sign-in sheet and agenda for all kitchen staff was uploaded.

### **Finding 3 – Professional Standards**

Foodservice Authority staff who interact with program applicants or participants and their supervisors, must have annual civil rights, offer vs serve, and HACCP training.

**C.A.P.:** Please 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. Staff must receive annual training for Offer vs Serve, HACCP (S.O.P) and Civil Rights.

**Timeframe for C.A.P. completion:** September 21, 2017

**Sponsor Response to C.A.P.:** Sponsor submitted a written training plan for annual spring training for all staff as well as training that will occur immediately for any new employees during their onboarding process.

## Commendations

- The food service staff works diligently to ensure the S.F.A. is meeting all requirements for participation in the child nutrition programs. The executive staff is supportive of the food service director's efforts to correct issues as soon as they are discovered.
- Students appear to enjoy the atmosphere of their surroundings and their enthusiasm for the staff is exhibited in conversation and participation in meal preparation and service.

## Technical Assistance (T.A.)

### Meal Components and Quantities

- S.A. contractor Shawna Durbin, R.D.N., L.D., conducted the menu compliance review for the review week and determined the following:
  - 2.75 oz. equivalents of grain-based desserts were being served during the week. Although the facility operates a seven-day week, only 2.00 oz. equivalent grain based desserts can be served. Recommend eliminating one grain based dessert from the weekly menu.

### Meal Counting and Claiming

- Ensure the Point of Sale (P.O.S.) staff member completing the manual tally accurately reflects the number of meals served at each meal. On July 25 the production record indicates nine students were served breakfast, however the enrollment list shows only eight students enrolled during meal service. On July 26, the production record indicates eight students were served, however the enrollment list shows that nine students were enrolled during the breakfast meal service. Production records should reflect actual number of enrolled student, number of meals serve and should provide an edit check for meals claimed. Similar issue occurred on July 13 for the lunch service; nine students claimed however only eight meals were prepared. S.F.A. indicates that one student had to receive an alternate meal due to morning intake process so only eight meals were prepared for lunch. An alternate meal can be claimed as long as notes are made on the production record to indicate all required components in required quantities were provided.

### Procurement

- S.A. Contractor Keddington and Christensen, L.L.C. conducted the Procurement Review and provided the following T.A.:
  - The S.FA should update the procurement policy to reflect applicable federal, state, and local laws and not simply reference them. The policy should include the actions taken to procure the goods or services, and any other necessary information to show that the correct bidder was selected. The S.F.A. should include in their procurement policy the

requirements for different purchasing methods and the thresholds required for each method. The State of Idaho has created a table that illustrates these procedures that may be incorporated into the S.F.A.'s procurement policy. While the S.F.A. did not have purchases above the small purchase threshold, they should still update their procurement policy in the event that a formal procurement needs to be made by the S.F.A. in the future.

- The S.F.A. should update their procurement policy to include a prohibition of the acquisition of unnecessary or duplicative items.
- The S.F.A. should update their procurement policy to include the following:
  - The S.F.A. takes affirmative steps as in 2 C.F.R. 200.321 to assure that small, minority and women's businesses enterprises and labor surplus firms are used when possible. These steps include:
    - Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
    - Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
    - Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
    - Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
    - Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development of Commerce; and
    - Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed above.
  - Include verbiage that ensures that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service being procured as required in 2 CFR 200.319(c).

### **Verification**

- Complete the Verification Report by November 15 of the current school year. Contact C.N.P if assistance is needed prior to the deadline.

## **Fiscal Action**

Due to meal service that included an unallowable milk component, the fiscal action for breakfast results in \$18.81. The S.A. also discovered that the July 2017 claim was short by eight lunch meals because one day's meals were not entered from the manual count into the claiming system. Additionally, the S.F.A miscalculated the July 2017 breakfast claim and was short one breakfast meal. This resulted in the S.F.A. missing out on \$28.57 in claim reimbursement. The

S.A. has elected to reimburse the S.F.A. for the breakfast and lunch meals not claimed in July minus the fiscal action for breakfast. The total amount to be paid to the S.F.A. is \$9.76. This total was calculated by taking the \$28.57 available from the short claim minus \$18.81 in fiscal action for incorrect lunch benefits.

## Your review is now closed

Should you wish to appeal any of these findings please follow the appeal procedures on the [State Agency Appeal Procedures](#) document located on the Idaho Child Nutrition Programs website.

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,



Teresa A. Goodsell, B.S, S.N.S.  
N.S.L.P. and U.S.D.A. Foods Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs  
Michell Shropshire, Child Nutrition Director, Bannock Youth Foundation/MK Place

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