



March 20, 2018

Kelly Trudeau, Administrator  
Compass Public Charter School  
2511 W Cherry Lane  
Meridian, ID 83642

Dear Administrator Trudeau,

On January 18, 2018, State Department of Education (SDE) Coordinators Heather Blume and Lynda Westphal conducted an Administrative Review of Compass Charter School for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was Compass Tech Lane.

The State agency (SA) would like to commend Wendy Long and the entire staff of Compass 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, 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:

## Findings and Corrective Action Plan (CAP)

### *Finding 1-Wellness Policy*

Districts must complete an assessment of the progress made in attaining goals stated in the Local School Wellness Policy and make it available to the public.

**Required Corrective Action:**

Please complete an evaluation of the implementation of the wellness policy and progress in attaining wellness policy goals and make it available to the public. Completing the Idaho Wellness Policy Progress Report would fulfill this requirement.

**Due Date for CAP Completion:** February 2, 2017

**Corrective Action Response:**

The district uploaded the completed Wellness Policy Progress Report in to MyIdahoCNP on February 2, 2018.

### *Finding 2- SFA On-Site Monitoring*

According to 7 CFR 210.8 (a)(1) and 7 CFR 220.11 (d)(1), each SFA with two or more feeding sites must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating NSLP and 50% of schools operating SBP under its jurisdiction prior to February 1, each school year.

**Required Corrective Action:**

Complete the SFA On-Site Monitoring Form for the current school year by February 1, 2018.

**Due Date for CAP Completion:** February 2, 2017

**Corrective Action Response:**

The district uploaded the completed SFA On-Site Monitoring Form into MyIdahoCNP on February 2, 2018.

### *Finding 3- Meal Components and Quantities*

The dough for the cheese and pepperoni pizza was being made with regular enriched bread flour. Flour must be whole grain-rich (WGR) in order to count the pizza dough as the grain component for a reimbursable meal.

**Required Corrective Action:**

The pizza needs to be made with WGR flour or a waiver needs to be submitted and approved by the State for an exemption.

**Due Date for CAP Completion:** February 2, 2017

**Corrective Action Response:**

The district uploaded a request to apply a WGR exemption to the pizza, supported by student surveys indicating poor student acceptance for WGR pizza, into MyIdahoCNP on February 2, 2018.

### *Finding 4- Offer versus Serve (OVS)*

Staff must receive annual 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.

**Required Corrective Action:**

Train applicable staff on OVS. OVS training is available through the State agency training portal and a training log is available in MyIdahoCNP Download Forms.

**Due Date for CAP Completion:** February 2, 2017

**Corrective Action Response:**

The district uploaded the signed agenda for OVS training into MyIdahoCNP on February 2, 2018.

## Fiscal Action

As there were neither benefit issuance errors nor claiming and counting errors, no fiscal action is needed as a result of this review.

## Commendations

- The food safety practices were well documented and staff and students trained effectively.
- The "Foods" class was very innovative and covered a range of nutrition education topics including food safety, ingredient identification, and making chocolate bars from scratch.
- The approval process for free and reduced applications was very good and resulted in a 0% error rate in the sample selected for review.
- The salad bar was presented in a beautiful manner and conveniently pre-packaged.
- The student helpers are involved in the process of counting leftovers and helping to completing the production records.

## Technical Assistance (TA)

### *Benefit Issuance*

- Free and Reduced applications received from the wrong year must be completed on the correct year application. You cannot just change the year at the top of the form.

### *Food Safety*

- Each SFA is required to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories, as applicable (7 CFR 210.21 (d)). Frozen orange juice, from USA, Brazil was found on-site. If a product from another country is sourced, then the food service must have proof that the domestic product is significantly higher in price or not available in sufficient quantities. Include the Buy American Provision in SFA solicitation documents for the purchase of commercial foods. Products must be checked upon receipt and not accepted if the products do not comply with the Buy American Provision, unless there is documentation to justify the exception (exorbitant pricing or product shortages).

### ***Meal Components and Quantities (TA provided by independent contractor Steffanie Sandoval)***

- Chocolate Waffle recipe contained too much non-creditable grains (corn starch). The suggestion was made to eliminate the cornstarch from the menu and substitute it for the 60/40 WGR flour blend. The food service director will be making this change.
- The following CN labels or PFS were requested on site: Chicken Egg Rolls, Original Sun Chips, 10" WGR flour Tortilla, and the Flame Broiled Beef Patty. Only product information sheets were provided.
- A nutrient analysis was conducted after finding out that the pizza was being made with non-whole grain flour. Also, Wendy had her own nutrient analysis estimate in her Excel spreadsheets. Some of these numbers were questionable and had the potential for being too high in calories for the day.
- Recipes need to be updated to include portion sizes. The roll recipe had a higher yield than the number of servings the dough produced. On site, Wendy weighed out the dough and counted the number of portions, which was lower than the recipe specified and credited correctly.
- Yield studies should be conducted to help speed up the portioning for the Tech Lane campus. The staff pre-portion items, such as the turkey & mashed potato entrée, and spent a lot of time weighing out the turkey. It was suggested that a yield study be done to determine if a certain portion scoop could yield the desired weight and to document the results of this study. Periodically check on the weights to make sure they are consistent and accurate.


### **Your review is now closed**

There is no fiscal action as a result of this review. Should you wish to appeal any of these findings please follow the appeal procedures found on the State Agency Appeal Procedures document attached to this letter.

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, SNS  
NSLP Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs  
Wendy Long, Foodservice Director, Compass Charter Schools

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# State Agency Appeal Procedures

## School Meal Programs – Administrative or Follow-up Review

School food authorities may appeal the denial of all or part of a Claim for Reimbursement or withholding payment arising from administrative or follow-up review activity conducted by the State Agency under 210.18 of this part.

### The appeal process outlined in 7 CFR 210.18 (p) reads as follows:

1. The written request for a review shall be postmarked within 15 calendar days of the date the appellant received the notice of the denial of all or a part of the Claim for Reimbursement or withholding of payment, and the state agency shall acknowledge the receipt of the request for appeal within 10 calendar days;
2. The appellant may refute the action specified in the notice in person and by written documentation to the review official. In order to be considered, written documentation must be filed with the review official not later than 30 calendar days after the appellant received the notice. The appellant may retain legal counsel, or may be represented by another person. A hearing shall be held by the review official in addition to, or in lieu of, a review of written information submitted by the appellant only if the appellant so specified in the letter of request for review. Failure of the appellant school food authority's representative to appear at a scheduled hearing shall constitute the appellant school food authority's waiver of the right to a personal appearance before the review official, unless the review official agrees to reschedule the hearing. A representative of the state agency shall be allowed to attend the hearing to respond to the appellant's testimony and to answer questions posed by the review official;
3. If the appellant has requested a hearing, the appellant and the state agency shall be provided with at least 10 calendar days advance written notice, sent by certified mail, return receipt requested, of the time, date and place of the hearing;
4. Any information on which the state agency's action was based shall be available to the appellant for inspection from the date of receipt of the request for review;
5. The review official shall be an independent and impartial official other than, and not accountable to, any person authorized to make decisions that are subject to appeal under the provisions of this section;
6. The review official shall make a determination based on information provided by the state agency and the appellant, and on Program regulations;
7. Within 60 calendar days of the state agency's receipt of the request for review, by written notice, sent by certified mail, return receipt requested, the review official shall inform the state agency and the appellant of the determination of the review official. The final determination shall take effect upon receipt of the written notice of the final decision by the school food authority;
8. The state agency's actions remain in effect during the appeal process;
9. The determination by the state review official is the final administrative determination to be afforded to the appellant.

Appeals must be directed to:  
Brandon Phillips  
Financial Specialist, Public School Finance  
State Department of Education  
PO Box 83720  
Boise, Idaho 83720-0027  
(208) 332-6983  
E-mail: [bcphillips@sde.idaho.gov](mailto:bcphillips@sde.idaho.gov)

### **USDA Nondiscrimination Statement**

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To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

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