



March 7, 2018

Brian Darcy, Administrator  
Idaho School for the Deaf and Blind  
1450 Main St.  
Gooding, ID 83330

Dear Mr. Darcy,

On February 13, 2018, State Department of Education (SDE) Coordinators Tamara Donovan and Lynda Westphal conducted an Administrative Review of the Idaho School for the Deaf and Blind for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Fresh Fruit and Vegetable Program (FFVP)
- USDA Foods

The site reviewed was the Idaho School for the Deaf and Blind.

The State agency (SA) would like to commend Shelli Mason and the entire staff of the Idaho School for the Deaf and Blind 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 Civil Rights

SFA staff interacting with program applicants or participants and their supervisors as well as the Hearing Official must have annual civil rights training. Brian Darcy is listed as the Hearing Official so must have USDA civil rights training. Training is available at the SA website.

**Corrective Action:**

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

**Due Date for CAP Completion:** February 27, 2018

**Corrective Action Response:** On the day of the SA on-site visit, documentation of USDA civil rights training for the Hearing Official was uploaded.

### Finding 2 Meal Counting and Claiming

A systemic error was discovered; there were inaccuracies in the January 2018 monthly claim. The Food Service Director will develop a plan to ensure accurate meal claiming and will train applicable employees. A meal counting spreadsheet option is available in MyIdahoCNP under Download Forms; the SA provided guidance on its usage.

**Corrective Action:**

Upload a written meal counting plan and documentation of training into MyIdahoCNP Review Attachments.

**Due Date for CAP Completion:** February 27, 2018

**Corrective Action Response:** A meal counting plan and documentation of training was uploaded into MyIdahoCNP Review Attachments on February 26, 2018.

### Finding 3 Professional Standards

A Food Service Director must have at least eight hours of food safety training, either not more than five years prior to their starting date or completed within 30 days of their starting date to meet Professional Standards compliance. This could be accomplished by taking the Institute of Child Nutrition (ICN) Food Safety in Schools on-line class for free.

**Corrective Action:**

Upload a certificate of completion indicating that 8 hours of food safety training has occurred into MyIdahoCNP Review Attachments.

**Due Date for CAP Completion:** February 27, 2018

**Corrective Action Response:** An ICN Food Safety in Schools certificate of completion for Shelli Mason, dated February 22, 2018, was uploaded.

### **Finding 4 Offer vs Serve (OVS)**

Staff must be trained annually and as needed on Offer vs Serve. 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. OVS training is available through the SA training portal and a training log is available in MyIdahoCNP Download Forms.

#### **Corrective Action:**

Upload certificates of completion indicating that OVS training has occurred into MyIdahoCNP Review Attachments.

**Due Date for CAP Completion:** February 27, 2018

**Corrective Action Response:** On February 22, 2018, OVS training certificates of completion were uploaded.

### **Finding 5 Certification and Benefit Issuance**

One application (one student) noted five in the household, but only four names were listed.

#### **Corrective Action:**

Contact the household and complete the application (request income information if an additional household member is added); determine the application and proceed with updating the benefit issuance list as applicable.

**Due Date for CAP Completion:** February 27, 2018

**Corrective Action Response:** On February 24, 2018, a completed application documenting no change in free meal status was uploaded.

### **Fiscal Action**

Due to a benefit issuance error, fiscal action was \$157.93, which will be disregarded and no financial adjustment will occur.

### **Commendations**

- Congratulations on being awarded \$8,006.52 for a range as part of a USDA Equipment Grant. Your initiative in applying for this grant is appreciated and shows commitment to your students.
- Only one error in application determination (1.59% rate of error). The requirement to complete the Second Review of Applications report and confirmation on all applications submitted will be discontinued beginning in school year 2018-19.
- The Food Service Director seemed receptive to SA input. Food service employees show a desire to provide high quality food for students.
- Staff demonstrated food safety practices (washing hands before putting on gloves, removing apron prior to using restroom).

## Technical Assistance (TA)

### Certification and Benefit Issuance

- Students who qualify for meal benefits when they appear on a direct certification (DC) list mid-month must be claimed in the original category until the day they appeared on the DC List.
- 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.

### Civil Rights

- Reminder that the Medical Statement Form does not need to be renewed on a yearly basis; however, it should be updated to reflect the current medical and/or nutritional needs of the participant.
- Consider revising the complaint procedure and remove 90 days language as that may be confusing; retain the information stating, “Forward civil rights complaints to SA within three working days”.

### Meal Components and Quantities

- Independent contractor Laura Thomas conducted the menu analysis for the review week (January 8-12, 2018) and provided the following TA:
  - Instructed Food Service Director to list hot cereals in the assorted cereal recipe if available daily or list hot cereals separately on production record if available less frequently. Consider changing hot rice cereal to whole grain rice cereal. If white rice cereal is used, it is an “extra” and does not credit toward meeting the meal pattern. Because all other hot cereals are whole grain rich, it is important to know for OVS meals that the white rice cereal does not credit as a grain.
  - The breakfast production record can list  $\frac{1}{2}$  cup fruit and  $\frac{1}{2}$  cup juice for all grades to satisfy the 1 cup fruit requirement. It is not necessary to plan 1 cup fruit and  $\frac{1}{2}$  cup juice for grades 9-12. The portion size of fruit observed was  $\frac{1}{2}$  cup with  $\frac{1}{2}$  cup juice.
  - On the day grilled cheese sandwiches were served, there was insufficient meat/meat alternates (m/ma) for the 9-12 age grade group by 1 ounce equivalent (oz eq); recommend increasing cheese or adding ham to credit 2 oz eq m/ma.
  - Menus were low in daily vegetable planned for the K-8 age grade group (must be  $\frac{3}{4}$  c per day), but the weekly planned vegetable total was in compliance; ensure production records have adequate planned vegetable each day.
  - Update recipes for actual ingredients used. Baked beans were a combination of pork and bean and low sodium vegetarian beans with no additional salt seasonings. The sodium level per serving was less than the estimated amount on the recipe from the computer, 300 mg per  $\frac{1}{2}$  cup compared to 430 per half cup.
  - Encouraged the use of the K-12 breakfast compliance worksheet instead of separate age-grade group worksheets.

## Offer vs Serve

- Ensure signage identifying a reimbursable breakfast meal is posted every day; discussed using the electric lunch board for both breakfast and lunch.

## Food Safety

- A food safety manual was located in the kitchen and the SFA is in the process of customizing it to reflect the needs of the kitchen. The food safety manual must contain standard operating procedures for safe food handling and must contain a standard operating procedure for bodily fluid cleanup. All staff must be trained annually and as needed to insure the service of safe food. (7 CFR 210.13(c))
- 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)). Fresh strawberries, California blend vegetables, winter blend vegetables, and SAF yeast were labeled product of Mexico. 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).

## 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. The Wellness Policy notes an amended date of February 17, 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 (included).
  - 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 (included, “the Administrator”).
  - 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 (not included).
  - 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 (mentioned).
  - Identifying nutrition standards for non-sold foods and beverages available during classroom and school celebrations (mentioned).

- 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 (not included).
- 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 (wellness committee met May 2, 2017; no documented assessment).
- Identifying a way to share the wellness policy content and implementation with the public (included).
- For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs School Wellness webpage.

### 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; the Food Service Director planned to use the Professional Standards Excel tracking resource available in MyIdahoCNP under Download Forms.

### Fresh Fruit and Vegetable Program (FFVP)

- The school must widely publicize the FFVP. Consider mentioning FFVP options served in the past month or planned to be served in upcoming months in the school newsletter or email updates to parents.

### Reporting and Recordkeeping

- Encouraged Food Service Director to gather all food service related records from 2014-2018 and label, organize, and save them. The remaining records (if not needed by finance) may be discarded with administration approval. Note: shred records containing personal information.

### Resource Management

- Food service financial detail provided by the SFA documented a migrant council catering event May-November 2017 as well as food and labor expenses for non-USDA food programs. School year 2016-17 financials show a transfer of \$213,176.25 from the General Fund to the Child Nutrition Fund (NF 232). The school meal program reviewers contacted the State Department of Education finance department for assistance. Records indicate that food service is under the general fund; for the USDA school meal programs, it is required that a separate federal fund account for food service/child nutrition be in place and that catering is a separate section since catering is a non-USDA program transaction. The SA will follow up during the next administrative review to ensure that child nutrition funds are coded under federal funds.
- Note that foods purchased with child nutrition funds are for use in the USDA school meal programs; however, it may be reasonable to use school meal program foods for

non-USDA meals in some instances (e.g., on a Friday, a can of peaches was opened at lunch and only ¼ of the can was used; leftovers were stored using proper food safety practices; ¾ of the can was served at supper Friday night; or spices purchased with USDA funds were used for any meal, since it would be cumbersome to keep separate storage space for USDA and non-USDA purchased spices).

### **Procurement**

- A separate procurement review was completed by Keddington & Christensen, LLC; please follow the guidance previously provided to ensure all areas of concern are addressed prior to the next review.

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

Fiscal action in the amount of \$157.93 will be disregarded. Should you wish to appeal any of these findings please follow the appeal procedures found on the SA 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,



Tamara Donovan, RDN, LD, SNS  
NSLP Coordinator

cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs  
Shelli Mason, Child Nutrition Director, Idaho School for the Deaf and Blind

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