



February 28, 2018

Angela Hild, Principal
St. Edwards School
139 6th Ave E
Twin Falls, ID 83301

Dear Ms. Hild,

On February 16, 2018, State Department of Education (SDE) Coordinators Teresa Goodsell, Lynda Westphal, and Tamara Donovan conducted an Administrative Review of St. Edwards School for the following United States Department of Agriculture (USDA) programs:

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

The State agency (SA) would like to commend Serafina Magness, and the entire staff of St. Edwards 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 – Civil Rights

The Civil Rights (CR) Complaint Procedure must include the following information: "Forward the complaint to the State agency within three working days. Send Civil Rights Complaints to Director, Child Nutrition Programs, Idaho State Department of Education, PO Box 83720, Boise, ID 83720-0027". Please update the CR Complaint Procedure to reflect this information or use the Complaint Procedure provided by the State agency in the Download Forms section of MyIdahoCNP.

Corrective Action: Upload a copy of the corrected CR Complaint Procedure into MyIdahoCNP.

Timeframe for CAP Completion: March 5, 2018.

Sponsor Response to CAP: The SFA uploaded a copy of the CR Complaint Procedure provided by the State agency and a copy of the complaint log that includes the notification step on February 16, 2018. This finding was corrected and closed on the day of review.

Finding 2 – Verification

One application (one student) selected for verification was in error since net income was used instead of gross income for income verification. The student received free meal benefits but should have been changed to reduced price status after verification, based on actual household income.

Corrective Action: Notify the household of the change, allowing ten calendar days, and then update the benefit issuance list. Upload a copy of the notification letter showing the changed status into MyIdahoCNP Review Attachments.

Timeframe for CAP completion: March 5, 2018

Sponsor Response to CAP: A copy of the adverse notification letter sent to the household advising a reduction in benefits was uploaded on February 23, 2018.

Commendations

- The Food Service Director is well organized, worked diligently to prepare for the administrative review and has a firm grasp on program regulations. She does a wonderful job preparing and serving meals, while taking care of all other aspects of running a compliant program. Children are greeted warmly by name, and receive individual attention during meal service. Serafina is a huge asset to the school and CNP.
- The St. Edwards School meal charging policy is uniquely positive. It provides all the information needed for a family to clearly understand the expectations for payment and allows reasonable options for keeping accounts current. In addition, the child nutrition department used the policy to endorse their hard work and delicious meal choices. Great job!
- The Food Service Director, Business Manager and Principal were all very willing to discuss ways to improve the financial integrity of the program to ensure students will

continue to benefit from the implementation of USDA Child Nutrition Programs within their school.

Technical Assistance (TA)

Resource Management (2018)

- The Institute of Child Nutrition (ICN) has an on-line Financial Management course that might be beneficial to the SFA. The courses can be found on the [ICN website](#).
- The SFA food service runs in the red each year, but this is not reflected properly in their financials. Gave TA to break out deposits to divide from family payments and USDA payments and to also include salaries and value of USDA foods in their accounting of Child Nutrition Fund to correctly reflect the actual balances in this account.
- Add Food Service Director's wages to the child nutrition account so it does not show so much of a balance of income over expenses. Food service was in the red after the wages were added. The school will start this process from this point forward.

Certification and Benefit Issuance

- 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.

Local Wellness Policy

- The State agency provided the Idaho Wellness Policy Progress Report, and an assessment tool, which may be used for annual review of the policy by the wellness committee. For more wellness information, please visit the SA Wellness web page.

Meal Counting and Claiming

- Students may be able to see student information on the POS computer screen, especially during the breakfast service. Devise a plan for masking the meal status information. The State agency recommends utilizing a privacy screen on the computer monitor, etc. to help prevent overt identification.

Meal Components and Quantities

- Independent contractor Kerry McKaig completed the menu review and provided the following TA:
 - A choice of three cereals are offered daily for breakfast; however, one of the three is not a whole grain rich product. The non-compliant product was replaced and added to the product record.
 - The pre-printed production record showed that 1% white milk and 1% chocolate milk were offered for breakfast and that 1 cup of cereal credits as 2 ounce equivalent (oz eq) grains. The contractor confirmed on site that only 1% white milk and fat free chocolate milk are served, and that 1 cup of cereal is the portion served which credits 1 oz eq grains. The production record for breakfast was updated with

- the correct cereal grain crediting, and fat free chocolate milk was added and 1% chocolate milk was removed.
- The bread used for toast, served on 1/19/18 and 2/2/18, is not whole grain rich according to the label. A whole grain rich bread will be purchased. Copies of labels for the new products and updated production records were provided to the State agency contractor.
 - A current product formulation statement for the whole grain bagel served on 1/18/18 was provided to replace the one on file that was not dated and was missing the list of ingredients.
 - Pepperoni pizza served on 1/15/18 was credited as 2 M/MA and 1 Grain on the production record. Two pounds of mozzarella cheese are used on each pizza; cut into 24 servings. The cheese only credits as 1.33 oz. rounding down to 1.25 oz. M/MA per serving. Pepperoni is not creditable as M/MA component. The pizza crust recipe credits as 1.75 oz. grain eq per serving according to the creditable grain worksheet.
 - The tostadas served on 1/17/18 were incorrectly credited as 2 M/MA and 1.5 oz eq grain. One portion is 2 tostada shells with ½ cup refried beans and 1 oz. cheese which credits as 3 oz. M/MA and .75 oz eq grain. The tostada shells used were not whole grain rich. A whole grain rich tostada shell will be purchased going forward.
 - The corn salad served on 1/17/18 did not meet the minimum weekly requirement for the starchy and bean/pea (legume) subgroups, only crediting as ¼ cup each. The recipe was adjusted to credit as ½ cup for both starchy and bean/pea subgroups.
 - The turkey in the wrap served on 1/18/18 only credits as .75 oz. M/MA according to the product formulation statement rather than 2 oz. M/MA; does not meet the minimum daily amount of 1 oz. M/MA for the K -5 age group. A 1 oz. cheese stick will be added to the meal to ensure the minimum M/MA is served. The wheat tortilla used for the wrap credits as 1.25 oz eq grain not 1.0 oz. as indicated on the production records.
 - The Fritos served on 1/19/18 are not whole grain rich and the weekly requirement of 8 oz eq for Grains was not met; 7.75 oz eq was served. The food service director will change to a whole grain corn tortilla chip and increase the portion to 1.25 oz. grain to meet the weekly requirement. A new product formulation statement for the corn tortilla chips was provided.
 - Technical assistance was given to update the production records with the accurate milk offered at both meals, the correct crediting for each food item, and the correct date. Record number of portions leftover of each food and leftover milk each day. Record the temperatures of hot and cold food to make sure food is not being served in the danger zone.

Food Safety

- Mayonnaise in the dry storage food area is close to the best used by date. Furthermore, the temperature in the area, while in the acceptable range, does run on the high side. Consider moving this product to the refrigerator for full use during the product life cycle.

- The Independent contractor provided the following TA:
 - Recommended both student and adult volunteers wear hair restraints when preparing and serving food.
 - Recommended that food in the dry storage area be dated when received for using FIFO inventory management.
 - Recommended that bagged foods like coconut and panko breadcrumbs be stored in a bin for freshness and safety.

Procurement

- A separate procurement review was completed by Keddington & Christensen, LLC. No findings requiring corrective action were found, but areas of technical assistance were noted. Please follow the guidance provided in this NSLP Procurement Review.

Your review is now closed

There is no fiscal action resulting from 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,



Teresa Goodsell, BS, SNS
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Serafina Magness, Child Nutrition Director, St. Edward School

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