



February 8, 2018

Leslie McDaniel, Principal
Sts. Peter and Paul School
330 South B Street
Grangeville, ID 83530

Dear Principal McDaniel,

On January 22, 2018, State Department of Education (SDE) Coordinators Jennifer Butler and Lynda Westphal conducted an Administrative Review of Sts. Peter and Paul 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 Penny Stuiwenga, Helen Egland, and the entire staff of Sts. Peter and Paul 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 – Benefit Issuance

Two applications were identified as being incomplete due to the household member total not matching the total names listed on the application. Follow-up with the household must occur to identify all members of the household and any income received by them. These incomplete applications resulted in a 14.29% error rate requiring the continuation of the currently required second review of applications. This second review and associated report must continue until further notice. Be vigilant in checking the completion of applications before determining them.

Timeframe for CAP: Completed on January 22, during onsite review.

Sponsor Response to CAP: While reviewers were onsite, the applications were completed and resulted in no changes in benefits.

Finding 2 – Verification

During verification, a deposit email from the Department of Health and Welfare indicated a deposit total for a child support payment. This total was calculated at the bi-weekly frequency indicated on the application, even though the email did not indicate the frequency of payments. A single deposit email referencing only one deposit total is not a complete reflection or validation of bi-weekly payments made to the household. Obtain additional documentation to show the frequency of deposits and the dollar amount of those deposits. Using the additional information, determine household income and make changes in eligibility as applicable. Upload the original application, pay stubs, and complete child support payment information into MyIdahoCNP Review Attachments along with any notification reflecting changes in benefits if applicable.

Timeframe for CAP: Due February 6; completed January 31, 2018.

Sponsor Response to CAP: On January 31, 2018, the SFA upload the requested documentation showing multiple Department of Health and Welfare deposits occurring on a bi-weekly basis. No changes in benefit issuance were required.

Finding 3 – Meal Counting and Claiming

A systemic error was discovered with the Point of Service (POS) counting and monthly claiming process. Inaccuracies in the December 2017 claim were identified resulting in an over claim of one free meal and an under claim of seven paid meals. Markings on the daily participation sheets were confusing when circles were used and teachers did not consistently follow the SFA's request to draw a line through the preordered meal count. Daily counts added by teachers sometimes differed from the counts added by the kitchen manager. On the day of review, SA reviewers witnessed seven students get their meal before an adult was present at

the POS station. Processes must be improved to have students wait for an adult to record their participation. SA reviewers provided input on possible ways to improve system for more accurate counting. Develop a plan to ensure accurate daily reimbursable meal counting at the POS to support claim totals and train applicable employees on accurate completion of daily meal count sheets. Upload a narrative of the process and documentation of training into MyIdahoCNP.

Timeframe for CAP: Due February 6; completed January 31, 2018.

Sponsor Response to CAP: On January 31, the SFA uploaded a narrative describing a training held on January 24, 2018, on the expectations of meal counting at the POS. The principal and teachers signed off on the narrative which described that the principal will be the primary person to mark off students daily. Teachers will be responsible to mark their own classes only when the principal is unavailable. No student will be allowed to go through the food service line until the principal or teacher is seated at the POS station to mark their name. A line will be drawn through the student's preordered meal count; no circles will be used. The person marking the orders will calculate the total which will then be rechecked by the kitchen manager daily.

Finding 4 – Professional Standards

Effective July 1, 2015, per USDA Professional Standards, Food Service Directors must have at least eight hours of food safety training within the past five years. *Food Safety in Schools* (formerly known as *Serving it Safe*) is available through the Institute of Child Nutrition (ICN) online and free. Upload a training certificate indicating successful completion of at least eight hours food safety training into MyIdahoCNP Review Attachments.

Timeframe for CAP: Due February 6; completed January 31, 2018.

Sponsor Response to CAP: On January 31, the SFA uploaded a certificate of completion for the ICN's *Food Safety in Schools* online training completed on January 31, 2018.

Finding 5 – Trans-Fat

Food products and ingredients used to prepare school meals must indicate zero grams of trans-fat per serving (CFR210.10 (a) (ii)(3)). Pioneer Country Gravy mix with trans-fat was located in the storage room. The SFA advised that this gravy mix is not being used. This product must be discarded or donated immediately. Upload a narrative describing how the gravy mix was discarded and what steps will be taken to ensure that products with trans-fat will not be purchased in the future into MyIdahoCNP Review Attachments.

Timeframe for CAP: Due February 6; completed January 31, 2018.

Sponsor Response to CAP: On January 31, the SFA uploaded a narrative describing that the gravy packets were donated to the Knights of Columbus organization for their fund-raiser breakfasts. Additionally, since this organization also uses the kitchen and storeroom, shelves were reorganized and signage posted to divide inventory of foods belonging to the child nutrition program. The narrative also referenced more diligence will be used in purchasing items compliant with the rules of the program and the SFA's procurement policy.

Fiscal Action

Due to the December claiming error, fiscal action results in \$0.70. However, since this amount falls under the \$600.00 threshold, the fiscal action will be disregarded and no financial adjustment will occur.

Commendations

- The preparation for the Administrative Review was greatly appreciated. All requested items were uploaded in a timely manner.
- Staff was courteous and receptive to suggestion and technical assistance provided by reviewers.

Technical Assistance (TA)

Meal Counting and Claiming

- The school does not participate in the Offer versus Serve provision and therefore, all meal components must be served in their full amount before a meal is counted as reimbursable.

Dietary Specifications and Nutrient Analysis

- SA contractor Tisha Whatcott, RD, LD, conducted the menu analysis for review week and discovered the following:
 - The production records for the week of 12/4-12/8 verified that meal components were being met. However, there were times when the production records indicated a shortage of meal components. This was determined to be caused by 'user input error' when completing the records. Time was spent with the kitchen manager educating her on the importance of accurately completing the production records - specifically with regards to grain oz. equivalents and the meat/meat alternate oz. equivalents.
 - The school has appropriate documentation for all foods used, i.e. CN labels and Product Formulation Statements (PFS), but did not have all the appropriate standardized recipes to follow for a few of their menu items. It is recommended that they go on-line to the USDA site and obtain these recipes to use in order to insure that meal components are being met (and not routinely exceeded) at meals by using appropriate serving sizes.
 - It was recommended that a copy of a vegetable subgroup list be printed and posted in the kitchen. This list should help make it clear how to classify vegetable subgroups when planning a menu.

Meal Components and Quantities

- The Uncrustable Peanut Butter & Jelly (PB&J) sandwich was not Whole Grain-Rich (WGR). The SFA usually purchases a WGR option through their food vendor, but ran short and had to purchase more at the local store which did not have a WGR option. The

non-compliant PB&Js were served on January 19 and January 22, the day of review. The SA identified that the PB&Js were not WGR prior to meal service so accommodations to meet the minimum grain component were made. Usually, one NutriGrain bar is served with the PB&J sandwich selection, but since that bar only credits as ½ oz. eq., two NutriGrain bars had to be served with the seven pre-ordered PB&J sandwiches served on January 22 in order to meet the 1 oz. eq. minimum.

- The SFA and SA edited the January 19 meal counts to remove the 6 non-compliant PB&J sandwiches served on that day so that those non-reimbursable meals will not be included in the January claim. The SFA will order the WGR option through their food vendor on January 24 for delivery on January 25 and will plan to make the pre-ordered PB&J sandwiches on WGR bread to be served on January 23 and 24 until that order is delivered.
 - On January 31, the SFA advised they will give the non-compliant PB&J sandwiches to the Grangeville Food Bank as part of their Giving Tuesday donations. They will use more care in purchasing compliant WGR products.
- Signage explaining a reimbursable meal must be posted at or near the service line. The school does not participate in Offer vs. Serve (OVS), so it was advised that posting the monthly menu on the bulletin board would meet this requirement.
 - This was completed while SA reviewers were onsite.
- Large cans of fruits and vegetables are purchased through commodities, but additional small cans are purchased from the local grocery store as back up incase only a few additional servings are required. The small cans of peaches and pears were in packed in heavy syrup. Be sure to purchase fruit in light syrup or juice for consistency and stay within calorie limits.

Food Safety and Buy American Provision

- The most recent food safety inspection report must be posted in a location visible to the public. (7 CFR 210.13(b)). The current location in the kitchen is not publically visible. Posting this report on the bulletin board in the hallway by the stairs leading to the cafeteria with the other food service items would meet this requirement while compromising with the schools directive not post anything in the cafeteria/gymnasium where the service area is located.
 - The SFA moved the inspection report to hallway bulletin board while SA reviewers were onsite.
- A food safety manual (HACCP) was located in the kitchen, but needs to be customized to reflect the needs of the kitchen. The customized policies should also reflect and implementation date and reviewed and revised dates as applicable.
- Record all food storage temperatures consistently on logs. This ensures food is stored within recommended temperature ranges for food safety and this standard helps ensure food quality. (CFR210.13(d)). TA was given during the last review to record temperatures, including dry storage temperatures. Although a thermometer is located in the dry storage room, daily dry storage temperatures are not being recorded.

- The dry storage room contains food and paper products purchased and utilized by other organizations. Although some signage was posted to indicate which organization was assigned specific shelving, it was evident that some products shared shelving with items purchased with child nutrition funds. It is recommended that signage be posted to clearly indicate shelving and items belonging exclusively to child nutrition and make it clear that those items should not be used for any other purpose.
 - On January 31, the SFA uploaded pictures showing new signage posted in the dry storage room.
- Unsafe food handling practices by students at the condiment station were witnessed. An adult should monitor this station to ensure that students use the tongs that are available. This is an opportunity to teach students about hygiene and food safety.
- Starting July 1, 2018, the Idaho Food Code requires a Person in Charge to demonstrate knowledge of food safety practices by completion of one of the examinations and courses that meets the demonstration of knowledge requirements in Section 2-102.11 of the Idaho Food Code.

Civil Rights

- Update your non-discrimination statement to the correct USDA non-discrimination statement available at the State Agency website. The current short non-discrimination statement reads, "This institution is an equal opportunity provider."
- Ensure the correct USDA Non-Discrimination Statement is included on all public documents dealing with USDA Child Nutrition Programs. The short non-discrimination statement is for use on documents less than one page (double-sided) in length; the long statement is for use on longer documents and can be found on the CNP website under Civil Rights. The short statement should be added to the monthly menu document; the long statement should be added to the foodservice webpage.

Local School Wellness Policy

- The final rule on wellness policies (§210.31) required LEAs to be in compliance by June 30, 2017. The LEA's current LWP (marked as Reviewed October 2017) is missing required elements, making it noncompliant. The wellness policy committee must work to get the LWP compliant with the final rule. Please refer to the Idaho Wellness Policy Progress Report completed by the SA and provided during the AR to identify the missing elements to be addressed.
- The Diocese of Boise has a compliant policy that Sts. Peter and Paul School may want to explore adopting as their own.
 - On January 31, the SFA advised they have contacted the Diocese to use their wellness policy as a model.
- For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs School Wellness website.

Professional Standards

- Utilized Training log does not indicate the subject matter or type of training completed. Logs must include the key area/topics and training subjects completed with certificates,

agendas, and sign-in sheets retained for backup. The SA has made available a template tracking log prompting this information and Professional Standards Learning Objectives and Topics with Codes which can be found on the USDA Professional Standards Website.

Procurement

- A separate procurement review was completed by Keddington & Christensen, LLC. on December 11, 2017. No findings requiring corrective action were found, but five 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,



Jennifer H. Butler, M.Ed., S.N.S.
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Penny Stuvenga, Child Nutrition Director, Sts. Peter and Paul School

This institution is an equal opportunity provider.



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

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- (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.

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