



July 2, 2019

Dr. Harold Nevill, Superintendent
Canyon-Owyhee School Service Agency
109 Penny Lane
Wilder, ID 83676

Dear Dr. Nevill,

On February 12, 2019, State Department of Education (SDE) Coordinator Lynda Westphal and Financial Specialist Melissa Cook conducted an Administrative Review of Canyon-Owyhee School Service Agency (COSSA) for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was COSSA.

The State agency would like to commend the staff of COSSA 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 (TA)
- 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:

Finding and Corrective Action Plan (CAP)

Finding 1 – Production Records

The SFA is not maintaining correctly completed daily production records for breakfast or lunch.

Corrective Action:

1. Provide the date that the finding was brought into compliance or the planned date of completion.
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
3. Provide a statement that the SFA will maintain completed production records for all meal services. The records must be kept on file for a minimum of 3 years plus the current school year.
4. Provide 1 week of completed production records for all meal services at the reviewed site(s).

Due Date for CAP Completion: January 25, 2019

Corrective Action Response uploaded by SFA: Per uploaded document “It is my intention to make sure all production records are filled out completely and accurately to include all areas of compliance necessary to achieve less than a 4% error rate. Because production records are legal documents, they shall be kept on file for the required amount of time, and professional training on the subject shall be recorded and updated periodically, not less than 2 times per year.”

Finding 2 – Meal Components and Quantities – Week of Review

1-For the week of menu review, the 9-12 lunch menu did not meet the minimum daily and weekly requirements for meat/meat alternate. A meat/meat alternate was offered daily, however the minimum daily and weekly requirements were not met.

2- For the week of menu review, the 9-12 lunch menu did not meet the whole grain-rich requirement. Not all grains provided were whole grain-rich.

Corrective Action:

1. Provide a written statement that the daily and weekly meat/meat alternate and whole grain-rich requirements are now met. Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance.
2. Submit any necessary documentation to demonstrate that the menu findings listed under step 1 are now corrected. This documentation may include: production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.

Due Date for CAP Completion: January 25, 2019

Corrective Action Response uploaded by SFA: “It is the intention of the FSA, to make sure all M/MA, and whole grain rich requirements for the SBP, and the NSLP, be met or exceeded. Each week of our cycle menu is in the process of being double checked to assure the full amount of M/MA is being met. Simultaneously, each product formulation statement and/or CN label will be checked to ensure compliance of the whole grain rich requirement. In addition, our food

vendor will be informed of the importance of their help in making sure all products meet our expectations.”

Finding 3 – Meal Components and Quantities – Day of Review

On the day of CNR review, the minimum daily quantity requirement for grains was not met for the 9-12 grade group at lunch. Menu items originally planned were 1.5 oz. eq. or 1 oz. eq. Menu was corrected prior to service to add an additional 1 oz. eq. WGR bread, breadstick or 2 oz. eq. biscuit.

Corrective Action:

1. Provide the date that the finding was brought into compliance or the planned date of completion.
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
3. Provide a written statement that all production records will be reviewed to ensure that all required components are planned in the minimum portion size required for the grade group

Due Date for CAP Completion: January 25, 2019

Corrective Action Response uploaded by SFA: “Before service of each meal, I will consult a checklist of the required components of a reimbursable meal to ensure compliance. Furthermore, the production records will also provide documentation of compliance in this area. It is also my intention to provide the students with the information as to what constitutes a reimbursable meal during the food service. I intend to implement a color-coded system to show the kids what food components are necessary to pick from to be sure there are no out-of-pocket costs incurred.”

Finding 4 – Food Safety

No current site specific food safety plan is on site.

Corrective Action:

1. Provide the date that the finding was brought into compliance or the planned date of completion.
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.

Due Date for CAP Completion: January 25, 2019 – completed Feb 12, 2019.

Corrective Action Response: During review the SFA gave the SA a jump drive with the Food Safety Plan from ICN from 2016 and the Food Service Supervisor will use this resource to develop the site specific food safety plan before the end of the school year June 2019.

Finding 5 – Meal Counting and Claiming

A systemic error was discovered; there were inaccuracies in the November and December 2018 monthly claim.

Corrective Action:

The Food Service Director will develop a plan to ensure accurate meal claiming and will train applicable employees. Upload the plan and documentation of training into MyIdahoCNP Review Attachments.

Due Date for CAP Completion: Feb 27, 2019.

Corrective Action Response uploaded by SFA: “For the remainder of this school year, the current system will still be used, however, the staff that volunteers during service are now trained to watch for signing in. Also, I am now able to be at the end of the food service line with

a clicker and this ensures a two-fold check on the accuracy of the count. In addition, meal amounts are counted as they are prepared, and the math will help keep proper checks and balances on our accurate meal counting efforts.”

Finding 6 – Civil Rights

Please update the non-discrimination statement to the correct USDA non-discrimination statement available at the State Agency website: <http://www.sde.idaho.gov/cnp/civil/>

Corrective Action: Add the full statement to the brochure sent to the students during enrollment.

Due Date for CAP Completion: February 12, 2019.

Corrective Action Response: The manual was updated by Dr. Nevill prior to the on-site review. This finding is now closed

Finding 7 – Breakfast Outreach

SFAs must inform eligible families of the availability of reimbursable breakfasts served under the School Breakfast Program (SBP) and Summer Food Service Program (SFSP). At the beginning of the school year, the SFA must send all households informational packets. In addition, schools must send reminders regarding the availability of the SBP multiple times throughout the school year. (7 CFR 210.12 (d)).

Corrective Action: Prepare a plan to inform families throughout the year. This can be accomplished through a website with the menus posted and breakfast information listed.

Due Date for CAP Completion: February 27, 2019.

Corrective Action Response uploaded by SFA: “I requested a full page on our school website to show our menu, and to inform families of our reimbursable breakfast service. We have started the process and are making final adjustments before activating the page. We are trying to make the page available before an upcoming parent teacher conference.”

Finding 8 – Offer versus Serve (OVS) and Nonprofit Food Service Account

On the day of CNR’s review, one meal counted for reimbursement did not contain all of the required components. (One breakfast selected did not contain a fruit). On the day of SA review, there were 16 students who self-selected menu items and did not take a reimbursable meal (did not select fruit) at breakfast. These students should be charged the a la carte rate for the individual items. The sign-in sheet is being misused with one child writing in several names or some not writing their names at all, just a pseudonym.

Corrective Action: Please develop a policy to either charge the students OR stop this from occurring. The written policy must be disseminated to the students so they know the policy. A compliant way to count reimbursable meals monitored by an adult must be developed to ensure proper meal counting.

Due Date for CAP Completion: February 27, 2019

Corrective Action Response uploaded by SFA: “Because COSSA Academy works with a diverse demographic group of students, it is a challenge sometimes to adequately explain the requirements of a reimbursable meal. Therefore, to stay in compliance with both OVS AND making sure each meal is reimbursable, we are placing all required components on the tray before handing it to the student. (They choose, we place on tray) after the compliance is met, the student then has other options to choose from. All food service workers and volunteers

must have a good understanding of the requirements of each meal, and of the OVS requirements. The staff will be trained as necessary or at least 2 times per year. (This has yet to be scheduled) I have also implemented a short meeting (5 minutes) with the volunteers that help with daily food lines. We meet right before the service to discuss what options we have for that day and what must be chosen from for that meal.”

State agency Response to Corrective Action Response: A compliant procedure must be implemented at the beginning of the 2019-20 school year in order to ensure an adult either serves a reimbursable meal or is at the end of the line monitoring reimbursable meal selection for all students. All school nutrition staff will need to take the online OVS trainings for both breakfast and lunch prior to meal service for school year 2019-2020.

Finding 9 – Nonprofit Food Service Account

The Food Service Director at times does the dishes for the culinary arts program using the new dishwasher and during the day, and on the day of review, the culinary arts teacher came into the kitchen for a measuring spoodle. There must be a time and effort report to delineate the hours between a federal program and general funds operated program. If the dishwasher or supplies are being used for culinary arts, then there should be a cost sharing of the detergent, or foil, etc. between the two programs.

Corrective Action: Develop a plan to separate costs and do a time and effort report for the proper accounting of time to a federal program.

Due Date for CAP Completion: February 27, 2019

Corrective Action Response uploaded by SFA: “It is our goal to have the Culinary Arts program, and the Food Service department be separate in every way possible. We are looking at several possibilities in the area of sinks/dishwashers, since the former is shared between the two. One possibility that is being considered is the use of only the three compartment sinks. Culinary Arts could use these at the Food Service Departments discretion. This would eliminate the need to track the use of newer dishwashing equipment, chemicals, etc. Culinary arts would supply all their own necessary equipment other than the sinks and water, thus eliminating unnecessary paperwork and tracking of labor or other cost tracking.”

State agency Response to Corrective Action Response: A compliant procedure must be implemented at the beginning of the 2019-20 school year in order to segregate the general fund usage/expenditures generated from the Culinary Arts program from federal expenditures from Food Service.

Finding 10 – Procurement

The Code of Conduct given during the Procurement Review was out of compliance. It cannot say it will follow 2 CFR 200, as this regulation says that each school will develop its own Code of Conduct and Procurement Policies. The SFA could adopt ISBA policies and procedures for procurement to encompass all of the 2 CFR 200 regulations.

Corrective Action: Develop a plan to bring the Procurement policies and procedures into compliance with a timeline.

Due Date for CAP Completion: February 27, 2019

Corrective Action Response uploaded by SFA: “Adoption and implementation of the Idaho State Board of Education’s policy and procedures for procurement.”

Commendations

- Congratulations on being awarded \$17,050.00 for a Dishwasher in 2017 as part of a USDA Equipment Grant. Your initiative in applying for this grant is appreciated and shows your commitment to your students.
- Students were served in a warm and caring environment. Students were observed enjoying the meals provided.

Technical Assistance (TA)

Meal Counting and Claiming

- The sheet used for counting must be replaced with a more reliable system. Even a counter used by another staff member could be used as a viable option.

Meal Components and Quantities (missing vegetable subgroups, inadequate grains)

- CN Resources completed the menu review and provided the following TA after final corrective action was received on May 30, 2019:
 - Breakfast - During the review, the components of the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should consider providing additional signage and training to students to make sure they know what is required for a reimbursable meal. The SFA should also provide additional training to the point of service staff on the requirements of a reimbursable meal. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. [USDA Meal Pattern Guidance](#)
 - Technical assistance was provided to increase production so they will not run out of any component during meal service.
 - Breakfast and lunch- During the review, production records were discussed with the SFA. The SFA must ensure that all sites are keeping accurate and complete production records for the meals they produce. The records must be completed throughout meal service and maintained every day. At a minimum, the production records should include the name of the item, the recipe or item number, the portion size, the number of planned portions, the component contribution amount and the number of actual servings. All kitchen staff should be trained on completing production records so that everyone can complete the records.
- Lunch-
 - During the Administrative Review the results of the menu review were provided to the SFA in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served within the SFA must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA was encouraged to provide training as

needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

- The federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent meat/meat alternate requirement. Planned menu does not meet the daily minimum meat/meat alternate requirement for Wednesday when only 1.5 oz. were offered. The Ham Fried Rice credits at 1 oz. eq. meat/meat alternate and the Egg Roll credits at 0.5 oz. eq. meat/meat alternate. Consider serving 2 egg rolls to the 9-12 grade group or add another ½ oz. eq. meat/meat alternate to the menu this day.
- The federal regulations require menus to be planned that meet the minimum weekly 8-ounce equivalent meat/meat alternate requirements. Only 7.75 oz. eq. were served during the week.

By following the suggestions to meet the daily requirement, the weekly requirement will also be met. Offer a minimum of 2 oz. eq. meat/meat alternate with each meal to help meet requirements.

- All grains served must be whole grain-rich in order to meet the whole grain-rich requirement. The menu met 89.5% whole grains.

The following products are not whole grain-rich and therefore do not contribute towards the grain requirements. Choose whole grain-rich alternates to meet meal pattern requirements.

- Egg Roll served on Wednesday - To be considered whole grain-rich, the product must be comprised of at least 50% whole grain ingredients, with the remaining grain products enriched. An easy way to determine this is by looking at the ingredient list. The product would be considered whole grain-rich if the primary ingredient is a whole grain, such as: whole wheat flour, graham flour, whole corn, oatmeal, whole barley, brown rice, or whole rye.

For more information on identifying products that meet the whole grain-rich criteria, refer to the link below for USDA's Whole Grain Resource [USDA Whole Grain Resource link](#)

Offer versus Serve (OVS)

- Gave TA that a fruit or vegetable must be a component taken at each meal.

Food Safety

- CN Resources completed the menu review and provided the following TA:
 - During the review, the food safety plan was discussed with the SFA. The SFA must have a food safety plan available at each site so that food service staff may stay in compliance with food safety requirements and procedures. The Food Safety Plan available is not site specific and lacks implementation dates and signatures (it is the ICN template, without any modifications).
 - During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publicly visible location at the site

- During the review, Buy American requirements were discussed with the SFA. The SFA must purchase, to the maximum extent practicable, domestic commodities or products. “Domestic commodity or product” is defined as an agricultural commodity that is produced in the U.S. and a food product that is processed in the U.S. substantially using agricultural commodities produced in the U.S. There are limited exceptions to the Buy American provision which allow for the purchase of foods not meeting the “domestic” standard in circumstances when use of domestic foods is truly not practicable. The SFA must keep documentation justifying the limited exception(s). These exceptions, as determined by the SFA, are:
 - The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or
 - Competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product.

Resource Management

- All foods purchased by the food service department to be used as non-program food sales must be marked up to account for the cost of the food, labor, storage, and delivery of the products. Food service cannot order for non-USDA programs without ensuring that Federal funds are not used to support non-program foods. Due to the added non-program foods paperwork and record keeping, evaluate non-program foods pricing to ensure compliance.
- While the dishwasher and equipment was paid for with child nutrition funds, the culinary arts program is using the dishwasher and utensils for their program. Food service cannot pay for all of the detergent for the dishwasher if other programs are using it. It must be pro-rated. The culinary arts program should have their own utensils for their program and not take these from the food service area. Since they are paid for with USDA funds, they should only be used for USDA purposes.

Local School Wellness Policy (LWP)

- A copy of the LWP evaluation was given to the SFA to correct the deficiencies identified.

School Breakfast and SFSP Outreach

- SFAs must inform eligible families of the availability of reimbursable breakfasts served under the School Breakfast Program (SBP) and Summer Food Service Program (SFSP). At the beginning of the school year, the SFA must send all households informational packets. In addition, schools must send reminders regarding the availability of the SBP multiple times throughout the school year. (7 CFR 210.12 (d)). Recommend having the menus posted on the website.

Provision Records

Special Provision Options (CEP)

- Maintenance of CEP records for SY 14-15 and SY 15-16 (first year) were validated by the SA using April 1, 2015, data and the SA downloaded the files to her desktop during the

review. Direct Certification reports for April 1, 2019, data must be run this year. The current CEP approval expires at the end of SY 18-19. Make sure this is done on Monday April 1, 2019, to ensure the SA can help validate the numbers immediately. As of May 21, 2019, this has not been uploaded.

Procurement

- A separate procurement review was completed with a State Agency closure letter sent with this closure letter.

Fiscal Action

Fiscal action resulted in \$426.59. However, since this amount falls under the \$600 threshold, the fiscal action will be disregarded and no financial adjustment will occur. If, during the next Administrative Review, there are repeat findings, there will be no disregard of fiscal action.

Your review is now closed.

There is no fiscal action resulting from this review. 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,



Lynda Westphal, MHS, SNS, NSLP Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Child Nutrition Supervisor, Canyon-Owyhee School Services Agency

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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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