



April 1, 2019

Josh Femreite, Chief Operating Officer  
Gem Prep: Meridian  
2750 E Gala Court  
Meridian, ID 83642

Dear Mr. Femreite,

On March 21, 2019, State Department of Education (SDE) Coordinators Lynda Westphal and Jennifer Butler conducted an Administrative Review of Gem Prep: Meridian for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)

The site reviewed was Gem Prep: Meridian.

The State agency (SA) would like to commend Rebekah Rasmussen and the staff of Gem Prep: Meridian 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)

### No Findings at this time

### Commendations

- Congratulations on your first year as a NSLP sponsor. Your hard work and dedication in implementing child nutrition programs is appreciated.
- Rebekah was diligent in preparing for the administrative review and maintains organized records. Her efforts in completing the off-site modules in a timely manner and in gathering documentation prior to the review were greatly appreciated.
- Great job maintaining a fundraising tracking log. As fundraisers increase, continue communication with the PTO to track compliant and non-compliant fundraisers to ensure that the limit of ten allowable non-compliant fundraisers per year is not exceeded.
- Your student helper was really good at multitasking with the salad and pickles and interacted well with the students.
- The food service was on their toes today with the main dish shortage, the total shortage of main dish, and the one child getting sick. Good job.
- Contractor CN Resource provided the following commendations:
  - Outstanding job meeting all the requirements for the meal pattern. All daily and weekly meal component and food quantity requirements were met for the week of menu review.
  - Gem Prep: Meridian contracts with Nampa School District for meals. Both operations follow food safety practices and prepare and serve meals with care.
  - Students are served the planned menu (not OVS) and were observed enjoying the meals. The atmosphere in the cafeteria is warm and friendly.

## Technical Assistance (TA)

### Verification

- Once the verification process has been completed and results determined, the Verification Official, who can be either the Confirming or Determining Official, must complete the “Official Use Only” box on the meal application with dates notices were sent and the results of verification.

### Meal Counting and Claiming

- If a student helper is provided a reimbursable meal at no charge for assisting with meal service, that meal can be claimed at the student's eligibility.

## Dietary Specifications and Nutrient Analysis

- CN Resource completed the menu review and provided the following TA:
  - Recommend putting the analysis in with actual planned numbers instead of one for each item.
  - A Full Nutrient Analysis was conducted and Nampa School District was notified of the following results:
    - The weekly calorie range was low at 593 (required range 600-650 calories). The calories will need to be corrected to meet the required range. The updates outlined below may bring the calories into range.
    - The following menu items entered in the nutrient analysis do not match the nutrition facts labels submitted. These items need updated in the nutrient analysis in order to validate the nutrient analysis. Please enter these corrections and submit the updated nutrient analysis.

February 5- Tuesday

-1% milk- calories on label 110, sodium on label 130mg. Analysis shows calories at 100 and sodium at 125mg

-Ranch- 1 oz. lite ranch cup- calories on label 100, saturated fat 2, sodium 250. Analysis shows calories 65, saturated fat 1.39, sodium 139

February 7- Thursday

-Hot dog Frank- per label 170 calories, 6 sat fat, 360mg sodium

-Bun- per label 150 calories, 0 sat fat, 190 mg sodium

-Totals- 320 calories, 6 sat fat, 550mg sodium. Analysis shows- calories 302, sat fat 5.06, sodium 534

February 8-Friday

-Corn- per USDA label for frozen corn, a  $\frac{3}{4}$  cup portion should be approx. 100 calories. Recipe shows  $\frac{3}{4}$  cup of corn using plain USDA frozen corn with nothing else added at 135 calories. Check to make sure ingredient has the most to up to date nutrition facts of 67 calories for  $\frac{1}{2}$  cup cooked corn.

This information was provided to Nampa School District and the menu was updated to increase calories to bring the menu into compliance. No further action on this is required.

## Meal Components and Quantities

- Communicate with the food delivery vendor to double check the delivery temperature log to ensure that the portion amount listed on the log matches the total amount picked up and delivered to the school. On the day of review, the log indicated 5 pans of chicken patties, but only 3 pans were initially delivered requiring two additional pans to be delivered during meal service. Ensure appropriate practices are built in to avoid this situation in the future.
- TA given that some ideas of shelf stable products to have on hand would be:
  - Peanut Butter or Sunflower seed butter single serve (serve two to equal 1 M/MA)
  - Tuna Pouch

- Sunflower Seeds
- Cheese stick (watch expiration dates)
- Hummus (Zee Zees Red Pepper Hummus 4.5 ounce cup = 2 M/MA – not advocating that brand)
- Dried meat sticks (turkey jerky, chicken jerky, beef stick as long as it is creditable)
- V-8 juice or other vegetable juice for the vegetable component
- CN Resource completed the menu review and provided the following TA:
  - Consider having additional reserve food on hand in event of emergency, such as dropped pan of vegetable - to assure all meals would include required served portion.

## Food Safety

- CN Resource completed the menu review and provided the following TA:
  - The food safety plan was discussed with the SFA. The SFA must have a complete food safety plan that includes all of the required sections as specified by USDA. 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. TA given to modify food safety SOPs to reflect actual practices and remove SOPs that do not apply to vended meal service operation.
  - Temperature logs were discussed with the SFA. The SFA must maintain temperature logs for all food storage areas, in accordance with the requirements of the local health department. The completed temperature logs must be kept on file for a minimum of six (6) months.
  - Buy American requirements were discussed with the SFA. As the SFA has a vended meal contract, the SFA should ensure that appropriate Buy American wording is included in the contract. Wording should require the contractor to follow the Buy American provision and provide documentation for exemptions when applicable. 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.

## Civil Rights

- Congratulations on having the full non-discrimination statement in the handbook and on the web.

## Local School Wellness Policy (LWP)

- The current policy, posted on the website, is not dated. An approved and/or revised date should be included so that the triennial assessment requirements can be monitored. Fixed as of review date.
- All LEAs must assess their wellness policy at least once every three years on the extent to which schools are in compliance with the district policy, the extent to which the local wellness policy compares to model local school wellness policies, and the progress made in attaining the goals of the local wellness policy. LEAs must make this assessment available to the public. The SA has a template progress report available on the [School Wellness page](#) of the CNP website.

## Smart Snacks

- An exempted fundraiser can be for a maximum of four consecutive school days. Fundraisers lasting longer than four days count as two or more fundraisers. In the case of the Shamrock Gram sucker fundraisers, the ordering of the grams was held over a period of 9 days, but the suckers were only delivered on one day. The SA would consider this fundraiser to be only one day as non-compliant food was only provided on one day; however, continue tracking the days the pre-ordering was open for sales.

## Professional Standards

- The Food Service Director was hired after July 1, 2015. A Professional Standards questionnaire was completed to document education and or experience. The Professional Standards for School Nutrition Program Employees brochure was provided.
- Trainings lasting 15 minutes or more may be recorded and counted toward required training hours. If trainings fall short of 15 minute increments, encourage follow-up discussions and question and answer sessions to bring time to a minimum recordable amount.

## Procurement

- A separate procurement review will be completed in SY19-20 with a State Agency closure letter sent following completion of corrective action (if needed); please follow the guidance provided.

## 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 on the State Agency Appeal Procedures document located on [the SDE web page](#).

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  
Rebekah Rasmussen, School Operations Manager/Food Service Director

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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](mailto:program.intake@usda.gov).

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