



November 30, 2018

Mrs. Jennifer Skeels, Business Manager
Northwest Children's Home
419 22nd Avenue
Lewiston, ID 83501

Dear Mrs. Skeels,

On October 25, 2018, State Department of Education (SDE) Coordinators Lynda Westphal and Tamara Donovan conducted an Administrative Review of Northwest Children's Home for the following United States Department of Agriculture (USDA) programs:

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

The State agency (SA) would like to commend Darren Flock, Jennifer Skeels, Rebecca Winker, Christy Lunceford and the staff of Northwest Children's Home 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

Civil Rights non-discrimination statement on the web site was supposed to be updated per the plan from the last review. This was not completed.

Corrective Action: Update website to include long non-discrimination statement.

Due Date for CAP completion: November 9, 2018

Corrective Action Response: As of October 10, 2018, the website was updated with the long non-discrimination statement. This finding is corrected, but must be monitored in the event the statement changes.

Finding 2 – Meal Components

The minimum daily 2 ounce Meat/Meat Alternate (M/MA), 1 cup fruit, and 1 cup vegetable were not offered each day. This is a repeat finding for both of the fruit and vegetable components. The State agency (SA) has the discretion to apply fiscal action, however will not at this time. Should this be identified during the next review, fiscal action will be assessed.

Corrective Action: Correct menus and recipes to come into compliance with meal pattern.

Due Date for CAP completion: October 25, 2018

Corrective Action Response: Menus and recipes for the food in question have been corrected and approved as of October 1, 2018.

Finding 3 – 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. The final rule requires LEAs to fully comply with the requirements of the final rule by June 30, 2017. For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs School Wellness website.

Corrective Action: Develop a plan and timeline for bringing the wellness policy into compliance and ensure the updated wellness policy will be shared with the public.

Due Date for CAP completion: November 9, 2018

Corrective Action Response: A proposed Wellness Policy was uploaded with the plan to bring it to the Executive Board at the end of November. After approval it will be added to the website.

Finding 4 – Offer versus Serve

Please train staff 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 State agency training portal and a training

log is available in MyIdahoCNP Download Forms. Staff did not receive annual OVS training at the Lewiston Ed Center.

Corrective Action: Train the staff at the Lewiston Ed Center on Offer versus Serve. Upload documentation of training into MyIdahoCNP.

Due Date for CAP Completion: November 9, 2018

Corrective Action Response: Training was completed from the Offer versus Serve manual from the state agency portal with a sign-in sheet on November 11, 2018.

Finding 5 – SFA On-Site Monitoring

The SFA did not complete the required on-site monitoring visits. These are required to be done for lunch and breakfast by February 1st every year. The breakfast review needs to be completed every other year; the lunch review needs to be completed annually.

Corrective Action: Complete SFA on-site monitoring at the Lewiston Ed Center for breakfast and lunch and upload documents into MyIdahoCNP.

Due Date for CAP Completion: November 9, 2018

Corrective Action Response: A review of the Lewiston Ed Center was completed for both breakfast and lunch on November 8, 2018.

Commendations

- Congratulations on being awarded \$1,650.00 for a planetary mixer as part of a USDA Equipment Grant. Your initiative in applying for this grant is appreciated and shows your commitment to your students.
- Thank you to Darren for being organized for me at the main kitchen - recipes and production sheets were readily available for me to see. The staff at the Education center was also very accommodating and it was a pleasure to see all their positive interactions with the students at both meals.

Technical Assistance (TA)

Meal Counting and Claiming

- On the weekends at the houses - the breakfast meal counts just have a line through that all children ate. The children must be marked by name, not just a line down for the day and the total. Darren has developed a sheet for Meal Count Expectations that spells this out clearly, however it is not consistently followed. Train the house staff on the weekends how to count properly so that a consistent method is used. During the weekdays it appears that they are counting correctly.

Dietary Specifications and Nutrient Analysis

- Independent contractor CN Resources completed the menu review and provided the following TA:
 - A Child Nutrition label or Product Formulation Statement can be used to

determine how processed food items contribute to the meal pattern. Without this documentation it may be difficult to determine if the meal component was satisfied. A sponsor must maintain manufacturer nutrient information and nutrition facts labels and CN labels. Nutrition facts labels submitted for some menu items were not manufacturer labels, they were labels created by your vendor. Secure labels directly from the manufacturer or product packaging and keep on file.

Meal Components and Quantities

- Independent contractor CN Resources completed the menu review and provided the following TA:

- The federal regulations require menus to be planned that meet the minimum daily 2 ounce equivalent meat/meat alternate requirement for grades 9-12.
 - On Monday, the polish dog was not credited toward the meal pattern; an official CN label was not submitted.
 - On Friday, the Chicken Sandwich only provided 1.5 oz. eq. m/ma.
 - The fajita strips used credit at 2 oz. eq. for every 2.7 ounces served. 2 ounces of cooked meat only provides 1.5 oz. eq. m/ma. Consider serving 2.7 ounces of chicken in each sandwich to provide 2 oz. eq. m/ma.

The federal regulations require menus to be planned that meet the minimum weekly 14 ounce equivalent meat/meat alternate requirements. The planned cycle menu provides only 12.25 ounce equivalents for the week. The federal regulations require a minimum of 1 cup of fruit to be offered each day for grades 9-12 which was not met on Monday.

- The kiwi only provides $\frac{1}{4}$ cup creditable fruit and the orange provides $\frac{1}{2}$ cup fruit. This is $\frac{3}{4}$ cup fruit total. You would need to serve 1 $\frac{1}{2}$ kiwis to meet $\frac{1}{2}$ cup fruit.
- The federal regulations require a minimum of 1 cup of vegetable to be offered each day for grades 9-12 which was not met on Monday.
 - The $\frac{1}{2}$ cup coleslaw served with the Polish Dog provides 0.48 cups cabbage which credits at $\frac{3}{8}$ cup cabbage. When served with the $\frac{1}{2}$ cup navy beans, the total vegetables is $\frac{7}{8}$ cups for the day. By increasing the amount of cabbage in the recipe to 5.25 pounds, this recipe would provide $\frac{1}{2}$ cup cabbage per serving. An updated recipe was submitted.
- Labels: A Child Nutrition label or Product Formulation Statement can be used

to determine how processed food items contribute to the meal pattern. Without this documentation it may be difficult to determine if the meal component was satisfied. Products on your menu that are missing a Child Nutrition label or Product Formulation Statement include:

- Polish Dog served on Monday
- Chicken Fajita strips served on Friday. The contractor located a product formulation statement for this product for the purpose of the review to accurately credit this item. Increasing the amount of chicken in the sandwich recipe will help meet the weekly requirements or consider serving a 1 ounce cheese stick with the chicken sandwich.
- Standardized Recipes: It is acceptable to use USDA recipes, but any changes by the school need to be noted on the recipe so recipe results and portions are standardized. Items on your menu that need standardized recipes include:
 - Taco Salad
 - Chicken Sandwich
 - BBQ Pork Sandwich

Standardize your recipes so that true yields and portion sizes can be determined. To be standardized recipes must include: • All ingredients in recipe. • Correct measures and specific weight/measure of each ingredient. • Serving/portion size(s) for each age/grade group. • The true yield made by recipe. • Clear and complete preparations steps / directions.

Offer versus Serve

- Signage explaining what constitutes a reimbursable meal to students is required at or near the beginning of the serving line to help students identify a reimbursable meal. Daily completion of the "What's for Breakfast" posters available through the SA meets this requirement. These were brought to the Lewiston Education Center on the day of review.

Food Safety

- TA provided to have a food safety plan for the ED center that discusses at least personal hygiene, receiving, serving, and discarding food.
- During the review, having a copy of all health inspections was discussed with the SFA.

Procurement

- A separate procurement review is currently being completed by Keddington & Christensen, LLC; please submit records to the contractor as requested and the State agency will provide you with a separate closure letter with recommended

changes, if needed, when the review is completed.

Special Provision Options

- Provision 2 Base Year (SY 2003-04) benefit issuance was previously validated by the SA on 4/14/16. The retention of all required Provision 2 documentation was confirmed during the administrative review. **Base Year records are kept in a box in the locked “bluebook room” in the Lewiston Ed Center.** The current Provision 2 cycle expires at the end of SY 2020-21. If you wish to continue with Provision 2 breakfast and lunch, you must contact the SA prior to the expiration date to see if you qualify for an extension.

Your review is now closed.

Fiscal action in the amount of \$50.44 resulting from this review will be disregarded because it is below our \$600 threshold. 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
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Darren Flock, Food Services Manager, Northwest Children’s Home

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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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