



December 27, 2018

Heather Dennis, Director
Anser of Idaho Inc.
202 E 42nd
Garden City, ID 83714

Dear Director Dennis,

On November 29, 2018, State Department of Education (SDE) Coordinators Teresa Goodsell and Lynda Westphal conducted an Administrative Review of Anser of Idaho Inc. for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- USDA Foods

The State agency (SA) would like to commend Danielle Kieffer and the entire staff of Anser Public Charter 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 – Certification and Benefit Issuance

The information on one application (five students) did not clearly identify the number of household members, the household listed eight but only seven names were provided. When contacted by the SFA, the household acknowledged seven members, which changed the eligibility status from free to reduced price benefits.

Corrective Action: Upload the letter with the notification of reduction in benefits, allowing 10 calendar days before changing the benefit issuance list. Upload a copy of the updated benefit issuance list with the changed benefit status into MyIdahoCNP review attachments.

Due Date for CAP Completion: December 17, 2018

Corrective Action Response: On December 10, 2018, SFA uploaded letter of adverse action sent to the household notifying a change from free to reduced price benefits. The benefit issuance list was updated and uploaded for SA validation of change of benefits.

Finding 2 - Meal Components and Quantities (Lunch)

Independent contractor CN Resources (CNR) completed the menu review:

During the week of menu review, a grain was offered daily, however the lunch menu did not meet the minimum daily and weekly requirements for grain.

Corrective Action: Provide a written statement and necessary documentation to demonstrate the daily and weekly grain 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. 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: November 5, 2018

Corrective Action Response: The SFA provided necessary documentation. The production records now include 12 pieces of popcorn chicken, brown rice was added to the taco lunch and whole grain goldfish crackers are offered with the peanut butter sandwich alternate lunch.

Finding 3 - Verification

The application selected for verification did not have the public assistance/child support income verified. Only the reported wages were verified by the SFA. All income listed on the application must be verified.

Corrective Action: Contact the family and receive backup of the public assistance/child support to complete the verification process. Provide appropriate documentation to household if results change the students' eligibility status and update the benefit issuance document accordingly. Upload copies of the household notification letter and benefit list into MyIdahoCNP.

Due Date for CAP Completion: December 17, 2018

Corrective Action Response: On December 10, 2018, SFA uploaded copies of the updated benefit issuance list and the household notification letter advising verification of the application resulted in a reduction in benefits due to being over income based on the current eligibility guidelines.

Based on the administrative error of 12.5% associated with certification and benefit issuance, the SFA will be required to conduct a second review of applications beginning school year 2018-19, and continuing until further notice. A second review of applications requires a re-evaluation by the Confirming Official of the eligibility determination made by the Determining Official, based on the information provided by the household on the application. Depending on the outcomes of this second review, the SFA may be required to complete this process until the next administrative review. A Second Review of Applications Report will need to be filed as well while this requirement is in place. Please reference the Independent Review of Applications section in the Eligibility Manual, a copy of which is available in MyIdahoCNP Download Forms.

Commendations

- Students are served in a warm, friendly environment with many choices, including a colorful salad bar and fresh fruit daily.
- All staff were responsive to answering questions and receptive to suggestions, technical assistance and corrective action. Excellent positive attitudes.
- Food service staff were observed practicing proper food safety procedures throughout the meal prep and service periods.
- Congratulations on being awarded \$6,944.00 for a Convection Oven as part of a USDA Equipment Grant. Your initiative in applying for this grant is appreciated and shows commitment to your students.
- Great job completing and posting the annual assessments and review of the Local Wellness Policy on the website for community awareness.

Technical Assistance (TA)

Certification and Benefit Issuance

- Make sure that the number of family members listed on the application match the number of household members. If there is a discrepancy, contact the household for additional information. If an additional member is added, confirm whether they receive income and include the amount of income received in the eligibility determination.
- Remove the approval effective “until” date on the Notification of Approval or Denial for Free or Reduced-Priced Lunch letter. Notifying households of the end of 30 day carryover is not necessary and the date may change based on operation days for the following school year.

Verification

- CAP received by sponsor for late submission of the Verification report. Remember all verification activities must be completed by November 15th, or benefits must be terminated.

Meal Components and Quantities

The SA provided the following TA:

- Survey students to determine their likes and dislikes for lunches. Resources are available on the Child Nutrition web page (Chef Designed School Lunches) that has some ideas, like Volcanic Meatloaf and Taco salad.
- May want to consider a second line for a la carte items, such as pizza, however, this may slow the lunch serving line down.

CNR completed a menu review and provided the following TA:

- 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. Update production record to correctly reflect the crediting of cheese - 1 slice = 1/2 oz. eq.
- 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 and weekly grain requirement. Planned menu did not meet the daily minimum 1oz. eq. requirement for two days, which affected meeting the weekly requirement. On Monday, only the breading on the popcorn chicken contributed toward the grain component. The Child Nutrition (CN) label submitted indicates that 12 pieces credits at 1 oz. eq. grain. Only 11 pieces are served, which credits at 0.75 oz. eq. grain. Serve a minimum of 12 pieces of popcorn chicken to meet the 1 oz. eq. portion. On Wednesday, the tortilla shells served only contributed 0.75 oz. eq. toward the grain component. A serving size of 3 shells is required to meet the minimum 1 oz. eq. grain. Consider serving a larger taco shell or serve brown rice with this meal to help meet grain requirements. The peanut butter and jelly sandwich meal offered daily provides only 1 oz. eq. grain. Over the course of the week, this meal is contributing to a weekly grain shortage. Offer another 1 oz. eq. grain with the sandwich daily to meet the weekly requirement. Consider whole grain-rich Goldfish Crackers or a bread stick, which was observed on the day of SA review.

Food Safety

CNR completed the meal service observations and provided the following TA:

- 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. TA given on ways to easily record and retain records of temperatures of received foods.

Smart Snacks

- All fundraisers, both exempted and compliant, must be tracked. Per state policy, a maximum of 10 exempted fundraisers per school site per year may be approved by the school administrator. An exempted fundraiser can be for a maximum of four consecutive school days. All exempted fundraisers beyond 10 must be pre-approved by the State agency using the Request form. (7CFR 210.11) Details available on the [SA website](#).

School Breakfast and SFSP Outreach

- SFA must notify the families of the availability of the summer food program in the area at the end of the school year.

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. Make sure to complete the required food safety training as soon as possible.

Procurement

- A separate procurement review will be completed by an independent contractor (currently Keddington & Christensen, LLC) during SY19-20. The State agency will provide a closure letter once corrective action (if needed) is complete; please follow the guidance provided.

Your review is now closed.

Fiscal action in the amount of \$165.46 resulting from this review will be disregarded because it is below the State agency threshold of \$600.00. 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,



Teresa Goodsell, B.S., S.N.S.
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Danielle Kieffer, Food Service Director, Anser of Idaho, Inc.

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- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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