



January 18, 2019

Denise Hammrich, Principal
All Saints Catholic School
3326 14th Street
Lewiston, ID 83501

Dear Principal Hammrich,

On December 12, 2018, State Department of Education (SDE) Coordinators Jennifer Butler and TJ Goodsell conducted an Administrative Review of All Saints Catholic School for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was the All Saints Catholic School (PK-6th grade)

The State agency (SA) would like to commend Kimberly Gilliam and the entire staff of All Saints Catholic 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: Meal Counting and Claiming

The SA was not able to reconcile the October 2018 claim while on-site and completed the reconciliation after the on-site portion of the review. The SFA provided the SA with the Excel spreadsheet the SFA uses at the point of service (POS) to count daily reimbursable meals by student. Using the spreadsheet the SA identified a discrepancy in the meal count types claimed by the SFA. Following discussion and review of claiming procedures, it was identified that one student, eligible for reduced priced meals, was incorrectly claimed as paid. Additionally, an entry error on the POS spreadsheet caused an additional meal count. The SA will adjust the October claim based on the correction of identified errors. Due to the potential of systemic errors associated with data entry and claiming process utilized by the SFA, the SA will review and validate the December 2018 claim.

Corrective Action: Upload the POS spreadsheet, in Excel format, for December 2018, as well as the QuickBooks *Sales by Item Summary* monthly report used to identify claiming totals.

Due Date for CAP Completion: January 12, 2019; completed January 10, 2019.

Corrective Action Response: The SA calculated the December 2018 totals using the POS spreadsheet uploaded by the SFA. The SA totals matched the sales summary report used by the SFA for claiming. The December 2018 claim was validated without errors.

Finding 2: Benefit Issuance 1

Multiple issues were identified with the distribution and determination of meal applications. Some of these errors were addressed during the last administrative review as technical assistance and have not been corrected. Specific details are included under Technical Assistance, below. Training is available in the Idaho CNP Digital [Training Portal](#).

Corrective Action: Upload a certificate of completion for Jean Jorgenson indicating successful completion of the SA online training titled *Application Determination SY18-19*.

Due Date for CAP Completion: January 12, 2019; completed January 10, 2019.

Corrective Action Response: A certificate was uploaded showing Jean completed the required training on January 10, 2019.

Finding 3: Benefit Issuance 2

Old template letters to the household are utilized that do not contain the required wording. The Eligibility Manual for School Meals provides details on what elements must be included in household letters. The notification letter for verification incorrectly requested that social security numbers for each adult household member should be provided. Discard old template letters and replace them with the template letters provided by the SA located in the Download

Forms section of MyIdahoCNP. Complete template form as required and ensure a practice of checking for new templates each school year.

Corrective Action: Upload blank template copies of letters to be used for notifying households of eligibility determination, direct certification qualification, verification selection, and adverse action.

Due Date for CAP Completion: January 12, 2019; completed January 10, 2019.

Corrective Action Response: The SFA uploaded the SA template letters for all household notifications.

Finding 4: Verification

Verification requirements were not met. The application pulled for Verification included a student that was included on the State Direct Certification (DC) list. This list was obtained by the LEA on September 18, 2018, before Verification began, so the application should not have been included in the verification pool. The required records to support the verification process occurred were not retained as required; copies of all household correspondence were not kept, and the LEA advised the paystub documentation was shredded. Additional issues are included under Technical Assistance, below. Training is available in the Idaho CNP Digital [Training Portal](#).

Corrective Action: Upload two certificates of completion for Jean Jorgenson indicating successful completion of separate online training titled *2017-2018 Verification Level 1* and *2018-2019 Enhanced Verification Training*.

Due Date for CAP Completion: January 12, 2019; completed January 10, 2019.

Corrective Action Response: Certificates were uploaded showing Jean completed the required trainings on January 9, 2019.

Finding 5: Civil Rights 1

Multiple issues concerning USDA civil rights requirements were identified including inadequate training, complaint documentation, and the incorrect non-discrimination statement (NDS) being used on program materials such as monthly menus, household letters, and civil rights training documentation. Specific issues are included under *Technical Assistance*, below. During the last administrative review, technical assistance was provided on USDA civil rights and NDS; these requirements are still not being met.

Corrective Action: 1) Upload a narrative describing steps to be taken to ensure that civil rights requirements will be met each year, addressing actions for providing appropriate training for all staff and program officials, maintenance of annual civil rights log and complaint procedures, ensuring the correct NDS is available on all program materials and website; 2) Discard old templates and replace them with templates that include the correct NSD, including civil rights training agenda sign-in sheets; 3) Upload a copy of the January breakfast and lunch menus reflecting the correct NDS and ensure the updated menu template is utilized moving forward.

Due Date for CAP Completion: January 12, 2019; completed January 10, 2019.

Corrective Action Response: A narrative was uploaded advising that time will be scheduled within the first week of the school year to ensure adequate USDA civil rights training occurs, all required paperwork will be maintained as required, and old templates have been replaced with new ones to be used moving forward. January breakfast and lunch menus listing the correct short NDS were also uploaded.

Finding 6: Civil Rights 2

School Foodservice Authority staff who interact with program applicants or participants and their supervisors must have annual civil rights training. Multiple staff members signed-off on reading the abbreviated "frontline staff" training, but the determining, confirming, verifying, and hearing officials must watch the complete annual civil rights training video. The video is available at the SA website and current training sign-in sheets are available in MyIdahoCNP under Download Forms.

Corrective Action: Upload a dated sign-in sheet to provide documentation that all officials watched the [SA civil rights training video](#).

Due Date for CAP Completion: January 12, 2019; completed January 10, 2019.

Corrective Action Response: A dated sign-in sheet was uploaded indicating the three officials watched the training video on December 13, 2018, and January 9, 2019.

Finding 7: Smart Snacks

Schools must meet the minimum requirement in 7 CFR 210.11, for all foods and beverages sold in school (also known as Smart Snacks in School) to increase consumption of healthful foods during the school day and support a healthy school environment. All Saints Catholic School sells non-compliant cookies once a month to celebrate student birthdays. Food and beverages sold to students must comply with specific nutrition standards, must be tracked as exempt fundraiser(s), or must be inaccessible during the school day (defined as midnight the day before until 30 minutes after the school day ends). During the last administrative review, Smart Snacks regulations technical assistance was provided on tracking fundraisers; this requirement is still not being met. Details are available at the SA [Smart Snacks webpage](#) where a fundraising tracking form may be found.

Corrective Action: 1) Complete a tracking log by listing all fundraisers, whether compliant, exempt, or non-exempt, having occurred during SY18-19. Upload the tracking log into MyIdahoCNP. 2) Upload a narrative describing how All Saints Catholic School plans to comply with Smart Snacks regulations, including who will be responsible for ensuring the fundraising tracking process moving forward.

Due Date for CAP Completion: January 12, 2019; completed January 10, 2019.

Corrective Action Response: The SA fundraiser tracking log was completed to include all fundraisers for SY18-19 and uploaded along with a narrative stating that Kimber Gilliam will be in charge of tracking all fundraisers using the tracking log. The SFA also located a standardized cookie recipe that is Smart Snacks compliant to be used monthly to celebrate birthdays going forward. The SA validated the compliance of the cookie per the standardized recipe directions. The SFA plans to purchase a new scoop so the correct portion size is used to ensure compliance with Smart Snacks regulations.

Commendations

- Kim demonstrates enthusiasm to operate compliant programs. She has a great rapport with students.
- Jean was open to all feedback provided by SA reviewers.
- During the menu review, the CNR contractor provided the following commendations:

- Excellent food safety and sanitation practices were observed during all meal preparation and service.
- Outstanding job meeting all meal pattern requirements for breakfast and lunch. All daily and weekly meal component and food quantity requirements were met for the week of menu review.

Technical Assistance (TA)

Certification and Benefit Issuance

- Per the Eligibility Manual, when determining Free and Reduced Applications, income should not be converted unless various income frequencies are reported. Please make use of the Income Eligibility Guidelines chart. During the last review, technical assistance was provided on income conversions; however incorrect calculations are still occurring and must stop. Even though applications were unnecessarily converted to a monthly frequency, no benefit issuance errors were identified.
- Incorrect applications were provided for the current school year (SY). The applications used for SY 2018-2019 stated SY 2017-2018 at the top. All applications were completed and submitted in August and September of the current SY, but last year's application was distributed. Ensure that the correct SY application is obtained for distribution sometime after July 1 each school year.
- Best practice is that student names (i.e., a current enrollment list) should be run through Direct Certification every week at the beginning of the school year, so that all the new students as well as any new matches that may be available may be identified. Once the students are identified, this documentation must be printed and saved for three years plus the current year (the DC system does not save information).
- Students who qualify for meal benefits through a Free and Reduced Application that then appear on a DC list must be noted as Free DC on the benefit issuance list.
- It is not necessary for the determining, confirming, and verifying officials to sign all meal applications. This process is reserved for Verification and times when the SFA is mandated to conduct a second review of applications, or when there is a question regarding the original determination. The confirming official, who must be a different individual than the determining official, must review an application prior to beginning the Verification process. This ensures the application eligibility was determined correctly. Both officials complete the "Official Use Only" box on the free and reduced meal application that has been selected for verification. Once the verification process has been completed and results determined, the verifying official, who can be either the confirming or determining official, must complete the "Official Use Only" box on the meal application. The hearing official is a separate individual with supervisory authority over the other officials that would oversee the hearing process and settle the eligibility if the confirmed original determination is disputed.
 - Principal Hammrich incorrectly signed the back of all meal applications as the verifying official; she is listed in the program application as the hearing official.

Verification

- Per 7 CFR 245.6a (h), all verified applications must be readily retrievable. All documents submitted by the household for the purpose of confirming eligibility, reproductions of those documents, or annotations made by the determining official indicating which documents were submitted by the household and the date of submission also must be retained, along with all relevant correspondence between the households selected for verification and the school or LEA. This documentation, including documentation concerning any appeals, must be kept by the LEA to demonstrate compliance with the verification requirements when LEAs are reviewed by State or Federal officials. The documentation must be kept for a minimum of three years, after the date of the fiscal year to which they pertain.
- LEAs must also maintain a description of their verification efforts. The description must include:
 - A summary of the verification efforts including the selection process;
 - The total number of applications on file on October 1; and
 - The percentage or number of applications that are/will be verified by November 15.
- Attempt to directly certify students selected for verification before sending the verification notification letter to the household. According to 7 CFR 245.6a(c)(2), verification efforts are not required for children who have been certified under direct certification procedures.
- The sample pool uses the total number of approved applications on file as of October 1 of the current school year. The sample pool depends on the number of approved applications, including paper and electronic applications. The sample pool is not based on the number of children eligible for free and reduced priced benefits, as some eligible students will have established eligibility through the direct certification process and will not have an application on file. In addition, the sample pool does not include applications where all children in the household are determined eligible based on documentation provided by the State or local agency responsible for the administration of the SNAP, FDPIR or TANF or applications where all children in the household are determined to be foster, homeless, migrant, or runaway children [7 CFR 245.6a(c)(2)].
- The confirming official must review an application prior to beginning the Verification process. This ensures the application eligibility was determined correctly by the determining official. Both officials complete the “Official Use Only” box on the free and reduced meal application that has been selected for verification. Once the verification process has been completed and results determined, the verifying official, who can be either the confirming or determining official, must review and sign the results of verification.

Meal Components and Quantities

CN Resource completed the 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 variety of milk must be on the production

record as well as the full serving size offered for all components. Recommend offering a second type of fruit to better show that 1 cup is offered to the students for fruit.

- 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 productions records so that everyone can complete the records.
- The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal.

Offer versus Serve (OVS)

- SFA uses creative signage to ensure students understand they must pick three items for a reimbursable meal and is properly implementing OVS. However, signage does not include the statement "one item must be a fruit/vegetable". Add this statement so students are fully aware that a reimbursable meal must include a fruit or vegetable choice.

Civil Rights

- Update your non-discrimination statement (NDS) to the correct USDA NDS available on the [SA website](#). The correct short NDS reads, "This institution is an equal opportunity provider." During the last review, it was discovered that the incorrect NDS was being utilized and technical assistance was provided to update existing documents; this correction did not occur.
- Per the Administrative Review Manual, the USDA NDS must be included on documents referencing USDA Child Nutrition Programs. The short statement, "This institution is an equal opportunity provider", is only for use on documents that do not have the space to include the full statement; the long statement is for use on longer documents and can be found on the CNP website under Civil Rights.
- Only teachers, secretaries, custodians, and volunteers can complete Civil Rights training using the Frontline Staff handout. All foodservice staff and the determining, confirming, verifying, and hearing officials must watch the full video training. Civil rights training must occur at the beginning of each school year and ongoing as necessary, including for any new employees.
- Ensure the Civil Rights complaint log is dated annually, with a new log started each year. If no complaints were received during the school year, write "No complaints" on the log at the end of the school year and retain the documentation for three years plus the current year. This direction was provided as technical assistance during the last review. The school years 16-17 and 17-18 logs did not indicate whether or not any complaints were received. Writing "No complaints" documents what occurred during the school year and helps to ensure the log is the final log and not an extra copy.
- The monthly breakfast and lunch menus are posted under "Menus" on the LEA website. Web pages associated with program operation should list the full USDA NDS with details on participants' right to file a complaint. Please work toward having the full NDS statement included on any webpages related to food service. It is recommended that a

link to the full statement in a variety of languages be included. The recommended link to use is the [USDA Nondiscrimination Statement](#) webpage.

Local School Wellness Policy (LWP)

- A report on the progress towards goals stated in the Local School Wellness Policy (LWP) must be publicly available. The current LWP states the assessment will be posted on the school's website, but it was neither located on the website, nor provided when requested as part of the Administrative Review. The LWP posted on the website does not include an adopted or amended date where indicated. This date should be included to assist in monitoring the requirement to conduct a triennial assessment. The SA has a template progress report available on the [School Wellness](#) webpage of the CNP website.

Smart Snacks

- Per state policy, a maximum of ten exempted fundraisers per school site per year may be approved. An exempted fundraiser can be for a maximum of four consecutive school days. All exempted fundraisers beyond ten must be pre-approved by the SA using the request form.

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.

Reporting and Recordkeeping

- Food service records must be maintained for three years plus the current year to document compliance with program regulations and the service of reimbursable meals. A plan for record retention needs to be incorporated. During the review, some records were missing.
- Due to findings directly associated to topics covered during annual mandatory training, the SA advises that additional steps be taken to ensure that all program requirements are effectively communicated internally to address the delineation of duties of Jean Jorgensen (office) and Kim Gilliam (kitchen). Each SFA should have a food service director (program contact) responsible for compliance with all aspects of the child nutrition programs. SA broadcast emails are sent to the program contact listed in MyIdahoCNP. These emails provide updates in program requirements, reporting deadlines, and training opportunities. Kim is currently listed as the program contact to receive program updates. If roles and responsibilities are shared, there must be a communication plan in place to ensure each individual receives appropriate trainings and program information applicable to their responsibilities for accountability purposes. Some of the issues identified during the review could be eliminated if Jean attended annual training, or received the annual updates presented in training, and it was ensured that broadcast emails were forwarded to her.

Resource Management

- The SFA bakes and sells a birthday cookie at the end of each month. Students who had a birthday during the month receive the cookie for free; other students can pay \$0.25 for a cookie. Revenue from the cookie sale is deposited into the foodservice account. All foods or ingredients 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 to ensure that Federal funds are not used to support non-program foods. The non-program food revenue tool (NPFRT) must be completed to evaluate compliance.

Procurement

- A separate procurement review will be completed in 2019-2020 with a SA closure letter sent following completion of corrective action (if needed); please follow the guidance provided.

Fiscal Action

Due to an October 2018 claiming error, fiscal action results in an adjustment of \$41.23 to be paid to the SFA. The SA will make the correction.

Your review is now closed.

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,

Jennifer Butler, MEd, SNS
NSLP Coordinator

cc: Colleen Fillmore, P.h.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Kimberly Gilliam, Child Nutrition Director, All Saints Catholic School
Jean Jorgenson, Book Keeper, All Saints Catholic School

Civil Rights

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To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at [the USDA website](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (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.

This institution is an equal opportunity provider.