



January 17, 2020

Mr. Jeff Blaser, Superintendent
Cascade School District
209 N School Street
Cascade, ID 83611

Dear Superintendent Blaser,

On November 6, 2019, State Department of Education (SDE) Coordinators Jennifer Butler and Lynda Westphal conducted an Administrative Review of Cascade School District for the following United States Department of Agriculture (USDA) programs:

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

The SA reviewed the following sites:

- Cascade School

The State agency would like to thank Marilyn Arvin and the staff of Cascade School District 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, however Idaho has received a waiver to conduct reviews on a five-year schedule 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 - Certification and Benefit Issuance

Four applications (8 students) were determined incorrect resulting in an 8.89% error rate. Two applications determined incorrectly resulted in a reduction of benefits from free to reduced and reduced to denied; two applications were incomplete and require additional information in order to determine benefits and result in a change from free to denied.

Corrective Action: Send letters of adverse action and change student benefits after the 10-day period. Upload the letters of adverse action and updated benefit issuance list.

Due Date for CAP Completion: November 21, 2019

Corrective Action Response: All letters of adverse action were uploaded and changes were made to applications and benefit issuance list.

Finding 2 – Afterschool Snack Program (ASSP)

Snacks served through the NSLP Afterschool Snack Program must include full servings of **two** of any of the following four food components; Fluid Milk, Meat/Meat Alternative, Vegetable or Fruit, Grain. A snack cannot consist of two of the same components. By providing all four components you are exceeding the per snack reimbursement received at \$0.94 cents. Please prepare a menu with only two components per day. Also, the invoices charged to food service in the previous school year for the ASSP had unallowable foods, kitty litter, and tax included. Please be aware that this cannot be paid with food service funds.

Corrective Action: Develop and upload a procedure addressing the number of items to be given during snack from this point forward.

Due Date for CAP Completion: November 21, 2019, extended to December 9, 2019, then January 10, 2020

Corrective Action Response: The “Cascade Afterschool Program Guidelines” was provided to the SA on January 8, 2020.

Commendations

- The supervisor was receptive to TA and made changes quickly during the on-site menu review.
- Outstanding job meeting all meal pattern requirements for the week of menu review. All daily and weekly meal component and food quantity requirements were met.
- Lunch was a freshly prepared meal of Chili Mac (whole grain), seasoned kidney beans, fresh raw broccoli and red pepper strips, and canned apple slices with cinnamon and choice of fat free strawberry milk or low-fat plain. Beautiful to look at and flavorful.
- The kitchen staff were receptive to TA and had positive attitudes for change.

Technical Assistance (TA)

Certification and Benefit Issuance

- Free and Reduced Applications were determined by converting all reported income to an annual amount. Income should only be converted to an annual amount when various income frequencies are reported, otherwise determinations should be based on the reported income frequency. Please make use of the Income Eligibility Guidelines chart.

Meal Counting and Claiming

- In order to avoid food waste, the district can sell the leftover items a la carte. The intent of the program is to have minimal leftovers. This would become a meal planning issue if it is a regular occurrence. An average entrée cost should be determined to come up with a reasonable cost to charge the children.

Dietary Specifications and Nutrient Analysis

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - Review the chicken Caesar salad recipe for accuracy. The amount of romaine and iceberg totals almost 3 cups per serving, however the instructions state to serve 1 cup to K-8 and 1 ½ cups to 9-12.
 - Review roll recipe for crediting accuracy. The recipe provided indicates the roll is a 3 oz. eq. roll, however the amount of flour in the recipe calculates out to 2.25 oz eq. per roll.
 - The product formulation sheet sent for the mozzarella bread stick was for the wrong product. The crediting was confirmed for this review. Ensure a copy of the correct product formulation sheet is on file for this product.

Meal Components and Quantities

- Production Records need to have the leftovers recorded on the 9-12 sheet to show how much was left over and tossed. If there are items that will be discarded and given to the Afterschool Snack Program, make a note of that on the 9-12 Production Records as well.
- Leftovers from lunch that are utilized in the Afterschool Snack Program have a cost associated with them, they are not considered “free” food. The intent of the lunch program is to have minimal leftovers. This would become a meal planning issue if it is a regular occurrence.
- Independent contractor CN Resource completed the menu review and provided the following TA:
 - During the review, serving multiple age/grade groups was discussed with the SFA. The SFA must ensure, if multiple age/grade groups are served, that menus are planned to meet the requirements of the meal pattern for each age/grade group that is served. If there are different menus served to the different grade groups with the same meal service the SFA must determine the changes that need to be made and how to determine which student receive which menu. For example, if the K-5 student come through first and then the 6-8 students come

through the serving line then the kitchen staff can adjust portions between the different grade groups. Using different serving spoons or measuring cups may be all that is needed to meet the requirements depending on the menu offered. Technical assistance given at the service line to offer students in grades 9-12 one or two 1/2 cup scoops of cinnamon apples due to substitution of whole fresh apple to canned slices.

- During the review, technical assistance was given on completing production records and using complete and standardized recipes. Ham Scramble served for breakfast did not have quantities for producing 45 servings nor any preparation steps.

Food Safety (HACCP)

- Independent contractor CN Resource provided the following TA during the review:
 - The food safety plan was discussed with the SFA. The SFA must have a food safety plan that complies with the requirements and the SFA must ensure that all elements of the plan are implemented. The SFA should be following the procedures as outlined in the plan and maintaining all required records. The kitchen did not have dishwashing soap available and did not test the sanitation solution. Dish washing soap was supplied after breakfast and sanitation solution was tested. The written policy of following a three-step process of wash, rinse and sanitize was reviewed with staff. Thermometers should be calibrated with documentation on a log. Thermometers should be cleaned, rinsed and sanitized between uses to avoid cross contact with allergens and cross contamination, even when temping the same product.
 - 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. The most recent inspection from March 2019 was posted publicly in the cafeteria and no further action is required.
 - 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. The dry storage areas did not have thermometers or temperature logs; both were added day of onsite review.

Buy American Provision

- Per 7 CFR 210.21 (d) Sponsors must purchase, to the maximum extent practicable, domestic commodities and products for use in the NSLP.
 - A domestic commodity or product is an agricultural commodity produced in the US and a food product that is processed in the US using substantial; agricultural commodities.
- Applies to all food/beverage products purchased using funds from the non-profit food service account.
- Limited exception (to be used as a last resort with documentation)

- When a product is not produced or manufactured in the US in sufficient and reasonable quantities of satisfactory quality.
- When competitive quotes, bids, or proposals reveal the cost of a US product is significantly higher than the foreign product.
- The State reviewers gave an example of the Buy American provision documentation as an example.
- On-Site CNR Reviewer observed the following items that were non-domestic: canned pineapple, mandarin oranges, and bananas. Documentation must be maintained to support purchases of non-domestic food items.

Offer versus Serve (OVS)

- Train staff annually on OVS for both breakfast and lunch and documented as such on a training agenda. 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.

Afterschool Snack Program (ASSP)

- Track receipts more closely to determine if unallowable costs and sales tax are being charged the nonprofit food service account.
- Ensure the menu for this program keeps to the .94 cents per meal reimbursement. The intent of the program is a snack and not a full meal.

Special Milk (SMP)

- Determine whether the Pre-K should be on the special milk program (SMP). Since the Pre-K program starts right at breakfast time, the children could be served breakfast and claimed using that reimbursement rate. There was one Pre-K student who ate breakfast and had the SMP. If the breakfast meal is made available to **any** Pre-K students, then the SMP must be discontinued.

Local School Wellness Policy (LWP)

- The Local School Wellness Policy must be in compliance with the USDA Final Rule established in July 2016, including the requirement that report(s) on the progress towards goals stated in the wellness policy be publicly available. The final rule requires LEAs to fully comply with the requirements of the final rule by June 30, 2017. TA given on the Wellness Policy and the Progress Report. A copy of a partially completed evaluation was given with some suggestions.
 - The Local Wellness Policy must include language specifying measurable goals for nutrition education, nutrition promotion, physical activity, and other school-based activities to promote student wellness that are written with consideration for evidence-based strategies. While the evaluation was posted on the website, the SA could not determine where the goals were measurable.

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. Vending, school stores, and fundraising need to comply with specific nutrition standards. Refer to [Guide to Smart Snacks](#) available at the USDA website.

- Documentation of compliance for all foods sold in vending machines must be available. The [Smart Snacks Product Calculator](#) is a useful tool that produces a report that can be used to confirm and document compliance.
- Per 7 CFR 210.11, All fundraisers, exempted and compliant, food and non-food, 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 (b)(2)) Details and tracking form available [on the Child Nutrition website](#) . TA given to the principal on Smart Snack tracking.

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.

Procurement

- A procurement review was completed and the review closure letter was sent November 19, 2019. Please follow the guidance provided in a separate closure letter.

Your review is now closed.

Fiscal action due to benefit issuance errors resulted in the amount of \$388.94 was determined from this review, however it is below the \$600 threshold set by USDA so will be disregarded. 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
Marilyn Arvin, Food Service Supervisor, Cascade School District

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