



June 30, 2020

Mr. Mark Kress, Superintendent
Hagerman School District
324 North 2nd Avenue
Hagerman, ID 83332

Dear Superintendent Kress,

On February 5, 2020, State Department of Education (SDE) Contractor, Laura Thomas with CN Resource conducted an on-site review of the meal program, and from April 23 – June 23, 2020 Coordinator Lynda Westphal conducted an off-site Administrative Review of the Hagerman School District due to the COVID-19 pandemic for the following United States Department of Agriculture (USDA) programs:

- School Breakfast Program (SBP)
- National School Lunch Program (NSLP)
- Fresh Fruit and Vegetable Program (FFVP)
- USDA Foods

The SA reviewed the following sites:

- Hagerman Elementary School

The State agency would like to thank LuAnne Coates, Cathy Birdwell and the staff of Hagerman 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 fund

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 – Food Safety

Proper hand washing and glove use was not observed. Correct use of the three-step method of dish washing was not implemented.

Corrective Action: Provide the date that the finding was brought into compliance or the planned date of completion. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. Provide the date that training was provided to all staff that includes, but not limited to: hand washing, glove use, and dish washing using the 3-step method of wash, rinse, sanitize. Submit a copy of the sign in sheet and agenda for the training.

Due Date for CAP Completion: 2/14/20

Corrective Action Response: Food Safety refresher training utilizing ICN PowerPoint and videos and updated SOP's for proper hand washing and proper glove use was implemented on Feb 10, 2020. All kitchen staff were trained and received a copy of updated SOP's. Replaced all outdated posters with new updated proper hand washing procedures posters. The 3-step method of wash, rinse, and sanitizing in the dish room was discussed and an updated SOP was put in place to ensure that the correct steps are taken for proper dish washing, food safety, and reducing the possibility of cross contamination from dirty trays to clean trays. The finding is closed.

Finding 2 – Menu Planning

Improper storage of raw and prepared foods was observed.

Corrective Action: Provide the date that the finding was brought into compliance or the planned date of completion. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. Provide the date of the training completed for all staff that includes, but not limited to: cold food storage practices. Submit a copy of the sign in sheet and agenda from the training.

Due Date for CAP Completion: 2/14/20

Corrective Action Response: Food safety refresher was completed on Feb 10, 2020. ICN PowerPoint, pre-assessment and post assessment was completed by all staff members. The training included proper food preparation, proper time and temperature guide lines for food safety preparation, internal cooking-holding and reheating temperatures, cooling and proper food storage. This included training on proper method of food placement while cooling and thawing in cooler. Since February 12, 2020, the updated SOP for proper cooling time/temperature control for food safety has been implemented. All staff members attended and signed training log. The Food Service Supervisor, will ensure on-going compliance. The finding is closed.

Finding 3 – Wellness Policy

While the Local School Wellness Policy (LWP) was updated and adopted by the board January 20, 2020, it is still missing required elements making it noncompliant with the USDA Final Rule established in July 2016, including the requirement that report(s) on the progress towards goals stated in the LWP be publicly available. Technical Assistance (TA) was provided during the last AR (February 7, 2017) advising that LEAs were required to comply fully with the requirements of the final rule by June 30, 2017.

Corrective Action: Work on making the Wellness Policy come into compliance and submit a plan to the SA

Due Date for CAP Completion: June 25, 2020

Corrective Action Response: A new draft of the wellness policy that the ISBA sent is on the agenda for a first reading this month. The finding is closed.

Finding 4 – Benefit Issuance

One application had a difference in the number of names written and the number of members listed in the household number box. These applications must be followed up on to ensure that the correct number is used for determining the household composition.

Corrective Action: Contact the family to verify the correct number of household members

Due Date for CAP Completion: June 1, 2020

Corrective Action Response: The family was contacted and notes were placed on the application. The finding is closed.

*Based on the administrative error of 2.16% associated with certification and benefit issuance, the SFA will **NOT** be required to conduct a second review of applications beginning school year 2020-21, however it is a best practice to avoid errors in Certification and Benefit Issuance.*

Commendations

- The State agency would like to commend both the new Business Manager and the Food Service Director for their quickness in responding to all requests for uploads. It made the review go smoothly.
- CN Resources commendations:
 - The Child Nutrition Food Service Manager showed dedication in coping with the crash of her office computer on the Saturday before the Monday of the review week.
 - The Child Nutrition Food Service Manager and kitchen staff were open and receptive to technical assistance. They show a desire to operate the Child Nutrition Programs in compliance with regulations.
 - All staff showed flexibility in adjusting to the sudden discontinuation of the salad bar during the week due to lack of student workers.
 - Outstanding job meeting all breakfast and lunch meal pattern requirements for the week of menu review!

Technical Assistance (TA)

Certification and Benefit Issuance

- Some applications were in the student information system as active when they were not in attendance and some applications did not have notes on them. In order to have an accurate student information system with accurate claiming it is paramount to keep this system up-to-date.
- There was also an Excel list being kept separately outside the SIS which showed different children on the list. Using one list, preferably the automated one where the claim originates from, is less time consuming and less error prone.
- The claim was recreated for the review and was off in the free, reduced and paid categories due to the parameters of running the report. Please be aware of the parameters being used to generate and accurate claim and have the backup of daily meal counts for the claim attached.

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - During the review, the components of the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group.
 - TA given during lunch preparation prior to meal service to assure menu provided all minimum serving sizes of vegetables. Because the salad bar usually served was discontinued unexpectedly during the week of review, Production records and planned offered serving sizes needed to be updated to provide $\frac{3}{4}$ cup vegetable offered to K-8th grades and 1 cup vegetable offered to 9-12th grades. Menus for the following day were reviewed and TA given to assure both vegetable requirements and carrots (1 cup for 9-12 to meet R/O weekly requirement) and beans/peas (legumes) for weekly vegetable requirements were met as much as possible given the 4-day menu week and two days of menus having already been served.
 - TA given on updating production records to reflect appropriate menu changes/substitutions and offered portion sizes at breakfast and lunch. TA given on following standardized recipes (soup) and creating standardized recipes for menu items that are heat and serve type items, such as frozen potatoes for guiding correct portioning of difficult to measure items.

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 update written HACCP food safety plan (from 2005 template currently used), personalize to Hagerman School Nutrition Programs and incorporate only SOPs needed (no need for Transporting Foods to Remote Locations, for example). TA given on how to find the ICN updated templates. TA given on how to access the ICN online Food Safety training and how a group training using school computer lab would allow each employee to log onto the course and receive completion certificate. Updated training and periodic refresher training recommended for all kitchen staff.

- 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. TA was given to post most current health inspection in public area. Posted inspection was from 2018 and was immediately updated.
- TA given for the following areas: proper hand washing including between loading dirty dishes and removing clean dishes from dishwasher, proper glove use, and proper 3 step process for cleaning, rinsing and then sanitizing surfaces in kitchen (hot, soapy bleach water was being used).
- Technical assistance was provided for proper storage within the refrigerator. The SFA was informed that raw eggs should not be stored on the top shelf and should be stored on the bottom shelf to prevent cross contamination. The SFA was also informed that all food, cooked or uncooked, should be covered in the pans and labeled with a prepared date and/or use by date.

Buy American Provision

- The State agency did not complete an on-site review of food products due to the COVID-19 pandemic. The below verbiage is included to remind all sponsors receiving an off-site review of this requirement.
 - 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

Fresh Fruit and Vegetable Program (FFVP)

- During the desk review of the FFVP claim for February 2020, it was noted that half of the purchasing amount was for non-domestic produce. The “Buy American” requirement in the National School Lunch Program (as provided in 7 CFR 210.21(d)) applies to

purchases made with FFVP funds. Retain required exemption documentation for specific fruits and vegetables

Local Wellness Policy

- Ensure the triennial assessment (e.g., Idaho Wellness Policy Progress Report) is available to the public; posting to the school/district website and/or in a school newsletter would support this requirement.

Smart Snacks

- The State agency did not complete an on-site review due to the COVID-19 pandemic, but located an a la carte food sale list on the LEA's website. This list contained items not Smart Snack compliant.
 - 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. Food and beverages sold to students must either comply with Smart Snack specific nutrition standards, be tracked as exempt fundraiser(s), or be inaccessible during the school day (defined as midnight the day before until 30 minutes after the school day ends). Refer to [A Guide to Smart Snacks in School](#) available at the USDA website. All fundraisers, both exempted and compliant, including non-food sales, must be tracked. Per state policy, the school administrator may approve a maximum of ten exempted fundraisers, per school site, per year. 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 (7CFR 210 (b)(2)). Details and a tracking form are available on the [SDE CNP Smart Snacks web page](#).
 - Per 7 CFR 210.11, the school should have knowledge of and keep a written record of (track) food sales that occur within the school day, but outside of food service. Only foods sold in school and intended for consumption during the school day (from midnight until 30 minutes after the end of school) fall under Smart Snacks regulations. Smart Snacks information and resources, including a sample site tracking form, can be found at [SDE CNP Smart Snacks web page](#).
 - Per Public Law 111-296 as clarified in 7 CFR 210.11, "All Foods Sold in School," vending machines, school stores, and fundraising need to comply with specific nutrition standards. These Smart Snacks standards can be found at the State Department of Education, Child Nutrition Programs, School Meal Programs, Smart Snacks website.
 - The selling of non-compliant snacks during the lunch meal time puts reimbursement in jeopardy.

Provision

- Provision 2 Base Year (SY16-17) benefit issuance was previously validated by the SA during the last Administrative review on February 7, 2017. The retention of all required Provision 2 documentation was confirmed by the upload of the checklist and three random days of meal counts by student name during the base year. Daily Meal Counts

by student name and eligibility are currently kept in Meal Time, however this information must be retrievable by reviewers at any time you are on the Provision 2 program. It is recommended that this data, with the benefit issuance lists be saved via PDF in hard copy to ensure the data is not lost.

- The current Provision 2 cycle expired at the end of SY19-20 and was extended for another four years and will expire at the end of SY23-24. Please ensure all required Provision 2 documentation, including base year **daily meal count records by student name and eligibility**, is maintained per requirements. The business manager advised in email on May 18, 2020, that they would begin working on getting the hard copies printed so they didn't have to rely on getting daily meal count records out of the software. All base year records listed on the Provision 2 checklist must be available to SA at any time. Work on running the required reports in the next few months and save via paper copy or PDF to ensure you are meeting the requirement to have these documents available to reviewers.

On-Site Monitoring

- Breakfast POS (point of service) on-site reviews are covered in 7 CFR 220.11(d)(1) which states: every school year, each school food authority with more than one school shall perform no less than one on-site review of the breakfast counting and claiming system and the readily observable general areas of review identified under 7CFR;210.18(h) of this chapter, as specified by FNS, for a minimum of 50 percent of schools under its jurisdiction with every school within the jurisdiction being reviewed at least once every two years. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school's meal counting or claiming procedures or general review areas, the school food authority shall ensure that the school implements corrective action, and within 45 days of the review, conduct a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school's claim is based on the counting system and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid breakfasts, respectively, served for each day of operation.

Procurement

- A procurement review is currently being completed. Please follow the guidance provided in a separate closure letter.

Your review is now closed.

Fiscal action in the amount of \$184.63 due to application and claiming errors is below the \$600 threshold set by USDA and 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
LuAnne Coates, Food Service Director, Hagerman School District

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

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