



December 31, 2019

Dr. N. Shalene French, Superintendent
Caldwell School District
2716 S. Montana
Caldwell, ID 83605

Dear Superintendent French,

On December 5-6, 2019, State Department of Education (SDE) Coordinators Lynda Westphal, Jessica Spoja and TJ Goodsell conducted an Administrative Review of Caldwell School District 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)
- Afterschool Snack Program (ASSP)
- USDA Foods

The SA reviewed the following sites:

- Sacajawea Elementary School
- Syringa Middle School

The State agency would like to thank Bonnie Ramsay and the staff of Caldwell 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:

Findings and Corrective Action Plan (CAP)

Finding 1 – Meal Pattern

The lunch meal service is not structured to comply with the required age/grade group meal service. For the week of menu review, the breakfast menu did not meet the minimum weekly requirement for grain. A grain was offered daily, however the weekly minimum requirement was not met. Meat/meat alternate products may credit towards the weekly grain requirement, once the daily grain requirement is met.

Corrective Action: Provide a written statement that the 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. Submit any necessary documentation to demonstrate that the menu findings listed are now corrected. This 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: 10/14/19

Corrective Action Response: A note was uploaded to MyIdahoCNP on October 9, 2019, stating that “Effective immediately a cheese stick will be added to Monday and Friday’s menu to bring our weekly grain total offering to 8 oz eq. Bringing our menu compliant with the Federal Regulations.”

Finding 2 – Resource Management

The Child nutrition fund 290 has listed all CACFP, NSLP, and SFSP revenues and expenditures in one general ledger fund detail code. Per the CACFP regulations, CACFP revenues and expenditures must be separated out to be able to identify income, payroll, benefits, and expenses in a separate fund detail to be able to track program income and expenses. The SFA should track all respective revenues and expenditures of each program separately.

Corrective Action: Provide a written statement outlining how these programs will be accounted for separately so as to give an accurate picture of each program.

Due Date for CAP Completion: December 20, 2019

Corrective Action Response: The Business Manager is working on different fund accounts for the different programs, food service will be breaking out the assigned PO’s with a breakdown of accounting funds for the different programs to accomplish this.

Finding 3 – Wellness Policy

The Local Wellness Policy (LWP) must include language inviting members of the school board to participate in the development, implementation, and evaluation of the SFA's wellness policy.

Additionally, the current LWP does not include a policy for food and beverage marketing regarding smart snack compliance.

Corrective Action: The SFA must provide a written plan explaining how the district will bring the Local Wellness Policy into compliance by the end of the school year.

Due Date for CAP Completion: December 20, 2019

Corrective Action Response: Document uploaded December 18, 2018 states “The Caldwell School District #132 Wellness Policy has been presented to the Policy Committee for a reading and will be updated following the suggested changes presented by the State Reviewer. The anticipated timeline is first reading to Board of Trustees January 2020, second reading and final approval February 2020. The Child Nutrition Director will post the updated Wellness Policy onto the Caldwell School District #132 website for public viewing.”

Finding 4 – Nonprofit Food Service Account

Unallowable costs were charged to the nonprofit food service account. A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances. For example, the cost of food is a reasonable cost to operate the nonprofit school food service if incurred according to these conditions. The following are unallowable costs: Coffee and Coffee filters for staff \$300.00 and \$95.98, working/training lunches (unless all staff are required to attend and there is an agenda of training topics and sign-in sheet) \$69.25 and \$51.63, sympathy cards \$2.11, Regal movie tickets \$645.00, Coffee Maker reimbursement \$42.35. These expenses total \$1,206.32 and must be paid out of general funds.

Corrective Action: Show a journal entry transferring \$1,206.32 from General Funds to the Child Nutrition Account.

Due Date for CAP Completion: December 20, 2019

Corrective Action Response: A journal entry was uploaded showing the transfer of funds from the General Fund to Child Nutrition account.

Commendations

- The child nutrition director was organized and provided all requested copies of information. She was positive and open to TA and best practice suggestions.
- Kitchen staff was observed following proper food safety practices, no bare hand contact with ready to eat foods, temperature recordings, and other signs of a clean preparation facility. A cooling temp form is used for recording temperatures of complex food preparation – excellent demonstration of proper food safety practices.
- The calculator wrapped in plastic wrap for food safety reasons was a first for the SA reviewer. This is a great "best practice".
- The meals are served in a warm and friendly environment. The lunch meal was a freshly prepared, from scratch chili with chips and cheese, cooked carrots, and canned peaches. The aroma was wonderful, and meal looked appealing and delicious.
- Excellent work meeting all lunch meal pattern requirements for the week of menu review!
- Good job on the fancy names for your foods. The cafeteria was a warm and inviting place for the children.

Technical Assistance (TA)

Meal Counting and Claiming

- Double check the numbers entered into the claim as the afterschool snack was underclaimed by 6 snacks.

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - During the review, the importance of signage was discussed with the SFA. The SFA must ensure signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal. TA given to include all creditable menu items on signage; applesauce was not listed along with the oranges.

Lunch

- Prior to meal service, the reviewer noted that 1/4 cup of carrots + 1/4 cup of vegetable in the chili would be offered/plated by the server on each tray. An additional 1/4 cup of carrots were offered on the self-serve bar, after the student leaves the line, and is monitored by a teacher. (The point of service takes place before the students enter the lunch line.) A suggestion was provided to the increase amount offered on line to “one or two ¼ cup portions” of cooked carrots in addition to the ¼ cup vegetable offered in the chili to ensure a total of ¾ cup of vegetables is offered prior to going through the self-serve bar. Technical assistance was given to monitor the total amount of cooked carrots prepared and adjust if needed.
- Chili recipe prepared on day of review did not follow the printed recipe for quantities of ground beef, tomato products and pinto beans and yield was 12 gallons or 384 ½ cup portions (less than the 450 ½ cup portions indicated on recipe). Onsite Reviewer calculated that meal would still provide at least 1 oz eq MMA (with cheese 1.75 oz eq offered) and ¼ cup r/o vegetable. TA provided on a plan for sufficient servings of MMA to offer to all students. Staff reported 40 or more students usually refuse the chili. Refried beans were prepared for back up option to go with chips and cheese in place of chili. TA given to Child Nutrition Supervisor to conduct district wide recipe standardization and yield project to assist district menu planner with updating recipe.
- During the meal service, all observed meals were complete.

Breakfast

- 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 weekly minimum amounts of grains to be served. The weekly requirement of 7 oz. eq. was not met. The menu offered a minimum of 6 oz. eq. of grain throughout the week. The cereal meal option offered daily at breakfast only provides 1-ounce equivalent grain per day for a total of 6-ounce equivalent grain for the week (including the eggs on Wednesday). Consider offering an additional item such as a 1-ounce cheese stick or 4 oz. yogurt with the cereal option daily. This will help meet the weekly grain requirement with the cereal meal choice. After the daily 1 oz. eq. grain minimum is met, the weekly minimum can be met with additional grains or meat/meat alternates.

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 complete food safety plan that includes all 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 have all written policies include signatures and dates for adoption and personalize to school name rather than reflect (sample) in the written materials. TA given to remove any SOPS that do not apply to each school food service operation, such as transport of food to remote sites.
- The Share table after lunch had all of the unopened milks discarded. The SDE staff, local health department and Caldwell FSD are working together to see if that practice must continue or they can be reused for breakfast.

Afterschool Snack Program (ASSP)

- The meal count for October was calculated correctly, however a different number was entered into the claim. Ensure the numbers are double checked.

Civil Rights

- The Civil Rights Procedures in each kitchen still listed the former supervisor on it. A new procedure with Bonnie's name on it was e-mailed to all kitchens to replace the current sheet on the day of review.
- The Meal Accommodation form in the kitchen binders was the old form with out of date information. The new form was e-mailed to the kitchens on the day of review.

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. Ensure the wellness 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. TA given on the Wellness Policy and the Progress Report. A copy of a partially completed one was given with some suggestions.

Smart Snacks

- Per 7CFR210.11, 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](#) are on this site.
- Per Public Law 111-296 as clarified in 7 CFR 210.11, "All Foods Sold in School," vending, 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.

Professional Standards

- Training standards apply to all school nutrition program employees, regardless of student enrollment in the school district or size of the Local Educational Agency (LEA). Note: If hired January 1 or later, an employee must only complete half of the required training hours.
 - Directors – must complete at least 12 hours of annual continuing education/training. These required hours are in addition to the food safety training required in the first year of employment.
 - Managers - must complete at least 10 hours of annual continuing education/training.
 - Staff working an average of at least 20 hours per week - must complete at least 6 hours of annual continuing education/training.
 - Part time staff working less than 20 hours per week - at least 4 hours annual continuing education/training, regardless of the number of part-time hours worked. (7 CFR 210.30 Professional Standards Regulations)
- Eight employees were missing training for Offer versus Serve, Civil Rights and Food Safety training in their training logs. Food service staff need access to Safe Schools training log so they can ensure that employees have the required training.
- A copy of 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.

Special Provision Options

- The district is on the Community Eligibility Program (CEP) using districtwide claiming percentages. This was validated in the 2018-19 school year and will expire on June 30, 2022. It is imperative to run the list of all students in the district on April 1 each year along with a direct certification report. If the districts' percentages increase it would be possible to validate the new CEP numbers and extend the program for an additional 4 years from the new SA validation.

Resource Management Comprehensive Review

- Nonprofit Food School Food Service Account
 - All programs income, payroll, and expenses cannot be lumped into one account. There must be separate fund accounting for the NSLP/SBP, SFSP, and CACFP to ensure all expenses accrue to the correct program.
- Revenue from Nonprogram Foods
 - TA was given on selling and catering to non-food service entities. Ensure there is a markup included in the food and labor to account for all of the costs to food service.
- Indirect Costs
 - No indirect costs were charged in the 18-19 school year to Food Service department.

Procurement

- A procurement review was completed by the SA. Please follow the guidance provided in the separate closure letter.

Your review is now closed.

Unallowable expenses in the amount of \$1,206.32 were discovered and moved from General Funds to Food Service, however this is not considered Fiscal action per 7 CFR 210.18 (p) as the SA did not deny all or part of a Claim for Reimbursement or are withholding payment. As such there are no Appeal rights due to this administrative review finding.

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
Bonnie Ramsay, Food Service Supervisor, Caldwell School District

Civil Rights

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- (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.

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