

**COOPER CO. R-IV (027-056)**

**Review ID: 5902**

**Exit Conference Date: 10/7/2016**

Review Year: 2017

Month of Review: September

Lead Reviewer: joseph samelak

Area	Findings ID	Finding Description	Required Corrective Action
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**LEA - Level Findings**

1100 - Smart Snacks	V-1100	In order to sell items a la carte to students, all items must be assessed using the Smart Snacks Product Calculator. This would include the pop-tarts, and any of the ice cream items that are offered on Friday. For any of your a la carte items you will need to use the Smart Snack Product Calculator, and remove any items that do not meet the standards from sale at the school. This may mean discontinuing the sale of several of your ice cream treats. Here is the link to the Smart Snacks Product Calculator: <a href="http://rdp.healthiergeneration.org/calc/calculator/">http://rdp.healthiergeneration.org/calc/calculator/</a>	Please provide assurance that you have used the Smart Snacks Product Calculator to assess all ice cream and other a la carte items, and that you will discontinue the sale of any items that do not meet the standards.
1100 - Smart Snacks	V-1100	For any items that you sell a la carte, you need to be sure that you also account for the accompaniments with these items when assessing their compliance with the Smart Snacks standards. Accompaniments would be anything, such as condiments, that are intended to go along with a food item. Examples would include: dressing w/ salads, cream cheese or jelly w/ toast, or cheese w/ eggs. If and when you offer any of these such types of items as a la carte, you will need be sure to include the accompaniments when you check these items with the Smart Snacks Product Calculator.	Please provide assurance that you will take into account all accompaniments when assessing their compliance with the Smart Snacks requirements.

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**LEA - Level Findings**

1200 - Professional Standards	V-1200	<p>The SFA is required to track the amount of received training hours for the required employees (i.e. Jeannie Tuttle, Loretta, and John Thompson). The requirements for each employee are as follows:</p> <ul style="list-style-type: none"> <li>- <b>Jeannie Tuttle (Director) = 12 hours</b></li> <li>- <b>Loretta (Full-Time Staff) = 6 hours</b></li> <li>- <b>John Thompson (Non-nutrition Staff) = 6 hours</b></li> </ul> <p>You will need to keep track of the amount of hours received by each of these employees. You can use either the USDA Tracker Tool, which is available through the DESE Food and Nutrition Services website under "Professional Standards", or you can use your own created spreadsheet to keep track of them.</p>	Please provide assurance that you will keep track of the received training hours for the required employees.
1200 - Professional Standards	V-1200	<p>Currently, the SFA is not tracking the received training hours. SFAs need to use, either, the USDA Tracker Tool or a spreadsheet of your own creation. The USDA Tracker Tool is available through the following link: <a href="http://www.fns.usda.gov/school-meals/professional-standards">http://www.fns.usda.gov/school-meals/professional-standards</a></p>	Please provide assurance that you will use the USDA Tracker Tool or that you will use a spreadsheet of your own creation for tracking training hours received.
1400 - Food Safety	V-1400	<p>All schools are required to have a Written Food Safety Plan, which is based on the HACCP principles, which are outlined in the HACCP Guidance. The HACCP Guidance must be kept on file, either a paper or an electronic copy, and this guidance must be used to construct a food safety plan for your school. HACCP Guidance:  <a href="https://dese.mo.gov/sites/default/files/HACCP_Guidance.pdf">https://dese.mo.gov/sites/default/files/HACCP_Guidance.pdf</a> You will need to put together a Written Food Safety Plan for your school, and a copy of this plan must be kept on file.</p>	Please provide written assurance that you will use the HACCP Guidance to construct your own Written Food Safety Plan, and that this plan will be kept on file at your school.

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**LEA - Level Findings**

200 - Verification	V-0200	<p>Since John Thompson is already acting as the "determining official", he cannot also be the "confirming official". The reason being that the determining official makes the original determination on an application that is turned in. Whenever it's time for verification, and you've selected the applications you will verify, the confirming official will first double check the original determination made was accurate. After he/she has double checked, then the verifying official can begin verification. That is why the determining and confirming official must be different people. To make sure two different sets of eyes check the application for accuracy.</p>	<p>Please provide assurance that someone other than John Thompson will be the confirming official.</p>
700 - Resource Management	V-0700	<p>The PLE tool had been incorrectly completed, which resulted in the tool saying "No Price Increase Necessary". I have completed the tool, and sent a copy to Superintendent John Thompson. The result of the tool is that a \$0.10 increase is necessary. As I discussed with Mr. Thompson, the options will be to either increase the paid lunch prices by \$0.10, or to transfer over non-federal money in lieu of raising prices.</p> <p>If the school chooses to transfer in non-federal money, rather than increase prices, the amount of \$788.10. Please refer to the 2016-2017 Paid Lunch Equity Tool, which is included in the "Review Attachments". You will need to show that you have transferred this money over.</p>	<p>Please provide assurance that you have increased your paid lunch prices by \$0.10, <b>OR</b> provide assurance that you have transferred \$788.10 in non-federal money to your school food service account.</p>

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LEA - Level Findings

800 - Civil Rights	V-0800	All program material must contain the updated USDA non-discrimination statement. This includes menus and all letters sent to the households. The menus currently do not have this statement. The menus don't currently have this statement. Since the updated non-discrimination is rather lengthy, the USDA says that schools can use the shortened statement on their menus: " <b>This institution is an equal opportunity provider.</b> "	Please provide assurance that you will add this statement to the menus.
Resource Mgt Comprehensive Review	V-RMCRF	<p><b>Adult Lunch Prices:</b></p> <p>The USDA provides guidance for how schools are to set their adult meal prices for lunch. Most schools are not aware that there is a guidance for this, and instead just set their adult prices so they are a bit above their paid student prices. Adults should certainly pay more for their meals than the students do, which they do. However, the question is always, "how much more?".</p> <p>The first thing to take into account is that you receive reimbursement for your paid students meals, in the amount of \$0.38. The other thing that needs to be factored in is "the current per-meal value of entitlement and/or bonus donated foods". That value is released each year along with the reimbursement rates. That value is currently \$0.32 per meal. This means that you would need to take the paid student price, and then add to that \$0.38 (paid reimbursement rate) and \$0.32 (per meal value of entitlement and/or donated foods).</p> <p>Currently your paid student price is \$1.75, however, you did not increase prices this year as required. Had you done so, you would have increased paid prices by \$0.10 at each school. This would have put your paid student price at \$1.85. So, this would mean your adult price should be roughly \$2.55. (\$1.85 + \$0.38 +</p>	Please provide assurance that you will increase your adult lunch prices, and that you will consider increasing your adult breakfast prices.

\$0.32 = \$2.55)

You will need to increase your adult meal prices to a level at or above \$2.55, **OR** you will need to include in your response an explanation that you will be covering the money you are losing from these adult meals with funds from your general fund.

### **Adult Breakfast Prices:**

For adult breakfast prices, we cannot require that you increase, but we can strongly encourage that you do so. The School Breakfast Program (SBP), just like the National School Lunch Program (NSLP), is a federally subsidized program. However, this program is subsidized with only the children in mind. The subsidies, which are received in the form of reimbursements and donated foods/entitlement, are not intended to subsidize teacher and/or adult meals. This means that those subsidies need to be taken into account when calculating the proper adult meal price. Currently your adult breakfast price, which you receive no reimbursement or subsidies for, is \$1.25; the exact same price as a student meal. Staff meals should always be priced higher than student meals.

As I showed you above, there is a formula used for calculating the proper adult meal prices for lunch. There is also a formula used for calculating adult breakfast prices, and it is a little bit different.

Adult Breakfast Price = Student Free Reimbursement (**\$2.04**) + Value of Donated Commodities (**\$0.32**). So, the adult recommended price is at least **\$2.36**.

Since the USDA doesn't regulate the student paid breakfast prices, we instead take the free reimbursement you would receive for a meal from USDA, and add to that the value of donated commodities.

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**LEA - Level Findings**

Resource Mgt Comprehensive Review	V-RMCRF	<p>After completion of the non-program food revenue tool, the result shows they needed to add an additional \$39 in non-program revenue to be in compliance. After evaluating the Non-Program Food Tracker, this is due to adult meals being priced too low. Adult lunches are only \$2, and adult breakfasts are only \$1.25. Please see CAD for adult meal prices. Looking at adult meals over the 5-day review period from September (9/12 - 9/16), the total costs were \$93.19, but the total revenues were only \$104. Many of the meals, mainly the breakfasts, sold for less than they cost the school to purchase. So, adult prices will need to be increased (please see findings for "Adult Meals" in CAD). Another thing to consider, is that you are not making much profit at all on the sale of your ice cream treats you sell on Friday. You sell most of them for \$0.50, yet many of them cost over \$0.40 to purchase. You should strongly consider increasing the price of these items, as well.</p>	<p>Please provide written assurance that you will re-evaluate your adult meal prices, and a la carte prices, so that you can be in compliance the revenue from non-program foods requirement.</p>
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**Site - Level Findings: COOPER CO. ELEM. (4020)**

1400 - Food Safety	V-1400	<p>While on site, I found that they did not have an up-to-date Written Food Safety Plan currently in place. There was a folder from about nine (9) years ago which contained an approval for a then-current policy. However, no policy was shown to be available. The USDA requires that every SFA develops a written food safety plan, based on the HACCP Guidance; available on our website at:  <a href="https://dese.mo.gov/sites/default/files/HACCP_Guidance.pdf">https://dese.mo.gov/sites/default/files/HACCP_Guidance.pdf</a>                      You need to keep a hard copy or an electronic copy of this guidance on file at your school. This guidance is NOT a written food safety plan, but is a guide on how to develop your own plan.</p>	<p>Please provide assurance that you will use the HACCP Guidance to develop your own Written Food Safety Plan for Cooper Co. R-IV. If you are able to locate your older policy, please scan and upload that plan along with a response that you will update your policy immediately.</p>
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**Site - Level Findings: COOPER CO. ELEM. (4020)**

400 - Meal Components and Quantities - Breakfast	V-0400	<p>1) There are some labels/recipes that were missing from the targeted menu review week. The items missing these are:</p> <ul style="list-style-type: none"> <li>- <b>McGriddles (recipe)</b></li> <li>- <b>yogurt cups (label)</b></li> <li>- <b>granola (label)</b></li> <li>- <b>pretzels (label)</b></li> <li>- <b>cheese sauce (label)</b></li> </ul> <p>2) The Cocoa Munchies cereal is not whole-grain rich (WGR). The first ingredient listed for this cereal is "sugar". To be WGR, a whole-grain ingredient must be listed first on the label.</p>	<p>1) Please provide assurance that you will obtain/keep all missing labels and recipes. If you already have any of these items, please upload them to this finding.</p> <p>2) Please provide assurance that you will replace this remove this cereal/replace it with one that is WGR, <b>OR</b> that you will complete the WGR Exemption Request Form, which is available on the DESE website, and submit it right away.</p> <p><b>WGR Exemption Request:</b> <a href="http://dese.mo.gov/sites/default/files/dac_forms/MO5003123.pdf">http://dese.mo.gov/sites/default/files/dac_forms/MO5003123.pdf</a></p> <p>Please keep in mind that although the waiver says it is only good through SY 15-16, it has been extended to also be allowed through SY '16-'17. Please see the "Extension Notice" link below for clarification: - <a href="https://dese.mo.gov/sites/default/files/food/documents/SP33-2016.pdf">https://dese.mo.gov/sites/default/files/food/documents/SP33-2016.pdf</a></p>
400 - Meal Components and Quantities - Lunch	V-0400	<p>1) There were some missing labels/recipes from the targeted menu review week. The items missing documentation are:</p> <ul style="list-style-type: none"> <li>- <b>sub sandwich (recipe)</b></li> <li>- <b>PB sandwich (recipe)</b></li> </ul> <p>2) Some of your recipes didn't list the number of servings, or the amount of each of the ingredients listed. In order to properly be able to credit a recipe towards the meal pattern, it's important that recipes list the amounts of all ingredients and the number of servings.</p>	<p>1) Please provide assurance that you will obtain and keep all required labels and recipes. If you already have this documentation, please upload them to this finding.</p> <p>2) Please provide assurance that you will add the number of servings to your recipes, and that all of your recipes will list the weight/volume of all ingredients.</p>