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April 10, 2017

Return Receipt No. 7013 1710 0000 9755 8903

Dr. Ronald Bolinger
American Falls School District
827 Fort Hall Avenue
American Falls, ID 83211

Dear Dr. Bolinger,

On March 28, 2017, State Department of Education (SDE) Coordinators Tamara Donovan and Lynda Westphal conducted an Administrative Review of American Falls School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) (Provision 2 operating at each school for Breakfast)
- Fresh Fruit and Vegetable Program (FFVP) at William Thomas Middle School
- Afterschool Snack Program (ASSP) at William Thomas Middle School
- USDA Foods

The site reviewed was William Thomas Middle School.

The State agency (SA) would like to commend Lisa Krell and the entire staff of the American Falls 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 (HHFKA), 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:

Finding and Corrective Action Plan (CAP)

Finding 1- Provision 2 Base Year adjustment

In validating the percentages for Provision 2 by double-checking a statistical sample of applications, a few applications were determined incorrectly thereby requiring the claim percentages to be adjusted. These new percentages must be used to adjust claims back to the beginning of the school year per USDA guidance. The fiscal amount is listed below and the appeal rights are referenced at the bottom of this letter.

Timeframe for CAP completion:

Based on the adjustment (sheet attached) the total amount adjusted back to the beginning of the year is \$512.25, and cannot be disregarded. This adjustment changes your percentage amounts slightly, resulting in claims being downward adjusted slightly every month.

Commendations

- The Food Service Director was well prepared for the State agency on-site review. All necessary documentation was organized and ready for review and she was available to answer questions and provide clarification. The time and work put into preparing for the review allowed the reviewers to work efficiently.
- The Food Service Director did a remarkable job ensuring appropriate food service and administrative staff were trained in USDA civil rights.
- State agency independent contractor Shawna Durbin validated the Nutrient Analysis at American Falls SD and found all to be in compliance.
- Food products are dated and well organized at William Thomas Elementary School. The staff takes pride in keeping the kitchen facilities clean and in order. It is apparent that the kitchen manager has developed a cohesive, well organized team that works diligently and with good attitudes to serve meals efficiently.
- A great variety of fruit and vegetables were available to the students at WTMS at lunch. The food service staff had an excellent understanding of offer versus serve and students selected from the many colorful produce options.

Technical Assistance (TA)

Verification

- Keep copies of the original and follow-up letters sent to families in the Verification file along with the copy of the application.

Procurement and Buy American Provision

- Each SFA is required to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories, as applicable (7 CFR 210.21 (d)). If a product from another country is sourced, then the food service must

have proof that the domestic product is significantly higher in price or not available in sufficient quantities. The Buy American Provision was included in SFA solicitation documents for the purchase of commercial foods. Food products must be checked upon receipt and not accepted if the products do not comply with the Buy American Provision, unless there is documentation to justify the exception (exorbitant pricing or product shortages). Saf Yeast from Mexico has been discovered, however documentation to support this product was shared with SFA's previously in the year. Strawberries from Chile and grapes from Chile must have this additional documentation. SFA should request documentation to justify the cost or lack of product availability in the future.

Local School Wellness Policy

- On July 29, 2016, the USDA Food and Nutrition Service (FNS) finalized regulations to create a framework and guidelines for written wellness policies established by LEAs. (§210.30) The final rule requires LEAs to fully comply with the requirements of the final rule by June 30, 2017. Federal legislation requires school districts to implement a local wellness policy that must include language:
 - Permitting parents, students, school board, PE teachers, school health professionals, school food service staff, administrators, and community members to participate in the development, implementation, review, and update of the local wellness policy.
 - Identifying wellness policy leadership of one or more LEA and/or school official(s) who have the authority and responsibility to ensure each school complies with the wellness policy.
 - 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.
 - Addressing nutrition guidelines for all foods and beverages sold on the school campus during the school day and for providing school meals that adhere to Federal meal pattern requirements.
 - Identifying nutrition standards for non-sold foods and beverages available during classroom and school celebrations.
 - Stating a policy for food and beverage marketing that allows the marketing and advertising of only those foods and beverages that meet Smart Snacks in School nutrition standards.
 - Addressing an evaluation conducted once every three years of the wellness policy and the extent to which schools are in compliance, how the district policy compares to model wellness policies, and the progress made in attaining local wellness policy goals.
 - Identifying a way to share the wellness policy content and implementation with the public.
 - For more information regarding local wellness policies, please visit the Idaho SDE [Child Nutrition Programs School Wellness website](#).

Smart Snacks

- All fundraisers, both exempted and compliant, must be tracked. Per state policy, a maximum of ten 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 ten must be pre-approved by the State agency using the request form. (7CFR 210.11) Details available [here](#).

Your review is now closed.

Fiscal action in the amount of \$512.25 from claims from August through February will be recovered from future claims for the Provision 2 adjustment. Should you wish to appeal any of these findings please follow the appeal procedures on the [State Agency Appeal Procedures](#) document. 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,

A handwritten signature in black ink that reads "Lynda Westphal". The signature is written in a cursive style and is positioned above the typed name and title.

Lynda Westphal, MHS, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Lisa Krell, Food Service Director, American Falls School District

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