



SHERRI YBARRA
SUPERINTENDENT OF
PUBLIC INSTRUCTION

650 W. STATE STREET
P.O. BOX 83720
BOISE, IDAHO 83720-0027

OFFICE: 208-332-6800
FAX: 208-334-2228
SPEECH/HEARING
IMPAIRED: 1-800-377-3529

March 21, 2017

Mr. Ronald Anthony
Buhl School District
920 Main Street
Buhl, ID 83316

CERTIFIED # 7013 1710 0000 9755 8880

Dear Mr. Anthony,

On February 9, 2017, State Department of Education (SDE) Coordinators Jennifer Butler and Lynda Westphal conducted an Administrative Review of Buhl School District for the following United States Department of Agriculture (USDA) programs:

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

The sites reviewed were Buhl Senior High and Poppelwell Elementary Schools.

The State agency (SA) would like to commend Michelle Shaddy and the entire staff of the Buhl 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- Civil Rights

School Foodservice Authority staff who interact with program applicants or participants (i.e., cafeteria staff, Free and Reduced Application approval staff) and their supervisors as well as the Hearing Official must have annual civil rights training. The Superintendent is listed as the Hearing Official so must have USDA civil rights training. Training is available at the SA website. Upload a dated sign in sheet to provide documentation that the Hearing Official received civil rights training.

Timeframe for CAP completion: February 24, 2017

SFA Response to CAP: The Hearing Official watched the SA Civil Rights video and signed the sign-in sheet on February 21, 2017.

Finding 2- Certification and Benefit Issuance

Five students needed more information on their application (household members don't match, social security number – or indication that there is no SSN box checked), two missing applications (free to paid) and one application went from reduced to paid. At the end of the review, there were only two that needed more information.

These errors resulted in a 6.72% error rate.

Timeframe for CAP completion: February 24, 2017

SFA Response to CAP: All applications and letters sent to the families were uploaded on February 13, 2017.

Finding 3- Certification and Benefit Issuance

One student is on the list as free; however the printout from the software system lists that she has no status. The theory is that this is a transfer student who received benefits prior and when enrolled again, they were given the prior benefit.

Timeframe for CAP completion: February 24, 2017

SFA Response to CAP: Per correspondence from the District Technology Department, it was determined that if all schools followed their check-out policy, which includes a check out sheet where all students make contact with all departments, the withdrawal process will stop this from occurring in the future.

Finding 4- Meal Counting and Claiming

The January claim for the Middle School that the breakfast and lunch numbers identical, which upon further investigation it was recalculated and discovered an overpayment of \$581.50.

Timeframe for CAP completion: February 24, 2017

SFA Response to CAP: This will be recovered as part of the review.

Due to errors in the claim and benefit issuance, the fiscal action value is \$622.00 for breakfast and \$125.92 for lunch. The lunch amount can be disregarded, however the breakfast amount is over the \$600 threshold, so cannot be disregarded. It will be recovered from your next claim.

Commendations

- The computer at the HS went down during the lunch meal service. Traci did an awesome job collecting numbers to record when the computer was up and running. It is obvious she knows what the procedure is when this happens.
- Michelle worked hard preparing for the review and was open to any feedback provided by SA reviewers.
- A lot of children were served during a long meal service; kitchen staff did a great job providing meals in a quick and efficient manner.
- Kitchen staff wore appropriate hair restraints as required per Idaho Food Code.
- Shannon does a great job providing educational and nutritional information to teachers for weekly FFVP offerings.

Technical Assistance (TA)

Certification and Benefit Issuance

- Several applications needed to be followed up during the review. Cross-training someone to double check the applications received might help with these types of errors.
- Per the Eligibility Manual, when determining Free and Reduced Applications, income should not be converted unless various income frequencies are reported. Please make use of the Income Eligibility Guidelines chart.

Verification

- Please staple copies of the letters (both the original and reminder) sent to the families in the verification file. When you send the denial notification letter - that must get stapled too. Make sure to upload a copy of the letters for the State agency to verify.

Dietary Specifications and Nutrient Analysis

- Each SFA is required to purchase domestic agricultural commodities or products that are produced and processed substantially using agricultural commodities that are produced in the United States or territories, as applicable (7 CFR 210.21 (d)). Grape Tomatoes in the fridge were assessed for the country of origin and were found to be out of compliance (Mexico). The SFA must have documentation that US products were not available or were a substantially higher cost.

Meal Components and Quantities

- Steffanie Sandoval Viet, RD, LD, independent contractor, talked to Michelle about using Exhibit A. She was crediting 1/2 cup cooked rice as 0.5 oz. eq instead of 1 oz. The nachos for the same recipe were being credited as 1.5 oz. eq when it should have been 1.25 based on the portion size and product specs/nutrition label. The menu for that day still met the minimum requirement of 2 oz. and she made adjustments to future production records.
- Gave TA that they should get new signs without the 2% milk reference. **Corrected while on site.**

Food Safety

- The most recent food safety inspection report must be posted in a location visible to the public (7 CFR 210.13(b)). The high school had it in the back of the kitchen. **Corrected while on site.**
- Gave TA to include the bodily fluid clean-up plan in your HACCP (food safety) plan.

Local School Wellness Policy

All LEAs must assess their wellness policy at least once every three years on the extent to which schools are in compliance with the district policy, the extent to which the local wellness policy compares to model local school wellness policies, and the progress made in attaining the goals of the local wellness policy. LEAs must make this assessment available to the public.

Procurement

- Include the Buy American Provision in SFA solicitation documents for the purchase of commercial foods; please refer to Guidance Memo SP24-2016. 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).
- Recommend that the Procurement Policy for the District include verbiage regarding minority and women owned businesses (they must get more points if you go out to bid).

Fresh Fruit and Vegetable Program

- The school must widely publicize the FFVP. It was discussed that a blurb will be added to the school newsletter and information may be added to the menu.

Food Donations

- On days when a large amount of food is left over (e.g., flooding issue on the day of review), food items may be donated to a 501(c) 3 private non-profit organization. The policy memo that addresses this regulation was forwarded to Michelle.

Your review is now closed.

Fiscal action totaling \$622.00 will be recovered from a future claim for reimbursement. To appeal 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,



Lynda Westphal, MHS, SNS
NSLP Coordinator

cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Michelle Shaddy, Food Service Director, Buhl School District

“This institution is an equal opportunity provider”