



**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

February 3, 2017

Superintendent Ed Schumacher  
Cambridge School District  
PO Box 39  
Cambridge, ID 83610

Dear Mr. Schumacher,

On December 5, 2016, State Department of Education (SDE) Coordinators Jennifer Butler and Lynda Westphal conducted an Administrative Review of Cambridge School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- USDA Foods

Cambridge Elementary was the school site reviewed.

The State agency (SA) would like to commend Theresa Schumacher and the entire staff of the Cambridge 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- Certification and Benefit Issuance***

Three applications were found to be incomplete. Two applications did not list names of household members to match the number indicated in the household total box. One application was missing the last four digits of the Social Security Number. Please be aware of the need to follow up with families as applications are submitted when items are incomplete. These applications should be considered denied as incomplete until all required information is obtained. These errors resulted in a 7.25% error rate.

**Timeframe for CAP completion:** No further action is required, as corrective action was addressed while SA reviewers were onsite.

**SFA Response to CAP:** During the onsite review, phone calls were made to the three households to obtain the missing information and add it to the application. No changes in the benefit determination were required.

### ***Finding 2- Verification***

One application affecting 3 students was verified incorrectly, resulting in the wrong benefit issued. The income amount and frequency was not accurately determined resulting in a change in benefit from free to reduced. The three students must be changed from Free to Reduced. Send letter of adverse action to the household notifying them of the change in benefit and update the POS to reflect the changes. Upload the household notification letter into MyIdahoCNP.

**Timeframe for CAP completion:** December 19, 2016

**SFA Response to CAP:** Letter of adverse action was sent home to family on December 6, 2016, advising of the free to reduced benefit change.

### ***Finding 3- Civil Rights***

All foodservice and administration staff, and their supervisors, including the Hearing Official, who interact with program applicants and participants, and conduct program related duties must have annual civil rights training. Upload, into MyIdahoCNP, the signed and dated Civil Rights training agenda showing that the Hearing Official and relevant front office staff accepting meal payments and determining applications have completed the required annual training. Training video and agenda/sign-in sheet are available on the Idaho Child Nutrition web pages under [Civil Rights](#).

**Timeframe for CAP completion:** December 19, 2016

**SFA Response to CAP:** On December 8, 2016, six employees watched the SA Civil Rights training video.

### ***Finding 4- Food Safety***

Each SFA must have a written food safety plan for compliance with Hazard Analysis Critical Control Point (HACCP) program criteria found in 7 CFR 210.13(c). SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared or served for the purposes of the NSLP, SBP or other FNS programs. This means the food safety

program should contain standard operating procedures for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria, as applicable. Upload a copy of the kitchen's HACCP-based food safety procedure manual.

**Timeframe for CAP completion:** December 19, 2016, extended to January 20, 2017.

**SFA Response to CAP:** On January 20, 2017, the SFA provided a dated HACCP manual including the relevant procedures.

#### ***Finding 5- Food Safety***

After July 1, 2018, one person that has "direct managerial duties in the kitchen" in each school district must be trained in food safety. Qualifying courses include Serve Safe certification through the National Restaurant Association (cost involved). It is recommended that the Food Safety in Schools, formerly known as Serving it Safe, through ICN's free on-line course be taken to cover this requirement until July 1, 2018. Certification is good for five years. Best practice is to require all food handler staff to take the Food Safety in Schools course. The foodservice director needs to come up-to-date on food safety training. The SFA will submit a plan that outlines a plan of action and the timeframe in which the foodservice director will complete at least 8 hours of school food safety training before the end of the school year.

**Timeframe for CAP completion:** December 19, 2016

**SFA Response to CAP:** On December 19, 2016, the SFA advised that the foodservice director will complete the online food safety training by March 31, 2017.

#### ***Finding 6- Offer versus Serve***

In SFAs that implement Offer versus Serve (OVS), staff must receive annual training. All staff training needs to include an agenda and sign-in sheet and training documentation must be maintained on file at the SFA for three years plus the current year. OVS online training is available on the State agency website and may be used for training. Please ensure all staff is trained on OVS for SY16-17 and upload the OVS training agenda/sign-in sheet or certifications of completion into MyIdahoCNP to document that training was completed.

**Timeframe for CAP completion:** December 19, 2016, extended to January 13, 2017.

**SFA Response to CAP:** On January 13, two employees completed 2 hours of OVS training.

#### ***Finding 7- Resource Management***

Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR210.14(f), SFAs are required to ensure that all revenue from the sale of nonprogram foods accrues to the non-profit school food service account and that revenue available to support the production of reimbursable school meals does not subsidize the sale of nonprogram foods. SFAs are required to determine if the percent of total revenue that is generated from their nonprogram food sales is equal to or greater than the percent of total food costs that are attributable to the SFA's purchase of nonprogram foods. TA was given that the cost of milk last year was more than the price children were being charged. Provide documentation of the simplified approach to assess compliance by completing one of the nonprogram food revenue tools provided by the SA. This simplified approach allows SFAs to separate their nonprogram food costs from their

program food costs for a period of at least 5 consecutive operating days. Upload a completed tool into MyIdahoCNP for SA review.

**Timeframe for CAP completion:** December 19, 2016, extended to January 13, then January 20, 2017.

**SFA Response to CAP:** On January 13, 2017, the SFA provided a nonprogram food revenue tool spreadsheet. Upon review, the SA discovered some missing information and returned to the SFA for completion. A completed spreadsheet was provided on January 17, 2017.

***Finding 8- Special Provision Option (Provision 2 breakfast)***

Per USDA memo SP-46-2015 dated September 18, 2015, the SA must review Provision 2 base year certification documents. The SA could not complete this process because some Provision 2 Base Year 2010-2011 records were not maintained. Since the required base year records have not been maintained, the SA would generally require the district to immediately return to standard counting and claiming procedures and calculate fiscal action. However, the SA is extending previous USDA guidance and allowing the SFA to continue their claiming procedure until no later than February 3, 2017. The SFA will need to return to a standard counting and claiming procedure at that time. Notify the SA of the plan and timeline to return to regular counting and claiming for the remainder of the school year and upload into MyIdahoCNP the notification letter sent to families advising them of the change with the Provision 2 breakfast option.

**Timeframe for CAP completion:** December 19, 2016

**SFA Response to CAP:** on December 16, 2016, the SFA advised of the plan to notify the school board during the December 19 meeting of the change and give them two options regarding the funding of the breakfast meal to be determined at the next school board meeting. On January 16, 2017, the school board approved subsidizing the breakfast program with district funds to continue to provide students with a free breakfast.

## Commendations

- The business manager was proactive and very helpful to SA reviewers, providing them with required information in a timely manner.
- Kitchen staff wore appropriate hair restraints as required per Idaho Food Code.
- The director does a nice job utilizing USDA foods in her scratch cooking recipes.
- The meals are freshly prepared using ingredients that are lower in salt, added fats and sugar. Fresh fruits and vegetables are also offered daily. The students in Cambridge are receiving quality foods prepared with care.
- Hamburger was cooked, drained of fat and rinsed with hot water to remove additional fat. Canned low sodium beans were also drained and rinsed to remove excess sodium. Freshly made chili and freshly baked corn bread were served to students on the day of the onsite review.

# Technical Assistance (TA)

## **Certification and Benefit Issuance**

- 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.
- Last school year's eligibility status can carry over 30 operating days into the new school year, allowing time for households to reapply without interruption of benefits (7CFR 245.6).

## **Verification**

- When performing Verification of Free and Reduced Applications, the Confirming Official cannot be the same person as the Determining Official (the person who approves the application). There must be another person checking the application prior to sending out the letter for Verification. Verification must be in line with requirements outlined in 7 CFR 245.6a.

## **Dietary Specifications and Nutrient Analysis**

The following TA was provided by SA contractor Laura Thomas, MED, RD, LD, who conducted the menu analysis:

- All meals featured all components; however a recipe adjustment is required to account for the new USDA 60/40 blended flour so that the cornbread is whole grain rich. The cornbread recipe states 100% whole wheat flour, but the 60/40 blend was being used. The muffins are not whole grain rich after corn meal is added to the recipe.
  - 100% whole wheat flour was purchased prior to the SA onsite review to use with the cornbread recipe. The cornbread was delicious with the whole grain flour.
- A full cup of fruit must be offered to all students at breakfast to all grade levels, although when OVS is implemented, only ½ cup of fruit must be selected for a reimbursable meal. Offering ½ cup fruit and ½ cup 100% juice qualifies as offering 1 cup of fruit.
- The creditable equivalents of the component contributions for each portion size by age group were not completed on the production records. Production records must be completed with all required information.
- Standardized recipes must include component calculation per serving.
- Review menus to assure daily minimum serving requirements are met.
- Recipes need to be revised to account for new USDA blended flour and whole grain rich foods.

## **Meal Components and Quantities**

- The director must immediately stop the practice of keeping daily production information in a spiral notebook and, as time allows, transferring the information on to a production record. TA was provided during the last review that this practice needed to stop as it is time consuming and causes unnecessary additional work. Be sure to have a production record for the meal prepared in advance and record the daily information directly onto the production record.
- Milk must be offered in two varieties at breakfast as well as at lunch.

### **Food Safety, Storage, and Buy American**

- Eggs were observed stored over cheese and oranges in the fridge. This is a food safety concern as the eggs would contaminate any food below them if they were to break. For this reason, store eggs on the lower shelf.
  - This issue was corrected immediately during the day of review while SA reviewers were onsite.

### **Resource Management**

- The foodservice director should plan ahead and buy foods in bulk to avoid paying higher costs when making frequent trips to the grocery store to buy one or two items needed for the day.
- Some itemized grocery receipts did not identify the actual product purchased. When this occurs, the foodservice director should attach a description for each product as back up to the receipt so it is known what was purchased.
- Based on the cost of milk from 2015-16, the SFA should charge at least \$0.35 for all milk sold ala carte.

### **Civil Rights**

Copies of the Civil Rights complaint procedure, log, complaint forms must be available at each school site. The civil rights procedure, log, forms, and training materials are available on the Idaho Child Nutrition web pages under [Civil Rights](#).

- A Civil Rights binder with all required information was compiled and placed at the front office while SA reviewers were onsite.

### **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](#).

### **Professional Standards**

- The United States Department of Agriculture has established minimum Professional Standards for school nutrition professionals who manage and operate the National School Lunch and School Breakfast Programs, effective July 1, 2015. The standards provide annual training requirements for all school nutrition professionals. It is required that some form of documentation be kept on file to show Professional Standards compliance; options include the [FNS online tracking tool](#) and two Professional Standards tracking resources available in MyIdahoCNP under Download Forms in the Professional Standards section.

### **Special Provision Options (Provision 2)**

- If the SFA wishes to participate in Provision 2 Breakfast next school year, they will need to establish a new base year during the next school year (SY 2017-18).

**Your review is now closed.**

At this time there will be no fiscal action. Should you wish 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 support of the Child Nutrition Programs.

Sincerely,



Jennifer Butler, MEd, SNS  
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs  
Theresa Schumacher, Food Service Director, Cambridge School District

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