



**SHERRI YBARRA**  
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April 28, 2017

Mr. Sid Tubbs  
Firth School District  
735 N 600 E  
Firth, ID 83236

Dear Mr. Tubbs,

On April 18, 2017, State Department of Education (SDE) Coordinators Teresa Goodsell and Lynda Westphal conducted an Administrative Review of Firth School District for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was AW Johnson Elementary School.

The State agency (SA) would like to commend Amy Dye and the entire staff of the Firth 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:

## Findings and Corrective Action Plan (CAP)

### **Finding 1- Free and Reduced Price Process**

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. After the carry over period ended, meal benefit status was not updated as applicable (see below finding). The carryover period is not intended to allow schools to delay the processing of applications. Failure to reapply during the carryover period is not a denial of benefits for the current school year. LEAs are not required to notify families or send reminders. A notice of adverse action is not required as eligibility was not established for the current school year. (7CFR 245.6).

**Timeframe for CAP completion:** May 3, 2017

**Sponsor Response to CAP:** On April 25, 2017 the SFA sent an email to the SA stating, "Working with the current software vendor, developed a procedure to stop this from happening. Our date for the next year will be October 19, 2017, to be set up as the expiration date for all applications that are not renewed. I will make sure that all applications are current. I will also make sure that a list is created with our current students and their eligibility, is retained from the previous year. I will also take more training with our computer tech about this subject."

### **Finding 2 – Free and Reduced Applications**

Seven applications (14 children) were found in error. Four children were carried over from the last year (see above finding).

**Due Date for CAP Completion:** May 3, 2017

**Sponsor Response to CAP:** All applications or benefit issuance changes were made April 18, 2017 on the day of review.

## Commendations

- Thank you to all the kitchen staff for wearing hairnets AND caps.
- Thank you for using the ice wand to cool the gravy from breakfast and monitoring and recording the temperatures on the production record.
- Appreciate the staff taking time to instruct student servers on correct handwashing technique and when to wash hands.
- Thank you to Heather for making a last minute sweet & sour sauce for the chicken nuggets that unexpectedly didn't have breading on them. It was good!
- Appreciate Amy Dye for being very organized and making the adjustments immediately.
- The staff at AW Johnson exhibited wonderful food safety practices. They wore gloves, hairnets and washed hands often on the day of on-site review.

## Technical Assistance (TA)

### **Monthly Claiming**

- When printing out the daily reports, make sure the daily amounts correspond to the production records. During the review it was discovered that one day only listed two children as eating breakfast when the production records listed many more. This is a loss in revenue if it occurs more often due to "computer glitches". This should be checked on

a daily basis to ensure the proper amount of meals is claimed. Based on an estimate of the number of meals for other days in the month, this glitch resulted in an approximate loss of \$68.80.

### **Free and Reduced approval**

- When multiple frequencies are reported on Free and Reduced applications, convert the incomes to annual income to determine eligibility. The Food Service Director misunderstood the SA memo on annual income.

### **SFA On-Site Monitoring**

- The on-site review shall take place prior to February 1 of each school year; they were conducted 2/6/17.

### **Dietary Specifications and Nutrient Analysis**

- Kerry McKaig, RD, LD, contractor, reviewed the NutriKids K-8 Breakfast and Lunch Certification tools for grades K-8. The contractor compared the recipes, CN labels and manufacturer formulation statements for the review week:
  - Breakfast food component quantities were corrected for the egg/cheese/ ham biscuit on Monday, March 6 and for the scrambled eggs on Wednesday, March 8. The egg/cheese/ham biscuit increased to 2.5 meat/meat alternate (m/ma) and 2 ounce equivalent grains from 2 m/ma and 1.5 ounce equivalent grains according to the nutrient information. Corrections were made to the NutriKids recipes and production records.

### **Meal Components and Quantities**

- The lunch menu for the review week was missing the starchy vegetable subgroup. The pork and beans were erroneously credited as a starchy vegetable. TA was given to remove the pork and beans from Wednesday, March 8, and ½ cup of potato wedges were added to the meal. Broccoli was increased to ½ cup and cauliflower was taken off.
- Lunch food component quantities were corrected for the bun used for the chicken burger on Monday, March 6, and the hamburger on Wednesday, March 8. The bun credits as 1.75 ounce equivalent grains according to the label and not 2 ounce equivalent.
- The weekly juice percentage was erroneously listed as 100% and was corrected.
- The celery sticks and lettuce on Monday, March 6 were erroneously credited as 1.5 cups in the “Other” vegetable sub-group. This was corrected to .625 cup.
  - SFA Response: “On the week of 13-16, I increased my breadsticks to 2 to add another 25%. I also found that the whole grain was not credited. I fixed it in the recipe and in the analysis. On the 20th I upped the potato wedges to a 4 ounce serving from a 3 ounce, and on the 23rd, I found the vegetable on one day was not checked in the reimbursable meal groups. I had to remove the cookie from the 23rd, to take away calories. It did not affect the grains.”

### **Offer versus Serve**

- Please train staff on Offer vs Serve (OVS) annually. All staff training should include an agenda and sign-in sheet and training documentation should be maintained on file at the

SFA for three years plus the current year. OVS webinars are available on the State agency training resource center (IDLA) and may be used for training.

### **Resource Management**

- Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure that all revenue from the sale of non-program 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 non-program foods. SP 20-2016 Nonprofit School Food Service Account Non-program Food Revenue Requirements memorandum provides guidance on the revenue requirements including options for assessing compliance to fulfill the requirements in section 206 of the Healthy, Hunger-Free Kids Act of 2010.
  - Since your Nonprogram Food Revenue tool shows a shortage in funds, consider increasing prices next year to cover all food sold or come up with another plan.

### **Food Safety and Buy American Provision**

- A few items in the storeroom were out of date such as:
  - powdered fruit glaze in can (2008 and 2012), canned pimentos (2014), Basil (1999), parsley (2009).Reevaluate these products and dispose as needed.
- A food safety manual (HACCP) was located in the kitchen and the SFA is in the process of customizing it to reflect the needs of the kitchen and will include a copy of the Bodily Fluids Clean-up process. All staff should be trained on HACCP procedures to insure the service of safe food. (CFR210.13(c)).

### **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 of the wellness policy conducted once every three years, 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.
- 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. Posting to the school /district website and/or in a school newsletter would support this requirement. Idaho SDE Child Nutrition Programs (CNP) has a progress report available for use located on the [School Wellness](#) website under Tools for Success.
- For more information regarding local wellness policies, please visit the Idaho SDE CNP [School Wellness website](#).

#### **Professional Standards**

- All staff should be trained on HACCP procedures to insure the service of safe food (CFR210.13(c)) and should be tracked to ensure their annual hours for Professional Standards are met.

## Your review is now closed.

Fiscal action resulting in errors in benefit issuance in the amount of \$258.92 is below the threshold of \$600.00 and will be disregarded. 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,



Lynda Westphal, MHS, SNS  
NSLP Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs  
Amy Dye, Food Service Director, Firth School District

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