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PUBLIC INSTRUCTION

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December 1, 2016

Superintendent Byron Stutzman
Fremont County Jt. School District #215
945 W 1ST N
St. Anthony, ID 83445

Dear Mr. Stutzman,

On November 7 and 8, 2016, State Department of Education (SDE) Coordinators Jennifer Butler, Tamara Donovan, and TJ Goodsell conducted an Administrative Review of Fremont County Jt. 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

Parker-Egin Elementary School and North Fremont Jr-Sr. High School were the school sites reviewed.

The State agency (SA) would like to commend Hali Mackert and the entire foodservice staff of Fremont County Jt. 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 (affecting 8 students) required a change in determination based on additional information received after inquiring about the basis of the originally reported annual income. Two applications resulted in increased benefit levels and one application resulted in decreased benefits. Send letters to households notifying them of the change in benefits and update the Point of Service (POS) to reflect changes. Upload notification letters into MyIdahoCNP.

Timeframe for CAP completion: November 23, 2016

SFA Response to CAP:

- The SA sent and uploaded copies of the household notification letters on November 8, 2016.

Commendations

- The food service staff at Parker-Egin Elementary School knows all students by name and is warm and friendly, creating a welcoming environment during the mealtime.
- The food service staff at North Fremont Jr./Sr. High School know the students by name and created an atmosphere of respect and cooperation during the mealtime. Meals were appealing, properly apportioned and students seemed eager to participate in the lunch service.
- Professional Standards are clearly tracked for all food service staff and trainings include all aspects of the Child Nutrition Programs. The Food Service Director has developed a collaborative relationship with the school district administration who sponsors trainings that include diabetes awareness, student health issues, and understanding for homeless/migrant and runaway individuals.
- The Food Service Director and Assistant were organized and prepared for the administrative review. They were cooperative with SA reviewers and receptive to feedback.
- Foodservice employees wore appropriate hair restraints as required per Idaho Food Code.
- Kerry McKaig, RDN, SA contractor, advised the SA of the following commendations:
 - North Fremont Jr./Sr. HS staff does a great job completing the daily production records.
 - They keep a very clean and organized kitchen as well as complete production records.
 - They have a great relationship with all students.
 - The Foodservice Director did an awesome job providing all of the menu review information needed and making changes immediately.

Technical Assistance (TA)

Certification and Benefit Issuance

- Annual income should only be accepted in limited situations. If the household provided only annual income, the LEA must ensure that the amount is an accurate reflection of the household's current income.
- An application is considered to be incomplete if the household total does not match the total names of household members listed on the application.

Dietary Specifications and Nutrient Analysis

- Kerry McKaig, RDN, SA contractor, provided technical assistance on two discrepancies on the NutriKids Meal Group Contribution Report. Portion sizes were correct but contributions were not. The Romaine Salad, 1.5 cup portion, on 10/10/16 was credited as 1.5 cups for Dark Green Vegetable and should be credited at 3/4 cup. The mashed potatoes, 3/4 cup portion, on 10/13/2016 was credited as 1.5 cup starchy vegetable and should be credited as 3/4 cup.
 - These changes were made immediately and the weekly certification worksheet updated.

Offer versus Serve

- Reviewed and clarified counting breakfast items with the kitchen manager at Parker-Egin Elementary School. (Breakfast pup may count as two items: 1 ounce equivalent grain and 1 ounce equivalent meat/meat alternate - which counts as a grain.)

Food Safety, Storage, and Buy American

- As freezer food storage space is limited at Parker-Egin Elementary School, some food items were removed from their packaging. Best practice is to label all food items with product name for identification, especially in regards to a food recall.

Resource Management

- Adult meals (non-program foods) cannot be subsidized by federal funds. This minimum amount is established based on the value of federal reimbursement and value of USDA foods.

Civil Rights

- Nutrikids letter template must be updated to include the correct USDA long non-discrimination statement available at the [State Agency](#) website.

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.

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
Hali Mackert, Food Service Director, Fremont County Jt. School District

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