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February 24, 2017

Superintendent Spencer Larson
Gooding Joint School District
507 Idaho St.
Gooding, ID 83330

Dear Mr. Larson

On February 6, 2017 State Department of Education (SDE) Coordinators Jennifer Butler and Lynda Westphal conducted an Administrative Review of Gooding Joint 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)
- USDA Foods

Gooding Elementary and Gooding Middle School were the school sites reviewed.

The State agency (SA) would like to commend Angela Branch, Erica Valdez, and the entire staff of the Gooding Joint 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- Benefit Issuance

Three applications (affecting 11 students) had income that was not included in the benefit determination. One application (affecting 3 students) remained the same after the income was included; however, the other two applications require a benefit issuance change from free to reduced. One application (affecting one student) was not clear on the frequency of the income received. A phone call was made to the household for clarification and resulted in no change to the benefit determination. These errors affected 4 applications from the statistical sample resulting in a 3.35% error rate. Upload copies of the letters of adverse action sent to the two households in which the child income was not included in the benefit determination. Also, upload the household application history from the POS software to show that the benefits were changed after the 10 day period.

Timeframe for CAP completion: February 20, 2017

SFA Response to CAP: Letters of adverse action were printed and placed in the mail while SA reviewers were onsite. Copies were provided to SA reviewers to be uploaded. A copy of the updated Benefit Issuance List was uploaded on February 20, 2017, showing benefits have been changed. The updated Benefit Issuance List was accepted in lieu of the household application history, but additional TA was provided to reinforce that any adverse action or reduction in benefits should not occur until after the 10 day appeal period.

Finding 2- Civil Rights

School Foodservice Authority staff that interact with program applicants or participants and their supervisors, as well as the Hearing Official, must have annual civil rights training. The Superintendent is listed as the Hearing Official, and so must have USDA civil rights training. Also, the front office staff that accepts payments for the program must also have annual training. Training is available at the [SA Civil Rights website](#). Upload a dated sign-in sheet to provide documentation that the Hearing Official and all front office staff collecting meal payments received Civil Rights training.

Timeframe for CAP completion: February 20, 2017

SFA Response to CAP: A training sign-in sheet was uploaded on February 13, 2017, showing that the Superintendent and three other employees completed the required Civil Rights training.

Finding 3- Offer versus Serve (OVS)

It was discovered that the SFA misunderstood the ½ cup minimum fruit or vegetable requirement for a reimbursable meal when operating OVS. To ensure that this misunderstanding was not incorrectly communicated to staff, please follow-up with supplemental OVS training. OVS online training is available on the State agency website and may be used for training. Upload a dated sign-in sheet to provide documentation that foodservice staff received OVS training.

Timeframe for CAP completion: February 20, 2017

SFA Response to CAP: An agenda and a training sign-in sheet were uploaded on February 13, 2017, showing that nine staff members completed a 2-hour OVS refresher training on February 8, 2017.

Fiscal Action

Fiscal action results in \$39.23 (\$26.06 for NSLP plus \$13.17 for SBP). However, since this amount falls under the \$600 threshold, the fiscal action will be disregarded and no financial adjustment will occur.

Commendations

- Anji put all required documentation in order of the modules, making the review go smoothly.
- The Salad Bar at the Elementary/Middle School looked wonderful. Staff interacted with the students and was having fun doing their job; it was nice to see.
- Erica does a great job with benefit issuance and took immediate action to correct any errors identified by SA reviewers and has identified ways to improve processes.
- Kitchen staff wore appropriate hair restraints as required per Idaho Food Code.

Technical Assistance (TA)

Certification and Benefit Issuance

- Student lists of certified Homeless and Migrant students must be signed and dated by the applicable liaison. Combinations of signed and unsigned lists were kept with some students only appearing on one or the other of the lists. The SFA advised that names of students were provided over the phone by the liaison and added to unsigned lists maintained by the SFA. However, the signed lists by the liaison didn't always include those student names. A consistent practice of establishing liaison certified (signed and dated) student lists must be established. The SFA advises they plan to obtain an updated and signed list from the liaisons on a monthly basis and use those lists for benefit issuance.

Verification

- When performing Verification of Free and Reduced Applications, the Confirming Official must check the application prior to sending out the letter for Verification and complete the applicable section of the Official Use Only box. Since an electronic system is used to determine the benefit, a manual calculation should be conducted by the Confirming Official.

Meal Counting and Claiming

- The Elementary school should use a clicker or other method to count the students as they go through the line to double check the teachers' count.
- The afternoon Kindergarten class must be served lunch and not breakfast.

Dietary Specifications and Nutrient Analysis

- While onsite conducting the menu analysis, SA contractor Steffanie Sandoval assisted the Foodservice Director with using the nutrient analysis software to form the meal compliance worksheets and ensuring recipes were entered accurately.

Meal Components and Quantities

- The Potato Bar on January 25 did not meet the minimum grain requirement. Only 1/2 oz eq grain cracker was offered and it was not whole grain rich. This was corrected while the SA contractor was onsite by adding a 2 oz eq whole grain rich roll to the service line prior to service.
- The SA contractor observed that reimbursable meal signage was not being displayed. Only the main entree names were displayed. This was corrected by the date of the State agency review.
- Starting October 1, 2017, a new meal pattern is required for the PreK class. It is suggested that the new meal pattern is started at the beginning of the school year. Begin planning menus now, as some nutrition requirements for food items differ from the current K-12 meal patterns.

Food Safety, Storage, and Buy American

- Retrain the school-age helpers in the proper use of gloves and hairnets. There were some observed touching their hair and faces after donning gloves.

Offer Versus Serve

- Offer vs. Serve requires that a minimum 1/2 cup of fruits or vegetables be selected as part of a reimbursable meal for all age/grade groups.

SFA On Site Monitoring

- Per new requirements with 7 CFR 220.11(d)(1), an updated form titled, *School Food Authority On-Site Review Checklist* is now available in MyIdahoCNP download forms. The new form includes additional site relevant questions and must be used for the on-site review in the future.

Resource Management

- Due to the Foodservice Director being a director at two separate districts, the SA recommends that Gooding SD has at least one other full time employee to assist with the program.

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 CNP has a [progress report](#) available for use located on the [School Wellness website](#).
 - For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs [School Wellness website](#).

Smart Snacks

- The vending machine in the Elementary/Middle School cafeteria is not compliant with Smart Snack regulations and needs to count as a fundraiser due to the inclusion of non-compliant foods. Ms. Burns was provided with the Smart Snacks in School Brochure and shown how to determine if a product is compliant or not. If non-compliant products are sold in the machine during the school day, then each day counts as one of the 10 exempt fundraisers and prior approval from the State agency is required for sales beyond the 10 days is required.
- All fundraisers, both exempted and compliant, must be tracked. Per state policy, a maximum of 10 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 10 must be pre-approved by the State agency using the Request form. (7CFR 210.11) Details available at the [SA Smart Snacks website](#).

- Per 7 CFR 210.11 *Competitive food service and standards*, all food sold to students during the school day must meet Smart Snack requirements. Schools must meet the minimum requirement in 7 CFR 210.11 for all foods and beverages sold in school to increase consumption of healthful foods during the school day and support a healthy school environment. Snack carts, school stores, vending machines, and fundraising need to comply with specific nutrition standards.
- An [online Smart Snack product calculator](#) is available to determine compliance. A link to this calculator is also conveniently located on the Gooding SD website.
- The SA provided a copy of "A Guide to Smart Snacks in Schools". Additional Smart Snacks information and resources can be found at [USDA's website](#).

Special Provision Options

- A Provision 2 Base Year is currently being established (SY16-17). Please ensure all required documentation, including daily meal count records by student name and eligibility, is maintained per requirements.

Fresh Fruit and Vegetable Program

- The school must widely publicize the FFVP. Please consider ways to inform the parents about this program. During the last administrative review (February 2014), TA was given that the FFVP should be advertised in the monthly newsletter or on the website.

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
Angela Branch, Food Service Director, Gooding Joint School District

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