



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

April 10, 2017

Jamie Holyoak
Grace School District
704 S. Main
Grace, ID 83241

Dear Mr. Holyoak,

On March 8, 2017, State Department of Education (SDE) Coordinators TJ Goodsell and Tamara Donovan conducted an Administrative Review of Grace School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) Provision 2 breakfast base year 2015-2016

Grace Elementary School was the site reviewed.

The State agency (SA) would like to commend Kelli Aplanalp and the entire staff of the Grace 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- *Verification*

One application with multiple students was verified due to being error prone. Verification provided documentation that required changing the student's Benefit Issuance status from free to denied. Only one of the student's status was changed in the system. State agency suggests contacting the point of service software provider to determine if there is a way to link applications to ensure the error does not reoccur in the future. SFA needs to change the benefit eligibility status for one household member on the affected application.

Timeframe for CAP completion: March 22, 2017

SFA Response to CAP: While the SA was on-site, the Food Service Director changed the benefit eligibility status for the household member on the affected application.

Finding 2- *Special Provision Options*

Provision 2 Breakfast base year information (daily meal counts by student name at the high school) was not retained for base year 2015-16. It is a requirement that this data be available to document/support claiming percentages. Please continue to search for the daily meal counts by student name; if records cannot be located, the sponsor may elect to establish a new base year. A new base year may be established in SY 2017-18. During the establishment of a base year, all students are not charged to eat breakfast (/lunch). Communicate with the SA regarding how you would like to proceed.

Timeframe for CAP completion: March 22, 2017 **EXTENSION:** April 7, 2017

SFA Response to CAP: On April 10, 2017, the Food Service Director uploaded a copy of the written decision from the district to establish a new Provision 2 Breakfast 2017- 2018 base year district wide.

Finding 3- *Meal Counting and Claiming*

A systemic error was discovered; there were inaccuracies in the transfer from the daily meal count sheets for breakfast at Grace Elementary School to the software system that establishes the monthly claim. The Food Service Director will develop a plan to ensure accurate meal counting/claiming and will train applicable employees. Upload the plan and documentation of training into MyIdahoCNP Review Attachments. If the plan is to use the existing software, this should streamline the process, reduce human error, and save time.

Timeframe for CAP completion: March 22, 2017

SFA Response to CAP: On March 13, 2017, the staff at Grace S.D. was trained on the use of their existing Point of Service software system for entering student identification numbers directly at the elementary school during the breakfast meal service. This effort will reduce human error in meal counting and claiming and improve accuracy while saving valuable staff time. A copy of the training log was uploaded into MyIdahoCNP on March 22, 2017.

Finding 4- Buy American Provision

Each SFA is required to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories, as applicable (7 CFR 210.21 (d)). Products in the storeroom were assessed for the country of origin and found to be out of compliance; (SAF Yeast from Mexico). If a product is sourced from another country, the food service must have proof that the domestic product is significantly higher in price or not available in sufficient quantities. Include the Buy American Provision in SFA solicitation documents for the purchase of commercial foods. Products must be checked upon receipt and refused if the products do not comply with the Buy American Provision, unless there is documentation to justify the exception (exorbitant pricing or product shortages).

The regional food service purchasing cooperative, SEIPA, will be meeting in the coming weeks to discuss the upcoming school year bid procurement plan. The Food Service Director requested a copy of the meeting agenda and received email confirmation from the area coordinator, regarding adding the Buy American Provision requirement to procurement documentation. Written notice of intent to include the Buy American Provision was uploaded into MyIdahoCNP under the review attachments section

Timeframe for CAP completion: March 22, 2017

SFA Response to CAP: While the SA was on-site, the Food Service Director uploaded required documentation on Yeast from Mexico along with an email from SEIPA members bid contract lead regarding inclusion of Buy American Provision in school year 17-18 bid contracts.

Commendations

- The Food Service Director was well prepared for the State agency on-site review. All necessary documentation was organized and ready for review and she was available to answer questions and provide clarification. The time and work put into preparing for the review allowed the reviewers to work efficiently. Kelli is very organized, productive, and works diligently to better the program on all levels.
- The cafeteria at Grace Elementary School was a cheery place to enjoy breakfast and lunch. The food service staff were so helpful with the children as they helped serve themselves the available fruit and vegetable options.
- The students at Grace ES were polite and pleasant – what a tribute to the district to see positive behaviors.

Technical Assistance (TA)

Civil Rights

- The SFA's procedure for receiving and processing civil rights complaints should ensure all complaints associated with Child Nutrition Programs are forwarded to the State agency within three (3) working days. (CFR210.15(a)(6))

Local School Wellness Policy

- On July 29, 2016, the USDA Food and Nutrition Service finalized regulations to create a framework and guidelines for written wellness policies established by LEAs. (§210.30) The final rule requires LEAs to comply fully 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 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 foods and beverages available during classroom and school celebrations (not sold in the school).
- 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](#).

Your review is now closed.

At this time, there will be no fiscal action. 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,



TJ Goodsell, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Kelli Aplanalp, Food Service Director, Grace School District

“This institution is an equal opportunity provider”