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February 23, 2017

Superintendent Dale Layne
Jerome School District
125 4th Ave West
Jerome, ID 83338

Dear Mr. Layne,

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

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) – operating district-wide Free Provision 2 Breakfast option, base year 2016-17
- Fresh Fruit and Vegetable Program
- USDA Foods

Horizon Elementary School was the school site reviewed.

The State agency (SA) would like to commend Carolyn Sullivan and the entire staff of the Jerome 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*

PowerSchool added a pre-K student sibling to the household when the student registered for pre-K school. The SFA had already put him in the Mealtimes system based on the Free and Reduced Application that was submitted by the family; the family was Denied / over income. After the household size was erroneously increased due to the name duplication, the Mealtimes software system determined the household should receive Reduced meal benefits. The computer generated a notification letter and the family received Reduced meal benefits for which they actually did not qualify. Notify the household of the error to inform that meal benefits will be denied, provide 10 days' notice of the reduction in meal benefits. Review other pre-K student families to ensure this is not a systemic problem.

Timeframe for CAP completion: February 22, 2017

SFA Response to CAP: While the SA was on-site, a notification letter was sent to the household. The Food Service Director reviewed all other applicable students' determinations and noted that this issue involved only the one student.

Finding 2 - *SFA On-Site Monitoring*

The USDA instituted a new breakfast POS (point of service) on-site review: per 7 CFR 220.11(d)(1), every school year, each SFA with more than one school shall perform no less than one on-site review of the breakfast counting and claiming system and the readily observable general areas of review for a minimum of 50 percent of schools under its jurisdiction with every school within the jurisdiction being reviewed at least once every two years, prior to February 1 of each school year. If the review discloses problems with a school's meal counting or claiming procedures or general review areas, the SFA shall ensure that the school implements corrective action, and within 45 days of the review, conduct a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school's claim is based on the counting system and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid breakfasts, respectively, served for each day of operation. Complete the SFA On-Site Monitoring forms (formerly referred to as POS Counting Review) for at least 50% of the breakfast programs and upload copies into MyIdahoCNP under Review Attachments.

Timeframe for CAP completion: February 22, 2017

SFA Response to CAP: On February 21, 2017, the Food Service Director uploaded the SFA On-Site Monitoring forms for breakfast.

Fiscal Action

Due to benefit issuance errors of 0.19%, total fiscal action was \$31.41. This amount falls under the \$600 threshold so will be disregarded and no financial adjustment will occur.

Commendations

- Food Service Director Carolyn Sullivan was very well prepared for the Administrative Review. It is evident she runs and manages an organized, efficient, and compliant nutrition program. She has a strong understanding of the school meal regulations and is thorough when completing and maintaining all required documentation.
- Brianna Luper maintained necessary documentation in an organized manner and records were ready for review; 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.
- Horizon Elementary School food service staff has implemented some very good best practices to meet student needs. The secure photo system used to track students with food allergies is a great way to ensure that staff on the meal service line can identify children with medical needs. The staff also randomly weighed the BBQ pork being used in the sandwich at lunch, making sure that all students received a proper portion size. The staff wears hair nets and use clearly defined proper food handling procedures.
- The food service employees at Horizon Elementary School, including aides who help in the cafeteria, did a great job engaging with the children while they come through the meal serving line. The POS employee, who greeted the children, was friendly and the children were so polite and reciprocated with smiles and hugs.
- The write on/wipe off inventory lists for the refrigerator and freezer was a great idea by the kitchen manager at Horizon ES. This process allows other staff to be involved in the site specific needs for inventory management control and ordering.
- At Horizon Elementary School, a lighted cooler is stocked with the day's Fresh Fruit and Vegetable Program offering - a great way to market the produce to students as they come into the cafeteria for meal service. Baskets are prepared and placed in the cooler first thing in the morning, ready for students to collect and carry to their classroom. Students were excited to peer into the cooler for a peek at the day's fresh treat!

Technical Assistance (TA)

Certification and Benefit Issuance

- Once a child qualifies for meal benefits, that benefit is for the school year regardless of a change in household income (i.e., new income application submitted). Parents may decline meal benefits; however, it must be communicated to the family that the benefit may continue. The child this relates to is no longer a student in the school district.

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 working days. (CFR210.15(a)(6))
- Student charges appear on the POS computer screen at Horizon ES. This can be a form of overt identification. The SFA must devise a plan for masking the meal charges. The State agency suggests changing the settings in the computer software, placing a sticky note to cover the charges, repositioning the screen, or any other mechanism to prevent overt identification.

Food Safety

- The Idaho Department of Health & Welfare updated the Food Code to come in line with the current FDA Food Code. This includes a new requirement that all food safety plans must include a procedure for cleaning up bodily fluids. The HACCP Bodily Fluid Cleanup sample procedure located in MyIdahoCNP in the Download Forms section under the Food Safety heading was printed for all schools while the SA was on-site.
- 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 were found to be out of compliance (tuna from Indonesia was found in the central warehouse and Saf yeast from Mexico and Signature fruit juices that contain product from USA along with other countries was discovered at Horizon ES). If a product from another country is sourced, then the food service must have proof that the domestic product is significantly higher in price. Include the Buy American Provision in SFA solicitation documents for the purchase of commercial foods. The Food Service Director and Kitchen Manager must check products upon receipt and not accept products that do not comply with the Buy American Provision without documentation to justify the exception (exorbitant pricing or product shortages).

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. The Jerome Board of Trustees plans to meet on February 28, 2017; agenda items include Wellness Policy Purpose and Goal, Guidelines for Food and Beverage Sales, and School Meal Program business. 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.
 - Confirm Wellness Policy information regarding Foods and Beverages Sold in Schools to reflect new Smart Snacks regulations. The SA provided “A Guide to Smart Snacks in School”.
 - For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs [School Wellness website](#).
 - Heather Blume, Coordinator of Nutrition Assessment and Promotion at the State Department of Education, is an excellent resource for guidance and questions related to the Wellness Policy: hblume@sde.idaho.gov, 208.332.6902.

Resource Management

- SFAs are required to ensure that all monies in the food service account are used for allowable purchases. Retirement party supplies and plaques are unallowable expenses.
- The alternate assessment for non-program foods was used; the SFA sells only adult meals (\$3.75) and milk a la carte (\$0.50), demonstrating compliance. If the SFA is going to sell any additional non-program foods (a la carte beyond just milk, catering, etc.), the non-program food revenue tool must be completed and submitted for SA review.

Your review is now closed.

At this time there will be no fiscal action. To appeal these findings, 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,



Tamara Donovan, RD, LD, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Carolyn Sullivan, Food Service Director, Jerome School District

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