



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

December 14, 2016

Dr. Lindsay Park
Kendrick School District
305 4th Street
Juliaetta, ID 83535

Dear Dr. Park,

On December 9, 2016, State Department of Education (SDE) Coordinators Tamara Donovan and TJ Goodsell conducted an Administrative Review of Kendrick School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Afterschool Snack Program (ASSP) Juliaetta Elementary School, desk review
- USDA Foods

Kendrick Junior / Senior High School and Juliaetta Elementary School were the school sites reviewed.

Overview

The State agency (SA) would like to commend Charlotte Parsley and the entire staff of the Kendrick School District for their hard work operating the school nutrition programs.

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- Civil Rights

School Foodservice Authority staff that interacts with program applicants or participants (i.e., cafeteria staff, Free and Reduced Application approval staff) and their supervisors as well as the Hearing Official must have annual civil rights training. Dr. Lindsay Park, Superintendent, is newly listed as the Hearing Official, so must have USDA civil rights training. The training video is available on the [State Agency Civil Rights](#) website.

Upload, into MyIdahoCNP Review Attachments, a sign in sheet with the Superintendent's signature and the date training was received, to document that the Hearing Official received civil rights training.

Timeframe for CAP completion: December 23, 2016

SFA Response to CAP: On December 13, 2016, a dated sign in sheet was provided, documenting that the Hearing Official received civil rights training.

Finding 2- Certification and Benefit Issuance

Two applications (three students) were incomplete due to missing required social security number information.

Contact the families to obtain the information and document on the application. Upload the completed applications into MyIdahoCNP Review Attachments.

Timeframe for CAP completion: December 23, 2016

SFA Response to CAP: Both applications were completed while SA was on site.

Finding 3- Buy American Provision

Each SFA is required to purchase domestic agricultural commodities or products that are produced and processed substantially using agricultural commodities that are produced 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 (Sauer's granulated garlic product of China; Red Star yeast product of Mexico). Include the Buy American Provision in SFA solicitation documents. 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.

Timeframe for CAP completion: December 23, 2016

SFA Response to CAP: While the SA was on-site the FS Director and staff confirmed that products will be checked upon receipt and not accepted if the products do not comply with the Buy American Provision.

Commendations

- The staff was very helpful and attentive to SA requests, making for an enjoyable, productive day of review.
- Kendrick School District followed a thorough process in the determination of Free & Reduced Applications. No determination errors were found in any applications or in the Verification process. Applications were clearly marked and time-stamped.
- Food service staff substitutes for the day of review were very helpful, organized, and supportive of the Food Service Director. The Superintendent stepped in to assist at the elementary school, showing support of the school meal program.
- The Food Service Director and Business Manager completed the comprehensive Non-Program Foods Revenue Tool before the SA reviewers arrived.
- Kitchen staff has a great rapport with the students. Students were very respectful and were eating a generous amount of fruits and vegetables. There was minimal waste and many students came back for seconds on the available fruits and vegetables.

Technical Assistance (TA)

Certification and Benefit Issuance

- Per the Eligibility Manual, when determining Free and Reduced Applications, income should not be converted unless various income frequencies are reported. Please make use of the Income Eligibility Guidelines chart.
- The benefit issuance list lists students as Free, Reduced, or Paid, but does not document the Free category (application, DC, categorically eligible). Please update the document to reflect the reason/category for the Free status and note the date of any meal benefit changes.

Meal Counting and Claiming

- SFAs seeking reimbursement for an alternate meal must meet the meal pattern requirements or not claim the meals for reimbursement. Record the alternate meals on the production record to track food usage.

Dietary Specifications and Nutrient Analysis & Meal Components and Quantities

- State agency independent contractor Renee Legan provided the following TA:
 - Reminded the SFA to include all food items and all condiments for each grade group when assessing menus for dietary specification compliance.
 - Recommended changing servings sizes to more "cook-friendly" sizes such as "6 each" chicken nuggets instead of 92 grams; duplicating recipes and adjusting the components as needed; including all components listed on the CN Label; correcting missing nutrient data; entering new products into Nutrikids prior to planning them on the menu to ensure the component equivalent is correct and the meal pattern is met.
 - Instructed that whole grain white flour recipes need to be updated.
 - Clarified that weighting food items according to what the students are allowed to take must be done.
 - Informed of the need to correct the data entry error for lettuce (1/4 c=1/8 c eq) and double check all future menus to ensure 1 cup of vegetable is planned for grades 9-12 daily and 3/4 c daily for grades 6-8. On Friday, November 11, 2016, a total of 7/8 c of vegetable

- was planned for grades 9-12 (1/2 c fries, 1/4 c carrots, and 1/8 c lettuce, which credits as 1/4 c lettuce); 1 cup of vegetable is required for lunch menu compliance. The cook made a data entry error and entered 1/4 c lettuce, when 1/4 c of actual lettuce credits for 1/8 c eq of lettuce, making the total vegetable amount inadequate.
- Reviewed the need to change the serving size of French toast sticks from 1 servings to 4 each and 5 each, maple bites from 1 oz to 4 each & 5 each, and bagels from 2 oz to 1 each to clarify planned quantities; include the description of the item in the name as well.
 - On the day of contractor review, November 28, 2016, it appeared that grades 9-12 were offered 2 oz meat/meat alternate (m/ma) in the turkey & noodles, however the cook could not provide a standardized recipe for the dish or a product formulation statement (PFS) or CN label for the turkey so that the actual contribution could be calculated. The cook used 8 lbs turkey meat, 3 lbs chicken meat, 4 lbs WG spiral pasta, and 2 packets of gravy. Per a December 5, 2016, email, the Food Service Director provided the SA contractor with standardized recipe information and the required documentation to calculate m/ma contribution. The independent contractor notes that every serving of turkey and noodles provided 2.75 oz eq m/ma and 1 oz eq grain.

Food Safety

- Food safety training should be ongoing, and all applicable HACCP topics should be covered annually. Staff training must be documented with an agenda and sign-in sheet and must be kept on file for three years plus the current year.
- Best practice is to label all food items with date and product name for identification, especially in regards to a food recall.

Civil Rights

- Please update your non-discrimination statement to the correct USDA non-discrimination statement available at the [State Agency](#) website. The short non-discrimination statement reads, "This institution is an equal opportunity provider."
- Ensure the civil rights complaint log is dated annually, with a new log started each year. If no complaints were received, best practice is to write "No complaints" and keep this on file for three years plus the current year. The FS Director downloaded the complaint form while the SA was on site and added it to the civil rights.

Local School Wellness Policy

- The district wellness policy was amended November 16, 2016; the SA reviewed the policy and offered minor suggestions via email to the school district Business Manager. Standard technical assistance: 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. For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs [Local School Wellness](#) website.
- Update Wellness Policy information regarding Foods and Beverages Sold in Schools to reflect new Smart Snacks regulations.

Smart Snacks

- As per 7CFR210.11(b)(2), the school district should have knowledge of and keep a written record of (track) food sales that occur within the school day, but outside of food service. Only foods and beverages sold in school and intended for consumption during the school day (from midnight until 30 minutes after the end of school) fall under Smart Snacks regulations. The SA provided a copy of "A Guide to Smart Snacks in Schools". Additional [Smart Snacks information and resources](#), including a sample site tracking form can be found on the SA Child Nutrition web site.
- Per state policy, a maximum of ten 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 ten must be pre-approved by the State agency using the request form (7CFR 210 (b)(2)).

Resource Management

- The FS Director shops at Costco and URM distributors in Lewiston and submits a receipt for reimbursement. This is allowable; however this needs to be included in the written procurement plan, outlining who has authority to make FS purchases.
- Adult meal serving sizes may be the 9-12 age/grade group portions.

Afterschool Snack Program (ASSP)

- Standard reminder that the program must be open to all and cannot limit membership for reasons other than space or security considerations.

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,



Tamara Donovan, RD, LD, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Charlotte Parsley, Food Service Director, Kendrick School District

“This institution is an equal opportunity provider”