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December 16, 2016

Superintendent James Foudy  
McCall-Donnelly Jt. School District  
120 Idaho Street  
McCall, ID 83638

Dear Mr. Foudy,

On December 6 and 7, 2016, State Department of Education (SDE) Coordinators Jennifer Butler and Lynda Westphal conducted an Administrative Review of McCall-Donnelly School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- USDA Foods

Payette Lakes Middle School and McCall-Donnelly High School were the school sites reviewed.

The State agency (SA) would like to commend Lisa Howes and the entire staff of the McCall-Donnelly 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- Civil Rights***

School foodservice authority staff who interact 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. The superintendent is listed as the hearing official so must have USDA Civil Rights training. Upload a dated sign in sheet to provide documentation that the hearing official completed the required Civil Rights training.

**Timeframe for CAP completion:** Completed while SA was onsite. No further action required.

### **SFA Response to CAP:**

When brought to his attention, the superintendent immediately completed the required training while SA reviewers were still onsite and the signed training agenda was uploaded into MyIdahoCNP.

## Commendations

- The foodservice director was well prepared for the review and open to suggestions from the SA reviewers.
- All kitchen staff are ServSafe certified.
- Smarter Lunchrooms Movement best practices were utilized at the high school by having fruits and vegetables at the beginning of the service line as well as a fruit bowl at the end of the line.
- The high school's Food Production and Management Culinary Class does an outstanding job with their vending machine. The class curriculum involves identifying Smart Snack compliant items. An organized binder included copies of labels, Alliance Smart Snack Calculator results, and/or Product Formulation Statements for all items purchased for sale in the vending machine. The class also measures, combines, and packages items for sale in the machine such as a yogurt with granola and rice cakes with peanut butter.
- The high school kitchen was clean and well organized.
- The middle school's dry storage room was clean and brightly lit.

# Technical Assistance (TA)

## Meal Components and Quantities

- Remove the pre-packaged salad dressings from the service line (only use the pre-made ranch dressing since it is low fat and low sodium)
- Add condiments of ketchup, mustard and mayo to the production record
- Recommend cutting some apples for the students, since both elementary and middle school students have dental challenges.
- Stop the "Cooks Choice" menu day as this will invalidate the nutrient analysis.
- Count the meat/meat alternate as a grain at breakfast to bring the meal compliance worksheet into compliance.
- Change the production records to include amount taken and leftover. Place a signature on the records to make the staff accountable for the preparation of the records. Some of the records at one school needed work depending on who was completing them (it was unknown)

## Offer Versus Serve

- Offer versus Serve allows for the option for students to select only 1/2 cup of either a fruit or vegetable, although a greater portion must be offered per the meal pattern requirements. The middle school required 1 cup of fruit or vegetable of students. With OVS, a 1/2 cup is acceptable if two other full components are also selected.
- Please provide refresher training for staff on Offer vs Serve. All staff training should include an agenda and sign-in sheet and training documentation should be maintained on file at the SFA for three years plus the current year. OVS training is available on the State agency website and may be used for training.

## Food Safety, Storage, and Buy American

- Food safety training should be ongoing, and all applicable HACCP topics should be covered annually and documented with an agenda and sign-in sheet. Be sure to make use of the date lines in the policy manual to indicate date that HACCP plan was implemented, revised, and reviewed.
- 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. A HACCP Bodily Fluid Cleanup sample is located in MyIdahoCNP in the Download Forms section under the Food Safety heading.
- The most recent food safety inspection report must be posted in a location visible to the public. (7 CFR 210.13(b)).
  - The inspection report was moved from behind the service line in the kitchen to a publicly visible location at the middle school immediately following this TA.

## Resource Management

- Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure that all revenue from the sale of nonprogram foods accrues to the non-profit school food service account and that revenue available to support the production of reimbursable school meals does not subsidize the sale of

nonprogram foods. SFAs are required to determine if the percent of total revenue that is generated from their nonprogram food sales is equal to or greater than the percent of total food costs that are attributable to the SFA's purchase of nonprogram foods.

- During the AR, a finding was issued and documented in the exit report requesting that the SFA provide documentation of the simplified approach to assess compliance by completing the nonprogram food revenue tool. However, after the AR, further guidance was received from USDA advising that this tool is not required if the only non-program foods sold are milk a la carte and adult meals, and the Alternate Assessment for nonprogram food pricing is being followed. The director was advised of the new guidance, and after providing appropriate documentation on a la carte milk pricing, the finding was deleted.

### **Civil Rights**

- 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" on last year's log and keep this on file (three years plus the current year).

### **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.

- For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs [School Wellness website](#).

### **Smart Snacks**

- All fundraisers (exempted, noncompliant, 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. Fundraisers 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 (b)(2))

### **Professional Standards**

- Some form of backup documentation (certificate of completion, agenda, sign-in-sheet, etc.) must be kept on file with the employee's professional standards tracking log.

### **School Breakfast and Summer Food Service Program Outreach**

- SFAs must inform eligible families of the availability of breakfast served under the School Breakfast Program (SBP) at the beginning of the school year as well as provide reminders regarding the availability of SBP multiple times throughout the school year (7CFR 210.12 (d)). This requirement was provided as technical assistance during the last review and must be addressed immediately. The SFA advised they are working on posting the breakfast menu to 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  
Lisa Howes, Food Service Director, McCall Donnelly School District

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