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December 19, 2016

Dr. Josh Middleton
Middleton School District
5 South 3rd Ave. W.
Middleton, ID 83644

Dear Dr. Middleton,

On November 14, 2016, State Department of Education (SDE) Coordinators Lynda Westphal and Jennifer Butler conducted an Administrative Review of Middleton 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)
- USDA Foods

Middleton Heights Elementary and Middleton Middle Schools were the school sites reviewed.

The State agency (SA) would like to commend Barbara Bumgardner, SNS and Valerie Thompson, SNS and the entire staff of the Middleton 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- Afterschool Snack Claiming

Schools may claim reimbursement for one full snack, per child, per day. Only a full snack (one serving from two different components) qualifies as reimbursable. The Point of Service counting is inadequate as the students come in and say they want a snack, but then leave and come back later to receive the snack. The count for the day of review was 62, however only 53 snacks were taken (using the amount returned). Please change the procedure and upload how this will change.

Timeframe for CAP completion: December 6, 2016

SFA Response to CAP: On December 1, 2016, the corrective action plan to be followed and the completed Afterschool Snack Review form were uploaded.

Finding 2- Certification and Benefit Issuance

Several applications had listed a number in the household which did not match the number of people named on the application. While all of these were corrected on-site during the review, please be aware of this and follow up with families as applications are submitted. This affected 25 applications from the statistical sample resulting in a 5.79% error rate.

Two applications did change status, which will be adjusted by the SA for the August, September and October claims which were already submitted. This is required to ensure a good percentage for the district's Provision 2 base year.

Timeframe for CAP completion: December 6, 2016

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

Fiscal Action

Due to this being your base year, per USDA guidance we must assess fiscal action from the beginning of the year for Breakfast counts. This amount is \$11.40 for August-Nov claims. Lunch amount equals 143.64 and will be disregarded.

Commendations

- Barb and Valerie were highly organized for the review and had all review documentation in separate stacks clearly marked by review area subject waiting for SA arrival.
- Absolutely no mathematical errors occurred in the determination of applications for benefit issuance.

- Foodservice employees and student helpers wore appropriate hair restraints as required per Idaho Food Code.
- The Food staff was a pleasure to meet with and kudos to the first grade teacher who taught his class their numbers. He stood by and gave encouragement to each of his students when they entered their number in and gave praise when it went in correctly. It was a pleasure to watch.
- The Middle School lunch service was conducted quickly and efficiently. Many students were served in a timely manner.

Technical Assistance (TA)

Certification and Benefit Issuance

- Several applications were determined even though the household total box did not match the names listed on the application, or the household total box was left blank. To be considered complete, an application must include all required information. Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and should not be processed. The LEA should make reasonable efforts to contact the household in order to obtain or clarify required information.
- Medicaid coverage does not mean a child is automatically eligible for free or reduced cost lunches. Families still must meet family income criteria to determine benefits.
- If the household provided only annual income on an application, the LEA must ensure that the amount is an accurate reflection of the household's current income and that it qualifies under the Special Situations portion of the Eligibility Manual. The determining official may need to contact the household for further clarification of the information provided on the application. Remember to make notes on applications to document follow up (date, who spoke with, information collected, and initial).

Dietary Specifications and Nutrient Analysis & Meal Components and Quantities

- Steffanie Sandoval, RD, LD, observed one mashed potato bar line running out of mashed potatoes for the last 5 students at the end of service. Corn was still available for students to take and students had the option of choosing the other service line. Suggested closer monitoring of students as they served themselves to make sure there was enough for every student or calling the other building to see if they had extras. All students left the line with required meal components however.
- NutriKids files provided to Steffanie Sandoval, RD, LD did not have each component entered as the same as was found on the production sheets. Valarie updated meal components in NutriKids based on production sheets and I suggested to double check to make sure components equaled the reimbursable total at the bottom of each day in the NutriKids system.
- Update recipes and menus when new products are used to ensure accurate nutrient analyses.
- Not all recipes had the updated product information. The correct serving sizes were observed being used during the on-site review. I have updated the NutriKids .dat files with the current products.

- During the review, one Waffle stick line at the Middle School also ran out of sticks for the last few students. Two walked away without eating any lunch that day.

Offer versus Serve

- Would like to see more detail on the agenda for annual training. Listed “meal components” as the training topic for offer versus serve training. Agenda should list all key topics covered in training.
- It was observed at the Middle School that one cashier was making everyone take 4 Waffle sticks when they had the required amounts of components already. Please train that if they have the required amount on their trays, the children should not be made to go back and get additional food if they do not want it and the meal is reimbursable without it.

Civil Rights

- Ensure a copy of the SFA’s procedure for receiving and processing Civil Rights complaints is available at all sites. The procedures should be kept with the log and complaint form and should ensure all complaints associated with Child Nutrition Programs are forwarded to the State agency within three (3) working days per CFR210.15 (a) (6)).
 - A procedure was printed and distributed to sites to be added to their binder. They must read and sign that they have seen the procedure.

SFA On-Site Monitoring

- Gave TA on the new form required this year with the additional requirement to observe breakfast in at least half of the schools each 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: <http://www.sde.idaho.gov/cnp/hne/wellness.html>.

Smart Snacks

- The PTA popcorn fundraiser at Middleton Heights Elementary School must be tracked as a non-compliant fundraiser. The New Smart Snack final regulations which went into effect July 1, 2016 limits the sodium in a serving to 200 mg or less. The popcorn recipe does not adhere to this as it is over 200 mg. Also serving to students in the classroom prior to lunch service is not recommended. All fundraisers need to be tracked to make sure each school does not go over the 10 allowed non-compliant fundraisers. Even if the child or parent pays for it one time at the beginning of the school year each time it is served it is counted as one fundraiser.
 - Per the Middleton Heights PTO president, they would make the popcorn with half the salt as usual to make it in compliance.

Special Provision Option

- Reminder that this is your base year for Provision 2. Please keep all of your documentation, including daily meal counts, in a file for as long as you are on the program.
- Also look at the monthly claims, as the percentages calculated for October were not optimal for a sound program.

Resource Management

- Total of \$433.73 of meals purchased at fast food establishments served to summer food help and maintenance helping unload trucks. This is unallowable and the practice has ceased this year.

Nonprogram Food Revenue Tool

- 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 non-program 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 non-program foods. SP 20-2016 Nonprofit School Food Service Account Non-program Food Revenue Requirements memorandum provides guidance on the revenue requirements

including options for assessing compliance to fulfill the requirements in section 206 of the Healthy, Hunger-Free Kids Act of 2010.

- Please send a copy of the steps taken to increase the cost of food sold to cover the revenue from nonprogram foods.
- TA given that benefits should be included in the costing of catering with a markup of approximately 38% to cover all costs. The SA validated your Nonprogram Food Revenue Tool and currently you are 18K short in the proportion of revenue. Remember you are using your time to do these things.
- Suggest that there be a Vending general ledger line to capture the vending food costs and vending sales. This will help calculate the nonprogram food revenue tool.
 - Completed on 11/14/16 during day one of the review.

Your review is now closed.

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,



Lynda Westphal, MHS, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Barbara Bumgardner, Food Service Director, Middleton School District

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