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February 23, 2017

Superintendent Mr. David Peterson
Nampa School District
8076 E Executive Drive
Nampa, ID 83687

Dear Mr. Peterson,

On January 30-31, 2017, State Department of Education (SDE) Coordinators Lynda Westphal, Tamara Donovan, Jennifer Butler, Heather Blume, and Teresa Goodsell conducted an Administrative Review of Nampa School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Fresh Fruit and Vegetable Program (FFVP) at Snake River and Endeavor Elementary Schools
- Afterschool Snack Program (ASSP) at Snake River Elementary
- USDA Foods

Endeavor, FD Roosevelt, Snake River Elementary Schools, and Union High School were the school sites reviewed.

The State agency (SA) would like to commend Sheila Keim and the entire staff of the Nampa 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. Randy Dewey is listed as the Hearing Official so must have USDA civil rights training. [USDA Civil Rights Training for All Programs](#) is available on the Idaho Child Nutrition website.

Due Date for CAP Completion: February 15, 2017

SFA Response to CAP: The Hearing Official must be trained annually in Civil Rights. The training took place on January 31, 2017, and the signed agenda was provided while SA reviewers were onsite.

Finding 2- Free and Reduced Price Process

Six applications needed to be corrected. Letters must be sent to families providing ten days' notice for reduction of meal benefits; regarding the one incorrectly denied application, students must be given meal benefits immediately.

Due Date for CAP Completion: February 15, 2017

SFA Response to CAP: All families were contacted by phone and letters were sent on January 31, 2017. The benefit issuance list showing the change in status was uploaded on February 14, 2017.

Finding 3- Provision 2 Base Year

At the time of State agency on-site review, the daily meal counts by student name for Provision 2 base year 2015/16 were not retained on file (they were electronic, however not readily available to the reviewers). The Food Service is in the process of making this required documentation available and accessible, to provide proof of meal claiming percentages for all sites operating Provision 2.

Due Date for CAP Completion: February 15, 2017

Corrective Action Response: Retain all required Provision 2 base year documentation. Notify the SA, in writing, that the daily meal counts by student name for all Provision 2 sites are saved and accessible (for school year, aka base year 2015/16). Provision 2 base year records must be kept on file for the entirety of the program operation, plus three years after the program concludes unless there is a review finding. A NutriKids Case was opened with an anticipated completion timeline of one week.

SFA Response to CAP: By January 31, 2017 a screen shot of the list containing 13,385 breakfast meal counts by individual and date was uploaded into MyIdahoCNP.

Finding 4- Three Month Operating Balance

Using the June 2016 audit, the Food Service Department is still over their three month operating balance. (Allowable amount \$2,257,285 and current operating balance is \$2,444,246 which is over by \$186,961.) ***This is a repeat finding from the last review.***

Due Date for CAP Completion: February 15, 2017

Corrective Action Response: Develop a plan with a timeframe for completion to reduce the operating balance. Potential scenarios include increasing food quality, increasing food service staff, replacing old food service equipment or updating computer equipment for the Point of Sale system.

SFA Response to CAP: The snow days in January 2017 will reduce the balance below this amount.

Fiscal Action

Due to benefit issuance errors of 0.85% (corrected immediately) and 55 meals served missing a component, fiscal action resulted in \$425.42. Since this amount falls under the \$600 threshold for each program, the fiscal action will be disregarded and no financial adjustment will occur.

Commendations

- Staff at all of the sites and central office were receptive to TA and truly interested in making any improvements to the program, beyond required but into the area of best practices. Everyone seemed to have a great positive attitude.
- Jane has a really good handle on the Free and Reduced benefit issuance. The reviewers appreciated being able to go through 590 applications in under 2 1/2 hours.
- Kudos to the central office supervising staff for their training and systems, the new staff at the school was well trained and it was obvious.
- Food Safety System for 7 day discard color coded approach is impressive.
- All production records and labels were accessible and complete. Very thorough program operations.
- The food service staff at Snake River Elementary did a great job managing a continuous flow of students; the team work and passion for feeding the students was evident. The staff wore hairnets and followed good food safety practices.
- At Snake River Elementary, the broccoli and carrots were steamed perfectly, maintaining a bright color. The rice also had a lot of flavor with the broth it was cooked in.
- The staff and custodian at FD Roosevelt Elementary were well prepared for implementing the HACCP 'Bodily Fluids' protocol. Although it is preferred to avoid having to rely on the procedures, everyone was trained and enacted the requirements with professionalism and efficiency.
- The staff at FD Roosevelt Elementary looked very professional in their blue chef coats and work very cohesively with one another. The uniform provides a sense of assurance that school nutrition professionals are providing meal service.
- The students at Endeavor Elementary School were enthusiastic regarding the meal service, saying to the kitchen staff, "You guys are the best cooks", "Yay!", and "It's healthy, yum." The fruit and vegetable selections were colorful and well prepared leading to a remarkable selection of healthy choices.

- The staff at Endeavor Elementary School looked very professional in their blue chef coats and work very cohesively with one another. The uniform provides a sense of assurance that school nutrition professionals are providing meal service.
- At Endeavor Elementary School, the kitchen was clean and organized and the food service staff worked well as a team.
- Warehouse processes and procedures for receiving shipments, storing received food items, tracking food use and communication with district menu planners follows a well-defined FIFO practice. Food items are clearly dated to ensure usage before the 'best if used by date'. Procurement is driven by inventory management at each site as well as the central warehouse. Great job.

Technical Assistance (TA)

Certification and Benefit Issuance

- TA was given on not accepting Tax forms for Verification, Collateral Contacts, and including allowances on income calculations.
- Gave TA that foster students should automatically be free even if they do not show up on the DC list. This was an instance of a foster student from Missouri being denied when they should have been approved as Foster - Free by application and eligible for verification.

Offer versus Serve

- Three students at Endeavor Elementary selected only two meal components (yogurt and fruit), this was brought to the food service manager's attention by the SA; the students were directed to select a third component so that they had a reimbursable meal, all students selected milk.

Dietary Specifications and Nutrient Analysis

The following TA was provided by SA independent contractor Laura Thomas RD, LD, who conducted the menu analysis:

- TA given for the targeted menu review site, Endeavor Elementary; all elementary schools serve same menu. TA given on weekly minimums for M/MA and how NutriKids weekly requirements are calculated. Menu was low in M/MA for minimums due to Yogurt parfait. TA given to provide revised menu week to minimum M/MA by increasing yogurt in parfait to 6 ounces and replacing yogurt parfait with other menu item. Revised menu with component contributions created for corrections.

Meal Components and Quantities

- During the middle of lunch service at Endeavor Elementary School, they ran out of WG rice for the mandarin orange chicken entrée service line. More rice was prepared, but was not available for 55 students who selected the mandarin orange chicken. All five food components must be available for all students during the meal service. The students who had pre-selected the hamburger entrée option were still able to select the WG hamburger bun, so this line contained all of the required components. The Kitchen Manager stated that, in the future, a whole grain substitute will be made available.

- TA given on weekly minimums for M/MA and how NutriKids weekly requirement is calculated. Menu was low in M/MA for minimums due to Yogurt parfait. TA given to provide revised menu week to minimum M/MA by increasing yogurt in parfait to 6 ounces and replacing yogurt parfait with other menu item. Revised menu with component contributions created for corrections.
- Nursing moms are offered whole milk on the serving line. Only fat free plain or flavored and 1% plain milk is allowed as a part of the 9-12 age grade meal pattern.

Resource Management

- Update the lunch menu at Endeavor Elementary School to include the adult lunch price (the breakfast price is listed on the lunch menu). This was completed while onsite January 31, 2017.

Food Safety

- 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)). Saf-instant yeast from Mexico was located at Snake River Elementary. If a product from another country is sourced, then the foodservice must have proof that the domestic product is significantly higher in price. The SFA did not initially have this documentation when requested, but obtained it while SA reviewers were onsite. 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).

Fresh Fruit and Vegetable Program (FFVP)

- The school must widely publicize the FFVP. The State agency recommends communicating with parents monthly via the published menu (place a note at the bottom of the menu informing of the fresh fruits and vegetables offered to the students).
- The school nurse is very supportive of the FFVP and sends out a weekly email with the nutritional information of the offerings provided that week. However, the school must not provide fresh fruits and vegetables to adults except for teachers/nurse who are in the classroom with students during the FFVP food service. The nurse should only be provided with the FFVP offering if she is in the classroom participating with the students.
- Please remind all schools that the FFVP should not be given right before the children are released for the day. Waiting to serve could also be a food safety issue, depending on when it is delivered.
- Fresh Fruit and Vegetable is a grant for reimbursement of Fruits, Vegetables and Labor. Per USDA, Indirect Costs can be charged and reimbursed, however your district is the only one diverting funds for this purpose. If you are going to continue charging Indirect Costs, please do so in a timely manner so that they can be claimed. As it was only charged at the end of the year after the program ceased, these charges were not reimbursed.

Smart Snacks

- All fundraisers, both exempted 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. An exempted fundraiser 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 210.11). Additional [Smart Snacks](#) and fundraiser information is available on the Idaho Child Nutrition Programs webpages.

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 [School Wellness](#).

Procurement

- The SA recommended including language in procurement documents regarding country of origin for food products; if the product is sourced from outside of the USA, then the responder must include prices of American products, or note that the product is not produced in the USA in sufficient quantities. Please refer to Guidance Memo SP24-2016.

- Catering contracts have to follow the Buy American provision as well.

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,



Lynda Westphal, MHS, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Sheila Keim, Food Service Director, Nampa School District

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