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PUBLIC INSTRUCTION

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March 23, 2017

Mr. David Sotutu
North Gem School District
360 S Main
Bancroft, ID 83217

Dear Mr. Sotutu,

On March 9, 2017, State Department of Education (SDE) Coordinators Jennifer Butler and Lynda Westphal conducted an Administrative Review of North Gem School District for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was North Gem Elementary School.

The State agency (SA) would like to commend Jill Askew and the entire staff of the North Gem 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- Offer versus Serve

OVS was being conducted correctly in the cafeteria with students selecting three items and putting unwanted items on a tray after the point of service. However, this practice was not occurring in the classroom. In the classroom, all students took the minimum 1/2 cup fruit, but not all took 3 items as required for a reimbursable meal. All students must take the minimum requirements in order for the meal to be counted as reimbursable. Options of having a “no thank you” bin were discussed to ensure that a reimbursable meal was selected, and then unwanted items set aside. Only students who take a reimbursable meal should be counted. Please train all teachers having breakfast in the classroom in OVS.

Timeframe for CAP completion: March 23, 2017

SFA Response to CAP: Per upload of March 21, 2017, “Classroom training of breakfast offer vs. serve was done on March 10th, for 5th and 6th grade classes. I trained the kids and teachers, and let the teachers know that I would be coming into the classrooms on a regular basis to check and make sure it was being done correctly. Classroom training for Kindergarten was done on March 16. Training both teacher and students also explaining that I would come in on a regular basis to make sure it was being done correctly.”

Finding 2- Free and Reduced Application

One application was found to be missing a social security number.

Timeframe for CAP completion: March 23, 2017

SFA Response to CAP: Application was corrected and uploaded March 13, 2017.

Finding 3- Meal Compliance

The lunch menu analysis for the review week was short on the daily requirement for meat/meat alternate (M/MA) on Wednesday and was short on the weekly minimum requirements for M/MA and Grains. The M/MA daily requirement can be met by increasing the meat in Wednesday’s Taco Soup recipe, which will meet the weekly minimum requirement. The weekly grain requirement will be met if 1/4 cup more flour is added to Tuesday’s roll recipe. The Taco Soup recipe as written only credits for 3/4 M/MA and 1/4 vegetable and must be rewritten to meet the desired crediting amount. Some recipe and production record consistencies need to be adjusted as discussed.

Timeframe for CAP completion: March 23, 2017

SFA Response to CAP: Per e-mail response on March 21, 2017, “I changed the taco soup recipe from 1/2 cup serving to 1 cup serving and was able to increase the meat from .75 to 1.75 ounces. We also changed the recipe for the bread and added the 1/4 cup more flour to it to increase it to two grain servings.”

Commendations

- Jill has a good handle on the paperwork and is very detailed oriented. It is appreciated as the review went smoothly with the total amount of paperwork reviewed in a short time.
- As water was recently deemed to not be safe to drink, the foodservice staff took extra steps to call the health department to ensure that safe water was available to students as required.
- Staff wore appropriate hair restraints as required per Idaho Food Code.
- The school supported National Breakfast Week by passing out stickers with breakfast.
- Jill had all the required paperwork for the Provision 2 breakfast. The 2002-2003 base year was validated and there were 52 meals that went from Reduced to Free. The percentages went from 37.4% Free and 19.8% Reduced to 37.7% Free and 19.5% Reduced. This will result in an additional \$5.95 being paid for October through January. Your percentages are adjusted to reflect the greater free rate and the lower reduced rate from this point forward. Please remember to keep all of this base year documentation while you operate the Provision 2 breakfast program.

Technical Assistance (TA)

Certification and Benefit Issuance

- Please cover or move the computer monitor in order to protect students from seeing the lunch fund balance of other students to avoid overt identification.

Offer versus Serve

- During lunch, it was observed that the school was not properly implementing OVS by allowing students to decline some items, yet requiring that students take either the full offered amount of either a fruit or vegetable and not the 1/2 exception allowed by OVS. OVS is a menu planning and meal service concept that allows students to decline some of the food offered in a reimbursable lunch or breakfast while permitting students to choose the foods they want while reducing food waste. OVS sets requirements for the food components that schools must offer during a meal and the minimal number of items or components a student must take for a reimbursable meal. SBP and NSLP have different OVS requirements.
 - For SBP, schools must offer three food components: fruit (or vegetable), grain, & fluid milk in creditable portion sizes in a minimum of four food items and students must take a minimum of three food items, including at least ½ cup of the fruit (or vegetable) offering.
 - For NSLP, schools must offer five food components: fruit, vegetable, grain, meat/meat alternate & fluid milk in at least the daily minimum required amounts for the age-grade group and students must take at least three of the five food components in the required serving, including at least ½ cup of a fruit and/or vegetable.

Dietary Specifications and Nutrient Analysis

- Ensure that product formulation statements and labels are current and match the products being used.

Civil Rights

- Please update your non-discrimination statement on the menu to the current USDA non-discrimination statement available at the [State Agency Civil Rights website](#).

Procurement and 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)). Saf Yeast from Mexico was located onsite. If a product from another country is sourced, then the foodservice 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. Be sure to 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).
- Recommend including in RFP language that asks for country of origin for their products and if the product is sourced from outside of the USA, then the responder must include prices of American products, or that the product is not produced in the USA. Please refer to Guidance Memo SP24-2016.

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, both exempted and compliant, must be tracked. 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 Idaho Exempted Fundraiser Request](#) form. (7CFR 210.11)
- The vending machine has Cranberry Juice Cocktail, which is not 100% juice. If the machine is on during the day, that product will need to be removed.

Your review is now closed.

There will be no fiscal action. Should you wish to appeal any of 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 continued support of the Child Nutrition Programs.

Sincerely,



Lynda Westphal, MHS, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Jill Askew, Food Service Director, North Gem School District

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