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May 9, 2017

Mr. Craig Woods
Notus School District
25257 Notus Road
Caldwell ID 83607

Dear Mr. Woods,

On April 3, 2017, State Department of Education (SDE) Coordinators Jennifer Butler and Heather Blume conducted an Administrative Review of Notus Schools for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) operating Provision 2 breakfast (base year 2010-2011) at Notus Elementary School and Notus Jr./Sr. High School
- Afterschool Snack Program (ASSP)
- USDA Foods

The State agency (SA) would like to thank Eileen Javaux, Food Service Director and the entire staff of Notus school food service 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- Certification and Benefit Issuance

There was one application (affecting seven students) that was approved incorrectly without accounting for child income. The application was approved as free and must be changed to reduced status. One additional application (affecting eight children) was incomplete and did not include the total number of people in the household. The family was contacted and the number in the household was confirmed with no change in benefits.

Timeframe for CAP completion: April 17, 2017

SFA Response to CAP:

The required letter of adverse action and the updated benefit issuance list was uploaded into MyIdahoCNP on April 18, 2017. No additional action was needed for the second application.

Finding 2- Special Provision

Per USDA memo SP-46-2015 dated September 18, 2015, the SA must review Provision 2 base year certification documents. The SA could not complete the process of validating Provision 2 Base Year 2005-2006 records while onsite due to the student daily meal count records not being located before reviewing applications for determination validation. The SFA was given a due date of April 17, 2017, to locate and submit records to the SA. Since the required base year records have not been maintained, the SA would generally require the district to immediately return to standard counting and claiming procedures and calculate fiscal action. However, the SA is extending previous USDA guidance and allowing the SFA to continue their claiming procedure until the end of the school year. If the SFA wishes to participate in Provision 2 Breakfast next school year, they will need to establish a new base year during the next school year (SY 2017-18).

Timeframe for CAP completion: April 17, 2017

SFA Response to CAP:

The Food Service Director informed the State agency that the missing base year documentation could not be located. The district is requesting a new base year in school year 2017-2018.

Finding 3- Resource Management

- All foods purchased by the food service department to be used as non-program food sales must be marked up to account for the cost of the food, labor, storage, and delivery of the products. Food service cannot order for non-USDA programs without marking up the price an average of 38%. This process should be evaluated using the Non-Program Food Revenue Tool (NPFRT).
- It does not appear that food service has a separate meter or usage indicator for power and there is no documentation to support allocation of garbage collection services. Utility and

garbage collection charges must be directly billed or included in indirect costs applied uniformly to all federal programs.

Timeframe for CAP completion: April 17, 2017

SFA Response to CAP:

- The Food Service Director completed the Non-Program Food Revenue Tool for a period of one week and uploaded the document into MyIdahoCNP on April 26, 2017.
- The business manager provided documentation that the power and garbage collection are directly billed and allocated appropriately in an email on April 28, 2017.

Finding 4- 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, and employees who accept meal payments must have annual civil rights training. Superintendent Woods is listed as the Hearing Official so must have USDA civil rights training. Secretaries accepting free and reduced applications and meal payments must also have applicable foodservice civil rights training, which is located under the “Training” tab of the [CNP Resource Center website](#).

Timeframe for CAP completion: April 17, 2017

SFA Response to CAP:

Dated sign-in sheets and agendas were provided to the State agency on April 12, 2017 verifying that the Hearing Official and applicable school secretaries received civil rights training.

Finding 5- Offer versus Serve

Offer versus Serve (OVS) training is required annually and has not occurred since 2015. Please train staff on OVS. 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. Online training is available on the State agency website and may be used for training.

Timeframe for CAP completion: April 17, 2017

SFA Response to CAP:

Staff was trained on OVS for and the signed and dated sign-in sheet was uploaded into MyIdahoCNP on April 13, 2016.

Finding 6- Afterschool Snack Program

- The Afterschool Snack Program requires production records that show component compliance and note number of portions prepared, served, and leftover for every day the ASSP operates. The daily production record should be used to validate the claiming total. Currently, snacks are provided and stored on an ongoing basis, with more snacks provided as needed when requested. Daily served documentation is provided with attendance backup, but the prepared and leftover totals are difficult to establish. During the review, it was determined that the SFA should provide only one week of snacks (2 components) at a time to be stored at the site. The target total will be 20 snacks per

week, unless notice is given that more snacks may be necessary (weeks before grades come out). A weekly production record showing the daily totals is required.

- Additionally, ensure that a USDA non-discrimination poster is displayed and visible to participants during ASSP.

Timeframe for CAP completion: April 17, 2017

SFA Response to CAP:

- Two completed weekly ASSP production records showing the required elements were uploaded into MyIdahoCNP on April 17, 2017.
- A photo demonstrating the location of the non-discrimination statement was uploaded into MyIdahoCNP on April 11, 2017.

Finding 7- Meal Counting and Claiming

An error was found in the consolidated meal count for February.

Timeframe for CAP completion: April 17, 2017

SFA Response to CAP:

The Food Service Director re-submitted the claim and provided documentation of the correction on April 18, 2017.

Commendations

- The water cooler was inviting and heavily used. It was obvious the students appreciated the access to clean fresh water.
- It was noted that Eileen takes the time to find exciting new recipes for the students to try and she and the food service staff take the time to prepare recipes from scratch, including a hand-made hamburger prepared for the high school students.
- Eileen was very friendly and receptive to feedback! The State agency appreciates her positive attitude and competence when running the school meals programs.
- Both the breakfast and lunch meals provided the day of review looked and smelled wonderful and encouraged participation among the students and staff.
- The great card scanning process was utilized and created a streamlined process.

Technical Assistance (TA)

Certification and Benefit Issuance

- Six additional applications had inconsistencies between the names listed and the total stated for the number of people in the household. Eileen contacted each family and confirmed the total number of people in the household and documented the conversations.

Verification

- When performing Verification of Free and Reduced Applications, the Confirming Official cannot be the same person as the Determining Official (the person who approves the application). There must be another person checking the application prior to sending

out the letter for Verification. Verification must be in line with requirements outlined in 7 CFR 245.6a. Software may be listed as the confirming official.

Local School Wellness

- 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 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) Details available at the [Smart Snack Resources website](#).

Professional Standards

- It is required that backup documentation be kept on file to support the Professional Standards training hours recorded on each employee's training log; options include certificates, agendas, and sign-in sheets.

SFA On-Site Monitoring

- Breakfast POS (point of service) on-site reviews are covered in 7 CFR 220.11(d)(1), and states every school year, a minimum of 50 percent of sites under and FSA's jurisdiction must be reviewed at least once every two years. The on-site review shall take place prior to February 1st of each school year. Further, if the review discloses problems with a school's meal counting or claiming procedures or general review areas, the school food authority shall ensure that the school implements corrective action, and within 45 days of the review, conduct a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school's claim is based on the counting system and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid breakfasts, respectively, served for each day of operation.

Fresh Fruit and Vegetable Program (FFVP)

- The school must widely publicize the FFVP. This is a grant award of which parents should be made aware. It was discussed that this could be promoted in a newsletter sent home.

Afterschool Snack Program (ASSP)

- For the ASSP a juice serving must be a minimum of 6 oz.

Food Safety

- Each SFA is required to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories, as applicable (7 CFR 210.21 (d)). Rio Luna Chipotle Peppers from Peru and Saf Yeast from Mexico are being used. If a product from another country is sourced, then the food service must have proof that the domestic product is significantly higher in price or not available in sufficient quantities. Include the Buy American Provision in SFA solicitation documents for the purchase of commercial foods. Products must be checked upon receipt and not accepted if the products do not comply with the Buy American Provision, unless there is documentation to justify the exception (exorbitant pricing or product shortages).
- Boxes of food were stored on the floor in the walk-in freezer. This issue was a finding with required corrective action from the Southwest District Health Department during their 4/21/16 and 12/14/16 health inspections. The SFA stores some frozen food items for the local food bank that takes up shelf space; this assistance is putting the SFA in violation of the health code and limits the space available for foods purchased for the school meals programs. A remedy needs to be identified.
- Please record food storage temperatures on logs daily (excluding weekends). This ensures food is stored within recommended temperature ranges for food safety and this standard helps ensure food quality (CFR210.13(d)). A consistent daily record will also show patterns with equipment and could provide an indication of equipment beginning to fail. (CFR210.13(d))

Meal Components and Quantities

- Production records showed 120 students being served at breakfast, but only 100 milks were documented on the Nutri-Kids production records. On-site visit showed all children have access to milk, but production records should be updated to reflect this.

Nutrient Analysis

- Update breakfast menus to reflect all children are being offered milk with their meal.

Offer Versus Serve

- With Offer versus Serve (OVS) students are encouraged to choose the foods they want to eat and decline the ones they don't. Menu planners must ensure that adequate amounts of all five food components are offered and available to all students, but students only need to select a minimum of 1/2 cup fruit or vegetable and at least two other full food components to make a reimbursable meal.

Your review is now closed.

The total fiscal action is \$0.00 for breakfast and \$56.94 for lunch. Since these amounts are below the \$600 threshold for each program, fiscal action will be disregarded. 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,



Heather Blume, MS, RD, LD
Child Nutrition Program Coordinator

Cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Eileen Javaux, Food Service Director, Notus School District

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