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February 15, 2017

Ms. Jeneille Branen, Executive Director
Palouse Prairie Charter School
1500 Levick Street
Moscow, ID 83843

Dear Ms. Branen,

On January 12, 2017, State Department of Education (SDE) Coordinator Lynda Westphal conducted an Administrative Review of Palouse Prairie Charter School for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)

Palouse Prairie Charter School was the school site reviewed.

The State agency (SA) would like to commend Debbie Berkana, Janis Steffens, and the entire staff of the Palouse Prairie Charter School 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 are two applications affecting 4 students that require follow-up. One parent gave average amount of income. If a note comes on the application, you must follow up. It is best that the parent does not make notes like this, but if they do – follow-up is necessary. Another application has four names, but lists the number in the household as five. Follow-up with the family must be conducted to find out the name of the fifth person and whether they have income. Upload the application when follow up is completed.

Timeframe for CAP completion: January 26, 2017 – extension granted for an additional two weeks to February 9th.

SFA Response to CAP: This has been resolved as of January 31st as the last application was uploaded with corrections.

Fiscal Action

Since you are a small school, the errors do add up causing benefit issuance errors of 6.78%. However, there is no fiscal action since all students remained in the same category.

Commendations

- Ed Larson was very good with the children when handing out the lunches. He was meticulous in the amounts of food given to the children.
- Janis has a good handle on the paperwork. I appreciated knowing how Direct Certification was conducted by uploading an entire list after a new student enters the school. That goes above and beyond.

Technical Assistance (TA)

Certification and Benefit Issuance

- Make sure household size matches and do not take an application with notes from the family that they are averaging income, unless you follow up.

Meal Components and Quantities

- Meals offered to students must meet vegetable subgroup and whole grain-rich requirements. (7 CFR 210.10) Targeted week of review 10/10-14 (meals provided by Moscow SD) was found to be missing the starchy vegetable sub group. The error was corrected on site during the Moscow SD meal compliance review with the assistance of a State agency contractor for the month of November's menu.
- The planned menu for the week 10/10/16-10/14/16 did not have the minimum weekly requirement of ½ cup dark green vegetable. It only had ¼ cup of dark green planned on 10/13. The tossed salad had ¼ cup dark green equivalent planned per salad and the

students generally are not allowed seconds. Immediate correction action was required. On 11/7/16, the Foodservice Director (FSD) revised the menu for the weeks of 11/7, 11/14, and 11/28 and created a recipe for ¾ cup fresh broccoli & carrots. The item was added to the menu on 11/10 and 11/18. For the week of 11/28, the FSD planned ½ cup steamed broccoli which was offered on 12/01/16.

- SFAs receiving vended meals are responsible for ensuring that all meals served to students and claimed for reimbursement are compliant with the National School Lunch Program meal pattern.

Offer versus Serve

- MyIdahoCNP application says you do not use Offer versus Serve; however, some students were observed not taking milk. Please mark the application as Offer versus Serve and allow students to decline two items. One of the required items is a fruit or vegetable.

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>

Professional Standards

- The United States Department of Agriculture has established minimum Professional Standards for school nutrition professionals who manage and operate the National School Lunch and School Breakfast Programs, effective July 1, 2015. The standards provide annual training requirements for all school nutrition professionals. It is required that some form of documentation be kept on file to show Professional Standards compliance; options include the FNS online tracking tool [found at USDA's Professional Standards website](#) and two Professional Standards tracking resources available in MyIdahoCNP under Download Forms in the Professional Standards section.
- You currently keep all of the certificates, but you also need to include them in the tracking log so you know if they met the annual training amount.

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
Debbie Berkana, Business Food Service Director, Palouse Prairie Charter School

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