



**SHERRI YBARRA**  
SUPERINTENDENT OF  
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April 25, 2017

Superintendent Pauline King  
Payette School District  
20 N 12<sup>th</sup> St.  
Payette, ID 83661

Dear Ms. King,

On April 10, 2017, State Department of Education (SDE) Coordinators Jennifer Butler and Heather Blume conducted an Administrative Review of Payette 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)
- Fresh Fruit and Vegetable (FFVP) at Westside Elementary only
- USDA Foods

Westside Elementary and Payette HS were the school sites reviewed.

The State agency (SA) would like to commend Kellie Campbell and the entire staff of the Payette 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 - Resource Management***

During a review of SY15-16 foodservice finances, it was discovered that the district incorrectly calculated the indirect cost charges applied to the foodservice account. All food costs and capital outlay expenses should have been excluded prior to applying the indirect cost rate to the school foods program as stated in the FY2016 restricted indirect cost rate memo from Idaho Department of Education's Finance Department. Restore the \$5,283.16 overcharge for the indirect costs and provide a copy of the general ledger to the State agency showing the transfer of funds to the foodservice account.

**Timeframe for CAP completion:** April 21, 2017

**SFA Response to CAP:** On April 21, 2017, a copy of the fund 290 general ledger showing a fund transfer credit of \$5,283.16 was provided to the SA.

## Commendations

- Parsley flakes were sprinkled on top of the cooked carrots making them more visually appealing. This extra touch to enhance the meal is appreciated.
- Homemade bread is baked for the sandwiches and toast. The smell and taste enhances the warming environment of the cafeteria.
- Westside Elementary School students were polite and heard saying "thank you" and "no thank you". Staff interacted well with students and always happily responded "you're welcome" when thanked.
- Food garnishing and displays are created for the Fresh Fruit and Vegetable Program (FFVP) with pictures taken and posted to the district's Facebook Page. This is a great example of promotion of the FFVP.

## Technical Assistance (TA)

### **Dietary Specifications and Nutrient Analysis**

The following TA was provided by SA contractor Steffanie Sandoval, RD, LD, who conducted the menu analysis:

- Nutrient analysis was accurate, but crediting of certain items were input into the Nutrikids software incorrectly. Required corrections to recipes were emailed. Meal pattern requirements were met during the menu review week even with the adjustments to crediting.

- Menu planning for yogurt crediting needed to be corrected; 4 oz of yogurt was credited as 4 oz m/ma. This was fixed on site to reflect that 4 oz of yogurt = 1 oz m/ma.
- Update from scratch bread recipes to reflect the portion size and number of servings actually produced in the kitchen. One recipe says it produces 600 servings which would equate to .75 oz eq of grain per serving. Kitchen staff says they only produce 416 servings per recipe which equates to 1 oz eq of grain per serving. Another recipe says it produces 300 servings which would equate to 1.5 oz eq of grain per serving. Kitchen staff says they only produce 213 servings per recipe for the larger portion size which equates to 2 oz eq of grain per serving.

### **Meal Components and Quantities**

- The "What's for Lunch?" and "What's for Breakfast?" posters were visible, but not utilized. Menus were posted for students to see, but did not clearly identify the components of a reimbursable meal. Some students demonstrated confusion over the fruit/vegetable component of the reimbursable meal.

### **Food Safety, Storage, and Buy American**

- It was discussed that while a Fall 2016 Health Inspection took place, and was paid for, no copy of the report was provided to the school at the time and the public health office discovered they also do not have a copy of the report.

### **Civil Rights**

- Ensure the Civil Rights complaint log is dated annually, with a new log started each year. If no complaints were received, best practice is to write "No complaints" on last year's log and keep this on file (three years plus the current 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.
- All LEAs must assess their wellness policy at least once every three years on the extent to which schools are in compliance with the district policy, the extent to which the local wellness policy compares to model local school wellness policies, and the progress made in attaining the goals of the local wellness policy. A report on the progress towards goals stated in the Local School Wellness Policy must be publicly available. Posting to the school /district website and/or in a school newsletter would support this requirement.
- For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs [School Wellness website](#) or contact Heather Blume, State Department of Education Nutrition Assessment and Promotion Coordinator, at [hblume@sde.idaho.gov](mailto:hblume@sde.idaho.gov).

### **Smart Snacks**

- As per 7CFR210.11(b)(2), the school district should have knowledge of and keep a written record (tracking form) of food sales that occur within the school day, but outside of food service. Only foods sold in school and intended for consumption during the school day (from midnight until 30 minutes after the end of school) fall under Smart Snacks regulations. Smart Snacks information and resources, including a sample site tracking form, can be found at the CNP [Smart Snacks webpage](#).
- 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 (b)(2)) Details available at the CNP [Smart Snacks webpage](#).

### **Professional Standards**

- All staff training should include an agenda with topics covered, as well as a sign-in sheet. Please be sure to have all topics covered during the beginning of the year training clearly documented with topic title, applicable key codes and topic areas, and time spent training on the topic. This is critical to document that the mandatory training (OVS, Civil Rights, and Food Safety) topics have been covered each year. Training documentation should be maintained on file at the SFA for three years plus the current year.

**Special Provision Options (CEP)**

- Maintenance of CEP records for SY14-15 (year used) and SY15-16 (first year) were validated. Direct Certification reports for April 1 data have been run each year. The current CEP approval expires at the end of SY18-19.

**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,



Jennifer Butler, MEd, SNS  
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs  
Kellie Campbell, Food Service Director, Payette School District

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