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January 20, 2017

Judi Sharrett  
Plummer Worley School District  
1255 E Street  
Plummer, ID 83851

Dear Ms. Sharrett,

On January 12, 2017, State Department of Education (SDE) Coordinators Tamara Donovan and Jennifer Butler conducted an Administrative Review of Plummer Worley 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 Lakeside Elementary School
- USDA Foods

Lakeside Middle / High School was the school site reviewed.

The State agency (SA) would like to commend Michelle Triplett and the entire staff of the Plummer Worley 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

This was the SA determined finding and the SFA response to the finding:

## Finding and Corrective Action Plan (CAP)

### ***Finding 1- Civil Rights***

School Foodservice Authority staff that interacts 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. Ms. Judi Sharrett, Superintendent, is newly listed as the Hearing Official, so must have civil rights training. The [USDA Civil Rights training video](#) is available on the Idaho Child Nutrition Programs webpage under Civil Rights, Training.

Upload, into MyIdahoCNP Review Attachments, a sign in sheet with the Superintendent's signature and the date training was received, to document that the Hearing Official received civil rights training.

**Timeframe for CAP completion:** January 12, 2017

### **SFA Response to CAP:**

Superintendent Sharrett completed and documented civil rights training while the SA was on site.

## Commendations

- Food Service Director Michelle Triplett was well prepared for the State agency on-site review. All necessary documentation was organized and ready for review and she was available to answer questions and provide clarification. The time and work put into preparing for the review allowed the reviewers to work efficiently.
- An excellent job has been done by the Food Service Director in customizing the master food safety manual. Staff training has been a priority, evidenced by posters, additional training materials, and attention to assuring substitute food service employees are trained.
- The Food Service Director has done a commendable job of encouraging stakeholder participation in and knowledge of the Wellness Policy, including announcements made via Facebook, the school website, community emails to interested individuals, bulletin boards which provide and promote information, and student informational handbooks which are provided to enrolled students at the beginning of the school year.
- Michelle does a great job seeking out and applying for grant opportunities. These extra items and programs help to promote a healthy and enjoyable environment.
- A nice variety of fresh fruits and vegetables are offered as part of the FFVP.
- Breakfast participation was increased by changing the service location. This is a great example of the success of being open to trying new things and accommodating student needs.

# Technical Assistance (TA)

## Meal Components and Quantities

- State agency independent contractor Renee Legan provided the following TA:
  - Discussed revision of the production record forms to include K-12, K-8, and 9-12 portion size columns to simplify the documentation of age-grade meal pattern requirements.
  - Reviewed recording equivalences on production records as well as on the spreadsheet.

## Food Safety

- A food safety manual with HACCP procedures was available at the foodservice office, but procedures were not located in the kitchen or breakfast serving area. The kitchen did include a checklist and corrective action summaries, but the actual procedures must be available at the site. Please ensure that applicable procedures, available in the HACCP manual located at the foodservice office, are also maintained in the kitchen and breakfast serving area.
- The most recent food safety inspection report must be posted in a location visible to the public. (7 CFR 210.13(b)) The high school breakfast room required a copy; this was taken care of while the SA was on-site.
- Cold food storage temperatures are consistently recorded on a log in the breakfast service area, however dry food is also stored in the area and dry storage temperatures should also be maintained just as they are in the kitchen. Please add a thermometer and record dry storage temperatures at the breakfast service area to help ensure food quality. (CFR210.13(d))
- 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)). A "No-Salt" seasoning product from Germany was located in the kitchen. This non-compliant product is rarely used and was discarded while SA reviewers were onsite.

## Fresh Fruit and Vegetable Program

- The school must widely publicize the FFVP. Occasional promotions exist in the school building; please ensure that parents and the community are aware of the program. Comments on this grant award can be included in materials sent home or on the district's website. The Food Service Director will plan to promote the FFVP on the district's Facebook page.

## Civil Rights

- Ensure the updated long [USDA non-discrimination statement](#) is utilized. The current non-discrimination statement is available on the Idaho Child Nutrition Programs webpages under Civil Rights.

## **Local School Wellness Policy**

- The Wellness Policy was adopted on March 9, 2015. 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. The final rule requires LEAs to begin developing a revised local school wellness policy during School Year 2016-2017. LEAs must 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 Child Nutrition Programs webpages.

## **Smart Snacks**

- The State agency provided "A Guide to Smart Snacks in Schools" to the Food Service Director and discussed recent changes to Smart Snacks regulations.

### **Professional Standards**

- Include the relevant Key Area and Key Topic codes for all training listed on the tracking form.

**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 continued support of the Child Nutrition Programs.

Sincerely,



Tamara Donovan, RD, LD, SNS

NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs  
Michelle Triplett, Food Service Director, Plummer Worley School District

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