



**SHERRI YBARRA**  
SUPERINTENDENT OF  
PUBLIC INSTRUCTION

650 W. STATE STREET  
P.O. BOX 83720  
BOISE, IDAHO 83720-0027

OFFICE: 208-332-6800  
FAX: 208-334-2228  
SPEECH/HEARING  
IMPAIRED: 1-800-377-3529

February 3, 2017

Superintendent Jerry Keane  
Post Falls School District  
PO Box 40  
Post Falls, ID 83877

Dear Mr. Keane,

On January 9-11, 2017, State Department of Education (SDE) Coordinators Jennifer Butler and Tamara Donovan conducted an Administrative Review of Post Falls 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)
- USDA Foods

West Ridge Elementary, Post Falls High School, and Fredrick Post Learning Center were the school sites reviewed.

The State agency (SA) would like to commend Debi Willy and the entire staff of the Post Falls 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- Benefit Issuance***

22 applications were found to be incomplete due to unclear income issues or the household total box not matching the total number of names listed for the household. During the onsite review, phone calls were made to the households to obtain the missing information. 14 applications resulted in no change in the determination. 4 applications, affecting 9 students, required benefit issuance changes. (2 applications (affecting 5 students) changed from reduced to free, 1 application (affecting 1 student) changed from reduced to denied, and 1 application (affecting 3 students) changed from free to reduced), 3 applications still require follow up. These applications were pulled from a statistical sample and resulted in a 4.38% error rate. Follow up with the remaining applications and add the missing information to the application and determine new benefit as necessary. Upload a copy of the completed application and any required household notification letters into MyIdahoCNP.

**Timeframe for CAP completion:** January 25, 2017

**SFA Response to CAP:** Follow up on the 3 remaining applications resulted in 1 application (affecting 2 students) being changed from reduced to free.

### ***Finding 2- Meal Counting and Claiming***

Per USDA Q&A Guidance, <http://www.fns.usda.gov/sites/default/files/cn/SP57-2016os.pdf>, SFAs seeking reimbursement for an alternate meal must meet the meal pattern requirements. SFAs not seeking reimbursement for an alternate meal, however, are not required to ensure those meals meet the meal pattern requirements. Schools providing a non-reimbursable alternate meal should aim to offer an economical meal that reflects FNS' nutritional goals. The costs of non-reimbursable alternate meals may be absorbed by the NSFSA, the general fund, or other community donations. However, FNS encourages schools to provide a reimbursable meal to all children who want one. Providing children with a "regular" reimbursable meal prevents the singling out of children with unpaid meal charges, provides children with the nutritional benefits of a reimbursable meal, and ensures the school receives the applicable Federal reimbursement for the meal. To claim an alternate meal that limits choices to lower cost entrées and other components, schools must offer children at least two different types of fluid milk. In addition, a school participating in the offer versus service (OVS) provision must allow children to select up to five food components for the NSLP and four items for the SBP. Alternate meals that allow children to select only three components are not reimbursable. It was discovered that the SFA while operating the OVS provision, was providing alternate meals at lunch that did not allow students to select from five components. The SFA must follow the applicable requirements in order to continue to claim the alternate meals for reimbursement. Devise a plan for providing alternate meals, providing for either a Serve or Offer versus Serve procedure, that meet the requirements in order to claim for reimbursement. (Or advise if the practice of providing

alternate meals will be discontinued or if the SFA plans to discontinue submitting these non-reimbursable alternate meals for reimbursement). Train staff on the procedure. Upload the new alternate meal procedure and an agenda and sign in sheet to document staff training into MyIdahoCNP.

**Timeframe for CAP completion:** January 25, 2017

**SFA Response to CAP:** The SFA created an alternate meal recipe that includes four components and a choice of fluid milk. On January 13, 2017, staff was trained on the alternate meal procedure and new recipe.

### ***Finding 3- Smart Snacks***

Per 7 CFR 210.11 Competitive food service and standards, all food sold to students during the school day must meet Smart Snack requirements. Schools must meet the minimum requirement in 7 CFR 210.11 for all foods and beverages sold in school to increase consumption of healthful foods during the school day and support a healthy school environment. Snack carts, school stores, and fundraising need to comply with specific nutrition standards. At Post Falls High School, the DECA Club has a school store that sells items that are not Smart Snack compliant. Devise a plan and timeframe for making the DECA Club store come into compliance with Smart Snacks regulations. Upload the plan and timeframe into Review Attachments in MyIdahoCNP.

**Timeframe for CAP completion:** January 25, 2017

**SFA Response to CAP:** A plan was uploaded that advised that a university intern would be presenting a class to the DECA club students on Smart Snacks and how to use the compliance calculator on January 30. The DECA club will work with foodservice to get information on vendors and compliant food products. All non-compliant items will be eliminated and new products purchased to have the store in compliance by February 10, 2016.

### ***Finding 4- Resource Management***

While reviewing the detailed Foodservice (Fund 290) accounts, it was discovered that cash was received by the foodservice director and provided to the high school kitchen so that staff could provide cash reimbursements to graduating seniors who had a balance in their meal account. This process provides no documentation of what happened to the cash. There should be documentation detailing the amount of money that was refunded to students and confirming that the cash was received by the student. Please devise a plan that allows for documentation to account for the receipt of returned unused funds. Please upload a description of the process into Review Attachments in MyIdahoCNP.

**Timeframe for CAP completion:** January 25, 2017

**SFA Response to CAP:** The SFA has created a plan that involves printing a roster of graduating seniors with a positive account balance on their meal accounts. At senior check out, the students that receive funds will sign off on the roster that they have received the cash balance.

## Fiscal Action

Due to benefit issuance errors, fiscal action results in \$546.12 for lunch and \$71.51 for breakfast. However, since these amounts falls under the \$600 threshold for each program, the fiscal action will be disregarded and no financial adjustment will occur.

## Commendations

- The Post Falls Foodservice office staff was pleasant to work with and open to all feedback. Debi did a great job preparing for the review and had all records ready and organized for SA reviewers.
- The Post Falls High School kitchen and storage areas were organized and clean - a sign of good management, staff pride, and teamwork.
- The kitchen and food storage areas at Frederick Post Elementary School were exceptionally clean and organized. The food service employees worked well together, assisting each other and efficiently performing tasks.
- The West Ridge Elementary kitchen staff is wonderful with the students and is good with reinforcing manners (please and thank you). They have high energy and it is obvious they enjoy their job.
- At West Ridge Elementary, lots of fresh vegetable varieties were offered at lunch, including carrots, cherry tomatoes, cauliflower, green and red peppers, and black beans. It was nicely displayed in an appealing manner. Individual portion cups made it quick and easy for the students to select.
- Congratulations to all Post Falls SD schools for receiving a Food Safety Award of Excellence in 2016 from the Panhandle Health Department.

## Technical Assistance (TA)

### **Certification and Benefit Issuance**

- Applications should be considered denied as incomplete until all required information is obtained. Please be aware of the need to follow up with families as applications are submitted when items are incomplete.
- Several applications were determined even though the household total box did not match the names listed on the application, or the household total box was left blank. To be considered complete, an application must include all required information. Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and should not be processed. The LEA should make reasonable efforts to contact the household in order to obtain or clarify required information.
- When more than one application is submitted by the same household and different information is provided, follow up is required and one application should be marked as determined with a notation to reference additional applications.

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

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

- Menu options to assist in lowering sodium to meet the upcoming sodium guidelines were provided.
- Additional menu entrees were discussed that could be applied to both the middle school and high school menus. Some items may also be applicable for the elementary menus. Lunch was the primary area of discussion.
- Discussed looking at a 3 week cycle menu to assist in reducing food cost and cost of inventory, and reviewing menus to use products more than once in the cycle menu as different entree.

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

- A personalized food safety manual (HACCP) was located in each kitchen and included standard operating procedures. However, individual categories did not include monitoring, corrective action, and recordkeeping procedures. Please reference the ICN HACCP manual template for recommended wording to add to the HACCP manual. Debi began locating wording and creating a new HACCP manual while SA reviewers were still onsite.

### **Resource Management**

- Although Debi retains time sheet records, it is recommended that she obtain payroll documentation from the district office to validate the payment amount for each employee with income paid out of foodservice funds. This documentation should be retained as backup for fund 290 annual expenses.
- The foodservice office has a good practice of signing off on invoices and retaining backup documentation of expenses. However, some bills (Frontier for office phones, City Service Valcom for fuel, and postage charges) are directly removed from the foodservice funds without Debi signing off or being provided with a copy of the invoice to review. Invoice documentation should be approved by Debi and retained as backup for fund 290 expenses.
- It is suggested that the district re-evaluate the benefits of the contract with Ecolab for the monthly leasing of dish washer machines (\$189.95 - \$291.45/mo. each for 8 schools) and the accompanying water softener (\$75/mo. each at 8 schools) to see if leasing is still the most feasible option. Debi does a great job with contract management and recently refusing to pay a repair charge and travel expense for the machines that should have been covered in the lease contract. The machines have been leased for over 15 years and it is possible that needs have changed.

### **Civil Rights**

- The SFA's procedure for receiving and processing civil rights complaints should ensure all complaints associated with Child Nutrition Programs, whether verbal or in writing, are forwarded to the State agency within three working days (CFR210.15(a)(6)). The current procedure only identifies receiving and forwarding written complaints. Debi printed a new policy for distribution while SA reviewers were still onsite.

- Ensure that all food service notification letters contain the correct non-discrimination statement. It was found that the letter advising households of the need to verify their income included the correct non-discrimination statement, but the verification result letter and status change letter still had the old statement. These letters were fixed during the onsite review. Make sure you have a procedure identified in which each letter template within the MealTime software is updated appropriately.

### **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](#).
- The final rule requires 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. A soft drink dry erase sign was located in the hallway near the POS at the high school that is not allowable under the final rule. Please have this sign modified to be compliant with the requirements of the final rule by June 30, 2017.

### 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 (b)(2)). Details available at <http://www.sde.idaho.gov/cnp/sch-mp/snacks.html>
- SA discussed marketing strategies to increase meal participation, including: considering student involvement in new menu choices, uniquely naming food items, having students create posters, and announcing trial menu items.

### Afterschool Snack

- Schools may claim reimbursement for one full snack, per child, per day. At West Ridge Elementary School, a substitute employee planned to provide a second snack to two students who were enrolled in both afterschool programs; this is double claiming which is unallowable. Because of this concern, the State agency conducted a more thorough review of the review month records to determine if unallowable snacks were claimed during the month of December for students enrolled in both afterschool programs. One program was offered four days a week, and the other only two days a week. It was discovered that three students were enrolled in both afterschool programs. The attendance rosters and production records from both programs were compared. There was no indication that more than one snack per student was claimed. However, the SA requested that the SFA follow up with all persons involved in the ASSP to ensure they understand the requirements, especially as they apply to the unique situation of students enrolled in two programs.

## 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  
Debi Willy, Food Service Director, Post Falls School District

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