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November 18, 2016

Chad Williams
Ririe School District
13809 N 130 E
Ririe, ID 83443

Dear Mr. Williams,

On November 11, 2016, State Department of Education (SDE) Coordinators Tamara Donovan and Lynda Westphal conducted an Administrative Review of Ririe School District for the following United States Department of Agriculture (USDA) programs:

National School Lunch Program (NSLP)
School Breakfast Program (SBP) – Operating the Free Provision 2 option (base year 2003-04 Ririe Elementary School; base year 2005-06 Ririe High School)
USDA Foods

Ririe High School was the school site reviewed.

The State agency (SA) would like to commend Eva Niederer and the entire staff of the Ririe 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- Verification/Denied Applications

- One application (two students) selected for verification was in error since net income was used instead of gross income. The students received reduced-price meal benefits and should have been denied/paid. Notify the family of the change, allowing 10 calendar days before termination. Update the benefit issuance list. Upload copies into MyIdahoCNP Review Attachments.
- One application (three students) was determined as denied based on an inaccurate household size. The students should have been receiving reduced-price meal benefits. Notify the family of the change to begin immediately or no later than three operating days. Update the benefit issuance list. Upload copies into MyIdahoCNP Review Attachments.

Timeframe for CAP completion: December 2, 2016

SFA Response to CAP: The Food Service Director completed corrective action while the SA was on-site, November 11, 2016. The SA uploaded copies of the notification letters.

Finding 2- Special Provision 2 Breakfast

- Provision 2 Breakfast base year information (daily meal counts by student name) was saved on a floppy disk and is inaccessible. It is a requirement that this data be available to document claiming percentages; therefore, standard meal counting and claiming must begin after December 31, 2016. The school district may elect to establish a new base year in SY 2017-18. Standard counting and claiming at breakfast must begin on January 1, 2017, and continue for the remainder of the school year. This includes charging all students for breakfast from January 1, 2017, through the end of the school year. All students will be counted (free, reduced, and paid) and claimed at their benefit status as is done for the lunch service. Notify the community of this change by publishing a public release in December 2016. You may wish to announce this change in a school newsletter as well and remind families of the option to submit income applications. Upload a copy of the public release into MyIdahoCNP Review Attachments.

Timeframe for CAP completion: December 2, 2016

SFA Response to CAP: A copy of the public release (to be published December 2016) was provided to the SA on the day of review; the SA uploaded the copy.

Finding 3- Buy American Provision

- Canned peaches from Greece and Saf yeast, cucumbers, and tomatoes from Mexico were in storage for student meal use. Food items available in the United States must be purchased and used whenever possible when participating in USDA school meal programs per the Buy American Provision.

Timeframe for CAP completion: December 2, 2016

SFA Response to CAP: The SFA is a member of a cooperative buying group that has Buy American specifications in the bid documents. On November 18, 2016, the Food Service Director notified the SA that products will be checked upon receipt and not accepted if the products do not comply with the Buy American Provision.

Commendations

- Free and Reduced Applications were well organized and easily reviewed. Not only was documentation clearly marked but each application was time stamped and reviewed by the Confirming Official per the Second Review of Applications requirement. A significant amount of time is spent by the Food Service Director learning the new software to facilitate benefit issuance.
- The cafeteria was clean and bright, creating a very inviting environment.
- During the on-site review, the Food Service Director responded to SA requests promptly, making many changes while the SA was on-site.
- The meal was well liked by the students as evidenced by the salad bar being empty by the end of the meal.

Technical Assistance (TA)

Certification and Benefit Issuance

- Annual income should only be accepted in limited situations. If the household provided only annual income, the LEA must ensure that the amount is an accurate reflection of the household's current income. The FS Director contacted the families for more information while the SA was on-site.
- All student names (i.e., a current enrollment list) should be run through Direct Certification every week at the beginning of the school year, so that all the new students as well as any new matches that may be available are identified.

Meal Components and Quantities

Kerry McKaig, RDN, State agency contractor, provided technical assistance to Eva Niederer, FS Director on the following topics:

- Ensure production records and back up documentation are accurate and are in alignment with production records and daily & weekly menu contribution reports. Record the serving time and temperature to ensure food is served at the appropriate temperatures and dated correctly. Reviewer observed that these temperatures were not being recorded. Most of the information is recorded on a note pad by the kitchen manager then transferred to the production record after the meal.
- Update daily/weekly menu contribution reports (crediting for grain and meat/meat alternate oz eq and whole grain oz eq). Check the accuracy of the portions and component equivalents if the recipe is changed or the food supplier changes a product. Discrepancies were noted on the whole grain roll, whole grain bun, and on the dark green vegetable subgroup for several salads.
- The SD is not using NutriKids software this school year but is still using their older version for production records and recipes. The high school serves grades 7-12. The

software was using the grades 6-8 meal pattern for the 9-12 menus and showing average calories of 700 for the lunch meals instead of 750-850.

- The reviewer completed USDA breakfast and lunch certification tools for grades 6-8 and 9-12:
 - The 6-8 lunch salad line did not meet the minimum weekly grain requirement of 8 oz eq. Provided technical assistance to add a whole grain roll (1.25 oz eq) on Wednesday.
 - The 9-12 lunch salad line did not meet the minimum daily grain requirement of 2 oz eq on 10/25, 10/26, 10/27, and 10/28/2016. Technical assistance was provided to add a roll, breadsticks, or a cookie.
 - The 9-12 lunch hot entree line did not meet the minimum daily grain requirement of 2 oz eq on 10/25 and 10/27. Technical assistance was provided to add a roll with the chicken fried beef menu and to increase the ½ cup portion to 1 cup of chicken rice pilaf.
 - The 9-12 lunch hot entree line and the 9-12 lunch sandwich line did not meet the minimum for the red/orange vegetable subgroup for the week. Technical assistance was provided to adjust the veggie bar recipe to offer ¼ cup red/orange vegetables by increasing the carrots or adding cherry tomatoes to the bar.

Food Safety

Kerry McKaig, RDN, State agency contractor, provided technical assistance to Eva Niederer, FS Director on the following topics:

- Observed staff not wearing any type of hair restraint during food preparation and serving. FS director indicated that the local health department doesn't require them.
- Please instruct employees to wash hands between glove changes when changing tasks.
- Observed food cases being stored on the floor of the storeroom and the walk-in freezer. Please relocate to the shelves.
- The most recent food safety inspection report must be posted in a location visible to the public per 7 CFR 210.13(b). This issue was noted during the last administrative review as well. The report was moved to a publicly visible location while the SA was on site.

Civil Rights

- To prevent overt identification, the Food Service Director plans on using a screen filter to mask account information.

Local School Wellness Policy

- The district wellness policy is dated June 2015 (adoption & reviewed). 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 SDE Child Nutrition Programs School Wellness website:
<http://www.sde.idaho.gov/cnp/hne/wellness.html>

Smart Snacks

- Schools must meet the minimum requirement in 7 CFR 210.11, for all foods and beverages sold in school (also known as Smart Snacks) to increase consumption of healthful foods during the school day and support a healthy school environment. Vending and school stores (fundraising) need to comply with specific nutrition standards. The vending service for the school district has a few products in compliance, but the majority of the products are not Smart Snacks compliant.
- 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. The SA provided a copy of "A Guide to Smart Snacks in Schools". Additional Smart Snacks information and resources, including a sample site tracking form, can be found at <http://www.sde.idaho.gov/cnp/sch-mp/snacks.html>.

Resource Management

- The Food Service Director states the only non-program foods are a la carte milk, adult meals and adult a la carte salads. The FS Director plans to limit non-program foods to a la carte milk and adult meals, reducing the paperwork needed for the non-program food revenue tool.

- The Business Manager states there is an accounting plan in place to document adult meal sales as well as adult meal sales for helpers whose meals are paid for out of general funds.

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,



Tamara Donovan, RD, LD, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Eva Niederer, Food Service Director, Ririe School District

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