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May 9, 2017

Jim Doramus  
Salmon River School District  
117 Ace's Place  
Box 872  
Riggins, ID 83549

Dear Mr. Doramus,

On April 5, 2017, State Department of Education (SDE) Coordinators TJ Goodsell and Tamara Donovan conducted an Administrative Review of Salmon River School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) Provision 2 breakfast base year 2005-2006
- Fresh Fruit and Vegetable Program at Riggins Elementary School
- Afterschool Snack Program
- USDA Foods

Salmon River High School was the site reviewed.

The State agency (SA) would like to commend Linda Kern and the entire staff of the Salmon River 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**

One application (three students) selected for verification had an income calculation error. The students should have been changed from free to reduced meal benefits. Send a letter notifying the family of the change and update the benefit issuance list after ten day time period.

**Timeframe for CAP completion:** April 24, 2017

**SFA Response to CAP:** While the SA was on-site, the Food Service Director produced the notification letter and sent to the affected family. On May 8, 2017 SFA provided an updated benefit issuance list to confirm the students' change in status was completed.

### **Finding 2- Special Provision Options**

Provision 2 Breakfast base year information (daily meal counts by student name) was not retained for base year 2005-2006. It is a requirement that this data be available to document/support claiming percentages. Please continue to search for the daily meal counts by student name. If those records cannot be located, the sponsor may elect to establish a new base year in SY 2017-18. During the establishment of a base year, all students are may eat breakfast at no charge. Communicate with the SA regarding how you would like to proceed.

**Timeframe for CAP completion:** April 24, 2017

**SFA Response to CAP:** On April 14, 2017, the Food Service Director provided an email which was uploaded into MyIdahoCNP, confirming the district's decision to establish a new Provision 2 Breakfast 2017- 2018 base year district wide.

### **Finding 3- Food Safety**

Each SFA is required to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories, as applicable (7 CFR 210.21 (d)). (Granulated garlic from China, juice from USA/Argentina/China, melon and tomatoes and sugar snap peas from Mexico.) If a product from another country is sourced, then the food service must have proof that the domestic product is significantly higher in price or not available in sufficient quantities. Ensure that the bid-specific documents contain the Buy American Provision for the upcoming school year. Include the Buy American Provision in SFA solicitation documents for the purchase of commercial foods. Products must be checked upon receipt and not accepted if the products do not comply with the Buy American Provision, unless there is documentation to justify the exception (exorbitant pricing or product shortages). Provide a written plan to the State agency for including this requirement and upload the document into MyIdahoCNP compliance module.

**Timeframe for CAP completion:** April 24, 2017

**SFA Response to CAP:** On April 20, 2017, the Food Service Director uploaded a copy of the revised school district procurement policy, which included the Buy American Provision into MyIdahoCNP.

#### **Finding 4- Afterschool Snack Program**

Schools may claim reimbursement for one full snack, per child, per day. Only a full snack (one serving from two different components) qualifies as reimbursable. Provide State agency with a copy of the FS-4 Daily Meal Count Record for the month of March to ensure that the counting and claiming compilation error is corrected, and submit a revised claim.

**Timeframe for CAP completion:** April 24, 2017 **Extension:** May 11, 2017

**SFA Response to CAP:** On April 12, 2017, the Food Service Director (FSD) uploaded Afterschool Snack Program production records and counts for March. Upon review of those records, a minor calculation error was discovered that would disallow six snacks for the month. State agency allowed a CAP completion extension and requested April snack documentation to ensure error was not systemic and to have FSD provide written plan for avoiding error in the future. On May 8, 2017, April records were provided and written plan was implemented; no errors in claim consolidation were discovered.

## Commendations

- The Food Service Director, Linda Kern, does a great job with all of the duties and responsibilities associated with managing the Child Nutrition Programs. Her attention to detail and willingness to have all the documentation required to complete the administrative review process readily available allowed the State agency ample time for a thorough review process.
- Students at the High School were extremely polite and it is very apparent that the Kitchen Manager and lunch staff have a good rapport with the children. Students are known by name and seemed to appreciate the personal attention they received.
- The atmosphere in the cafeteria was very calm and the level of waste from the meal was noticeably minimal, indicating students genuinely enjoyed the foods served.
- Every effort was taken by employees to follow strict hygiene and food safety best practices including hair restraints.
- The dry goods storage room at SRHS was clean and neat. The Kitchen Manager is trying to put the regulations into action, asking good questions and showing interest in following the many meal requirements.

## Technical Assistance (TA)

### **Certification and Benefit Issuance**

- Per the Eligibility Manual, when determining Free and Reduced Applications, income should not be converted unless various income frequencies are reported. Please make use of the Income Eligibility Guidelines chart.
- Only have one Determining Official to ensure a consistent, accurate procedure and to track that civil rights training occurs annually for the Determining Official.

- Make sure to send the Eligibility Determination Notification Letter found in MyIdahoCNP download forms to all families (whether free, reduced or denied on an application) so there is written documentation that provides the information for the opportunity to appeal the determination. Verbal notification has been the process for the majority of applications, but this process should include written as well.
- If the household provided only annual income on an application, the LEA must ensure that the amount is an accurate reflection of the household's current income and that it qualifies under the Special Situations portion of the Eligibility Manual. The determining official may need to contact the household for further clarification of the information provided on the application. Remember to make notes on applications to document follow up (date, who spoke with, information collected, and initials).

### **Local School Wellness Policy**

- On July 29, 2016, the USDA Food and Nutrition Service finalized regulations to create a framework and guidelines for written wellness policies established by LEAs. (§210.30) The final rule requires LEAs to comply fully 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 foods and beverages available during classroom and school celebrations (not sold in the school).
  - 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](#).

## **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; any vending, school stores, and fundraising need to comply with specific nutrition standards (including standards per grade). The vending machines at SRHS offer some products that are not Smart Snacks compliant. The SA provided a copy of "A Guide to Smart Snacks in Schools" to the SRHS secretary and reviewed the SDE website. 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>.
- Per current Idaho policy, ten exempted food sales of no more than four days in length may be approved by school site administrator. Exempt food sales beyond those ten must be approved by the State Department of Education.

## **Verification**

- Keep copies of the original letter and any follow-up letters sent to families in the verification file along with a copy of the application and other verification documents.
- Ensure verification is completed and submitted by November 15 each school year (was received by the SA January 10, 2017).
- Please use the "Official Use Only" section on the free and reduced income application to document the confirmation and the verification review (date and signature of the confirmation official and the verifying official).
- When performing Verification of Free and Reduced Applications, the Confirming Official cannot be the same person as the Determining Official (the person who approves the application). There must be another person checking the application prior to sending out the letter for Verification. Verification must be in line with requirements outlined in 7 CFR 245.6a. The Hearing Official must remain independent as well.

## **Fresh Fruit and Vegetable Program**

- Production records for FFVP should be completed for daily service preparation. The records will support food costs associated with the program.

## **Civil Rights**

- Please post the current "And Justice for All" poster at the breakfast grab-and-go service site at SRHS. FNS Instruction 113-1 requires that participating schools prominently display the USDA nondiscrimination poster "And Justice for All". All posters must be 11" x 17". The poster must be placed in a location that enables program participants to read the text of the poster without obstruction.

## **Food Safety**

- The Idaho Department of Health & Welfare updated the Food Code to come in line with the current FDA Food Code. This includes a new requirement that all food safety plans must include a procedure for cleaning up bodily fluids. Please place the procedure in the SRHS site food safety manual.
- The most recent food safety inspection report must be posted in a location visible to the public. (7 CFR 210.13(b))

### **Afterschool Snack**

- Have the "And Justice For All" poster mounted in the computer lab since Child Nutrition Program food is served in that location.

### **Meal Components and Quantities Lunch**

- May want to consider reconfiguring the lunch serving line so that the salad bar is available first to encourage fresh fruit and vegetable selection, more easily ensure a reimbursable meal, and to decrease cooked vegetable food waste.
- The roll served on 2/6/17 was not whole grain; however, croutons served on the salad bar that day were. The salad bar is an option for all students and the croutons were whole grain rich. The Food Service Director will ensure a whole grain roll is offered.
- As a reminder, to ensure you are meeting meal plan requirements, complete the production record portion size sections based on the unit size noted in the meal pattern, as a general rule. For example, in column 12, record the planned portion size in weight (ounce) units for meat/meat alternates since the meal pattern lists weight (ounce) equivalents required – but record the planned portion size for vegetables in volume (cup) units since the meal pattern lists volume (cups/tablespoons) required.
- While on-site with kitchen manager, the SA reviewed the whole grain resource, Exhibit A, vegetable subgroups, the Food Buying Guide, the Idaho School Nutrition Reference Guide, production records, calculating serving sizes for age/grade groups, the SA website, and the meal pattern - including the age 3-5 CACFP meal pattern old and new.
- Regarding 2/8/17, the orange chicken portion size must be based on weight (ounces measured on a scale). To be compliant: Pre-K (ages 3-5 years) must receive at least 2.7 ounces of product (meal pattern requires 1.5 oz eq / day minimum) K-8 must receive at least 1.8 ounces of product (meal pattern requires 1 oz eq / day minimum) 9-12 must receive at least 3.6 ounces of product (meal pattern requires 2 oz eq / day minimum) Regarding 2/9/17, the pulled pork portion size must be based on weight (ounces measured on a scale). To be compliant: Pre-K (ages 3-5 years) must receive at least 2.81 ounces of product (meal pattern requires 1.5 oz eq / day minimum) K-8 must receive at least 1.88 ounces of product (meal pattern requires 1 oz eq / day minimum) 9-12 must receive at least 3.75 ounces of product (meal pattern requires 2 oz eq / day minimum) Correct production records moving forward. Do not go back and change earlier production records for meals already served. Upload corrected production records that you will use in the future showing serving amounts in ounces for each age-grade group and how the meal pattern is met in ounce equivalents (oz eq). Check to be sure you are meeting the weekly minimums as well for m/ma. For a 4-day week, those amounts are: Grade Amount K-5 6.5 oz eq m/ma per week 6-8 7 oz eq m/ma per week 9-12 8 oz eq m/ma per week.

### **Meal Components and Quantities Breakfast**

- On all daily production records, fruit equivalents (15a column on the production record) should be listed as .5 for the fruit items since the portion is, for example, ½ cup of applesauce and ½ cup of frozen strawberries. Changes made to production records moving forward. Fruit portion size was also corrected to reflect cups instead of ounces. Also, remember that the breakfast meal pattern is 1 cup of fruit available, but students

need only select ½ cup fruit for a reimbursable meal. SA confirmed that students are allowed to select 1 cup of fruit at breakfast.

## Your review is now closed.

At this time there will be no fiscal action. 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,



TJ Goodsell, BS, SNS  
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs  
Linda Kern, Food Service Director, Salmon River School District

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