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April 11, 2017

Jonathan Braack
Shoshone-Bannock Junior Senior High School
17400 Hiline Road
Pocatello, ID 83202

Dear Mr. Braack,

On March 27, 2017, State Department of Education (SDE) Coordinators Tamara Donovan and Lynda Westphal conducted an Administrative Review of Shoshone-Bannock Junior Senior High School for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Operating the Free Community Eligibility Provision (CEP) Breakfast and Lunch option, base year 2014-15
- USDA Foods

The State agency (SA) would like to commend Rebecca Racehorse and the entire staff of the Shoshone-Bannock Junior Senior High School 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- Civil Rights

School Foodservice Authority staff who interact with program applicants or participants and their supervisors as well as the Hearing Official must have annual civil rights training. Hank Edmo McArthur is listed as the Hearing Official so must have USDA civil rights training. A new employee joined the food service staff, so needs civil rights training as well. Training is available at [SA Civil Rights website](#). Provide documentation that the Hearing Official and new food service employee received civil rights training

Timeframe for CAP completion: April 10, 2017

SFA Response to CAP: The Hearing Official and the new employee completed training the day of the SA on-site visit.

Commendations

- The storerooms were neat, clean, and well organized.
- Food service staff practiced good food safety procedures: wearing gloves and changing them between tasks, wearing hairnets, and properly portioning fruits using scoops.
- The custodian was personable, relating the history of the area and helping the reviewers set up a work table. It is evident that he enjoys his job.
- The Food Service Director and the school administration were receptive to the reviewers' input, completing many tasks while the SA was on site.
- Shoshone-Bannock employees were all accommodating and friendly, making for a productive and pleasant review day.

Technical Assistance (TA)

Special Provision Option

- CEP (Community Eligibility Provision) allows local educational agencies (LEAs) in high-poverty areas to offer free school breakfast and lunch to all students for up to a four year cycle once percentages are validated. In order to qualify for CEP, schools must have an identified student percentage (ISP) of 40% or higher. The ISP is calculated by dividing the number of directly certified (DC) students in a school by the school's total student enrollment. The ISP does not include information from income applications, and schools electing CEP must not collect free and reduced price applications. To be eligible for CEP, schools must operate the school breakfast and lunch programs, must serve these meals at no charge to the student, and must have a record of administering the meal programs in accordance with program regulations. Reimbursement at the free rate is based on the ISP multiplied by 1.6, with the remaining percentage reimbursed at the paid rate. Nonfederal funds pay the difference. To operate CEP, the sponsor must collect and retain April 1 data each year (SY 2016-17, April 3 data):
 - Enrollment list for the school site containing: Student first and last names
 - Identified Student Population list containing students that were: Directly Certified (DC) through the State DC Match list for SNAP (Supplemental Nutrition Assistance Program Food Stamps) or TAFI (Temporary Assistance for Families in Idaho); DC siblings - must be documented on the DC list from the State (hand written) to indicate the names of the corresponding siblings; FDPIR (Food

Distribution Program on Indian Reservations), Homeless, Migrant, Runaway, and Foster students - must be identified/certified through documentation by the appropriate liaison (signed list or an email with list attached) or court documentation.

- Note: Homeless, Migrant, Runaway, and Foster students do not extend free meal benefits to siblings.

Civil Rights

- Keep a civil rights file up-to-date with all required information and place in a location known to food service staff. The civil rights procedure, log, complaint forms, and training materials are available on the [SA Civil Rights website](#). While the SA was on-site, the required documents were printed and organized.
- 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 for three years plus the current year.
- Please post the current "And Justice for All" poster per FNS Instruction 113-1. The poster must be placed in a location that enables program participants to read the text of the poster without obstruction. Five posters were mailed from the SA on March 27, 2016. When received, replace posters with the new ones.

Meal Components and Quantities

- The one week menu review showed that the red-orange vegetable sub-group was slightly low. The Kansas Cycle Menu used credits in percentage increments (such as .3), which is non-compliant with meal pattern requirements; vegetables can only be credited in 1/8 cup (.125) increments. TA provided on how to properly credit vegetables.
- In the storeroom were two non-compliant food items: SAF yeast from Mexico and vegetable shortening which contained trans fat. 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. The vegetable shortening was not being used, so it was discarded.

Offer versus Serve

- Ensure all applicable staff is trained on Offer vs Serve. Staff training should include an agenda and sign-in sheet and training documentation should be maintained on file at the SFA for three years plus the current year.

Professional Standards

- The United States Department of Agriculture has established minimum Professional Standards for school nutrition professionals who manage and operate the National School Lunch and School Breakfast Programs, effective July 1, 2015. The standards provide annual training requirements for all school nutrition professionals. It is required that some form of documentation be kept on file to show Professional Standards compliance; options include the FNS online tracking tool at [USDA Tracking Tool](#) and two Professional Standards tracking resources available in MyIdahoCNP under Download Forms in the Professional Standards section. The Food Service Director printed a copy of the SA tracking template; she will begin to document food service staff training. The SA provided a training agenda/sign in sheet template.

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. A HACCP Bodily Fluid Cleanup sample is located in MyIdahoCNP in the Download Forms section under the Food Safety heading. Check with the BIA health inspector for local regulation requirements.

Smart Snacks

- A vending machine in the cafeteria contained very low calorie beverages that were Smart Snacks compliant for the high school students. Middle school students also had access, and these products are non-compliant for this age grade group. Discussed turning the vending machine off to prevent middle school access. A copy of "A Guide to Smart Snacks in Schools" was provided. Smart Snacks information is available at the [Smart Snacks website](#).

School Breakfast Outreach

- SFAs must inform eligible families of the availability of reimbursable breakfasts served under the School Breakfast Program (SBP). At the beginning of the school year and during the year, schools must send reminders regarding the availability of the SBP. This may be accomplished with a newsletter, website or media posting, bulletin board in the school, etc. (7 CFR 210.12 (d))

Reporting and Recordkeeping

- Food service records must be maintained for three years plus the current year to document compliance with program regulations and the service of reimbursable meals.

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,



Tamara Donovan, RD, LD, SNS
NSLP Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Rebecca Racehorse, Food Service Director, Shoshone-Bannock Jr. Sr. High School

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