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April 14, 2017

Dr. Molly Stein, EdD
Soda Springs School District
60 East 4th South Street
Soda Springs, ID 83276

Dear Dr. Stein,

On March 30, 2017, State Department of Education (SDE) Coordinators Tamara Donovan and Lynda Westphal conducted an Administrative Review of Soda Springs 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 2003-04 operating at each school site
- USDA Foods

The site reviewed was Thirkill Elementary School.

The State agency (SA) would like to commend Valee Wells and the entire staff of the Soda Springs 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- Provision 2 Base Year

In validating the Provision 2 base year of 2003-04, complete Provision 2 Breakfast base year information was not located / retained. It is a requirement that this data be available to document/support claiming percentages. (7 CFR 245.9(g)) The documents missing from the base year box are: Verification file, public release, denied applications (two have been located in the pile). If all documents are found, please upload them into MyIdahoCNP; if all documents are not found, please notify the SA via e-mail. If base year documents cannot be located, the district may elect to establish a new Provision 2 base year in 2017-18 or will need to return to standard counting and claiming.

Timeframe for CAP completion: April 14, 2017

Sponsor Response to CAP: On April 13, 2017, a e-mail was sent stating that the records could not be found and a new base year would be started in 2017-18.

Finding 2 – Certification and Benefit Issuance

Eight households (12 students) required follow up to ensure meal benefit status was accurate.

Due Date for CAP Completion: April 14, 2017

Sponsor Response to CAP: Letters sent to families with the change date of April 14, 2017 were uploaded into the system on April 5, 2017.

Based on an administrative error of 7.06% associated with certification and benefit issuance and the fact that the SFA will be conducting a new base year in 2017-18, the SFA will be required to conduct a second review of applications for school year 2017-18. A second review of applications requires a re-evaluation by the Confirming Official of the eligibility determination made by the Determining Official, based on the information provided by the household on the application, as well as the completion of the Second Review of Applications report in MyIdahoCNP. Please reference the Independent Review of Applications section in the Eligibility Manual.

Finding 3 – Nonprogram Food Revenue

Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure that all revenue from the sale of non-program foods accrues to the non-profit school food service account; and that revenue available to support the production of reimbursable school meals does not subsidize the sale of non-program foods. SP 20-2016 Nonprofit School Food Service Account Non-program Food Revenue Requirements memorandum provides guidance on the revenue requirements including options for assessing compliance to fulfill the requirements in section 206 of the Healthy, Hunger-Free Kids Act of 2010.

Due Date for CAP Completion: April 14, 2017

Sponsor Response to CAP: A completed Nonprogram Food Revenue tool was uploaded into MyIdahoCNP on April 11, 2017

Commendations

- Food products are dated and well organized at Thirkill Elementary School. The staff takes pride in keeping the kitchen facilities clean and in order.
- A great variety of fruit and vegetables were available to the students at Thirkill Elementary School at lunch.

Technical Assistance (TA)

Verification

- Please utilize the verification letter templates found in MyIdahoCNP Download Forms.
- Keep a separate file with copies of all verification letters, applications, and information supplied by families along with results of verification. Keep for 3 years plus the current.
- Ensure verification is completed and submitted by November 15 each school year (was received by the SA January 10, 2017).

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.
- Please use the "Official Use Only" section on the free and reduced income application to document the determination review (date and signature of the determining official).
- One application was on a 2015-16 school year application. Ensure usage of current applications. Suggestion is having a different color paper for each year.
- 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 notes on applications to document follow up (date, name of person contacted, information collected, and official's initials) in the event of an unclear or incomplete application.
- The State agency recommends that all Free and Reduced Applications be date stamped upon receipt to allow students to receive benefits as of the date of receipt as opposed to the date of determination (SP11-2014). Additionally, the date stamp will document that eligibility was determined within the ten operating day window.
- Please utilize the benefit issuance notification and denial letter templates found in MyIdahoCNP Download Forms to ensure appeal information is available and to allow ten calendar days of notice if benefits decrease.

Meal Components and Quantities

- The elementary is operating offer versus serve which is designed to help reduce food waste. May want to consider serving a smaller portion of broccoli for students to taste if a reimbursable meal has already been selected (for example, if a fruit has already been chosen).

Offer versus Serve

- All staff must be trained annually on Offer vs Serve (OVS). 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. OVS online training is available on the State agency website and may be used for training. The Food Service Director received this training during annual training, but needs to train the staff and document with an agenda and sign-in sheet.

Recordkeeping

- If operating Provision 2 Breakfast, please use the applicable public release template available in MyIdahoCNP Download Forms.

Food Safety and Buy American Provision

- 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)). Cucumbers 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. 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).

- The most recent food safety inspection report must be posted in a location visible to the public. (7 CFR 210.13(b)).
- 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.

Meal Components and Quantities

- Starting October 1, 2017, a new meal pattern is required for Pre-K students. It is suggested that the new meal pattern is started at the beginning of the school year. Begin planning menus now, as some nutrition requirements for food items differ from the current Pre-K meal patterns.

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](#).

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 and two Professional Standards tracking resources available in MyIdahoCNP under Download Forms in the Professional Standards section.

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, the SFA must provide all households informational packets with Free and Reduced Meal Applications. In addition, schools must provide reminders regarding the availability of the SBP multiple times throughout the school year. (7 CFR 210.12 (d)).

Your review is now closed.

Fiscal action resulting in errors in benefit issuance in the amount of \$331.46 is below the threshold of \$600.00 and will be disregarded. Should you wish to appeal any of 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,



Lynda Westphal, MHS, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Valee Wells, Food Service Director, Soda Springs School District

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