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PUBLIC INSTRUCTION

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December 16, 2016

Alan Dunn, Superintendent
Sugar Salem School District
25 North Cutler Ave
Sugar City, ID 83448

Dear Mr. Dunn,

On November 10, 2016, State Department of Education (SDE) Coordinators Lynda Westphal and Tamara Donovan conducted an Administrative Review of Sugar Salem 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

Sugar Salem High School (NSLP and SBP) and Sugar Salem Jr. High School (ASSP) were the school sites reviewed.

The State agency (SA) would like to commend Evelyn Coolidge and the entire staff of the Sugar Salem 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- Application and Benefit Issuance

Two applications were found to be in error requiring letters for reduction in benefits to be sent to families, and one student who was determined correctly was in the incorrect category (free instead of reduced). Please upload the one letter sent to the parents explaining their reduction in benefits.

Timeframe for CAP completion: December 1, 2016

SFA Response to CAP: Letter sent to parents was uploaded on November 14, 2016, with correction date of November 24, 2016.

Finding 2- Production Records

Production records must indicate how the food items on the menu are meeting the USDA meal pattern for the age/grade group being served to document compliance (7 CFR 210.10). Upload one week's worth of completed production records for breakfast and lunch for Sugar Salem High School in MyIdahoCNP Review Attachments for SA review; timeframe: 11/14 - 11/18/16. Please upload/e-mail daily.

Timeframe for CAP completion: December 1, 2016

SFA Response to CAP: Production records were uploaded daily November 14-17th, indicating that the changes have been made.

Commendations

- Evelyn was very organized with the free and reduced applications and the direct certification lists. This organization allowed the SA personnel to review all of the 368 applications in a short time frame. Evelyn also went over to her office several times to get follow up information on the applications to be corrected.
- Stored food items were appropriately labeled and covered at Sugar Salem High School.
- The food service employees at Sugar Salem High School were energetic, positive, and had nice rapport with the students making for a cheerful way to start the day.

Technical Assistance (TA)

Verification

- Reminder to perform Direct Certification on student names selected for Verification.
- When performing Verification of Free and Reduced Applications, the Confirming Official must check the application prior to sending out the Verification notification letter

to the household. Verification must be in line with requirements outlined in 7 CFR 245.6 (a).

Dietary Specifications and Nutrient Analysis

- On 10/13/16 Line 2, the turkey and cheese sandwich on a whole grain bun was crediting as 2.5 M/MA but the recipe shows 2 slices of cheese per sandwich, which credits for a total of 3 M/MA per sandwich. Evelyn will upload the corrected weekly certification worksheet (Already uploaded)

SFA On Site Monitoring

- Sugar Salem HS POS monitoring report for SY 2015-16 was not available. POS reports for the other three sites were available and monitoring was performed prior to February 1. Food Service Director will attempt to locate the missing high school report. All sites and meals POS monitoring reports are not yet completed for SY 2016-17 (the high school has been completed this year).

Local School Wellness Policy

- The Local School Wellness Policy must include all required elements as listed in the HHFKA of 2010, must be made available to the public, and is required to be reviewed and updated on a periodic basis. Parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public must be permitted to contribute to the development, implementation, periodic review, and update of the Local School Wellness Policy.

Smart Snacks

- Vending machines contain items that are not Smart Snacks compliant at the High School and fundraisers are not being tracked per the Principal. As per 7CFR210.11(b)(2), the school district should have knowledge of and keep a written record of food sales that occur within the school day outside of food service. The SA discussed Smart Snacks and Wellness Policy with the principal and 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>.

Special Provision Options

- Reminder that this is your base year for Provision 2. Please keep all of your documentation in a file for as long as you are on the program.

Resource Management Comprehensive Review

- All foods purchased by the Food Service department must be marked up to include the labor, storage and delivery of the products. Food Service cannot order for another district department without marking up an average of 38%. Would recommend due to the added paperwork burden of the Non-Program Food Revenue tool, that this practice be evaluated. If it continues a system of tracking non-program foods expenses and revenues must be developed to be tracked through the accounting department.

Your review is now closed.

The fiscal action amount of \$39.34 is below the \$600 threshold and will be disregarded. 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,



Lynda Westphal, MHS, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Evelyn Coolidge, Food Service Director, Sugar Salem School District

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