



**SHERRI YBARRA**  
SUPERINTENDENT OF  
PUBLIC INSTRUCTION

650 W. STATE STREET  
P.O. BOX 83720  
BOISE, IDAHO 83720-0027

OFFICE: 208-332-6800  
FAX: 208-334-2228  
SPEECH/HEARING  
IMPAIRED: 1-800-377-3529

May 25, 2017/June 7, 2017

CERTIFIED MAIL: 7013 1710 0000 9755 8934

Mr. Monte Woolstenhulme, Ed.S.  
Teton School District  
445 N Main Street  
Driggs, ID 83422

Dear Mr. Woolstenhulme,

On April 19, 2017, State Department of Education (SDE) Coordinators Teresa Goodsell and Lynda Westphal conducted an Administrative Review of Teton School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- USDA Foods

The sites reviewed were Teton Middle School and Rendezvous Upper Elementary School.

The State agency (SA) would like to commend Kathy Rowbury and the entire staff of the Teton 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:

## Findings and Corrective Action Plan (CAP)

### **Finding 1 - Free and Reduced Price Claiming**

A systemic error was discovered in the breakfast meal counts; there were inaccuracies in the January, February, and March (2017) monthly claims. The Food Service Director was able to determine that the software program that was recently implemented had been set up to make percentage adjustments based on last year's Provision 2 claiming percentages. The Food Service director was able to update the software to immediately correct the programming error.

**Timeframe for CAP completion:** May 5, 2017

**Sponsor Response to CAP:** The Food Service Director adjusted the claims for January through March on April 19, 2017, in the amount of \$3,760.26.

### **Finding 2 – 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. This was not completed prior to the review.

**Due Date for CAP Completion:** May 5, 2017

**Sponsor Response to CAP:** A Nonprogram Food Revenue Tool was uploaded on April, 27, 2017, with backup documentation to show the district is in compliance with this regulation.

### **Finding 3 – Free and Reduced Letters**

The long non-discrimination statement currently provided on the application Approval/Denial letter generated to families who submitted applications is the old USDA statement. Please update your non-discrimination statement to the correct USDA non-discrimination statement available on the [State Agency](#) website.

**Due Date for CAP Completion:** May 5, 2017

**Sponsor Response to CAP:** The corrected letters were uploaded on April, 27, 2017, showing the correct non-discrimination statement.

### **Finding 4 – Meal Access**

Breakfast menu is provided to students at the beginning of the meal service line; however the printed components available does not indicate what constitutes a reimbursable meal per Regulation 7 CFF 220.8 or 7 CFR 220.3. Students must be advised that a fruit must be chosen along with 2 other items for the meal to be reimbursable. Please provide a written plan for updating the current menu posting process to include this requirement.

**Due Date for CAP Completion:** May 5, 2017

**Sponsor Response to CAP:** The description uploaded April, 27, 2017, stating that the breakfast poster has been posted and the kitchen manager assures that she will complete it on a daily basis.

### **Finding 5 – Free and Reduced Applications**

Using a statistical sample, it was discovered that a few income applications needed to be corrected which resulted in a 1.17% error rate. Because this is a Provision 2 base year, it is required that the State agency adjust the entire district's site claims from August – March to reflect the correct claiming percentages districtwide.

**Due Date for CAP Completion:** May 5, 2017

**Sponsor Response to CAP:** All applications have been corrected as of date of review. Because this is your Provision 2 base year, the adjustment from August through March totals \$139.69 in withholding which cannot be disregarded.

## **Commendations**

- The Food Service Director, Kathy Rowbury, was very organized for the review. She provided detailed folders laid out with all the varied administrative review documents readily available for the State agency.
- Kathy has a wonderful Special Needs Diet procedure to be followed by all kitchens. This will be showcased as a model policy on webinars and in training. We appreciate this attention to detail.
- Kathy had everything uploaded ahead of time except for a few labels which she was able to provide immediately. Wish everyone was like her!
- Thank you to the kitchen manager at Teton Middle School for taking the initiative to provide a blended meal for a child with broken jaw. This accommodation is appreciated by the state and hopefully, the child as well.
- The Kitchen Manager at Teton Middle School is very organized - the kitchen is extremely clean and professionally handled. The HACCP plan was personalized to be site specific and included a progressive plan for implementation of the newly required bodily fluids training and cleanup kit.
- The option for students to choose fresh fruit that can be sliced by them daily is a great way to encourage consumption of fresh produce at breakfast. Nice job!
- The kitchen staff at Rendezvous Elementary School was very efficient and cognizant of food safety for them and their volunteers. They were also operating in a small space that needs some extra fans to keep them from overheating.

## **Technical Assistance (TA)**

### **Meal Counting and Claiming**

- Please have the people checking in the children not announce that they owe money. With your system of notifying parents weekly about balances, do not notify children how much they owe in the line. This should be handled with the parent.

### **Free and Reduced approval**

- Watch the on-line applications for "Baby" as a name. You may need to follow up with families (however it made no difference in determination for a family of 5 or 6). Also watch for social security number (SSN) or indication of no SSN on paper applications.

### **Dietary Specifications and Nutrient Analysis**

- Kerry McKaig, RD, LD, contractor, reviewed the NutriKids K-8 Breakfast and Lunch Certification tools for grades 6-8. The contractor compared the recipes, CN labels and manufacturer formulation statements for the review week. All minimum daily and weekly requirements were met. Mrs. Rowbury updated all week of review recipes with grains to show that they are whole grain rich in the software program.

### **Meal Components and Quantities**

- Technical assistance was given to TMS kitchen manager to remind student servers to level serving spoon for fruits and vegetables to ensure each student is served a full half cup portion. The manager does a great job completing the TMS production records, however she needs to sign or initial them.
- There was a lot of observed waste at Rendezvous Upper Elementary School of peaches and carrots. Would suggest training the students and staff that they do not have to take everything, just a fruit OR vegetable - or 1/4 cup of each. This would cut down on the waste, thereby saving money in food cost.

### **Offer versus Serve**

- Four students left the meal service line without the required fruit component at breakfast. Kitchen staff was preoccupied with pulling out warm food and fixing the fruit slicer.

### **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)). (Peeled Baby Corn from Thailand was observed in the storeroom) 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)).
- Best practice is to label all food items with product name for identification, especially in regards to a food recall. State agency reviewer suggests getting a date stamp that can be used on food delivery when received.

### **Procurement**

- Recommend including in RFP language that asks for country of origin for their products and if the product is sourced from outside of the USA, then the responder must include prices of American products, or that the product is not produced in the USA. Please refer to Guidance Memo SP24-2016.

### **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 of the wellness policy conducted once every three years, 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.
- All LEAs must assess their wellness policy at least once every three years on the extent to which schools are in compliance with the district policy, the extent to which the local wellness policy compares to model local school wellness policies, and the progress made in attaining the goals of the local wellness policy. LEAs must make this assessment available to the public. Posting to the school /district website and/or in a school newsletter would support this requirement. Idaho SDE Child Nutrition Programs (CNP) has a progress report available for use located on the [School Wellness website](#).

### **Smart Snacks**

- 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. (7CFR 210 (b) (2)) More [Smart Snacks](#) information is available on the Idaho Child Nutrition website.
- Per the Wellness Policy survey a parent called out teachers selling candy out of classrooms at the High School. These must be counted as some or all of the non-compliant fundraisers. While the State agency does not have authority at this time to

withhold funds for noncompliance, in the future if it is a repeat finding the General Funds might be required to pay foodservice back for the assessed monetary withholding.

**Provision 2 Base Year**

- The school year 2016-17 is your Provision 2 base year. Please retain all documentation found on the Provision 2 checklist for this school year for as long as you are on the program.

**Your review is now closed.**

Fiscal action resulting from errors in benefit issuance in the amount of \$139.69 will be withheld from future claims. The claiming error which resulted in over claiming breakfast in the amount of \$3,760.26 has already been deducted from the January through March 2017 claims. 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  
Kathy Rowbury, Child Nutrition Director, Teton School District

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