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March 21, 2017

Spencer Barzee
West Side School District
775 N Westside Highway
Dayton, ID 83232

Dear Mr. Barzee,

On March 9, 2017, State Department of Education (SDE) Coordinators Tamara Donovan and TJ Goodsell conducted an Administrative Review of West Side School 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

Harold B. Lee Elementary School was the school site reviewed.

The State agency (SA) would like to commend Marcia Kendall and the entire staff of the West Side 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- *Certification and Benefit Issuance*

One free and reduced income application (one student) contained discrepancies with the number in the household documented and the actual number of names listed; household number is a determining factor in meal benefit income eligibility. Contact the household, correct/complete the application and determine if there is a change in benefit status.

Timeframe for CAP completion: March 23, 2017

SFA Response to CAP: While the SA was on-site, the Food Service Director contacted the family and confirmed the number in the household. There was no change in meal benefit status.

Finding 2- *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)). SAF yeast from Mexico was in dry storage. 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 area food service purchasing cooperative is going to meet in the coming weeks to discuss the upcoming school year bid procurement plan. Upload written notice of intent to include the Buy American Provision in the bid specs into MyIdahoCNP under Review Attachments.

Timeframe for CAP completion: March 23, 2017

SFA Response to CAP: The area coordinator for the co-op group has added the Buy American Provision clause to the meeting agenda; the agenda was uploaded into MyIdahoCNP under the Review Attachments section.

Finding 3- *Special Provision Options*

Provision 2 Breakfast base year information (daily meal counts by student name) was not retained. 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 records cannot be located, the sponsor may elect to establish a new base year. A new base year may be established in SY 2017-18. During the establishment of a breakfast base year, all students eat breakfast at no charge. Communicate with the SA regarding how the district would like to proceed.

Timeframe for CAP completion: March 23, 2017

SFA Response to CAP: On March 20, 2017, the Food Service Director, via email to the SA, requested to establish a new Provision 2 Breakfast base year in 2017-18 district-wide.

Commendations

- The Food Service Director was well prepared for the State agency on-site review. All necessary documentation was organized and ready for review and she was available to answer questions and provide clarification. The time and work put into preparing for the review allowed the reviewers to work efficiently. Marcia was receptive to input, highly productive, and she works diligently to better the program.
- The cafeteria aid who assists during lunch at the elementary school is a great asset to the food service staff. She is energetic, effective, and provides a valuable resource to students. One child was having a rough day and she took the time to sit by him, talk with him, and encourage him to try the fruits and vegetables on his tray. By the end of the lunch period, he had eaten all of his lunch.
- The storage room at Harold B. Lee Elementary School was organized and all food was labeled, which helps to keep food fresh and accessible.
- The food service staff at Harold B. Lee Elementary School does a great job. They were observed working well as a team, enjoying themselves, and modeling positive behavior for the students. They work efficiently to serve quality, reimbursable meals in a limited meal service time.
- Food service staff t-shirt motto "Caring enough to be a lunch lady...Crazy enough to love it!" is very representative of the nutrition team's approach to ensuring students are well served.

Technical Assistance (TA)

Certification and Benefit Issuance

- The State agency recommends that 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.

Verification

- After the verification process has been completed, be sure to save a copy of the final determination letter sent to families to document notification occurred.

Food Safety

- Whole grain rotini and elbow macaroni products were past the Best if Used by Date of August 2014.

Civil Rights

- Please update your non-discrimination statement to the current USDA non-discrimination statement available at the [SA Civil Rights website](#). The short non-discrimination statement reads, "This institution is an equal opportunity provider." The old statement was on the civil rights training agenda / sign in sheet.
- The SFA's procedure for receiving and processing Civil Rights complaints must ensure all complaints associated with Child Nutrition Programs are forwarded to the State agency within three working days. (CFR210.15(a)(6))

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). West Side's wellness policy was adopted June 21, 2006, revised April 17, 2012, and reviewed January 9, 2017. 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.
- Confirm Wellness Policy information regarding Foods and Beverages Sold in Schools to reflect new Smart Snacks regulations. The SA provided "A Guide to Smart Snacks in School."
- For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs [School Wellness website](#).
- Heather Blume, Coordinator of Nutrition Assessment and Promotion at the State Department of Education, is an excellent resource for guidance and questions related to the Wellness Policy: hblume@sde.idaho.gov, 208.332.6902.

Smart Snacks

- Please track all fundraisers, both exempted and compliant. Per state policy, a maximum of ten 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 ten must be pre-approved by the State agency using the Request form. (7CFR 210 (b)(2)) Details available at the Idaho Child Nutrition Programs [Smart Snacks](#) webpage.

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,

A handwritten signature in blue ink that reads "Tamara".

Tamara Donovan, RD, LD, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs
Marcia Kendall, Food Service Director, West Side School District

“This institution is an equal opportunity provider”