



**SHERRI YBARRA**  
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February 10, 2017

Dr. Byron Cannon, Superintendent  
Whitepine Joint School District  
502 1st Ave  
Deary, ID 83823

Dear Dr. Bailey,

On December 5, 2016, State Department of Education (SDE) Coordinators TJ Goodsell and Tamara Donovan conducted an Administrative Review of Whitepine Joint School District for the following United States Department of Agriculture (USDA) programs:

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

Bovill Elementary School was the school site reviewed.

The State agency (SA) would like to commend Linda Hennigar and the entire staff of the Whitepine Joint 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***

Last school year's eligibility status can carry over 30 operating days into the new school year, allowing time for households to reapply without interruption of benefits. Students' prior year eligibility will end on the last day of the carryover period which means that their status must be updated in the benefit issuance list. Failure to reapply during the carryover period is not a denial of benefits for the current school year; however, eligibility must be updated when the period ends. LEAs are not required to notify families or send reminders. (7CFR 245.6)

**Timeframe for CAP completion: December 19, 2016**

### **SFA Response to CAP:**

Eligibility status after the end of the 30 operating days must be updated in the benefit issuance list for meal counting and claiming purposes. SFA provided a written plan to complete a monthly audit check to ensure that when future carryover period is ended the POS is accurately reflecting eligibility status of students.

***Based on the administrative error associated with certification and benefit issuance, the SFA will be required to conduct a second review of applications beginning school year 2017-18, and continuing until further notice. 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. Depending on the outcomes of this second review, the SFA may be required to complete this process until the next administrative review. Please reference the Independent Review of Applications section in the Eligibility Manual.***

### ***Finding 2 – Civil Rights***

School Foodservice Authority staff who interact with program applicants or participants (i.e., cafeteria staff, Free and Reduced Application approval staff) and their supervisors as well as the Hearing Official must have annual civil rights training. The principal is listed as the Hearing Official and must have USDA civil rights training. Upload a dated sign in sheet to provide documentation that all received USDA civil rights training.

**Timeframe for CAP completion: December 19, 2016**

### **SFA Response to CAP:**

The Food Service Director uploaded a dated sign in sheet and meeting agenda to provide documentation that all applicable SFA staff received civil rights training.

### ***Finding 3 – Civil Rights***

Please note the USDA short non-discrimination statement is for all documents that are only one page or one sheet of paper in length: "This institution is an equal opportunity provider." The USDA long non-discrimination statement is for use on all documents of more than one page or one sheet of paper and is available at the [State agency website](#).

**Timeframe for CAP completion: December 19, 2016**

**SFA Response to CAP:**

The Food Service Director uploaded a copy of January's menu showing the correct non-discrimination statement in MyIdahoCNP.

***Finding 4 – SFA On Site Monitoring***

Breakfast POS (point of service) on-site reviews are covered in 7 CFR 220.11(d)(1) which states: every school year, each school food authority with more than one school shall perform no less than one on-site review of the breakfast counting and claiming system and the readily observable general areas of review identified under §210.18(h) of this chapter, as specified by FNS, for a minimum of 50 percent of schools under its jurisdiction with every school within the jurisdiction being reviewed at least once every two years. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school's meal counting or claiming procedures or general review areas, the school food authority shall ensure that the school implements corrective action, and within 45 days of the review, conduct a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school's claim is based on the counting system and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid breakfasts, respectively, served for each day of operation. POS counting reviews were not done last school year (and are not yet done/due this year).

**Timeframe for CAP completion: December 19, 2016**

**SFA Response to CAP:**

The Food Service Director completed the SFA On Site Monitoring reviews as outlined and uploaded the completed forms into MyIdahoCNP.

***Finding 5 – 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. For more information regarding local wellness policies, please

visit the Idaho SDE Child Nutrition Programs [School Wellness](#) website. A report on the progress towards goals stated in the Local School Wellness Policy must be publicly available. Posting to the school /district website and/or in a school newsletter would support this requirement. For further Wellness Policy guidance and resources please contact Heather Blume, State Department of Education Nutrition Assessment and Promotion Coordinator, at [hblume@sde.idaho.gov](mailto:hblume@sde.idaho.gov), 208.332.6902.

**Timeframe for CAP completion: December 19, 2016**

**SFA Response to CAP:**

A report on the progress towards goals stated in the Local School Wellness Policy must be publicly available. Posting to the school /district website and/or in a school newsletter would support this requirement. 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. Per the Wellness Policy Final Rule, LEAs are required to permit 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. The Local Wellness Policy must include, at a minimum, measurable goals for nutrition education, physical activity, and other school-based activities to promote student wellness, as well as nutrition guidelines for all foods available on school campus.

A Wellness policy commitment was identified and a specific plan for updating the 2006 Wellness Policy was provided to the State agency by the Corrective Action Plan due date. The Implementation and Monitoring Plan available in the download forms section was completed and submitted by the CAP due date.

***Finding 6 – Resource Management***

All foods purchased by the food service department to be used as non-program food sales must be marked up to account for the cost of the food, labor, storage, and delivery of the products. Food service cannot order for non-USDA programs without marking up the price an average of 38%. Due to the added non-program foods paperwork and record keeping, consider evaluating this practice.

**Timeframe for CAP completion: December 19, 2016**

**SFA Response to CAP:**

The Food Service Director completed the Non-program Foods Revenue Tool to assess the actual food costs (salad bar, a' la carte, etc.) to ensure non-program foods are not being subsidized by USDA funds.

***Finding 7 – Resource Management Comprehensive Review***

Adult Meal prices must be raised to \$3.65.

**Timeframe for CAP completion: December 19, 2016**

**SFA Response to CAP:**

Adult meal prices were raised and posted to the school district website.

# Commendations

- The Food Service Director and her staff were open to SA feedback regarding changes to make to her child nutrition program to follow USDA meal program regulations. The staff is working diligently and with teamwork to run the program.
- Bovill Elementary School students are developing healthy eating habits as evidenced by their requests for seconds on fruit and vegetable offerings. The students were remarkably polite and enthusiastic - other great habits.

Thank you to a very welcoming crew. The kitchens were very well run, well-organized and an obvious asset to the district. All of the students seemed genuinely happy with their meals.

## 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.

### **Civil Rights**

- The SFA's procedure for receiving and processing Civil Rights complaints should ensure all complaints associated with Child Nutrition Programs are forwarded to the State agency within three working days per CFR210.15(a)(6).
- The SA assisted in creating a civil rights binder containing the required elements. 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 on file (three years plus the current year).

### **Food Safety**

- A food safety manual (Idaho Food Code) was located in the kitchen and the SFA is in the process of customizing it to reflect the needs of the kitchen. All staff should be trained on HACCP procedures to insure the service of safe food. (CFR210.13(c))
- Bovill ES had food items stored in dry storage and in the refrigerators and freezers that did not have a month/day/year and/or product name documented. Please label all food items for identification, especially in regards to a food recall, and use the FIFO (First In, First Out) method of inventory management.

### **Offer versus Serve**

- Please train staff on Offer vs Serve. All 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 webinars are available on the State agency website and may be used for training. Also record training for professional standards requirements.

- "What's for Breakfast" and "What's for Lunch" signage was posted at Bovill ES, but the breakfast poster was not completed with the menu. Please ensure that signage is completed daily so that students are informed of what constitutes a reimbursable meal.

### **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. The FS Director printed forms for her staff in order to track the staff's training while the SA was on site.

### **Verification**

- Error prone applications are applications that document a monthly income within \$100 of the Income Eligibility Guidelines. Error prone applications must be a priority when selecting households for verification.
- Retain a copy of the letter sent to household that provides information on changes in benefits to the student(s).

**Your review is now closed.**

**At this time there will be no fiscal action.** 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,



TJ Goodsell, SNS  
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs  
Linda Hennigar, Food Service Director, Moscow School District

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