



March 5, 2018

Stefanie Shaw, Superintendent  
Dietrich School District  
406 North Park  
Dietrich, ID 83324

Dear Mrs. Shaw,

On February 14, 2018, State Department of Education (SDE) Coordinators Lynda Westphal and Tamara Donovan conducted an Administrative Review of Dietrich School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Fresh Fruit and Vegetable Program (FFVP)
- USDA Foods

The site reviewed was Dietrich School (operating Provision 2 breakfast). Only the paperwork for the FFVP was reviewed, as the program was not running on day of review due to a shortened week.

The State agency (SA) would like to commend Traci Perron, and the entire staff of Dietrich 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, 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 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.

#### **Corrective Action Response:**

The district will be bringing the Idaho School Board Wellness Policies revised January 2017 to the Board in March 2018. As long as the board approves the wellness policy, this corrective action can be considered closed. If there are issues with the approval of this policy, please keep in contact with the State agency to inform them of challenges with the policy approval.

### **Finding 2 Benefit Issuance**

One student in a family was reduced on the Benefit Issuance list, however other siblings were paid and the family was notified that they were paid. The student's benefit status was changed to paid on the day of review. This was the only error found in the free and reduced applications and benefit issuance resulting in a 0.76% error rate.

#### **Corrective Action Response:**

Corrected while reviewers were on-site in the Benefit Issuance List and a copy of the change was given to reviewers. This corrective action is closed.

### **Finding 3FFVP Claim**

The FFVP claim showed that the blueberry expense was claimed twice, resulting in an over claim of \$64.48; the clementine expense was not claimed leading to a \$41.92 under claim in December 2017. The total amount of over claim was \$22.56. The inaccurate claim was due to human error, not a systemic problem. Be sure to double check/review FFVP claims before submitting.

#### **Corrective Action:**

Uploaded a procedure to ensure claims are correct prior to submission.

### **Finding 4 Nonprogram Food**

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 memo 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.

**Corrective Action:** The Non-Program Food Revenue Tool Option 1 was completed and the tool shows that the district is in compliance.

## Commendations

- The District supervisor was open to suggestions and asked questions to better understand the program overall.
- All paperwork was well organized and ready for the reviewers making the review go smoothly.
- The Food Service Director was well organized and prompt with making program updates and improvements.
- Meals were freshly prepared items – scrambled eggs and toast with fresh strawberries, juice and milk and a variety of fresh vegetables and fruit choices on the salad bar for lunch. Served with care and attention to customers.
- The breakfast strawberries and friendly food service staff were a beautiful way to start the students' day.

## Technical Assistance (TA)

### Certification and Benefit Issuance

- The Homeless/Migrant Liaison must sign and date the list when submitting to food service for the children to receive benefits.

### Dietary Specifications and Nutrient Analysis

Independent contractor Laura Thomas completed the menu review and provided the following TA:

- The district supervisor should align service line serving equipment with portion listed for item. In addition, provided TA that serving larger portion of scrambled eggs (once during weekly cycle) will not exceed weekly calorie targets, as one egg is 2 oz. eq. and 70 calories.
- Kitchen cooking staff was given assistance on how to standardize the recipe for pulled pork, including food safety critical control points. Recommended using a temperature log for complex foods such as pulled pork that go through the danger zone more than once.
- The district supervisor was given assistance on menu options for whole grain rich foods paired with enriched grain options and assuring meat/meat alternates crediting information.
- Include component crediting of super salad bar for fruits and vegetables on the general production record with a reference to see bar production record for specific foods. When legumes subgroup are served cold from bar, note ½ cup portion size on main production record for consistency for when legumes subgroup is served hot from service line.
- TA given to district supervisor for completing production records (all types of milk offered, number of students served, leftovers and what was done with those items after service).
- TA given to district supervisor to work with kitchen staff to update recipes with weights and measures, current preparation steps including food safety critical control points for temperatures and where to document.

## Meal Components and Quantities

- Suggestion made to use K-8 meal pattern for lunch instead of K-5 and 6-8, plan 2 oz. of m/ma and grains daily to assure pattern is met, and meals are simpler to plan, prepare and serve. For all easily divided items with 2 m/ma and 2 grains, such as sandwich, younger students could be offered a half or whole. The half is 1 m/ma and 1 grain so fits reimbursable meal full components to go with 1/2 cup fruit and/or vegetable, but allows younger students to select smaller portion. Limit any extras on the menu to one a week and small portions to stay within calorie ranges.

## Food Safety

- TA given to district director to update written manual with dates and times that standard operating procedures are reviewed with kitchen staff and to document time for professional development. District has resources for starting bodily fluids SOP – referred to resource in MyIdahoCNP for completed sample.
- Discussed with district supervisor and staff potential risks of overnight cooking and ways to start cooking process early in morning for lunch items. Overnight process needs to be reviewed by health department.
- Please place a thermometer in the milk cooler and record temperatures on logs. This ensures food is stored within recommended temperature ranges for food safety and food quality as well as provides an indication of equipment beginning to fail. (CFR210.13(d))

## Fresh Fruit and Vegetable Program

- The school must widely publicize the FFVP. This could be accomplished through the school website, email to parents, or a newsletter.

## Civil Rights

- Please update your notification of benefits letter with the correct USDA non-discrimination statement, available at the State Agency website. The short non-discrimination statement reads, "This institution is an equal opportunity provider." This was taken care of on the day of SA review.
- Keep a civil rights binder folder up-to-date with all required information and place in a location known to food service staff. The civil rights procedure and complaint forms were added to the civil rights binder on the day of SA on-site review.
- Gave TA that they should get a Special Needs Meal Accommodation form for those children who are lactose intolerant so they can give them some other beverage besides water. If you cannot get the form, then a nutritionally equivalent soy beverage should be obtained for the children.

## 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 Local Educational Agencies (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 webpage.

### **Professional Standards**

- The USDA 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.

### **Procurement (TA provided by independent contractor Keddington Christensen, LLC)**

- A separate procurement review was completed by Keddington & Christensen, LLC; please follow the guidance previously provided to ensure all areas of concern are addressed prior to the next review.

### **School Breakfast and SFSP Outreach**

- SFAs must inform eligible families of the availability of reimbursable breakfasts served under the School Breakfast Program (SBP). Schools must send reminders regarding the availability of the SBP multiple times throughout the school year. (7

CFR 210.12 (d)) This could be accomplished through a newsletter, breakfast menus sent home or publication on the website.

### Special Provision Options

- All records maintained -Provision 2 Base Year (SY15-16) benefit issuance was previously validated by the SA on January 26, 2016. The retention of all required Provision 2 documentation was confirmed during the administrative review. Daily meal count records by student name and eligibility are maintained on a thumb drive and all other Base Year records are kept in a blue binder at the school. The current Provision 2 cycle expires at the end of SY18-19. If you wish to continue with Provision 2 breakfast, you must contact the SA prior to the expiration date to see if you qualify for an extension.

### Your review is now closed

Fiscal action in the amount of \$67.92 will be disregarded. Should you wish to appeal any of these findings please follow the appeal procedures found on the State Agency Appeal Procedures document attached to this letter.

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, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs  
Traci Perron, Child Nutrition Director, Dietrich School District

**This institution is an equal opportunity provider.**