



April 6, 2018

Mr. Brad Baumberger, Superintendent
Highland School District
112 Boulevard Ave
Craigmont, ID 83523

Dear Mr. Baumberger,

On March 20, 2018, State Department of Education (SDE) Coordinators Lynda Westphal and Tamara Donovan conducted an Administrative Review of Highland School District for the following United States Department of Agriculture (USDA) programs:

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

The State agency (SA) would like to commend Shannon Randall, Amanda Beck and Nathan Weeks and the entire staff of Highland 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:

Findings and Corrective Action Plan (CAP)

Finding 1 Benefit Issuance

Four students on the Homeless List were listed as either reduced or paid. If they are on this list, then they should be on the Benefit Issuance List as free. These errors resulted in a 2.22% error rate.

Due Date for CAP Completion: March 30, 2018

Corrective Action Response:

Upon notification prior to the review these students were moved into the free category 03/16/18 and an updated Benefit Issuance List was provided to reviewers on the day of review. The state agency, in consultation with the USDA Regional Office, determined that claims adjustments will be made from September 13, 2018 forward manually for those students who should have been free. This will result in a payment of an additional \$423.57 being paid to the district for these errors. This will adjust your claiming percentages due to it being a Provision 2 base year.

Fiscal Action

Due to application errors, fiscal action is \$423.57 that will be paid to the district on April 13, 2018.

Commendations

- The contractor noticed that the district has a great salad bar with a lot of variety to ensure that vegetable components are being offered.
- Shannon has a very good handle on the paperwork making the review go smoothly.
- The kitchen was clean and organized and the food service employees were interested in operating a compliant school meal program, evidenced by the thoughtful questions asked.
- Highland School District students were exceptionally well-mannered. Every kindergarten student said please when requesting hot lunch and students politely enjoyed their meals.
- The lunch meal was delicious, nutritious, and beautifully prepared and presented.
- The Food Service Director has done a lot of education with parents about "reimbursable meals" and NSLP meal patterns and food service has had additional health inspections with no citations.
- The lunchroom has numerous State of Idaho posters all around showing what constitutes a reimbursable meal, meal component education, veggie subgroups, etc. Good to see in use for education!

Technical Assistance (TA)

Certification and Benefit Issuance

- Ensure that any time a child is on a Homeless, Migrant or Runaway list, they are moved to free immediately.

Verification

- Update the notification letter template to inform households who to contact for questions (e.g., the NSLP Determining Official), which is different from who to contact regarding an appeal (the NSLP Hearing Official).

Dietary Specifications and Nutrient Analysis

- Independent contractor Tisha Whatcott, RDN, LD completed the menu review and provided the following TA:
 - All components were served for the week of review and on the day of my review.
 - The contractor reviewed the offer vs serve guidelines with Amanda because she was actually over-offering her K-5 students (with veggies). Today on the menu she had 1/2 cup fruit (applesauce) and corn and baked beans being served...she was using a 3/4 cup serving spoon for the corn and beans....so each K-5 student that came thru was actually getting 1 1/2 cup veggies on their tray. It just looked like a lot for most kids, and Amanda did say that there usually is waste with the younger age group. So going forward she will be using a 1/2 cup serving spoon on those days with two veggies so students will only get 1 cup if they take both and she will continue the 1/2 cup fruit.

Meal Components and Quantities

- SA reviewers provided instruction on how to complete the required components of the Production Record and how to record food items being served to the children.
- Pizza was a menu item. There was not a standardized recipe for the pizza with serving sizes or items listed. After review and using 'Exhibit A' and the Food Buying Guide it was determined that the pizza was providing the correct component size for grains and meat/meat alternate. Amanda will be reviewing her menus for any other needed recipes for items that she prepares from scratch on site.

Food Safety

- Food safety training should be ongoing, and all applicable HACCP topics should be covered annually. Staff training must be documented with an agenda and sign-in sheet and must be kept on file for three years plus the current year.

Offer versus Serve (OVS)

- Under OVS, a 1/2 cup serving utensil may be used to serve the students vegetables, which should help avoid food waste. Students must have the option to select more vegetables to meet the USDA meal pattern component amount.

- In OVS, if a student chooses ¼-cup fruit and ¼-cup vegetable to meet the ½ cup fruit and vegetable requirement, plus two other components, this constitutes a reimbursable meal.

Civil Rights

- A procedure for receiving and processing Civil Rights complaints must state that all complaints associated with Child Nutrition Programs are forwarded to the State agency within three working days. Please add this procedure to your civil rights file; a compliant procedure is located on the State agency civil rights web page. (CFR210.15(a)(6))
- Please update your non-discrimination statement on the menus and ensure usage of the correct USDA non-discrimination statement on all food service public materials. The language is available at the State agency website; the short non-discrimination statement reads, "This institution is an equal opportunity provider." This was corrected on the day of review.

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 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.

Smart Snacks

- Some items in the vending machines in the high school wing, near the gym, were not Smart Snacks compliant (16 ounce lemonade with 160 calories, 15.2 ounce apple juice, 20 ounce Gatorade, 85 gm cranberry almond mix, chocolate chip Cliff bar). Either bring all items into compliance, turn off the machine during the school day (midnight the day before until 30 minutes after school), or use the ten allowable (four consecutive day length) Smart Snacks fundraising exemptions per school year and keep track of fundraisers using the log.

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.

Procurement

- A separate procurement review was completed by Keddington & Christensen, LLC; please follow the guidance previously provided and bring your procurement policies into compliance prior to the next review.

Special Provision Options

- A Provision 2 Base Year is currently being established (SY17-18) and SA reviewers validated benefit issuance documents and application determination during a Base Year review on September 19, 2017 and during this Administrative review. Please ensure all required Provision 2 documentation, including base year daily meal count records by student name and eligibility, is maintained per requirements. Make sure the Provision 2 Base Year Checklist is completed at the end of the year and all documents it references are kept with it. The current Provision 2 cycle expires at the end of SY 20-21. 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 \$423.57 will be paid to your district on April 13, 2018. 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
Shannon Randall, Child Nutrition Director, Highland School District

Civil Rights

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotope, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at [the USDA website](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) Mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) Fax: (202) 690-7442; or
- (3) Email: program.intake@usda.gov.

This institution is an equal opportunity provider.

For Questions Contact

Child Nutrition Programs
Idaho State Department of Education
650 W State Street, Boise, ID 83702
208 332 6820 | www.sde.idaho.gov