



March 22, 2018

Mr. David Kerns, Superintendent
Snake River School District
103 South 900 West
Blackfoot, ID 83221-6065

Dear Superintendent Kerns,

On March 7-8, 2018, State Department of Education (SDE) Coordinators Lynda Westphal and Tamara Donovan conducted an Administrative Review of Snake River 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 Moreland Elementary School and Snake River High School.

The State agency (SA) would like to commend Rene Osman and the entire staff of Snake River 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 – Certification and Benefit Issuance

One application (three students) noted a household member had \$1.00 monthly income. The Food Service Director must contact the household and follow up regarding the income. As applicable, the Food Service Director is to note information gathered on the application (record date, who was contacted, details, and initials), update the benefit issuance list, and send a notification letter. The family was contacted and this was completed while the reviewers were on-site.

Two students were listed as free, homeless on the benefit issuance list. The students were documented/certified as homeless on August 17, 2016, but no qualification documentation was on file for SY 2017-18. The Food Service Director followed up and will change meal status to paid and notify the household. These errors resulted in a 1.53% error rate.

Due Date for CAP Completion: March 22, 2018, completed March 19, 2018

Corrective Action Response:

The Food Service Director notified the household and changed the meal status to paid. The corrected benefit issuance for these two students was uploaded into MyIdahoCNP Review Attachments on March 19, 2018.

Finding 2 – Smart Snacks/Wellness Policy

At the high school, there were numerous vending machines with non-compliant products in them and a note posted that they were available in the morning, during breaks, and at lunchtime. This goes against Smart Snack regulations and Snake River School District's newly approved Wellness Policy. Non-compliant vending sales are considered fundraisers. In addition, a senior student had plans to sell non-compliant desserts during the lunch period in the cafeteria as a fundraiser, but was told to move to the entryway. All fundraisers, both exempted and compliant, must be tracked. 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 210.11) Details are available at the SA Smart Snacks webpage.

Due Date for CAP completion: Due March 22, completed March 20, 2018

Sponsor Response to CAP: A plan outlining the timeframe to bring the vending machines and fundraisers into compliance was uploaded and accepted on March 20, 2018.

Fiscal Action

Due to benefit issuance errors, fiscal action results in \$56.14. However, since this amount falls under the \$600 threshold, the fiscal action will be disregarded and no financial adjustment will occur.

Commendations

- The high school breakfast and lunch menu compliance worksheets met all requirements.
- The menus posted with allergen statements are nice and help children with known allergens stay away from offending foods. This is a good practice.
- The independent contractor, Kerry McKaig, RDN, LD, noted that Peggy did a fantastic job with the salad bar. "I had heard it was good but I told her it exceeded my expectations and the nicest school salad bar I have seen."

Technical Assistance (TA)

Verification

- Please change your verification letter to include the correct USDA non-discrimination long statement, or the short statement. Completed during review.

Meal Components and Quantities

- Independent contractor Kerry McKaig, RDN, LD, completed the menu review and provided the following TA:
 - The ½ cup portion of granola served on Tuesday, January 9, 2018 of the review week was counted as 1 ounce equivalent (oz. eq.) grain. According to the label, 2/3 cup of granola is 2 oz. eq. grain so ½ cup of granola is 1.5 oz. eq.
 - The minimum weekly requirement for the other vegetable subgroup was not met for the week of review. The peas served on January 10, 2018, of the review week are in the starchy vegetable subgroup. Recommend revising menu to serve green beans or iceberg lettuce or snap peas to meet the ½ cup minimum requirement
 - The total grains for the week of review are 6.0 oz. eq. The weekly requirement is 6.5 oz. eq. An additional half ounce equivalent needs to be added with either a roll or a cookie.
 - The total meat/meat alternate for the week is 6.0 oz. The weekly requirement is 6.5 oz. The food service director is going to add a 1 oz. cheese stick to one of the meals.
 - The saltines served on January 10, 2018, of the review week are not whole grain rich. Recommend switching to a whole wheat saltine or a roll or not count as a grain.

Offer versus Serve

- There should be signage at breakfast at the high school telling students what the meal consists of and the components. This can be a sign on the cart that they update daily (not just a sign saying take 1/2 cup of fruit plus two other items).
- TA given that for the K-1 age group, the poster should have pictures so the students can identify a reimbursable meal.

Food Safety

- The most recent food safety inspection report must be posted in a location visible to the public (7 CFR 210.13(b)). The current posting locations made it difficult to read. The inspection posting in the high school was moved prior to the SA onsite review.
- Kitchen staff does not wear hair restraints with short hair, long hair is pulled back.
- Some product observed in the walk-in cooler and dry storage had “best by” dates in the past.
- Teachers were going behind the lunch line during serving time to get their lunch at the back of the kitchen. Gave TA that with the passage of the new FDA Food Safety Act in Idaho starting July 1, 2016, this practice is not allowed (2-103.11 Person in Charge - (B) Persons unnecessary to the food establishment operation are not allowed in the food preparation, food storage, or ware washing areas). Teachers can purchase a lunch from the line, but should not have been allowed behind the line after July 1, 2016. Student helpers are allowed because they are taught food safety prior to serving the food.

Civil Rights

- Please update your non-discrimination statement to 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."
- Please post the current "And Justice for All" poster in a public location during the breakfast service at the high school, such as on the breakfast cart. FNS Instruction 113-1 requires that participating schools prominently display the USDA nondiscrimination poster “And Justice for All”. All posters must be 11” x 17”.

Local School Wellness Policy

- Your newly enacted Wellness Policy is compliant; however, there is some room for improvement. Please make the principals aware of the policy to ensure their facility adheres to the policy (see finding above).
- For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs School Wellness website.

Smart Snacks

- One student, doing a senior project, started setting up a bake sale in the cafeteria during lunch. The food service handled this properly by asking them to relocate this to a different area; however, this counts as one of the ten exempt fundraisers allowed per each school that should be tracked on an annual basis.

Procurement

- A separate procurement review was completed by Keddington & Christensen, LLC; please follow the guidance previously provided to bring the District's Procurement Policies in line with Federal Regulations before the next administrative review.

Resource Management Comprehensive Review

- The purchase of food and commodities are for the food service program only. If any educational or outside programs are in need of food, they need to procure the needed ingredients using their procurement regulations. If this continues to occur, the USDA Nonprogram Food Revenue Tool would have to be completed and the prices would have to increase sufficiently to make income (cannot sell at cost).

Your review is now closed

Fiscal action resulting in \$56.14 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, S.N.S.
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Rene Osman, Food Service Director, Snake River School District

Civil Rights

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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

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