



December 4, 2017

Mr. Jeff Dillon, Superintendent
Wilder School District #133
210 A. Avenue East
Wilder, ID 83676

Dear Superintendent Dillon,

On November 28, 2017, State Department of Education (SDE) Coordinators Teresa Goodsell and Tamara Donovan conducted an Administrative Review of Wilder School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP) Operating Free Community Eligibility Provision (CEP) Option
- School Breakfast Program (SBP) Operating Free CEP Option
- Fresh Fruit and Vegetable Program (FFVP) at Wilder Elementary School
- USDA Foods

State Agency contractor Laura Thomas, M.Ed, RD, LD, FAND, conducted the menu analysis for the review week. The site reviewed was Wilder Middle/High School.

The State agency (SA) would like to commend Samantha Unger, Child Nutrition Director, and the entire staff of Wilder 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 – Meal Counting and Claiming – Breakfast

Breakfast meal count daily participation for the special needs students were recorded as: 10 meals per day (every day) in October and November 2017 for the high school students; 7 meals per day in October and 8 meals per day in November 2017 for the middle school students. Lunch meal count daily participation during this same period varied from 6-11 meals per day. The special needs teachers take food items for a set number of students each day and uses this standard number to count/claim breakfast meals. Breakfast meals are eaten in the special needs teacher's room. Ensure that breakfast meal counting/claiming reflects the actual number of reimbursable meals selected, and not the food taken for distribution by the teachers or simply the number of students in attendance. Only reimbursable meals actually selected by students are to be counted and claimed for federal reimbursement.

Timeframe for CAP completion: December 13, 2017

Sponsor Response to CAP: Establish a written procedure to ensure USDA compliant meal counting methods for the special needs students, including Offer versus Serve (OVS) training. Train the teachers, upload a sign in sheet documenting training, and upload a copy of the procedure. On December 1, 2017, SFA provided a copy of the written procedure, agenda and sign in sheets for special needs staff training along with a meal counting and claiming spreadsheet for teacher certification of reimbursable meals provided to students.

Commendations

- The food service director demonstrated commitment to operating compliant child nutrition programs that meet student needs. She was responsive to requests for information and quickly implemented suggested changes. Files and documents needed for the review were organized and accessible.
- The menu planner and kitchen staff worked diligently to prepare fresh foods and offered a variety of fruits and vegetables to students. Menus feature an assortment of foods students enjoy such as homemade breads and side dishes cooked onsite without relying heavily on heat and serve items.
- The breakfast service staff, participating students, and school staff at the Wilder MHS site were courteous and displayed civility and manners. It was a joy to see positive interactions. Delightful experience!
- The Wilder School District has done a great job updating their Local Wellness Policy. The district incorporated requirements from the final rule by using the *Idaho School Wellness Progress Report* to assess the policy and made those results available for the public on the district website.
- Special needs teachers who help facilitate breakfast meals for the middle/high school students received required USDA civil rights training.

Technical Assistance (TA)

Dietary Specifications and Nutrient Analysis

- Update production records to reflect the portion size for each grade group, including Pre-K when served. Clearly indicate how portions for each separate grade group contribute to the meal pattern requirements. List portion sizes on separate lines for each item when various sizes are offered.
- Complete production records in two-step process; menu planner (director) completes the planned menu, for number of students and adults, portion sizes for each grade group along with component contributions and planned amount of food needed. With OVS implemented at all grades (except Pre-K), actual production will reflect historic meal service quantities, which may vary from planned amounts. Planned amounts indicate quantity to have on hand in the event all students select all planned menu items in planned portions meeting the required meal patterns.
- Update current recipes, including USDA recipes, to reflect actual ingredients used, such as brown rice in the Spanish Rice recipe that calls for white rice. Provided TA on finding new USDA recipes for updated component calculations including vegetable subgroups. Create versions of recipes that match the actual cooking method. For example, pulled pork recipe called for canned pork, but fresh (frozen) raw pork was cooked for the menu item. Some recipes may need multiple versions such as tacos that are made with various meats: chicken, pork or beef. Use the food-buying guide and product information sheets to assure correct component crediting for various ingredients.

Meal Counting and Claiming

- The State Agency provided an Excel spreadsheet for the Food Service Director to use for tabulating daily meal counts for all age grades. This form can serve as a monthly summary document for claiming edit checks.

Meal Components and Quantities - Lunch

- Develop standard sack lunch menus for each grade group. During the review week, an unexpected request for sack lunches for the junior class was received. The menu provided was a reimbursable meal with ½ cup of fruit and/or vegetable. However, under OVS, sack lunches must follow the portions indicated on the meal pattern. Grades K-5 is 1/2 cup fruit and 3/4 cup vegetable, Grades 6-8 is 1/2 cup fruit and 3/4 cup vegetable, Grades 9 - 12 is 1-cup fruit and 1-cup vegetable.
- Ensure correct rounding for component credits. Refried beans at 2/3 cup rounds to 5/8 cup creditable vegetable, 1/8 cup is smallest increment.

Meal Components and Quantities – Breakfast

- Production records need to indicate amount and disposition of leftovers. The amount of items left at end of service must be recorded and “returned to inventory” or “discarded” as appropriate. If an item is the last served to the final student in line, then indicating zero and notation of student receiving item is appropriate. Document leftover items and the action taken (discarded, chilled and frozen, refrigerated for next day) along with supporting food safety critical control point times and temperatures as needed. This TA is applicable to all meals served - lunch and breakfast.

Offer Versus Serve (OVS)

- Menu support that reimbursable meals are offered and OVS has been implemented at K-5, however one day lacked enough planned vegetable to meet the 3/4 daily requirement. During the previous administrative review, cycle meals were served (no OVS) and did not have sufficient vegetables daily. Based on meal observation, TA was given to review with service staff the need to make sure all students are offered full planned portion by asking if students would like one or two scoops or a larger portion based on the serving utensil used. For example, 2 oz. spoodle (1/4 cup) used to serve baked beans (planned portion 3/4 cup); most students grade 6-8 received one serving without being offered the full planned portion. Students asked for various amounts of fruit, so they do know they have a choice. Recommend service staff review OVS training available through the State agency online training portal. The goal of OVS is to meet student preferences, provide minimum requirements for reimbursable meal and limit food waste.

Food Safety

- Foods with complex food preparation (complex process approach) need to have cooking temperatures, proper chilling and reheating temperatures logged. Suggestion was made to school staff to use a convenient location, such as the back of the production record for the appropriate menu day to record cooking and chilling of foods prepped ahead of menu service. Pulled pork served on day of nutrition review was cooked and chilled earlier in the week, and while staff measured temperatures, none were recorded. Suggestion was made to review all recipes and update with proper food safety critical control points and monitoring documentation for actual processes, (pulled pork was from raw pork, not canned pork listed in recipe).
- A food safety manual was located in the main kitchen; a food safety manual that is customized to reflect the needs of the location must be available at the middle / high school as well. The Food Service Director accomplished this on the day of SA review.
- The most recent food safety inspection report must be posted in a location visible to the public. (7 CFR 210.13(b)) Please request an inspection at the Middle/High School since breakfast is served out of the concession stand.

SFA On-Site Monitoring

- CEP site edit checks under Meal Counting question #10 on the *SFA On Site Review Checklist* form, would be a comparison of the number of enrolled students (how many could participate) that day and the number counted at the meal (how many actually participated). Have staff write “enrolled” and “ate” along with the corresponding numbers in this section.

Smart Snacks

- Only 12 oz. or less nonfat plain milk, 1% plain milk, nonfat flavored milk, water, and 100% fruit juice is compliant with Smart Snacks beverage standards for middle school students. A Wilder Middle / High School vending machine contains beverages that are not compliant with Smart Snack standards for middle school students. Make sure to follow the Local Wellness Policy regarding beverages sold in vending machines.

Professional Standards

- Effective July 1, 2015, the United States Department of Agriculture established minimum Professional Standards for school nutrition professionals who manage and operate the National School Lunch and School Breakfast Programs. 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; Wilder Food Service chose the Professional Standards tracking resource available in MyIdahoCNP under Download Forms. Ensure tracking forms for employee trainings are completed. The Food Service Director will remind staff to keep better track of training hours and commend staff on taking trainings and keeping certificates.

Special Provision Options

- Maintenance of CEP records for SY 2016 (year used) and SY 2017 (first year) were validated using April 1, 2016, data. Direct Certification reports for April 1 data have been run each year. The current CEP approval expires at the end of SY 19-20.

Procurement

- A separate procurement review was completed by Keddington & Christensen, LLC. on September 27, 2017. No findings requiring corrective action were found, but five areas of technical assistance were noted. Please follow the guidance provided in your NSLP Procurement Review.

Your review is now closed.

There is no fiscal action resulting from this review. Should you wish to appeal any of these findings please follow the appeal procedures on the [State Agency Appeal Procedures](#) document located on the Idaho Child Nutrition Programs website. 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,



Teresa Goodsell, BS, S.N.S.
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Ms. Sam Unger, Child Nutrition Director, Wilder SD

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