



January 24, 2019

Shane Pratt, Superintendent
Rolling Hills Charter School
8900 Horseshoe Bend Road
Boise, ID 83714

Dear Mr. Pratt,

On January 23, 2019, State Department of Education (SDE) Coordinators Tamara Donovan and Heather Blume conducted an Administrative Review of Rolling Hills Charter School for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was Rolling Hills Charter School.

The State agency (SA) would like to commend Shannon Puga and the staff of Rolling Hills Charter School 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 Civil Rights

The incorrect USDA non-discrimination statement was in use on the food service webpage, income application instructions, household benefit notification letters, and the online menus.

Corrective Action: Update the non-discrimination statement to the correct USDA non-discrimination statement, available at the SA website, and ensure the correct statement is used on printed and web-based materials referencing the food and nutrition programs. Make use of the SA letter templates available in MyIdahoCNP under Download Forms.

Due Date for CAP Completion: February 8, 2019

Corrective Action Response: On the day of SA on-site review, the correct USDA non-discrimination statement was posted on the school food service website; the menu contained the short statement and SA letter templates were put into use.

Finding 2 Wellness Policy

In July 2016, the USDA Food and Nutrition Service (FNS) finalized regulations to create a framework and guidelines for written wellness policies established by LEAs. 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 the following language (bolded items were absent in the policy uploaded for review):

- 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.**

Corrective Action: Provide a plan for how and when the wellness policy language will be brought into compliance with Federal requirements.

Due Date for CAP Completion: February 8, 2019

Corrective Action Response: On the day of SA on-site review, the wellness policy had been updated and posted to the school district website; the most recent progress report was posted to the website as well.

Failure to complete Corrective Action or request an extension by the due date may result in payment being withheld until complete.

Commendations

- The Food Service Director (FSD) was very well prepared for the administrative review. All documentation relating to the child nutrition program was organized and ready for review. The time and effort the FSD put into preparing for the review allowed the reviewers to work efficiently and showcased a smoothly running program.
- The FSD and the Administrator were receptive to SA recommendations, implementing changes immediately. The school had a positive environment and staff seemed motivated toward continuous improvement and excellence.
- The school cafeteria features two colorful nutrition education bulletin boards – great education for students.
- The FSD is very organized with all menus, CN labels, and product formulation statements available for all cycle menus. Records for temperature logs are organized and complete – excellent organization of support documents.
- This school nutrition program is implementing their food safety program beginning at receiving. They have temperature records of received foods and follow a process for rejecting foods received outside of the correct temperature range. They have temperature cooling records for complex food process recipe items. Accolades for the implementation of the food safety program! Other school nutrition programs could learn from their implementation model.
- Students are served in a warm, friendly environment with many choices, including an extra food colorful salad bar and fresh fruit and vegetable on the serving line - wonderful aromas through the lunch service.
- Great food service staff team work!
- Outstanding job meeting all the requirements for the meal pattern. All daily and weekly meal component and food quantity requirements were met for the week of menu review.
- Excellent job following up on verification seeking a response from the selected household.

Technical Assistance (TA)

Certification and Benefit Issuance

- The SFA must send a qualifying household a Direct Certification (DC) notification letter to help identify other students in the household that may qualify for free meal benefits through DC household extension. Please make use of the DC notification template letter found in MyIdahoCNP under Download Forms. The following must be included in the DC notification to household letter: the USDA long non-discrimination statement and an inquiry regarding additional children in the household. Moving forward, the SA household notification letter template will be used.

Food Safety

Independent contractor CN Resources completed the menu review and provided TA:

- Each SFA is required to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories, as applicable (7 CFR 210.21 (d)). If a product from another country is sourced, then the food service must have proof that the domestic product is significantly higher in price or not available in sufficient quantities. Include the Buy American Provision in SFA solicitation documents for the purchase of commercial foods. Products must be checked upon receipt and not accepted if the products do not comply with the Buy American Provision, unless there is documentation to justify the exception (exorbitant pricing or product shortages). The SFA must keep documentation justifying the limited exception(s); make use of the document available in MyIdahoCNP Download Forms. The out of compliance products observed were bananas and mandarin oranges. On the day of SA on-site review, documentation was available to show compliance with the Buy American provision.

Wellness Policy

- Utilizing current ISBA Wellness Policy Sections would help ensure compliance with wellness policy regulations. The Idaho State Department of Education Wellness web page contains resources, including a model wellness policy as well.

Resource Management

- USDA Foods must be noted as revenue and as expenses in the Fund 290. The SFA's Fund 290 has a journal entry called "end of year" which includes USDA values. Consider separate detail sections (revenue and expense) in the Fund 290 with "USDA Foods" descriptions.

Procurement

- Follow guidance provided in the separate procurement review to be conducted in SY 2019-20.

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 SDE web page](#).

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,



Tamara Donovan, RD, LD, SNS
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Jessica Honeycutt, Child Nutrition Director, Rolling Hills Charter School

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