



February 15, 2019

Jim Cobble, Superintendent
Camas County District
610 Soldier Road
Fairfield, ID 83327

Dear Superintendent Cobble,

On January 28 2019, State Department of Education (SDE) Coordinators Jennifer Butler and Tamara Donovan conducted an Administrative Review of Camas County School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP); Operating Provision 2 breakfast option
- USDA Foods

The site reviewed was the Camas County Schools (grades K-12).

The State agency (SA) would like to commend Wendy Jewett, Wendy Strickler, and the entire staff of Camas County 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

Three incomplete free and reduced meal applications, affecting six students, were determined for benefits although the applications were submitted without all required information. The missing household information was obtained for two applications while SA reviewers were onsite, but one application required an adult signature in order to be considered complete. Based on application errors due to processing incomplete applications, the SFA will be required to conduct a second review of applications beginning school year 2019-20, and continuing until further notice. This review is intended to assist in identifying miscalculations, missing information, and/or in accurate determination methods.

Corrective Action: Upload a copy of the completed application showing the adult who filled out the application has signed it to certify the information is true and correct.

Due Date for CAP Completion: Due February 12, 2019; completed January 28, 2019.

Corrective Action Response: Completed application was uploaded.

Finding 2 - Verification

The application selected for verification should have been changed to paid status due to being over income as a result of income verification, but was not changed. However, the household income is now less than at the time of verification and current income allows the application to remain at reduced benefit status.

Corrective Action: Obtain a copy of the household income / pay stubs to document qualification for meal benefits. Upload documentation along with the notification letter to the household. This corrective action was completed while SA reviewers were onsite.

Due Date for CAP Completion: Due February 12, 2019; completed January 28, 2019.

Corrective Action Response: Current pay stubs and household notification letter were uploaded.

Finding 3 - Meal Counting and Claiming

During the last AR (SY15-16), it was identified that incomplete meals were provided for free during breakfast but not tallied on the roster under Provision 2 to claim for reimbursement. A finding was issued and corrective action closed after the SFA assured the SA that all students would be required to take a reimbursable meal. This is a repeat finding as the practice is still occurring and must be stopped. If a student refuses to select a reimbursable meal, they must be charged a la carte prices for the items selected.

Corrective Action: Submit a plan outlining steps to be taken to promote the selection of a reimbursable meal. Submit a list of prices for breakfast items identifying the a la carte price for each item if selected independently and not part of a reimbursable meal.

Due Date for CAP Completion: Due February 12, 2019; completed February 11, 2019.

Corrective Action Response: A list of a la carte prices for breakfast items was uploaded, along with a statement explaining that the SFA will start having students select a basket that contains a reimbursable breakfast meal. A share table will also be implemented for students to place unopened items.

Finding 4 - Civil Rights

The nondiscrimination statement (NDS) must accompany any printed and web-based materials referencing FNS programs. Web pages associated with program operation should list the full USDA NDS with details on participants' right to file a complaint. The full statement is available on the SA website under Civil Rights. It is recommended that a link to the full statement in a variety of languages be included. The recommended link to use is the [USDA Nondiscrimination Statement](#) webpage.

Corrective Action: Post the full USDA NDS on the school food service webpage. Notify the SA when the website has been updated.

Due Date for CAP Completion: Due February 12, 2019; completed January 28, 2019.

Corrective Action Response: The full USDA NDS was posted to the district website under the Lunch Menu tab. The LEA advises the student handbooks will be amended to include the full USDA NDS statement.

Finding 5 - Professional Standards

Professional Standards regulations provide annual training requirements for all school nutrition professionals and require documentation be kept on file to show yearly Professional Standards compliance. During the last AR, it was discovered that professional standards hours were not tracked. A finding was issued and corrective action was closed after an employee training log and a statement explaining the plan to ensure future tracking was uploaded. The SFA is not following their identified plan, resulting in a repeat finding. A tracking system is not being implemented as required to ensure that all employees have received the required training hours for the school year.

Corrective Action: Upload completed training logs listing all training received for foodservice employees and support staff so far for SY18-19. In addition, upload a plan outlining how annual training requirements will be met each school year and what steps will be taken to assure compliance with this regulation.

Due Date for CAP Completion: Due February 12, 2019; completed February 7, 2019.

Corrective Action Response: Updated training logs with supporting documentation were uploaded. The SFA advises training will begin in the second week of each school year and a professional standards notebook will be kept up-to-date. Wendy Jewett will be responsible to track training hours.

Finding 6 - Food Safety

Kitchen staff has not received required annual food safety training. Additionally, the food safety plan is missing a procedure for cleaning up bodily fluids and a procedure for employee exclusion/restriction. While SA reviewers were onsite, sample procedures were printed. These procedures must be incorporated in to the SFA's updated food safety plan.

Corrective Action: Provide food safety training for food service staff. Submit a sign-in training agenda for all kitchen staff indicating the training date and topics covered.

Due Date for CAP Completion: Due February 12, 2019; completed February 11, 2019.

Corrective Action Response: Multiple training agendas and sign-in sheets for various food safety topics were uploaded.

Finding 7 - Offer versus Serve (OVS)

There is no documentation that training on Offer Versus Serve (OVS) took place for all kitchen staff. This was a finding requiring corrective action during the last AR, but is still not occurring. All line staff must be trained on OVS annually. Online OVS training is available through the [SA training portal](#) and provides a certificate of completion. All group staff training should include an agenda and sign-in sheet that specifically identifies that "OVS breakfast" and/or "OVS lunch", as applicable, was part of the training agenda. All training documentation should be recorded on the Professional Standards tracking log and maintained on file at the SFA for three years plus the current year.

Corrective Action: Submit certificates of completion or sign-in sheet and training agenda for all line staff indicating the training date and topic covered.

Due Date for CAP Completion: Due February 12, 2019; completed February 11, 2019.

Corrective Action Response: Certificates of completion were uploaded for the online trainings of OVS at Breakfast and OVS at Lunch.

Finding 8 – Smart Snacks

Schools must meet the minimum requirement in 7 CFR 210.11, for all foods and beverages sold in school (also known as Smart Snacks in School) to increase consumption of healthful foods during the school day and support a healthy school environment. During the last AR, Smart Snacks technical assistance was provided on tracking fundraisers, but this requirement is not being met. Ice cream is sold to the students during the school day, exceeding the ten exempt allowed per year. The SA discussed Smart Snacks regulations with the secretary and business manager.

Corrective Action: Submit a plan describing how Camas County Schools plans to comply with Smart Snacks regulations, including identifying compliant snacks and implementing a tracking process for all fundraisers.

Due Date for CAP Completion: Due February 12, 2019; completed January 29, 2019

Corrective Action Response: A procedure and supporting documentation, including a completed fundraiser tracking form, was uploaded. The school currently uses the *Activity/Facility User Authorization Form* to approve all activities and fundraisers. Approved forms will be forwarded to the business manager in order to log the fundraisers on the tracking form. The district advises no more than ten non-compliant fundraisers per year will be approved. While confirming the compliance of the ice cream items sold daily, it was discovered that only two of the twelve ice cream items sold were compliant with Smart Snacks regulations. The sale of the ten non-compliant ice cream products will be discontinued.

Finding 9 - Local School Wellness Policy (LWP)

In July 2016, the regulations on wellness policies (§210.31) was finalized and required LEAs to be in compliance by June 30, 2017. The policy provided during the AR is dated as adopted on August 8, 2016, but is missing required elements, making it noncompliant. The LEA's LWP, posted under Board Policies on the district's website, is dated August 12, 2013. The wellness policy committee must work to get the LWP compliant with the final rule requirements and ensure the current policy is made publically available. For more information, please visit the Idaho SDE Child Nutrition Programs School Wellness website.

Corrective Action: Upload a narrative describing the plan for how and when the LWP will be brought into compliance with Federal requirements.

Due Date for CAP Completion: Due February 12, 2019; completed January 29, 2019

Corrective Action Response: A timeline with action steps was uploaded. The district will organize a wellness committee or a system of open communication with input of all stakeholders to develop a compliant policy. The first reading of the LWP will occur during the September 9 board meeting, with a second reading on October 14, 2019, in order to have a complaint policy accessible on the school's website by November 1, 2019.

Finding 10 - Special Provision Option – Provision 2 Breakfast

While preparing for the review, the SA discovered that two claiming sites (Camas County ES – JR HS and Camas County HS) were combined into one site (Camas County Schools) for SY18-19, but the Provision 2 claiming percentages were not recalculated to combine the base year numbers from the two sites. As no changes occurred with the attendance population, the base year 16-17 claiming percentages were combined per page 37 of the *Provision 2 Guidance Manual*. Combining the two percentages changed the percentages to be used for breakfast claiming. The correct claiming percentage will be used starting with the January 2019 claim and an adjustment was made to the previously filed SY18-19 claims. The claim adjustment required an additional \$87.57 to be paid to the SFA for the August -December 2018 claims.

Corrective Action: None required; recalculated and adjusted by the SA.

Due Date for CAP Completion: No further action required; completed January 3, 2019.

Corrective Action Response: The SA corrected the Provision 2 breakfast claiming percentages and adjusted previously filed claims. These adjustments were made prior to the on-site AR.

Finding 11 - Meal Components and Quantities - Breakfast

Contractor CN Resources conducted the menu review and identified that for the week of menu review, the breakfast menu did not meet the minimum daily fruit requirement. Fruit was offered daily, however the minimum required portion size was not met. During the last AR, technical assistance was provided on this requirement, which is still not being met. Should inadequate fruit portions be identified during the next review, fiscal action may be assessed.

Corrective Action: Adjust daily breakfast menu to meet the required 1-cup daily minimum of fruit.

Due Date for CAP Completion: Due January 18; completed January 18, 2019.

Corrective Action Response: 4 ounces of juice was added to the menu to meet the daily 1-cup minimum.

Finding 12 - Meal Components and Quantities - Lunch

CN Resources identified that for the week of menu review, the lunch menu did not meet the minimum daily requirement for multiple components. All required components were offered daily, however the minimum required portion sizes were not met. The K-5 menu did not meet the daily minimum requirement for vegetables and the 9-12 menu did not meet the daily minimum sizes for fruit, meat/meat alternate, and grain. During the last AR, technical assistance was provided on portion sizes; which are still not being met. Should inadequate portions be identified during the next review, fiscal action may be assessed.

Corrective Action: Adjust daily lunch menus to meet the required daily minimum of all components for each grade level.

Due Date for CAP Completion: Due January 18; completed January 28, 2019.

Corrective Action Response: The SFA increased fruit and vegetables servings and added a sandwich to provide 2 oz. eq. grains and 2 oz. eq. meat/meat alternates. On another day, a roll was added to ensure 2 oz. eq. grains.

Commendations

- The time and effort by Wendy Strickler in answering off-site modules and responding to requests in a timely manner is greatly appreciated.
- During the menu review, the CNR contractor provided the following commendations:
 - Wendy Jewett was great to work with during the nutrition review. Her efforts to have a successful program should be commended.
 - Wonderful to see whole grain buns from scratch!

Technical Assistance (TA)

Certification and Benefit Issuance

- Ensure that all free and reduced meal applications are completed in full and not determined for eligibility until all required information is included.
- Do not retrieve missing information, such as names and SSN numbers, from previous years' applications.
- Based on application errors, the SFA will be required to conduct a second review of applications beginning school year 2019-20, and continuing until further notice. A second review of applications requires a re-evaluation by the Confirming Official of the eligibility determination made by the Determining Official, based on the information provided by the household on the application. Depending on the outcomes of this second review, the SFA may be required to complete this process until the next AR. A Second Review of Applications Report will need to be filed as well while this requirement is in place. Please reference the Independent Review of Applications section in the Eligibility Manual, a copy of which is available in MyIdahoCNP Download Forms.

Verification

- Error prone applications are applications that document a monthly income within \$100 of the Income Eligibility Guidelines. Error prone applications must be a priority when selecting households for verification.
- Verification must be in line with requirements outlined in 7 CFR 245.6a.
- When conducting verification, obtain two consecutive pay stubs to help ensure accurate income frequency is used.
- The Confirming Official, who must be a different individual than the Determining Official, must review an application prior to beginning the Verification process. This ensures the application eligibility was determined correctly. Both officials complete the “Official Use Only” box on the free and reduced meal application that has been selected for verification. Once the verification process has been completed and results determined, the Verification Official, who can be either the Confirming or Determining Official, must complete the “Official Use Only” box on the meal application.
- When verification is conducted and a household fails to respond, the process is: students are changed to paid status, a notification letter is sent to the household, and no other application (replacement) needs to be selected. If the non-responsive household re-applies for benefits within the school year, income verification must be conducted before benefits are issued.
- Attempt to directly certify students selected for verification before sending the verification notification letter to the household.
- Ensure a notification letter is sent to the household once verification is complete. Keep a copy of the letter in the verification file, along with all other verification documents (pay stubs, communication, a copy of the app(s) selected for verification, etc.).

Meal Components and Quantities

- Independent contractor CN Resources completed the menu review and provided the following TA:
 - The results of the menu review were provided to the SFA in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served within the SFA must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA was encouraged to participate in training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future ARs, may result in fiscal action.
 - The federal regulations set daily and weekly requirements for different age grade groups. These regulations require:
 - 1-cup serving size of fruit/vegetable for all age groups at breakfast,
 - 3/4 cup minimum of vegetable offered each day for grades K-5 and 6-8 at lunch, and 1-cup for grades 9-12,
 - 1 cup minimum of fruit to be offered each day for grades 9-12 at lunch, but only ½ cup for grades K-5 and 6-8, and
 - 1 oz. eq. daily minimum offered each day for all grade groups, with higher weekly minimum amounts for older grade groups.

Civil Rights

- All foodservice staff and the hearing, determining, confirming, and verifying, and officials signed off on reading the Frontline Staff handout for civil rights training for SY18-19. Those individuals must watch the full civil rights training annually and either use the appropriate sign-in agenda or add a note indicating actual training method. Only teachers, secretaries, custodians, and volunteers can complete civil rights training using the Frontline Staff handout.
 - If the district participates in Safe Schools training, there is a module for civil rights in foodservice that can be utilized to meet this requirement.
- A new complaint log must be started for each school year. Record the school year on the form, so it is clear which year it applies. At the end of the year if no complaints have been received, write "no complaints" and begin a new log for the new school year. Save all complaints log for at least three years plus the current. Blank logs were available, but none were dated. Dating and writing "no complaints" documents what occurred during the school year.

Food Safety and Buy American Provision

- SFAs are 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 SFA must have documentation that the domestic product is significantly higher in price or not available in sufficient quantities. Documentation for canned pineapple from Indonesia was not available during the AR. Complete and retain the SA's "Buy American Exemption Form" for all food products requiring documentation.
- Food safety training should be ongoing, and all applicable HACCP topics must be covered annually. Staff training must be documented with an agenda and sign-in sheet and be kept on file for three years plus the current year.
- The SFA must post a copy of the most recent food safety inspection in a publicly visible location at the site. This was corrected and the inspection was posted during CN Resource's on-site review.

Professional Standards

- Professional Standards regulations provide annual training requirements for all school nutrition professionals and require that some form of documentation be kept on file to show yearly Professional Standards compliance. Each year, directors must complete at least 12 hours of annual continuing education/training, staff working an average of at least 20 hours per week must complete at least 6 hours, and part time staff working less than 20 hours per week need at least 4 hours training. These hours must be tracked and required hours met each school year.
- Training hours must be tracked on a training log showing current training hours, key area/topics, and training subjects completed with certificates, agendas, and sign-in sheets retained for backup. The Professional Standards Learning Objectives and Topics with Codes which can be found on the [USDA Professional Standards Website](#).

- The SA recommends a training plan be identified at the beginning of the year with a timeline to hold employees accountable to reaching required hours. Ensure that all required annual trainings (Civil Rights, Food Safety, and Offer versus Serve) occur at the beginning of the school year.

Local School Wellness Policy

- All LEAs must assess their wellness policy at least once every three years on the extent to which schools are in compliance with the district policy, the extent to which the local wellness policy compares to model local school wellness policies, and the progress made in attaining the goals of the local wellness policy. LEAs must make this assessment available to the public. The SA has a template progress report available on the [School Wellness](#) page of the CNP website.
- Wellness Policy information regarding foods and beverages sold during school to students must be updated to reflect current Smart Snacks regulations.

Smart Snacks

- Food and beverages sold to students must comply with specific nutrition standards, must be tracked as an exempt fundraiser(s), or must be inaccessible during the school day (defined as midnight the morning of until 30 minutes after the school day ends).
- Per state policy, a maximum of ten exempted fundraisers per school site per year may be approved. An exempted fundraiser can be for a maximum of four consecutive school days. All exempted fundraisers beyond ten must be pre-approved by the SA using the request form. Details are available at the SA [Smart Snacks webpage](#) where a fundraising tracking form may be found.
- Vending machines are not currently utilized, however if there is a time when someone at the LEA takes the responsibility to fill the machines, ensure that they are following the Smart Snacks in Schools regulations with appropriate documentation.
- The [Smart Snacks Calculator](#) can be utilized to assess compliance of food items sold outside of the meal programs. Copies of nutritional information and compliance reports must be retained on file to support all foods sold to students during the school day.

School Breakfast

- SFAs must inform eligible families of the availability of reimbursable breakfasts served under the School Breakfast Program (SBP) at the beginning of the school year, as well as reminders regarding the availability of the SBP multiple times throughout the school year (7 CFR 210.12 (d)). This requirement is not being met and the lack of breakfast outreach was addressed as technical assistance during the last review. The SFA operates Provision 2 breakfast, providing free breakfast to all enrolled students. The only mention of free breakfast was located in the handbook for elementary students. The high school handbook does not reference breakfast, nor do the monthly newsletters. Lunch menus can be accessed from the LEA website, but no breakfast menu is available. Consider using these sources as options to promote the availability of free breakfast to households.

Special Provision Option – Provision 2 Breakfast

- Provision 2 breakfast base year (SY16-17) benefit issuance was previously validated by the SA on August 22, 2016. The retention of all required Provision 2 base year documentation was confirmed during the AR. Documents are kept in file folders. The SA recommends keeping these base year records separate from other records and clearly label them so they are not unintentionally discarded. The current Provision 2 cycle expires at the end of SY19-20. 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.
- Due to the potential financial burden of providing meals at no charge to households, at least a 65% or higher Free and Reduced percentage (<35% Paid) should be achieved to participate in Provision 2 breakfast. Anything lower may be unsustainable and compound losses over the 4-year cycle. The SA encourages the district to evaluate current claiming percentages on a monthly or quarterly basis and consider the sustainability of operating Provision 2.

Procurement

- A separate procurement review will be completed in 2020-2021 with a State Agency closure letter sent following completion of corrective action (if needed); please follow the guidance provided.

Fiscal Action

Benefit issuance errors, due to incomplete applications, did not affect student eligibility, so no fiscal action is required.

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,

Jennifer Butler, MEd, SNS
NSLP Coordinator

cc: Colleen Fillmore, PhD., RDN, LD, SNS, Director, Child Nutrition Programs
Wendy Jewett, Child Nutrition Director, Camas County School District
Wendy Strickler, Business Manager, Camas County School District

Civil Rights

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Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, 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.

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