



March 29, 2019

Lyle Bayley, Superintendent
500 Main St.
Castleford, ID 83321

Dear Superintendent Bayley,

On January 31, 2019, State Department of Education (SDE) Coordinators Heather Blume and Lynda Westphal conducted an Administrative Review of Castleford School District 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 Castleford School, operating Provision 2 breakfast, base year 2002-2003. The State agency (SA) would like to commend Elaine Hape, and the staff of Castleford 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:

Finding and Corrective Action Plan (CAP)

Finding 1 Local Wellness Policy

The Local School Wellness Policy must be in compliance with the USDA Final Rule established in July 2016, including the requirement that report(s) on the progress towards goals stated in the wellness policy be publicly available. The final rule requires LEAs to fully comply with the requirements of the final rule by June 30, 2017.

Corrective Action: Please provide a plan for how and when the wellness policy language will be brought into compliance with Federal requirements. Ensure the wellness assessment (e.g., Idaho Wellness Policy Progress Report) is available to the public; posting to the school /district website and/or in a school newsletter would support this requirement.

Due Date for CAP Completion: February 15, 2019

Corrective Action Response: The Food Service Director provided the plan and associated dates to update the wellness policy on February 14, 2019.

Finding 2 Meal Components and Quantities- Breakfast

For the week of menu review, the breakfast menu did not meet the minimum daily and weekly requirements for grain. A grain was offered daily, however the weekly minimum requirement was not met. Meat/meat alternate products may credit towards the grain requirement.

Corrective Action: 1. Provide a written statement that the daily and weekly grain requirements are now met. Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance.

2. Submit any necessary documentation to demonstrate that the menu findings listed under step 1 are now corrected. This documentation may include: production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.

Due Date for CAP Completion: January 9, 2019

Corrective Action Response: The weekly and daily grain requirements are now being met. The SFA discontinued Kix as one of the breakfast menu items, since it did not provide a full ounce equivalent portion. They will give two portions of Kix cereal to meet the 1 oz requirement until the current supply is gone. String cheese as well as graham crackers are available daily to meet the daily grain requirements. Egg pops are offered at least twice a week. This will ensure compliance with grain requirements for breakfast. Response provided on January 9, 2018.

Finding 3 Meal Components and Quantities- Lunch

For the week of menu review, the lunch menu did not meet the minimum daily requirement for grain. A grain was offered daily, however the minimum required portion size was not met.

Corrective Action: 1. Provide a written statement that the daily grain requirement is now met. Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance.

2. Submit any necessary documentation to demonstrate that the menu findings listed under step 1 are now corrected. This documentation may include: production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.

Due Date for CAP Completion: January 9, 2019

Corrective Action Response: To be in compliance the SFA updated the production record template to indicate one cup of rice instead of 3/4 cup for the next time they serve Tangerine Chicken and Rice. The SFA mistakenly thought that the Tangerine Chicken credited 0.5 grain. It has been changed. Response provided on January 4, 2019.

Finding 4 Verification

The sponsor did not verify the required number of free and reduced-price applications, i.e., 3% or 1.5% of the approved applications on file as of October 1 annually, as required by 7 CFR 245.6a. The sponsor should have used a standard sample size, rather than Alternate 2.

Corrective Action: Update Verification Report with the second application verified (that one will have to be updated in section 5-8 and in the question VC-1). Add a Corrective Action Plan specifying that SFA will complete the correct type of verification by consulting the notification received from the state, and that SFA will use the Verification Sample Selection Tool to ensure the correct number of applications is verified. CAP should also indicate that SFA will upload the tool into the report and ask the state agency to review it with her. The CNP Training Portal has an online Enhanced Verification training to assist in understanding the process of verification.

Due Date for CAP Completion: February 15, 2019

Corrective Action Response: The food service director updated the report while the State agency was onsite and completed the online Enhanced Verification Training on February 14, 2019.

Finding 5 Benefit Issuance

One application was approved without a social security number, resulting in an incomplete application.

Corrective Action: Contact the family and collect the missing information.

Due Date for CAP Completion: February 15, 2019

Corrective Action Response: The food service director contacted the family while the State agency was onsite.

Based on the administrative error of 2.44% associated with certification and benefit issuance, the SFA will no longer be required to conduct a second review of applications beginning school year 2019-20.

Commendations

- The menu offers a variety in all components. Salads and fresh fruits are offered frequently.
- Great job meeting the fruit requirements as well as all vegetable subgroup requirements.
- Congratulations on being awarded \$7,950.00 for a dishwasher as part of a USDA Equipment Grant. Your initiative in applying for this grant is appreciated and shows your commitment to your students.
- The meal today was loaded with vibrant fruits and vegetables and was well prepared. The students are lucky to have such caring lunch staff.
- Staff was very friendly and helpful. The decoration in the lunchroom was wonderful.
- Administrative paperwork was very organized and easy to review, thank you for the excellent preparation!
- Elaine completed an analysis of the food defense plan, this is an uncommon, yet highly recommended practice.
- The error rate of application determination was tremendously improved!

Technical Assistance (TA)

Certification and Benefit Issuance

- When determining applications, be sure to convert to annual income when multiple income frequencies are reported.

Meal Counting and Claiming

- Only enrolled children in the school can be provided meals without paying. Just because a family qualifies for free does not mean children who are not enrolled in the school can come and eat for free. Visiting family members must be charged the adult meal price.
- The State agency observed five breakfast meals consisting of only 2 food items. Discussed the regulations for Offer vs. Serve with the Food Service Director and disallowed the meals.

Meal Components and Quantities

- Independent contractor Child Nutrition Resources completed the menu review and provided the following TA:
 - During the Administrative Review the results of the menu review were provided to the SFA in a detailed Menu Review Results Report. 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 provide training as needed to

ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

- The federal regulations require menus to be planned that meet the minimum daily grain requirement. Planned lunch menu does not meet the daily minimum 2 oz. eq. requirement for Friday. On Friday the amount of brown rice served (3/4 cup) only provided 1.5 oz. eq. whole grains. Consider serving 1 cup of rice to this age group to provide 2 oz. eq. whole grains. A whole grain-rich roll or breadstick that provides at least 1 oz. eq. per serving could also be served to this age group.
- The breakfast daily minimum of 1 oz. eq. was not met on all days of the week. The Kix cereal that is offered daily only provides .5 oz. eq. whole grains. Offer 0.5 oz eq. Graham Crackers or another whole grain-rich item with this cereal to reach the minimum 1 oz. eq. grain requirement. Consider eliminating this cereal choice or offering two each per serving.
- The federal regulations require weekly minimum amounts of grains to be served. The weekly requirement of 7 oz. eq. for K-5 and 9 oz. eq. for 6-12 was not met. By following the suggestions to meet the daily grains, this requirement will also be met. After the daily 1 oz. eq. minimum is met, the weekly minimum can be met with additional grains or meat/meat alternates (the cheese stick or egg pop).
- The serving sizes for the K-5 grades vary during the week. Some days the K-3 students receive different serving sizes than the 4-5 grade students and on other days they receive the same serving size. Consistency among each grade group serving sizes will help ensure requirements are met when planning meals.

Procurement

- A separate procurement review is scheduled for the 2019-2020 school year. Please follow the guidance provided.

Special Provision Options

- **All records adequately maintained.** Provision 2 Base Year (SY 2002-2003) benefit issuance was previously validated by the SA on February 24, 2016. The retention of all required Provision 2 documentation was confirmed during the administrative review. All documents are hard copy and stored in a white container. The current Provision 2 cycle expires at the end of SY2022. 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.

Meal disallowances did not exceed the State agency disregard threshold, therefore, 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,



Heather Blume, MS, RD, LD, SNS
NSLP Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Elaine Hape, Child Nutrition, Castleford School District

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