



June 3, 2019

Wendy Johnson, Superintendent  
Kuna School District  
711 E. Porter  
Kuna, ID 83634

Dear Mrs. Johnson,

On February 5, 2019, State Department of Education (SDE) Coordinators Tamara Donovan, Jennifer Butler, and Lynda Westphal and Program Specialist Shawn Charters conducted an Administrative Review of Kuna School District for the following United States Department of Agriculture (USDA) programs:

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

The sites reviewed were Reed Elementary School and Initial Point High School which operate Provision 2 breakfast, base year 2018-19.

The State agency (SA) would like to commend Valdeen Swanson and the staff of Kuna 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: Verification

One application selected for verification was determined using bi-monthly income and should have been calculated using bi-weekly income, which led to a benefit change from free to reduced price status.

**Corrective Action:** Send a notification letter to the household allowing ten days before the reduction in meal benefits. Upload a copy of the notification letter and a copy of the benefit issuance list showing the benefit change into MyIdahoCNP.

**Due Date for CAP Completion:** February 20, 2019; completed February 15, 2019.

**Corrective Action Response:** A copy of the notification letter and a copy of the benefit issuance list showing the benefit change were uploaded into MyIdahoCNP.

### Finding 2: Professional Standards

Professional Standards regulations provide annual training requirements for all school nutrition professionals and require documentation be kept on file to show yearly compliance with professional standards. No employee training tracking logs have been maintained. Individual logs must be maintained and supported with back up documentation, such as certificates of completion and agendas. The district has recently implemented Safe Schools® training and plans to begin incorporating online trainings.

**Corrective Action:** Develop a plan for tracking training hours for all food service employees to comply with the professional standards requirements.

**Due Date for CAP Completion:** February 20, 2019; completed February 19, 2019

**Corrective Action Response:** A training tracking spreadsheet listing food service employees' names and recorded hours of training was uploaded.

### Finding 3: Local School Wellness Policy

The local school wellness policy (LWP) must be in compliance with the USDA Final Rule established in July 2016, including the requirement that the wellness policy and report(s) on the progress towards goals stated in the wellness policy be available to the public; posting to the school district website and/or in a school newsletter would support this requirement. The final rule required local education agencies (LEAs) to fully comply with the requirements of the final rule by June 30, 2017. The school district's wellness policy notes an amended date of May 9, 2006, and is out of compliance with Federal regulations. This is a repeat finding from the last administrative review, when the corrective action plan that was provided stated that the wellness policy would be updated, with final board approval in June 2016. Utilizing current ISBA Wellness Policy Sections in their entirety would help ensure compliance with wellness policy

regulations. The Idaho State Department of Education Wellness web page contains resources, including a model wellness policy.

**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 20, 2019, extended to March 8, March 29, April 11, May 14, and May 17; completed May 17, 2019.

**Corrective Action Response:** On March 8, the SFA advised that the ISBA wellness policy was being reviewed by the Assistant Superintendent Kim Bekkedahl and the wellness policy would be presented to the school board after the Wellness Committee had met about the changes. A range of possible dates for presenting the policy to the board were provided with the latest being May 14. On May 14, it was discovered that the Wellness Policy was still not included on the school board meeting agenda. The SA required a letter from district administration to identify a timeline for the policy to be presented to the board for approval and extended the due date to May 17, 2019. On May 17, a letter from Assistant Superintendent Kim Bekkedahl was received by the SA that stated,

*The Kuna School District #3 Wellness Committee is set to meet on June 3, 2019, to review and finalize the updated wellness policy. It will then be presented to the School Board of Trustees on June 11, 2019 for the first reading. Following any recommendations by the Board of Trustees at the June meeting, the wellness committee will meet and make any additions or corrections. The second and possibly the third reading of the Wellness policy will be on the July 9, 2019 agenda.*

#### **Finding 4: Meal Components and Quantities**

Contractor CN Resources (CNR) conducted the menu review and identified that for the week of menu review, the Initial Point High School lunch menu did not meet the 2 ounce equivalent (oz. eq.) minimum daily requirement for grain on Thursday. A grain was offered daily, however the minimum requirement was not met. The roll served provided 1.75 oz. eq. grain, which is an insufficient quantity.

**Corrective Action:** CNR required documentation demonstrating that the menu finding was corrected.

**Due Date for CAP Completion:** December 21, 2018; completed December 21, 2018.

**Corrective Action Response:** The roll recipe was updated and now credits at 2.5 oz. eq. grain per serving.

#### **Commendations**

- Great attention to detail regarding application determination and benefit issuance. No application determination errors were identified.
- The kitchen manager at Reed Elementary School was engaged and had a warm and inviting cafeteria for the students. She went above and beyond with the promotions to ensure children felt welcome.
- The Initial Point High School kitchen manager had an excellent grasp of Offer vs Serve and provided meals to the students in a respectful, upbeat manner.

- During the menu review, the CN Resource contractor provided the following commendations:
  - The Food Service Director was responsive to suggestions of ways to provide continuous improvement in the child nutrition program.
  - Outstanding job meeting all the requirements for the meal pattern at Reed Elementary School. All daily and weekly meal component and food quantity requirements were met for the week of menu review.
  - Students were served in a warm, friendly environment with high quality, freshly prepared foods, including baked chicken and two choices of fresh vegetable on the line, and a homemade breadstick. There were wonderful smells through the lunch service!

## Technical Assistance (TA)

### Civil Rights

- The nondiscrimination (NDS) statement must accompany any printed and any web-based materials referencing FNS programs. The short statement was accurately included on all NutriKids menus posted to the LEA website, but the lunch menu for Kuna High School was on a separate menu template that did not include the required statement. Update the menu template to ensure the NDS is included on all menus going forward.
- Replace the outdated civil rights “And Justice for All” poster in the entryway of Reed Elementary School with the current poster.

### Meal Components and Quantities

- CNR completed the menu review and provided recommendations to the SFA in a detailed Menu Review Results Report. Ensure menus to be planned that meet the USDA meal pattern daily and weekly requirements per Federal Regulations. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

### Offer versus Serve

- Ensure signage identifying a reimbursable lunch meal is completed every day at all sites including Initial Point High School and Reed Elementary School. Signage explaining what constitutes a reimbursable meal must be posted at or near the beginning of the service line. Menu signage is posted daily, but does not indicate what is required for a reimbursable meal. Signage stating that students must select at least ½ cup fruit and/or vegetable and two other components must be posted.

### Food Safety and Buy American

- During the menu review, CNR discussed the food safety plan with the SFA. CNR provided TA on the need to document receiving temperatures of deliveries, and the SFA must have a food safety plan that complies with the requirements. Ensure that all elements of the plan are implemented, and maintain all required records.

- Record dry storage temperatures for every operating day on the temp log to ensure food is stored within recommended temperature ranges for food safety and food quality. (CFR210.13(d))
- Remind employees to wash hands and change gloves when changing tasks. Due to a lunch serving line staff members absence, one food service employee was doing both the serving (gloved hands serving chicken strips) and the point of service duties (handling money). Please review the HACCP standard operating procedure regarding proper personal hygiene and hand washing. (CFR210.13(a))
- Placing hands in a bucket of bleach does not sanitize the hands and is not a proxy for washing hands with soap and water. Using the proper procedure to wash hands can stop the spread of illness-causing bacteria. According to the FDA, use plain soap and water and skip the antibacterial soap.
- Food safety training should be ongoing, and all applicable HACCP topics should be covered annually. Staff training must be documented with an agenda and sign-in sheet and must be kept on file for three years plus the current year.
- The most recent food safety inspection report must be posted in a location visible to the public. (7 CFR 210.13(b))
- 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 canned pineapple.

### Smart Snacks

- As per 7CFR210.11(b)(2), the school district must track food sales that occur within the school day, but outside of food service. Foods sold in school and intended for consumption during the school day (from midnight until 30 minutes after the end of school) fall under Smart Snacks regulations. Reed Elementary School was not keeping track of the one to two food sales per month, including popcorn. Smart Snacks information and resources, including a sample site tracking form, may be found on the SA Smart Snacks webpage.
- 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 (b)(2)). Additional information is available at the SA Smart Snacks webpage. The SA provided *A Guide to Smart Snacks in*

School brochure to the principal at Initial Point High School and reviewed the online Smarts Snack calculator for use in assessing food and beverage compliance.

- The food service director will provide fundraiser tracking forms to all school principals.

### Professional Standards

- Training standards apply to all school nutrition program employees, regardless of student enrollment in the school district or size of the LEA. (7 CFR 210.30)
  - Directors – must complete at least 12 hours of annual continuing education/training.
  - Managers – must complete at least 10 hours of annual continuing education/training.
  - Full time staff (working an average of at least 20 hours per week) - must complete at least 6 hours of annual continuing education/training.
  - Part time staff (working less than 20 hours per week) - must complete at least 4 hours annual continuing education/training, regardless of the number of part-time hours worked.
- Individual employee training logs should be filled out completely, indicating all required fields included on the log, on an on-going basis. The log should identify the hire date of the employee as well as how many hours are required per year for their position. Maintaining an updated log will identify the remaining hours to be completed each year. The SA recommends a training plan be identified at the beginning of the year with a timeline to hold employees accountable for reaching required hours.
- The SA reviewed professional standards requirements, including key area and key topic information required as part of tracking training.
- Currently, two of the three annual required trainings (offer vs serve and civil rights) occur at the beginning of the year during the in-service day training according to documentation on an agenda / sign-in sheet. However, there must also be annual food safety training documentation, including relevant HACCP training, for employees with duties relating to food service. The SA recommends including the total creditable hours for the in-service training. Currently, the agenda only includes the starting time of 8:00 a.m., but does not indicate an ending time or how much time was provided for the lunch break.

### Special Provisions:

- Provision 2 Base Year (SY 2018-19) benefit issuance was previously validated by the SA on October 16, 2018. The retention plan of all required Provision 2 documentation was confirmed during the administrative review. The current Provision 2 cycle expires at the end of SY 2022. To continue with Provision 2 breakfast, the SFA must contact the SA prior to the expiration date to see if they 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 four 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. Schools electing Provision 2 must pay, with funds from non-Federal sources, any difference between Federal reimbursement and the cost of serving breakfasts at no charge to all participating students.

### **Resource Management**

- Please consider using a “USDA Foods” description for the USDA Foods revenue and expense line items.

### **Procurement**

- A separate procurement review was conducted in SY 18-19 by contractors Keddington & Christensen, LLC. The State agency has issued corrective action for the findings discovered as part of this review. Once the corrective action has been approved, a procurement review closure letter will be sent. Please follow guidance provided in the procurement review closure letter.

### **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  
Valdeen Swanson, Child Nutrition Director, Kuna School District

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1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
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- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

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