



May 24, 2019

Dr. Don Coberly, Superintendent
Boise School District
8169 W Victory Road
Boise, ID 83709-4164

Dear Dr. Coberly,

On March 4 through 7, 2019, State Department of Education (SDE) Coordinators Heather Blume, Tamara Donovan, Jennifer Butler, Lynda Westphal, Teresa Goodsell, and Financial Specialist Katherine Forstie conducted an Administrative Review of Boise School District for the following United States Department of Agriculture (USDA) programs:

- School Breakfast Program (SBP)
- National School Lunch Program (NSLP)
- Fresh Fruit and Vegetable Program (FFVP)
- USDA Foods

The SA reviewed the following sites:

- Collister Elementary School
- Garfield Elementary School (operating Community Eligibility Provision and implementing the FFVP)
- Pierce Park Elementary (operating Community Eligibility Provision)
- Les Bois Junior High
- Frank Church High School (operating Community Eligibility Provision)
- Koelsch Elementary School(operating Community Eligibility Provision)

The State agency would like to thank Peggy Bodnar and the staff of Boise 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:

Finding and Corrective Action Plan (CAP)

Finding 1 - Certification and Benefit Issuance

One application (three students) that was reviewed was also selected for verification. The verification process resulted in a meal benefit change from free to reduced status, however, no collateral contact information was collected to confirm documentation submitted for verification. On the day of SA on-site review, the household was contacted to provide collateral contact for income and rather than provide documentation, the household then requested that meal benefits be changed to paid status.

One application (one student) had unclear income information on the application, noting identical income values in two places. Two applications (four students) had questionable income information on the applications, possibly noting hourly pay rate as the actual earnings every two weeks.

Corrective Action:

Contact the households to confirm income and determine status. Upload documentation to indicate the results of each conversation.

Due Date for CAP Completion: March 25, 2019

Corrective Action Response: Food service employees contacted the families and uploaded documentation to indicate the results of each conversation on March 13, 2019.

Finding 2 – 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 most recent wellness assessment 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: March 25, 2019

Corrective Action Response: The Food & Nutrition Services Supervisor uploaded a plan to indicate how the Local Wellness Policy will be brought into compliance on March 13, 2019.

Finding 3 – Resource Management

Financial information indicates that the maximum allowable food service operating balance was exceeded in SY17-18, which does not comply with the spend-down plan submitted by the SFA and approved by the SA in July 2017. Per §CFR 210.14(b) Resource Management Net Cash Resources, “The school food authority shall limit its net cash resources to an amount that does not exceed 3 months average expenditures for its nonprofit school food service or such other amount as may be approved by the State agency in accordance with §CFR 210.19(a).”

Corrective Action:

Revise the spend-down plan to ensure adequate funds are spent to comply with the maximum three month operating balance by December 2020.

Due Date for CAP Completion: March 25, 2019

Corrective Action Response: The Food & Nutrition Services Supervisor uploaded a plan to indicate how funds would be spent down on March 13, 2019.

Commendations

- Outstanding job meeting all meal pattern requirements for all sites selected. All daily and weekly meal component and food quantity requirements were met for the week of menu review.
- The written food safety plan is the most comprehensive and site-specific document that the CR Resource reviewer has observed. Kudos to the district staff for working with site staff on written SOPs to meet food safety requirements that align with actual implemented processes.
- The specialized diet tracking system the district created is complete and comprehensive.
- The staff was observed following food safety practices throughout preparation and service. Records for temperature logs are organized and complete – excellent organization of support documents.
- Students are served in a warm, friendly environment with many choices, including fresh fruit at every meal and fresh salad bar and vegetables on the lunch serving lines. Wonderful smells through the break and lunch service!
- All staff were responsive to answering questions; excellent positive attitudes.
- The development and use of the breakfast in the classroom monitoring form is a best practice and shows great initiative to support teachers and ensure accurate claiming. Excellent job providing training videos to teachers and students for successfully operating breakfast in the classroom as well!

Site Commendations

Garfield Elementary

- Each week, a unique or uncommon fruit or vegetable is offered as part of the FFVP. A variety of fruits and vegetables are always offered with nutritional educational

PowerPoint slides for teachers to share with their students. Great job in making the FFVP an educational and enjoyable experience.

Collister Elementary:

- Stephanie did a great job multitasking by monitoring the POS and serving students at the same time.

Koelsch Elementary

- The principal was doing a fine job tracking fundraisers.
- The food service staff were warm and friendly with the students and the meal looked delicious.

Pierce Park Elementary

- The teachers were helpful with the meal services, assisting in ensuring each student selected a reimbursable meal.
- The food service team did an excellent job with food safety, washing hands between tasks, and also worked very well as a team!

Les Bois Junior High

- The staff was observed following food safety practices throughout preparation and service. Records for temperature logs are organized and complete – excellent organization of support documents.
- Students are served in a warm, friendly environment with many choices, including fresh fruit at every meal and fresh salad bar and vegetables on the lunch serving lines. Wonderful smells through the break and lunch service!
- The lunch the day of review was very appealing and it seemed to be well accepted by students. Stacy and her staff worked well together and served the students in a friendly manner. Good Job!
- All staff were responsive to answering questions; excellent positive attitudes.

Technical Assistance (TA)

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - During the review, the components of the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group.
 - The SFA should consider providing additional signage and training to students to make sure they know what is required for a reimbursable meal. The SFA should also provide additional training to the point of service staff on the requirements of a reimbursable meal. The [USDA FNS website](#) can be used for training materials, resources and guidance on the meal pattern.

- TA given for lettuce salad when portion selected is 1/2 cup but credits as 1/4 cup. One option would be to use 1 cup measure in salad rather than tongs or show a sample of what 1 cup looks like on plate. Slowing lines may help cashiers observe dual lines. Crediting any vegetable in the pizza may also resolve the issue; per site no vegetable in pizza is counted toward crediting.

Food Safety

- 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).

Fresh Fruit and Vegetable Program (FFVP)

- The “Buy American” requirement in the National School Lunch Program (as provided in 7 CFR 210.21(d)) applies to purchases made with FFVP funds.

Meal Counting and Claiming

- When implementing breakfast in the classroom, ensure teachers understand that not all students are required to participate. Only have those who desire to eat breakfast go through the "service line". It was observed that at least two students selected all items offered and then returned all selected items into the "no thank you" bin.

Verification

- Make a copy of the application to go with all verification documentation. It could not be determined if there was a confirmation of the application prior to sending the letter.

Special Provision Option

- Maintenance of CEP records for SY 14-15 (data year used) and SY 15-16 (first cycle year) were previously validated by the SA using April 1, 2015, data. Direct Certification reports for April 1 data have been run each year. The current CEP approval expires at the end of SY 18-19. Records have been retained; ensure all CEP records continue to be maintained as per requirements. As your district is in the fourth year of a CEP cycle, you may qualify to continue participating in CEP for one grace year if your district-wide Identified Student Percentage (ISP) is less than 40 percent but at least 30 percent.
- Reimbursement for schools participating in a grace year is based on the ISP as of April 1 in Year 4 of the current four-year cycle. The Community Eligibility Provision (CEP) Planning & Implementation Guidance states that if the LEA, group of schools, or individual school regains an ISP meeting the 40 percent threshold as of April 1 of the grace year, the State agency may approve a new four-year cycle beginning the following school year. If the ISP as of April 1 of the grace year does not meet the 40 percent ISP

requirement, the LEA must return to standard counting and claiming, or enroll in another special Provision option for the following school year.

- If you intend to elect CEP/start a new CEP cycle, you must do the following by June 30, 2019: Notify the State agency of your intent to elect CEP, listing site(s), and Upload, into MyIdahoCNP Application Attachment List, enrollment lists and valid direct certification documents, by site(s), as of April 1, 2019.

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,



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

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Peggy Bodnar, Food and Nutrition Services, Boise S.D.

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- (3) email: program.intake@usda.gov.

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