



December 6, 2018

Mr. Kevin Ramsey, Superintendent
South Lemhi SD #292
111 South 3rd St.
Leadore, ID 83464

Dear Mr. Ramsey,

On November 13, 2018, State Department of Education (SDE) Coordinators Lynda Westphal and Jennifer Butler conducted an Administrative Review of Leadore School for the following United States Department of Agriculture (USDA) programs:

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

The State agency (SA) would like to commend Lisa Bird and the staff of South Lemhi 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 – Meal Components

CN Resource, independent contractor, analyzed one week of menus for review and found the following:

- The 6-8 lunch menu did not meet the minimum weekly requirement for the starchy vegetable subgroup.
- The 9-12 lunch menu did not meet the minimum daily fruit requirement. Fruit was offered daily, however the minimum required portion size was not met.
- The 9-12 lunch menu also did not meet the minimum daily requirement for meat/meat alternate. A meat/meat alternate was offered daily, however the minimum required portion size was not met.
- Not all grains provided were whole grain-rich.

Corrective Action: Adjust menus or correct the computer printout

Due Date for CAP completion: November 1, 2018

Corrective Action Response: Menus and production records have been adjusted. This finding is closed.

Finding 2 – Certification and Benefit Issuance

One child's form was not signed by the homeless liaison. This signature is required for certification of benefits.

Corrective Action: The homeless liaison must sign the form and upload into MyIdahoCNP.

Due Date for CAP completion: November 29, 2018

Corrective Action Response: The form was signed on November 19, 2018 by the liaison.

Finding 3 – Provision 2 documentation

Provision 2 Base Year (SY 09-10) benefit issuance was previously validated by the SA on 12/17/15. However, during this administrative review, the retention of all required Provision 2 documentation could not be confirmed due to missing records (daily meal counts for Leadore School).

Corrective Action: Locate and submit the missing records to the SA.

Due Date for CAP completion: November 29, 2018, Extended to December 5, 2018

Corrective Action Response: Meal counts by name were found for Sept-Dec 2009, however the January through May 2010 meal counts by name could not be located in the backup per e-mail December 3, 2018. Since these daily meal counts could not be located, standard counting and claiming procedures must start when school resumes on or after January 2, 2019. If the SFA wishes to participate in Provision 2 Breakfast next school year, advise the SA during renewal and establish a new base year during the next school year (SY 19-20).

Finding 4 – Civil Rights

The Confirming and Hearing Official must have annual USDA civil rights training. Training is available at the [SA Civil Rights website](#). Upload a dated sign in sheet to provide documentation that the Confirming and Hearing Officials received civil rights training.

Corrective Action: Upload a dated sign in sheet to provide documentation that the Confirming and Hearing Officials received civil rights training.

Due Date for CAP completion: November 29, 2018

Corrective Action Response: The Hearing official took the training and signed the attendance roster.

Finding 5 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. 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. 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.

Corrective Action: Upload a plan to bring the wellness policy into compliance and conduct a triennial wellness assessment and how it will be communicated with the public.

Due Date for CAP Completion: November 29, 2018

Corrective Action Response: An assessment using the SA Wellness Policy Assessment tool was completed and uploaded into MyIdahoCNP.

Commendations

- Congratulations on being awarded \$17,490.00 for a walk in freezer as part of a 2018 USDA Equipment Grant. Your initiative in applying for this grant is appreciated and shows your commitment to your students.
- All staff was very friendly and very easy to work with. Thank you!
- The lunch served on the day of review was nutritious and delicious.

Technical Assistance (TA)

Certification and Benefit Issuance

- Homeless/migrant/runaway lists are lists of students generated by the appropriate school district liaison who are certified to be homeless, migrant, or runaway, and, therefore, qualify to receive free meal benefits. The list(s) must be signed and dated by the designated liaison and retained on file.

Verification

- The Confirming Official, who must be a different individual than the Determining Official, must review an application prior to informing the household that they are subject to verification. This ensures the application eligibility was determined correctly. The Confirming Official must complete the "Official Use Only" box on the free and reduced 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 F/R application. Verification must be in line with requirements outlined in 7 CFR245.6a.

Dietary Specifications and Nutrient Analysis

- CN Resource completed the menu review and provided the following TA:
 - Recommend completing production records to show specific numbers for planned, actual and leftovers, for each of the three schools/serving sizes (listed as D, E, and C for Elementary, Middle and High School respectively).

Meal Components and Quantities

- CN Resource completed the menu review and provided the following TA:
 - 2 oz. equivalents of meat/meat alternate are required daily for grades 9-12. This was not met on 1 day.
 - ½ cup of starchy vegetables are required weekly for grades K-8. Currently this week's planned menu for grades 6-8 offers 3/8 cup of starchy vegetables.
 - All grains served must be whole grain-rich in order to meet the whole-grain rich requirement. The menu met 91.9% whole grains.
The following item is not whole grain-rich: Rotini pasta served on Tuesday
 - 1 cup of fruit is required to be offered daily to grades 9-12. This was not met on 1 day.
The production record indicated that only ½ cup of fruit was offered to the 9-12 grade students.
 - Ensure grain products are whole-grain rich, or do not credit toward the grain requirements and serve as extra.

Food Safety

- During the review, the food safety plan was discussed with the SFA. The SFA must have a food safety plan available at each site so that food service staff may stay in compliance with food safety requirements and procedures. This food safety plan should be site specific and contain the appropriate standard operating procedures for the site.
- The HACCP manual is from 2005 and is missing required elements. The manual should be updated with a current version. The Institute of Child Nutrition has a sample standard operating procedure (SOP) that can be utilized. It can be located at this link for [Food Safety Resources](#).

Civil Rights

- Ensure the civil rights statement is visible on both the breakfast and lunch menus.

Provision 2 breakfast

- Provision 2 operates on a 4-year cycle. During the first year, known as the base year, a reimbursable breakfast is offered at no charge to all enrolled children and claimed at their meal eligibility. Reimbursement during the subsequent years is determined by applying the percentages of free, reduced price, and paid meals served during the base year to the total meal count for the claiming period in subsequent years. Federal reimbursement is based on these percentages and the meals are reimbursed at the free, reduced price and paid rates.
- Because all breakfast meals are served at no charge to children in Provision 2 schools, the school is no longer receiving payment from households that would normally be paying the reduced price and full price for meals. Therefore, the district may need to make up the difference between Federal reimbursement and meal costs. A school considering Provision 2 must evaluate whether the savings in administrative costs associated with simplifying meal counting, cash handling, and claiming procedures under Provision 2 offset the costs of providing breakfast to all children at no charge.
- Due to the potential financial burden of providing meals at no charge, 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 State agency encourages the district to evaluate current claiming percentages on a monthly or quarterly basis and consider the sustainability of operating Provision 2.
- Per SP46-2015, State agencies are required to conduct a review of base year certification and benefit issuance documentation for any school food authority requesting approval to participate in Special Provisions 2.

Local School 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. 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.

Procurement

- A separate procurement review will be completed by contractors (currently Keddington & Christensen, LLC) in 2020-21 with a State Agency closure letter sent following completion of corrective action (if needed); please follow the guidance provided.

Your review is now closed.

There is no fiscal action resulting from this review. 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,



Lynda Westphal
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Lisa Bird, Food Service Director, South Lemhi SD #292

Civil Rights

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- (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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