



January 10, 2019

Vickie Chandler, Superintendent
Garden Valley School District
1053 Banks Lowman Rd.
Garden Valley, ID 83622

Dear Superintendent Chandler,

On November 28, 2018, State Department of Education (SDE) Coordinators Jennifer Butler and Heather Blume conducted an Administrative Review of Garden Valley 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 Garden Valley Elementary School (PK-5).

The State agency (SA) would like to commend Debbie Updike and the entire staff of Garden Valley 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

One application was incorrectly determined as qualifying for free, due to not including all income in the calculation, and should have been determined as reduced. A notice of adverse action was sent to the household on November 28 while SA reviewers were onsite.

Corrective Action: Upload a benefit issuance list after the 10 day adverse action period showing that the students' benefit has been changed.

Due Date for CAP Completion: December 12, 2018; completed December 10, 2018.

Corrective Action Response: A benefit issuance list was uploaded showing the student's eligibility was correctly changed from free to reduced price.

Finding 2: Civil Rights

The district civil rights policy indicates that complainants are referred to the superintendent in the absence of the food service director. Given the level of responsibility of receiving complaints, the superintendent must receive the full training on civil rights. A video training is available under the Training Resources tab on the [CNP Resource Center webpage](#).

Corrective Action: Upload a signed and dated training agenda showing that the superintendent has completed the required civil rights training.

Due Date for CAP Completion: December 12, 2018; completed December 3, 2018.

Corrective Action Response: A dated sign-in sheet was uploaded showing the superintendent completed civil rights training on November 29, 2018.

Finding 3: Meal Components and Quantities

Contractor CN Resources (CNR) conducted the menu review and identified that for the week of menu review, the lunch menu did not meet the minimum weekly requirements for grain. A grain was offered daily, however the minimum weekly requirement was not met.

Corrective Action: CNR required documentation demonstrating that the menu finding was corrected and these items were uploaded on October 27, 2018.

Due Date for CAP Completion: Due October 27; completed October 27, 2018

Corrective Action Response: Beginning November 1, 2018, the peanut butter and jelly (PBJ) alternate will be offered only once a week and a cheese sandwich will be offered on Mondays. A 1 oz. cheese stick and another 1 oz. eq. grain will be served with the PBJ. These changes will ensure the weekly grain and meat/meat alternate requirements are met with all meal choices.

Commendations

- The time and effort in preparing for the Administrative Review and responding to requests in a timely manner was greatly appreciated.
- Staff appearance was very professional with matching shirts and caps; thanks for all you do!
- The Food Service page of the district's website is helpful and easy to navigate providing links to the breakfast and lunch menus, free and reduced meal application, wellness policy, and progress report. The page also includes the full USDA nondiscrimination statement as well as a link to this statement in other languages.
- Debbie does a good job ensuring that non-program food charges are compliant and invoices are provided for catered events.
- During the menu review, the CNR contractor provided the following commendations:
 - Students are served in a warm, friendly environment with many choices, including a colorful salad bar and fresh fruit, and freshly baked whole grain rolls! The cafeteria smelled wonderful throughout the lunch service.
 - All staff was responsive to answering questions and receptive to suggestions, technical assistance and corrective action. Excellent, positive attitudes.
 - Great work meeting all meal pattern requirements for breakfast, for the week of menu review.

Technical Assistance (TA)

Certification and Benefit Issuance

- The Local Education Agency's (LEA) designated homeless liaison is responsible for determining if a student meets the requirements of the McKinney-Vento Act. In order for the SFA to identify a student as eligible for free meals, the student's name must be included on a certified list signed and dated by the homeless liaison. That information should be provided in a valid format (date and validating signature) on a periodic basis to the SFA so that students can receive free meals as soon as that information is determined.

Meal Components and Quantities

CN Resource 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. 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 provide training to staff as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.
- Update ingredients on freshly baked items to reflect USDA 60/40 blend flour (in case a recipe in past was prepared with whole wheat flour and an enriched product such as corn meal, to avoid a non-whole grain rich product).

- Utilize USDA resources - RAW worksheet and USDA National Nutrient Database - for recipe standardization and component calculations.
- For a four-day school week, a minimum of 6.5 oz. equivalents of meat/meat alternate are required weekly. The PBJ sandwich entrée, if chosen daily, will only provide 4 oz. equivalents of meat/meat alternate for the week (5 oz. equivalents with the sunflower seeds on the salad bar).
 - For the purpose of this review, to meet the weekly requirements, beans offered on the salad bar on some days were included to credit towards the meat/meat alternate component. If the beans from the salad bar are to credit towards the weekly meat/meat alternate requirement, the menu planner must ensure that the beans are clearly noted to be a meat/meat alternate when a PBJ is available on the production records. The line staff must understand the need for students to take both the PBJ and the beans in the correct amount in order to credit as a meat/meat alternate, if this is one of the three components taken to make a reimbursable meal under Offer Versus Serve. Another option is to offer a 1 oz. cheese stick with the PBJ, or switch to the larger sandwich from this manufacturer which credits as 2 oz. equivalent meat/meat alternate. This option would allow the PBJ meal to meet daily and weekly meat/meat alternate requirements, without the salad bar.
 - For a four-day school week, a minimum of 6.5 oz equivalents of grains are required weekly. The PBJ sandwich entrée, if chosen daily, will only provide 4 oz. equivalents of grain for the week. Consider serving the larger sandwich from this manufacturer which credits as 2 oz. equivalents of grains or offer an additional grain option with this entrée choice.
 - The SFA opted to add the cheese stick to the PBJ and serve a cheese sandwich once a week to meet the weekly grain and meat/meat alternate requirements.
- On Monday, half of a large banana was offered. Since this size of banana is not found in the Food Buying Guide, an in-house yield data study can be performed to determine the crediting. Retain documentation of results after completing an in-house yield study.
 - For the purpose of this review, the banana half was credited as ½ cup per documentation provided via email from the SFA. Information on in-yield data studies can be found in the introduction to the Food Buying Guide. This documentation was also emailed to the SFA.

Food Safety and Buy American Provision

CN Resource completed the menu review and provided the following TA:

- The SFA must ensure that all elements of the food safety plan are implemented. The SFA should be following the procedures as outlined in the plan and maintaining all required records. Recommended SOP be revised to reflect key drop deliveries to ensure temperatures are being checked and recorded.
- 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. Complete and retain the Buy American Exemption Form for documentation.

SFA On-Site Monitoring

- According to 7 CFR 210.8 (a)(1) and 7 CFR 220.11 (d)(1), each SFA with two or more feeding sites must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating NSLP and 50% of schools operating SBP under its jurisdiction prior to February 1, each school year. There is no record that this review has occurred in the past. Ensure that this review is conducted for all feeding sites (Garden Valley and Loman) as indicated no later than February 1 and retain documentation for three years plus the current year.

Professional Standards

- Ensure that supporting documentation (agendas, certificates of completion, sign-in sheets, etc.) is kept on file with the training tracking log.

Procurement

- A separate procurement review will be completed by contractors (currently Keddington & Christensen, LLC) in 2020-2021 with a State agency closure letter sent following completion of corrective action (if needed); please follow the guidance provided.

Special Provision Options

- Provision 2 base year (BY) benefit issuance was previously validated by the SA on February 29, 2016, for Lowman School (BY13-14) and on October 13, 2017, for Garden Valley ES and Garden Valley Jr/Sr HS (BY17-18). The retention of all required Provision 2 documentation was confirmed during the administrative review. Daily meal count records by student name and eligibility are maintained on a thumb drive. All other BY records are kept in a plastic hanging file box and white banker's box.
- The current Provision 2 cycles expire at the end of SY20-21. If you wish to continue with Provision 2 breakfast (and lunch at Lowman School), you must contact the SA prior to the expiration date to see if you qualify for an extension.

Fiscal Action

Due to benefit issuance errors, fiscal action was calculated. However, since the amount falls under the \$600 threshold, the fiscal action will be disregarded and no financial adjustment will occur.

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, M.Ed, S.N.S
NSLP Coordinator

cc: Colleen Fillmore, P.h.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Debbie Updike, Child Nutrition Director, Garden Valley School District

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