



December 17, 2018

Ryan Cantrell, Superintendent
Bruneau-Grand View Jt SD
39678 State Hwy 78
Bruneau, ID 83604

Dear Superintendent Cantrell,

On November 29, 2018, State Department of Education (SDE) Coordinators Heather Blume and Jennifer Butler conducted an Administrative Review of Bruneau-Grand View Jt. School District 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 Jessica Medrano and Paulina Bravo and the entire staff of Grand View Elementary 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 and Quantities

On the day of menu review, the lunch menu did not meet the $\frac{1}{2}$ cup daily fruit requirement. A fruit was provided, however, the minimum required portion size was not met. Planned amount was 3 wedges, orange size was #113, so 6 wedges needed to be the planned amount. This was corrected before meal service for the day of review.

Corrective Action:

1. Provide a statement that the SFA will ensure that all meals claimed for reimbursement contain at least the minimum number of required components in the minimum portion size for the specific grade group.
2. Include a statement that the USDA Food Buying Guide will be used to determine serving size and crediting for fresh fruit.

Due Date for CAP Completion: November 19, 2018

Corrective Action Response:

On November 15, 2019, the food service director stated that the staff at Bruneau-Grand View received training on using the USDA Food Buying Guide website to assure that they are serving the correct crediting amount of fresh fruit.

Finding 2 - Meal Components and Quantities

For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the red/orange vegetable subgroup. Additionally, the lunch menu did not meet the minimum weekly requirement for the beans/legumes vegetable subgroup for the week of review.

Corrective Action:

1. Provide a written statement that the red/orange and beans/legumes vegetable subgroup 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: November 18, 2018

Corrective Action Response:

The staff at Bruneau-Grand View uploaded the corrected menu for the noncompliant week on November 5, 2018. The menu added $\frac{1}{2}$ cup of bean/legume once a week and increased the salsa serving to $\frac{1}{4}$ cup along with $\frac{1}{2}$ carrots to meet the $\frac{3}{4}$ cup red/orange requirement for the week.

Finding 3 - Food Safety

The SFA's food safety plan does not contain the required elements.

Corrective Action:

1. Provide the date that the finding was brought into compliance or the planned date of completion.
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
3. Provide the following Standard Operating Procedures (SOP) from the food safety plan: Receiving Deliveries and Calibrating Thermometers.

Due Date for CAP Completion: November 19, 2018

Corrective Action Response:

On November 15, 2018, the food service director provided the plan that when deliveries come in the staff at Bruneau-Grand View will inspect the product and date when it was received as well as save item numbers in case of a recall. Staff now have a calibrating thermometer log and will calibrate on a weekly basis and document it.

Finding 4 - Food Safety

Storage violations were observed on-site. The SFA had food that was not dated upon delivery. The SFA had food that was opened and not dated with date opened.

Corrective Action:

1. Provide the date that the finding was brought into compliance or the planned date of completion.
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
3. Provide a written statement that all food items are dated with the delivery date and all food items are dated with the date the product was opened.

Due Date for CAP Completion: November 19, 2018

Corrective Action Response:

On November 15, 2018, the food service director stated that staff now have a stamp to use for marking the deliveries with the date received/opened as product is brought into the kitchen.

Finding 5 - Certification and Benefit Issuance

A repeat issue was identified in which applications with multiple earners were converted to annual household income even when the frequency was the same. Only convert to annual income when the income frequencies differ.

Corrective Action:

1. Provide a plan for how applications with multiple earners with the same income frequency will be determined.

Due Date for CAP Completion: December 14, 2019

Corrective Action Response:

The food service director uploaded a plan for how applications with multiple earners with the same income frequency would be determined without converting the income to annual on December 11, 2018.

Finding 6 - Smart Snack Regulations

Upon analysis by the Smart Snack Calculator, it was determined that the popcorn sold every Thursday does not meet Smart Snack nutrition guidelines. As this is a weekly food fundraiser, the 10 exemptions Idaho allows for non-compliant food fundraisers have been exceeded for the school year.

Corrective Action:

1. Provide a narrative to explain how food fundraisers will be tracked and Smart Snack requirements met.

Due Date for CAP Completion: December 14, 2019

Corrective Action Response:

Grand View Elementary is looking at other vendors that supply smart snack compliant popcorn for their fundraisers. Grand View Elementary now has the proper documentation to track popcorn fundraisers so they don't exceed the 10 fundraiser limit per year.

Finding 7 - 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 required districts to fully comply with the requirements of the final rule by June 30, 2017.

Corrective Action:

1. 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: December 14, 2019

Corrective Action Response:

Food Service staff along with the district policy committee will be working on bringing the wellness policy to full compliance with the USDA final rule regulations. The goal is to be in compliance by January 2019. Once the wellness policy is in full compliance, the district will upload it to the district website and publish it in the newsletter so it is available to the public.

Commendations

- Staff were responsive to answering questions and were receptive to suggestions.
- The students are served in a warm, friendly environment. Fresh fruits are offered daily at lunch and fresh vegetables are offered most days at lunch.
- Staff practiced food safety throughout the observation period - good job!
- Jessica and Paulina are very organized and maintain clearly labeled records.
- The produce signage displayed on the FFVP cart is a great way to educate students on the daily offering.
- The "sight word challenge" at the Point of Service is a fun and engaging educational opportunity.

Technical Assistance (TA)

Certification and Benefit Issuance

- Ensure that the "Approval Date" on the benefit issuance list is updated consistently to match the dates of new eligibility determinations.

Verification

- The LEA must make at least one attempt to contact the household when the household does not adequately respond to the request for verification [7 CFR 245.6a(f)(6)]. While the required follow-up attempt may be in writing (mail or e-mail) or by telephone or text message, make sure to document the attempt to contact the household.
- The confirming official must review the application to ensure the correct determination was made prior to sending the verification notice to the household, rather than after the notice is sent.

Meal Components and Quantities

- The contracted company, CN Resource, completed the menu review and provided the following TA:
 - Record milk on "What's for Lunch" and "What's for Breakfast" signs. Milk was added to the signs before meal service began.
 - Complete production records in two step process. Record planned menu, portions, component meal pattern contributions, and planned quantities ahead of production in first step. Record actual menu, including any changes or substitutions and actual production during meal prep as second step. Also include amount left over after meal service, even if amount is to be discarded.
 - Provided information on how to use the Food Buying Guide to determine ½ cup portions of fresh fruit. Offer the full amount, but remember in OVS that the smaller portion is acceptable so long as tray has ½ cup total fruit and or vegetable. Ensure staff are checking each meal to serve the appropriate number of components on the tray for reimbursement. Provide additional training to staff on how to identify reimbursable meals, if needed.
 - During the Administrative Review the results of the menu review were provided to the food service director in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served within the district must meet all daily and weekly meal pattern requirements for the specific grade group. The food service director 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.

Food Safety

- CN Resource completed the meal service observations and provided the following TA:
 - Create labels that can easily be filled in and placed on products with received date and opened date information. Foods must be tracked for any food recalls, so lot numbers need to be retained.
 - Locate standard operating procedures (SOPs) at the Institute for Child Nutrition website for use in reviewing/ updating current SOPs and determining if any other SOPs such as receiving, calibrating thermometers, or when to restrict or exclude workers due to illness are missing.

Fresh Fruit and Vegetable Program (FFVP)

- The school must widely publicize the FFVP. Promoting this competitive grant on the school's website or newsletter would meet this requirement. The SA provided a certificate of award and should be posted at the school site for the public to see.

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. The SFA is currently conducting breakfast and lunch reviews for 100% of the schools. The appropriate form is completed but does not include signatures or names for the School Representative or the SFA Reviewer. Ensure that the appropriate signatures are included. The school representative is generally the person who was monitored while operating the POS. The SFA reviewer is generally the food service director who can ensure action is taken on any area determined to not be compliant and requiring corrective action.

Local School Wellness Policy (LWP)

- All 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. Posting to the school/district website and/or in a school newsletter would support this requirement.

Professional Standards

- Professional standards training tracking logs for each employee must contain the required elements including key area and key topic codes, training title/subject, completion date, and creditable training time. The SFA maintains training records, but did not accurately record all required elements on the tracking log.

Procurement

- A separate procurement review will be completed by independent contractor Keddington & Christensen, LLC in SY2019-2020. The State agency will provide a closure letter once corrective action (if needed) is complete; please follow the guidance provided.

Provision 2 Base Year records previously validated:

- **All records adequately maintained.** Provision 2 Base Year (SY16-17) benefit issuance was previously validated by the SA on September 22, 2016. The retention of all required Provision 2 documentation was confirmed during the administrative review. All documents are hard copy and stored in a black bin. The current Provision 2 cycle expires at the end of SY2020. 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.

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, M.S., R.D., L.D., S.N.S.
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Jessica Medrano, Food Service Director, Bruneau-Grand View Jt. School District

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