



January 10, 2019

Wendy Moore, Superintendent
Genesee Joint School District
330 West Ash Street
Genesee, ID 83832

Dear Superintendent Moore,

On December 11, 2018, State Department of Education (SDE) Coordinators Jennifer Butler and TJ Goodsell conducted an Administrative Review (AR) of Genesee Joint School District for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was the Genesee Jr.-Sr. High School (7-12).

The State agency (SA) would like to commend Charlotte Craig and the entire staff of Genesee Joint 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 AR 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 AR 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 – Smart Snacks

Food and beverages sold to students must comply with specific nutrition standards, be tracked as exempt fundraiser(s), or be inaccessible during the school day (defined as midnight the day before until 30 minutes after the school day ends) per 7 CFR 210.11. Genesee Jr-Sr High School vending machines located in the hall were on and available to students during the school day, and contained non-compliant items (flavor packets taped to water bottles and full sized candy bars). As vending machines are considered a food fundraiser, the ten exemptions Idaho allows for non-compliant food fundraisers have been exceeded for the school year. The SA discussed Smart Snacks regulations and fundraiser tracking requirements with the school principal Kelly Caldwell. During the last review, technical assistance was provided on tracking fundraisers. The tracking requirement is still not being met. Per state policy, a maximum of ten exempted fundraisers per school site per year may be approved. An exempted fundraiser can be for a maximum of four consecutive school days. All exempted fundraisers beyond ten must be pre-approved by the SA using the request form. Details are available at the [Idaho SDE Child Nutrition Programs Smart Snacks web page](#) where a fundraising tracking form may be found.

Corrective Action: Upload a narrative explaining what steps will be taken to ensure Smart Snack requirements will be met and fundraisers will be tracked.

Due Date for CAP completion: January 8, 2019; completed January 8, 2019

Corrective Action Response: A letter was uploaded advising that the superintendent and secondary principal have discussed the required changes to become compliant with Smart Snack regulations. Fundraising will be tracked on the SA template log and records will be kept by the secondary principal. The secondary principal will also be responsible for the vending machines and will use the Smart Snacks calculator to determine compliance.

Finding 2 – Local Wellness Policy (LWP)

In July 2016, the regulations on wellness policies (§210.31) was finalized and required LEAs to be in compliance by June 30, 2017. Although the wellness committee has recently modified their wellness plan, it is missing required elements, making it noncompliant. The LEA's current LWP posted under *Board Policies* on the district's website include related policies with revised and reviewed dates ranging from 2006-2015, prior to the final rule. The wellness policy committee must work to get the LWP compliant with the final rule requirements. For more information, please visit the [Idaho SDE Child Nutrition Programs School Wellness website](#).

Corrective Action: Upload a narrative describing the plan for how and when the LWP will be brought into compliance with Federal requirements.

Due Date for CAP completion: January 8, 2019; completed January 9, 2019

Corrective Action Response: The LEA adopted the “Alliance for a Healthier Generation Model Wellness Policy” (dated SY2018-2019). It was advised that this policy was adopted in September 2018, but was not put on the website or made available until after the AR. The outdated LWP has been deleted from under *Board Policies* and the newly adopted policy is located under *Links* on the district’s website.

Finding 3 – Meal Components and Quantities – Breakfast

Contractor CN Resource (CNR) conducted the menu review and identified for the week of menu review, the breakfast menu did not meet the minimum daily 1 ounce equivalent requirement for grain. A grain was offered daily, however the minimum required portion size was not met.

Corrective Action: CNR required documentation demonstrating that the menu findings have been corrected and these items were uploaded on November 2, 2018.

Due Date for CAP completion: Due November 6; completed November 2, 2018.

Corrective Action Response: The cereal serving sizes were increased to 1 cup for all grades to meet the minimum daily grain requirement.

Finding 4 – Meal Components and Quantities – Lunch

CNR conducted the menu review and identified for the week of menu review, the lunch menu did not meet the minimum daily and weekly requirements for meat/meat alternate and grain. Although these components were offered daily, the minimum daily and weekly requirements were not met. Additionally, the lunch menu did not meet the minimum weekly requirements for the beans/legumes vegetable subgroup.

Corrective Action: CNR required documentation demonstrating that the menu findings have been corrected and these items were uploaded on November 2, 2018. After review of the corrective action responses three areas needed further correction and were discussed with the SFA. The SFA advised the menu changes will be implemented.

Due Date for CAP completion: Due November 6; completed November 7, 2018

Corrective Action Response: To meet the grain minimum, additional French toast sticks will be served and a breadstick will be served with the chef salads. To meet the meat/meat alternate minimum, additional cheese will be served with the lentil chili to grades 9-12, and the fajita chicken will be increased in the chicken Caesar salad. Baked beans have been added to the menu to meet the bean/legumes vegetable subgroup requirement for the week.

Commendations

- The CN Resource contractor advised, “Charlotte has a very organized and very clean kitchen! I enjoyed watching her positive interactions with all the students!”
- Charlotte demonstrates enthusiasm to operate compliant programs. Her time and effort in preparing for the AR and responding to requests in a timely manner was greatly appreciated.
- Great job on no benefit issuance errors!
- The SFA has a comprehensive website that includes information on monthly menus, meal prices, free and reduced meal applications, as well as links to the Idaho CNP website and USDA's full nondiscrimination statement.

- Genesee School District does a great job allowing students to make healthy food choices at breakfast. Additionally, students are held accountable for ensuring they 'paid' for their meal by providing their individualized decorative tokens at the meal point of service. This process helps educate children about the value of their breakfast meal while ensuring eligibility status is not overtly identified. The food service director has a great rapport with students.

Technical Assistance (TA)

Certification and Benefit Issuance

- Completed applications are generally received in the classroom or front office and then submitted to the SFA. It was discovered that there was a significant delay with some applications being submitted to the SFA for determination. This delay interferes with the SFA's timeline requirement to determine the application, may cause the household to unnecessarily accrue unpaid meal charges, and potentially interferes with Verification reporting requirements. The SA recommends Free and Reduced Applications be date stamped upon receipt to allow students to receive benefits as of the date of receipt as opposed to the date of determination (SP11-2014). Additionally, the date stamp will document that eligibility was determined within the ten operating day window.

Verification

- It is not necessary for the Determining, Confirming, and Verifying Officials to sign all meal applications. This process is reserved for Verification and times when the SFA is mandated to conduct a second review of applications, or when there is a question regarding the original determination. The Confirming Official, who must be a different individual than the Determining Official, must review the selected application(s) prior to beginning the Verification process. This ensures the application eligibility was determined correctly. Both officials complete the "Official Use Only" box on the free and reduced meal application that has been selected for verification. Once the verification process has been completed and results determined, the Verifying Official, who can be either the Confirming or Determining Official, must complete the "Official Use Only" box on the meal application. The Hearing Official is a separate individual with supervisory authority over the other officials that would oversee the hearing process and settle the eligibility if the confirmed original determination is disputed.

Meal Components and Quantities

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

- During the AR, 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 as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future ARs, may result in fiscal action.

- The federal regulations require daily minimum amounts of grains to be served. Read Product Formulation Statements (PFS) from the manufacture carefully to ensure adequate serving amounts and correct crediting. Increasing serving sizes for cereal or pair with another grain, such as toast, to meet the minimum daily grain requirement as necessary.
- The federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent meat/meat alternate requirement. On Tuesday the amount of ground beef and cheese in the lentil chili only provides 1.5 oz. eq. meat/meat alternate per serving. Consider offering an additional 0.5 oz. cheese to this grade group. On Thursday the amount of fajita chicken meat in the chicken Caesar salad only provides 0.5 oz. eq. per serving. A 1.7 oz. serving of chicken fajita meat provides 1 oz. eq. meat/meat alternate per serving. Serve at least a 1.7 oz. portion of chicken to meet the 2 oz. eq. requirement for the day with the parmesan cheese. The grilled cheese sandwich credits at 1 oz. eq. meat/meat alternate. The recipe calls for 1 oz. slices of cheese, but the cheese used comes in 0.5 oz. slices. Serve at least 4 slices of 0.5 oz. cheese to meet 2 oz. eq. meat/meat alternate. A 4 oz. yogurt could also be served with the grilled cheese, to meet this requirement.
- The federal regulations require menus to be planned that meet the minimum weekly 10-ounce equivalent meat/meat alternate requirements. By following the suggestions to meet the daily requirement, the weekly requirement will also be met.
- The federal regulations require menus to be planned that meet the minimum daily grain requirement. Planned menu does not meet the daily minimum 2 oz. eq. requirement for 3 days. On Monday, Thursday and Friday the croutons only provide 0.75 oz. eq. grain per serving, based on the measure in the crouton recipe. The recipe would need adjusted to at least 1 ¾ lb. bread for 28 servings to provide 1 oz. eq. per serving. An additional grain product still needs to be served with the salads these days. Consider serving a whole grain-rich roll or breadstick with the salads. Note that the grain requirement is met with the salad meal on the other days, as cinnamon rolls and breadsticks are served those days. The French toast sticks served on Thursday met only 1.5 oz. eq. grain. Serve 4 each French toast sticks to grades 9-12 to meet the 2 oz. eq. grain requirement.
- The federal regulations require menus to be planned that meet the minimum weekly grain requirement. Planned menu does not meet the minimum weekly 10 oz. eq. requirement for grains. By following the suggestions to meet the daily requirement, the weekly requirement will also be met.
- Subgroups of vegetables must be met for each grade group. The ½-cup weekly bean/legumes vegetable subgroup requirement was not met. The amount of lentils in the lentil chili served on Tuesday only provides ¼-cup lentils per serving. Consider adding ¼ cup refried beans to the menu on Tuesday or ¼ cup baked beans to the menu on Monday.

Smart Snacks in Schools

- The SFA sells a la carte juice during lunch; the cranberry juice cocktail contains only 25% juice and therefore is not compliant with Smart Snack regulations. Ensure all available

juice options are 100% juice. The sale of the cranberry juice must be discontinued as the limit for allowed exempted fundraisers has been reached for the school year.

- The SFA advised that unopened flats of cranberry juice will be returned to the vendor for credit and cranberry juice will no longer be received or sold.
- Competitive Food sold during the school day must meet Smart Snacks regulations. This is a required element a compliant wellness policy.

Resource Management

- Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure that all revenue from the sale of non-program foods accrues to the non-profit school food service account; and that revenue available to support the production of reimbursable school meals does not subsidize the sale of non-program foods. SP 20-2016 *Nonprofit School Food Service Account Non-program Food Revenue Requirements* memorandum provides guidance on the revenue requirements including options for assessing compliance to fulfill the requirements in section 206 of the Healthy, Hunger-Free Kids Act of 2010. All foods purchased by the food service department to be used as non-program food sales must be marked up to account for the cost of the food, labor, storage, and delivery of the products. The non-program food revenue tool (NPFRT) indicated non-compliance with this requirement. The a la carte entrée prices should be increased. Also, consider increasing the price for the a la carte 100% juice.

Procurement

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

Fiscal Action

There is no fiscal action resulting from this review.

Your review is now closed.

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
Charlotte Craig, Child Nutrition Director, Genesee Jt. School District

Civil Rights

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotope, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at [the USDA website](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (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.

This institution is an equal opportunity provider.