



January 7, 2019

Mrs. Lynette Ferguson, Superintendent
Kootenai SD #274
13030 E O'Gara Road
Harrison, ID 83833

Dear Mrs. Ferguson,

On December 11, 2018, State Department of Education (SDE) Coordinators Lynda Westphal and Tamara Donovan conducted an Administrative Review of Kootenai School District for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was Harrison Elementary School.

The State agency (SA) would like to commend Megan Galea and the staff of Kootenai 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 – Offer versus Serve Training (OVS)

Food service staff must be trained annually on OVS. Staff training must be maintained on file at the SFA for three years plus the current year. OVS training is available through the SA training portal.

Corrective Action: Food service serving-line staff must complete the online *OVS Breakfast* and *OVS Lunch Training* available on the CNP training portal. Upload the staff’s training certificates into MyIdahoCNP Review Attachments.

Due Date for CAP completion: January 4, 2019

Corrective Action Response: All staff were trained by January 4, 2019, and certificates were uploaded.

Finding 2 – Civil Rights Training

The SFA must provide documentation that indicates that annual civil rights training occurred and that required participants attended, including the POS (point of service) staff.

Corrective Action: Upload documentation to show that POS staff received USDA civil rights training.

Due Date for CAP completion: January 4, 2019

Corrective Action Response: All additional staff were trained as of December 12, 2018, and certificates were uploaded January 4, 2019.

Commendations

- Megan does a great job with the organization of paperwork and the questions she asks. She really wants to make this one of the best programs in the state.
- The staff are making many homemade items for both breakfast and lunch and the students really enjoyed the homemade muffins made on the day of CNR review.
- Outstanding job meeting all requirements for breakfast and lunch.
- Congratulations on having two people being trained to be a “Person in Charge” for the Health Department requirement which went into effect July 1, 2018.
- There were no errors in meal benefit issuance, nice job!

Technical Assistance (TA)

Certification and Benefit Issuance

- Per the Eligibility Manual, when determining Free and Reduced Applications, income should not be converted unless various income frequencies are reported. Please make use of the Income Eligibility Guidelines chart.
- Make sure the USDA nondiscrimination statement is on the bottom of all letters and websites.
- There are three programs, Meal Tracker, NutriKids, and Tyler Technologies keeping track of the students. May want to use the USDA Meal Compliance Spreadsheet in lieu of NutriKids to save money.

Verification

- Reviewed that even if the household submits information for verification, a letter must go out (and a copy retained) to the household notifying them of the results of verification. A copy of the application, letters sent, and the proof of income should be retained in a "Verification" file.

Offer versus Serve

- Reminder that “items” are counted at breakfast and “components” at lunch for reimbursable meals. OVS at breakfast allows one food to count as two items (e.g., two muffins may count as two items toward the three item requirement; one item must be at least 1/2 cup of fruit).
- Milk may be declined under OVS.

Resource Management

- Buy American requirements were discussed with the SFA. The SFA must purchase, to the maximum extent practicable, domestic commodities or products. “Domestic commodity or product” is defined as an agricultural commodity that is produced in the U.S. and a food product that is processed in the U.S. substantially using agricultural commodities produced in the U.S. There are limited exceptions to the Buy American provision which allow for the purchase of foods not meeting the “domestic” standard in circumstances when use of domestic foods is truly not practicable. The SFA must keep documentation justifying the limited exception(s). These exceptions, as determined by the SFA, are: the product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality or competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product. Out of compliance products observed were: canned pineapple from Thailand and mandarin oranges from China.

Civil Rights

- The nondiscrimination statement must accompany any new printed materials and any web-based materials referencing FNS programs. If the material is too small to contain the full statement, the material at minimum must include the following statement: “This institution is an equal opportunity provider.” The full statement must be included on

outreach material when notifying potentially-eligible participants how to apply for benefits or when informing participants about their right to file a complaint. The nondiscrimination statement must accompany any new printed materials and any web-based materials referencing FNS programs. If the material is too small to contain the full statement, the material at minimum must include the following statement: "This institution is an equal opportunity provider." The full statement must be included on outreach material when notifying potentially-eligible participants how to apply for benefits or when informing participants about their right to file a complaint. The full statement is available on the SA website under Civil Rights.

- Ensure civil rights folders have a copy of the complaint log and the complaint procedure. These documents were added to the folders on the day of SA on-site review.

Local School Wellness Policy

- All LEAs must assess their wellness policy at least once every three years starting in 2020 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.
- Reviewed how to complete the assessment, located on the Child Nutrition web site.

Smart Snacks

- Schools must meet the minimum requirement in 7 CFR 210.11, for all foods and beverages sold in school (also known as Smart Snacks in School) to increase consumption of healthful foods during the school day and support a healthy school environment. The high school vending machine contained non-compliant beverage items (Body Armor drinks). Vending machines must comply with specific nutrition standards, must be tracked as exempt fundraiser(s), or must be inaccessible during the school day (defined as midnight the day before until 30 minutes after the school day ends).

Professional Standards

- The United States Department of Agriculture has established minimum Professional Standards for school nutrition professionals who manage and operate the National School Lunch and School Breakfast Programs, effective July 1, 2015. The standards provide annual training requirements for all school nutrition professionals. It is required that some form of documentation be kept on file to show Professional Standards compliance; options include the FNS online tracking tool and two Professional Standards tracking resources available in MyIdahoCNP under Download Forms in the Professional Standards section.

Resource Management Comprehensive Review

- Adult lunch prices did not increase to \$3.85 per FNS instructions. The district is supporting the food service in the amount of approximately \$25,000 per year, some of which is going towards the subsidizing of adult meal process.

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, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Megan Galea, Food Service Director, Kootenai SD #274

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.

This institution is an equal opportunity provider.