



December 27, 2018

Steve Higgins, Superintendent
Kamiah School District
202 E 42nd
Garden City, ID 83714

Dear Superintendent Higgins,

On December 13, 2018, State Department of Education (SDE) Coordinators Teresa Goodsell and Jennifer Butler conducted an Administrative Review of Kamiah School District for the following United States Department of Agriculture (USDA) programs:

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

The State agency (SA) would like to commend JoAnne Trudeau and the entire staff of Kamiah 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 – Civil Rights

The nondiscrimination statement (NDS) must accompany any 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.” Menus posted to the food service page on the website do not include the required statement. The nondiscrimination statement is available on the SA website under Civil Rights.

Corrective Action: Add the short nondiscrimination statement to all menus provided on the website.

Due Date for CAP Completion: January 10, 2019

Corrective Action Response: The SFA updated the menu template to include the short NDS prior to the SA onsite review. Menus currently available have the statement.

Finding 2 – Resource Management

Journal entry #024950 entered on January 10, 2018 in the amount of \$2,800.00 was a coding error.

Corrective Action: A journal entry reversing the error must be made to ensure reasonable, necessary, allocable, and compliant expenses are represented in the Nonprofit School Food Service Account.

Due Date for CAP Completion: January 10, 2019

Corrective Action Response: On November 6, 2018, LEA provided documentation for corrected journal entry to reverse error.

Finding 3 – Food Safety

SFAs are required to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories, as applicable [7 CFR 210.21 (d)]. If a product from another country is sourced, then the SFA must have documentation that the domestic product is significantly higher in price or not available in sufficient quantities. Canned pineapple from Indonesia and mandarin oranges from China were located in the storeroom. The cremini mushrooms served in the FFVP on the day of review were from Canada.

Corrective Action: Complete the SA’s “Buy American Exemption Form” for all products requiring documentation and upload into MyIdahoCNP. Continue to complete and retain this documentation for any applicable foods.

Due Date for CAP Completion: January 10, 2010

Corrective Action Response: On December 14, 2018, SFA uploaded copies of the Buy American Exemption Form for products requiring documentation.

Commendations

- Congratulations on being awarded \$12,465.00 for a dishwasher as part of a 2018 USDA Equipment Grant. Initiative in applying for this grant shows commitment to Kamiah students and that commitment is appreciated by the SA.
- Outstanding job meeting all of the requirements for the meal pattern. All daily and weekly meal component and food quantity requirements were met for the week of menu review.
- Great job providing nutrition education with the daily FFVP offering. This is an important aspect of the program and the dedication is appreciated.
- The SA greatly appreciates the time and effort involved in preparing for the Administrative Review. JoAnne was very responsive in addressing requests and suggestions.
- The food service director and her staff do an excellent job of serving a large number of students in a quick, efficient and friendly manner!

Technical Assistance (TA)

Civil Rights

- The monthly breakfast and lunch menus are posted under "Food Service" on the LEA website. Web pages associated with program operation should list the full USDA NDS with details on participants' right to file a complaint. Please work toward having the full NDS statement included on any webpages related to food service. It is recommended that a link to the full statement in a variety of languages be included. The recommended link to use is [FNS USDA nondiscrimination statement](#).

Local Wellness Policy (LWP)

- An assessment report on the progress towards goals stated in the LWP must be publicly available. The current LWP does not address the required element for a periodic review or posting the assessment. The SA searched the school's website, but it was neither located on the website, nor provided when requested as part of the Administrative Review. The SA has a template progress report available on the [School Wellness](#) page of the CNP website.

Professional Standards

- The Food Service Director was hired after July 1, 2015. A Professional Standards questionnaire was completed to document education and or experience. The Professional Standards for School Nutrition Program Employees brochure was provided.

Special Provision Options

- Because all breakfast and lunch meals are served at no charge to children in Community Eligibility Provision (CEP) schools, the schools are no longer receiving payment from households who 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 district participating in CEP must evaluate whether the savings in administrative costs associated with simplifying meal counting, cash handling, and claiming procedures under CEP offset the costs of providing breakfast and lunch to all children at no charge. All schools in the district are currently operating under CEP. The claiming

percentages are based on an Identified Student Population (ISP), which consists of Directly Certified, Homeless, Migrant and Runaway students, established during SY 18-19 and due to expire end of school year 2022. The established base year for CEP includes the combined ISP percentages for the ES and HS at 68.22% and MS at 66.67%, meaning nearly 33% of all meals served during the school year are calculated at a paid rate, which is substantially lower than the free and reduced meal reimbursement rates. These rates have declined since the previously established base year. The State agency recommends assessing the benefit of offering these Provision programs as they contribute to deficits in Child Nutrition Programs funds and in general, the economy in the state of Idaho has improved. By continuing to offering these programs, general funds is ultimately responsible for ensuring that lost reimbursement is covered.

School Breakfast and SFSP Outreach

- SFAs must inform eligible families of the availability of breakfasts served under the School Breakfast Program (SBP), both at the beginning of the school year and multiple times throughout the school year. (7 CFR 210.12 (d)). The schools operate CEP and should promote that breakfast is served at no cost to all students every day. The foodservice page on the district's website would be a good location to promote the breakfast program. The monthly breakfast menu would also be a good place to remind participants and their families that breakfast is available at no cost.

Offer versus Serve

- Ensure all line staff is trained on Offer versus Serve (OVS) annually. OVS training is available through the State agency training portal and provides a certificate of completion. All group staff training should include an agenda and sign-in sheet; templates are available in MyIdahoCNP Download Forms. All training documentation should be recorded on the Professional Standards tracking log and maintained on file at the SFA for three years plus the current year.

Procurement

- A separate procurement review will be completed by contractors (currently Keddington & Christensen, LLC) during SY20-21. A closure letter will be sent by the State agency 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. 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,



Teresa Goodsell, B.S., S.N.S.
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
JoAnne Trudeau, Food Service Director, Kamiah School District

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.