



May 3, 2019
Dr. Brady Dickinson
Twin Falls School District
201 Main Ave. West
Twin Falls, ID 83301

Dear Mr. Dickinson,

On February 19 and 20, 2019, State Department of Education (SDE) Coordinators Heather Blume, Teresa Goodsell, Jennifer Butler, and Lynda Westphal conducted an Administrative Review of the Twin Falls S.D. for the following United States Department of Agriculture (USDA) programs:

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

The sites reviewed were:

- Bickel Elementary School, operating Community Eligibility Provision
- Canyon Ridge High School
- Lincoln Elementary School, operating Community Eligibility Provision

The State agency (SA) would like to commend Lori Reith and the food service staff of Twin Falls S.D. 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:

Finding and Corrective Action Plan (CAP)

Finding 1 - Certification and Benefit Issuance

One application listed two children's names, but indicated three children were in the household.

Corrective Action: Call the household to ensure that missing household members do not contribute income. Upload a copy of the application with documentation of conversations with the household. Additionally, upload an updated benefit issuance document if changes in eligibility statuses occur.

Due Date for CAP Completion: March 6, 2019

Corrective Action Response: This was completed while the reviewers were onsite. No further action is needed at this time.

Finding 2 - Verification

One application, impacting one student, was verified using twice a month income frequency. However, the income documentation indicated biweekly frequency, resulting in a denied eligibility status.

Corrective Action: Contact the family and inform them of the reduction in benefits. Upload the benefit issuance list once the eligibility status has changed.

Due Date for CAP Completion: March 6, 2019

Corrective Action Response: The letter to notify the family was sent while the reviewers were onsite. The benefit issuance list was uploaded on March 1, 2019 indicating the student's change in eligibility status.

Finding 3 - Meal Counting and Claiming

A systemic error was discovered; there were inaccuracies in the January claim that resulted in an over claim of eight paid meals at Pillar Falls Elementary School. Additionally, an over claim of one reduced meal and an under claim of one paid meal occurred at Canyon Ridge High School.

Corrective Action: The Food Service Director will develop a plan to ensure accurate meal claiming and will train applicable employees. Upload the plan and documentation of training.

Due Date for CAP Completion: March 6, 2019

Corrective Action Response: The Food Service Director developed and uploaded a plan and documentation of staff training on February 21, 2019.

Finding 4 – 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 requires LEAs to fully comply with the requirements of the final rule by June 30, 2017. Please note, the December 2016 update to the Idaho School Board Association (ISBA) wellness policy includes the following sections for full compliance with Federal requirements:

Policy 2305-Nutrition Services

Policy 2310-Nutrition Education

Policy 2315-Physical Activity Opportunities and Education

Policy 7310- Advertising in Schools/Revenue Enhancements

Policy 8200- Local School Wellness

Policy 8210- District Nutrition Committee

Policy 8230- Nutrition Standards

Policy 8235- Water Consumption/Water Bottles

Policy 8240- School Meals

Policy 8250- Guidelines for Food and Beverage Sales

Corrective Action: Please provide a plan for how and when the wellness policy language will be brought into compliance with Federal requirements.

Due Date for CAP Completion: March 6, 2019

Corrective Action Response: The District developed a plan to adopt missing ISBA policy sections for the local wellness policy and uploaded it on February 27, 2019.

Finding 5 – Food Safety

Food safety training material onsite did not include all required elements.

Corrective Action: Please review the Institute of Child Nutrition (ICN) Hazard Analysis Critical Control Points (HACCP) manual and include all relevant sections in a comprehensive Food Safety Plan available at each school site.

Due Date for CAP Completion: March 6, 2019

Corrective Action Response: The Food Service Director printed the ICN HACCP manual while SA reviewers were onsite and reviewed for relevance to each site. The Food Safety Training Agenda and Sign-In Form was uploaded on March 1, 2019.

Finding 6 – Meal Components and Quantities

1. For the week of menu review, the lunch menu did not meet the minimum daily and weekly requirements for grain. A grain was offered daily, however the minimum daily and weekly requirements were not met.
2. For the week of menu review, the lunch menu did not meet the minimum daily vegetable requirement. Vegetables were offered daily, however the minimum required portion size was not met.

Corrective Action: 1. Provide a written statement that the daily grain, weekly grain, and daily vegetable 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: February 4, 2019

Corrective Action Response: The Food Service Director received notification by e-mail from Lauralee Hansen, CNR that the Nutrition Review was completed on Friday, January 25, 2019. The district made the corrections to all menus and notified the schools immediately to increase the Normandy vegetables on Monday January 30, 2019, to $\frac{3}{4}$ cup as the vegetables in the fried rice were not in sufficient quantities to be creditable. This change was made prior to meal service, to be in compliance. The grain in the lasagna did not credit enough on Wednesday January 30, 2019. Schools were notified in advance to add a breadstick on this day, prior to meal service so as to be creditable for service. All meals served were in compliance on the day of meal service, all recipes and future menus have been adjusted.

Finding 7 – Meal Components and Quantities

For the week of menu review, the lunch menu did not meet the minimum daily and weekly requirements for grain. A grain was offered daily, however the minimum daily and weekly requirements were not met.

Corrective Action:

1. Provide a written statement that the daily and weekly grain 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: February 4, 2019

Corrective Action Response: The SFA provided the following statement to confirm corrective action had been taken, “Monday January 28, 2019, lasagna noodles, and the 1oz. eq. breadstick did not credit enough grain. The breadstick was increased to a 2oz. size or two 1oz breadsticks to meet requirements. This was changed before actual meal service.

Wednesday January 30, 2019, the Chicken Tacos did not provide enough grain to credit. A 1oz. bread stick was added to the menu to meet the requirement. This was changed before actual meal service. Thursday January 31, 2019, on the Pasta Bar, the pasta did not provide enough grain so a 1oz. breadstick was added to meet grain requirement. This was changed before actual meal service. The Taco Bar on Friday February 1, 2019, had inadequate grain; tacos and tortilla chips only credited 1 ounce grain, so the bar was split into two recipes and choice, one as Taco Bar, one as Nacho Bar, and a bread stick was added to meet the grain requirements of this line. This was changed before actual meal service.”

The district received notification by e-mail from Lauralee Hansen, CNR that the Nutrition Review was completed on Friday, January 25, 2019. The district made the corrections to all menus and notified the schools immediately to make the necessary grain changes each day. This change was made prior to meal service, to be in compliance. All meals served were in compliance on the day of meal service, all recipes and future menus have been adjusted.

Commendations

- Congratulations on being awarded \$6,744.92 for a convection oven as part of a USDA Equipment Grant. The initiative in applying for this grant is appreciated and shows Twin Falls Food Service's commitment to the students.
- The organization of the free and reduced price school meal applications was excellent, with an extremely low (0.19%) administrative error rate!
- The spice rack available at Canyon Ridge High School was very well utilized by the students.
- The homemade rolls offered at Canyon Ridge High School tasted wonderful and were an excellent addition to the meal service.
- A warm breakfast (eggs with ham and toast) on a cold day was inviting. The lunch lasagna smells were delicious and made everyone eager for a warm lunch too!
- Debbie and her staff work well in a very small kitchen. The meal was wonderful and they served a large number of children in a short amount of time.
- The staff at Canyon Ridge High School were great and worked well together.
- Excellent job getting the Idaho Wellness Progress Report completed for each school to measure the implementation of the wellness policy in each school.

Technical Assistance (TA)

Meal Components and Quantities

- Independent contractor 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. The SFA 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.
 - During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal.

Food Safety—Buy American

- Each SFA is 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)). Non-domestic pineapple, mandarin oranges, tomatoes, jalapenos, and cucumbers were observed onsite with no documentation. 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. Include the Buy American Provision in SFA solicitation documents for the purchase of commercial foods. Products must be checked upon receipt and not accepted if the products do not comply with the Buy American Provision, unless there is documentation to justify the exception (exorbitant pricing or product shortages).

Afterschool Snack Program (ASSP)

- When monitoring, make sure the product quantities are noted on the monitoring review sheet.

Fresh Fruit and Vegetable Program (FFVP)

- Awarded schools must widely publicize the operation of FFVP. Promoting this competitive grant on the school's website or newsletter would meet this requirement.

Civil Rights

- The district participates in Safe Schools training, be aware that there is a training module specific to civil rights in foodservice that can be utilized to meet the annual Civil Rights training requirement.

Smart Snacks

- As per 7CFR210.11(b)(2), the school district should have knowledge of and keep a written record of (track) food sales that occur within the school day, but outside of food service. Only foods sold in school and intended for consumption during the school day (from midnight until 30 minutes after the end of school) fall under Smart Snacks regulations.
- All fundraisers, both exempted and compliant, must be tracked. Per state policy, a maximum of 10 exempted fundraisers per school site per year may be approved by the school administrator. An exempted fundraiser can be for a maximum of four consecutive school days. All exempted fundraisers beyond 10 must be pre-approved by the State agency using the Request form. (7CFR 210 (b)(2)) Details available at <http://www.sde.idaho.gov/cnp/sch-mp/snacks.html>
- The Smart Snacks calculator can be utilized to identify whether or not food items are compliant with Smart Snacks regulations. Records should be maintained to identify compliance of particular products. If food items are not compliant and sold during the school day, they must count toward the 10 exempt fundraisers allowed.

Procurement

- A separate procurement review is scheduled to be completed in school year 2020-2021; please follow the guidance provided.

Fiscal Action

There was no fiscal action as a result of this review, so no financial adjustment will occur.

Your review is now closed.

No fiscal action will be taken as a result of 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, MS, RD, LD, SNS
NSLP Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Lori Rieth, Child Nutrition, Twin Falls S.D.

Civil Rights

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1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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