

November 03, 2021

Mr. Chester Bradshaw, Superintendent
Sugar-Salem School District #0322
105 West Center Avenue
Sugar City, ID 83448

Dear Superintendent Bradshaw,

On October 20, 2021, State Department of Education (SDE) Coordinator Lynda Westphal conducted an on-site Administrative Review of Sugar-Salem SD for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program Seamless Summer Option (SSO)
- School Breakfast Program Seamless Summer Option (SSO)
- USDA Foods

The State agency (SA) reviewed the following sites(s).

- Central Elementary School (SSO)

The SA would like to thank Evelyn Coolidge and the entire staff of Sugar-Salem SD 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 that State agencies conduct an Administrative Review a minimum of one time during a five-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 – Wellness Policy

The Local School Wellness Policy must be in compliance by June 30, 2017 per the USDA Final Rule established in July 2016 (7 CFR 210.31). The SA reviewed the Local Wellness Policy (LWP) which was adopted on June 30, 2021, however there are still some missing requirements that need to be made to the policy. The Wellness Policy and the State agency partial evaluation of the LWP was provided during the exit conference. This should be completed to be able to formally to assess compliance of the District's LWP.

Corrective Action:

Provide a written plan and timeline describing how and when the Wellness Policy language will be brought into compliance with federal requirements.

Due Date for CAP Completion: November 4, 2021

Corrective Action Response: The district will be submitting the ISBA Wellness Policy, tailored to their district, for the Board's approval no later than February 8. The wellness evaluation report will be reviewed / revised by that date as well.

COMMENDATIONS

- Evelyn did a superb job getting ready for the review. The attention to detail made the review go extremely smoothly.
- Thank you for your continued hard work in providing meals to children while encountering difficulties due to COVID-19 issues.
- Great work meeting all breakfast and lunch meal pattern requirements for the week of menu review.
- The Kitchen staff at Central Elem were diligent with food safety, washing hands and changing gloves. The homemade mac and cheese was a hit with the children and the reviewer!

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- Per USDA Guidance *COVID-19: Child Nutrition Response #97* - the requirement under 7 CFR 210.18(g) (1) is waived regarding certification and benefit issuance and the requirement under 7 CFR 210.18 (h)(2)(i) (A-E) is waived regarding free and reduced-price processes not applicable to SSO in SY21-22.

- The SA did review applications and Evelyn and her staff have excellent procedures for approving applications that will be shared with other districts during training.

Verification

- As free and reduced-price meal applications were collected, the SA reviewed the verification process and identified the following:
 - Excellent procedures for the Verification process which started on October 11 and is due on November 1.
- Although in Nationwide Waiver #97 FNS included verification as one of the sections that is not applicable to SSO Ars in SY2021-22, FNS strongly encourages State agencies to ensure that SFAs that are collecting applications during SY 21-22 are implementing verification processes in line with Federal Regulations

Dietary Specifications and Nutrient Analysis

- CNR found no issues with their menu review

Meal Components and Quantities

- CN Resource completed the menu review and provided the following TA:
 - Consider keeping frozen broccoli on hand. With supply issues it will be helpful to have a back-up dark green vegetable available to help ensure the weekly dark green sub-group continues to be met, even if the planned menu is modified.

Buy American

- 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 supporting documentation that the domestic product is 1) significantly higher in price or 2) not available in sufficient quantities.
- Both the SA's CNP digital training portal, as well as, the Institute of Child Nutrition (theicn.org) have Buy American Provision online trainings available that will provide additional clarification of federal requirements.
 - Out of compliance products observed were: Tropical fruit and Pineapple from Thailand and Mandarin Oranges from China.

Paid Lunch Equity

- This area was not reviewed based on USDA Guidance *COVID-19: Child Nutrition Response #97* in which the requirement under 7 CFR 210.18(h) (1) (ii) is waived regarding the requirements for pricing paid lunches in 210.14(e) that are not applicable to SSO in SY21-22. Per USDA, the SY 2020-21 Weighted Average Price equal to or above the target price of **\$3.18** are compliant for SY 2021-22. \$3.18 is the difference between the Free and Paid reimbursement rates for SY 2020-21.

Revenue from Nonprogram Foods

- The Revenue from Non-Program food sheet was uploaded and had some math errors when calculating the justification for Adult Meal Prices (\$4.00). The SA recommends that the Adults be charged the \$4.15 minimum so this portion of the sheet does not have to be completed, however, they still need to be completed if food service is catering meals or selling other nonprogram foods.
- If adult meals and milk sales are the only nonprogram foods sold, these spreadsheets would not need to be completed.

Local School Wellness Policy (LWP) (Assessment is not evaluated)

- FNS is waiving statutory and regulatory requirements at 7 CFR 210.31 and providing a **new first triennial assessment deadline** of June 30, 2022, for states that opt in to: *COVID-19: Child Nutrition Response #98 Nationwide Waiver of Local Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs.*

Procurement

- A separate procurement review was completed by Kathrine Forstie in SY20-21 with a SA closure letter sent following completion of CA (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,



Electronically Signed

Lynda Westphal, MHS, SNS
Coordinator, NSLP

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Evelyn Coolidge, Child Nutrition Director, Sugar-Salem School District

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