



January 13, 2020

Mr. Brian Hunicke, Superintendent
Basin School District
100 Centerville Road
Idaho City, ID 83631

Dear Superintendent Hunicke,

On December 3, 2019, State Department of Education (SDE) Coordinators Lynda Westphal and Procurement Specialist Kat Forstie conducted an Administrative Review of Basin School District for the following United States Department of Agriculture (USDA) programs:

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

The SA reviewed the following sites:

- Basin School

The State agency would like to thank Cyndi Watson and the staff of Basin 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, however Idaho has received a waiver to conduct reviews on a five-year schedule 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 was missing a social security number, resulting in an incomplete application. This resulted in a 0.97% error rate.

Corrective Action: Contact the family and obtain the missing SSN.

Due Date for CAP Completion: December 17, 2019

Corrective Action Response: This was obtained on the day of review and the finding closed.

Finding 2 – Meal Pattern

Independent contractor CN Resources completed the menu review and identified that for the week of menu review, the lunch menu was identified to not meet the minimum daily or week requirements for the following:

- A grain was offered daily, however the minimum required portion size for grades K-5 and 9-12 was not met.
- A meat/meat alternate was offered daily, however the minimum required portion size for grades K-5 and 9-12 was not met.
- No more than two-ounce equivalents of grain-based desserts may be offered weekly. This excess was identified for grades 6-8 and 9-12.
- Vegetables were offered daily, however the minimum required portion size for grades K-5 was not met.
- Beans/legumes were offered, but not in large enough quantities to meet the weekly requirement for this sub-group.

Corrective Action: Provide a written statement with documentation that the daily and weekly requirements are now met. Include details to describe what specific changes were made to the menu to correct each individual menu review finding and bring the menu into compliance.

Due Date for CAP Completion: October 16, 2019

Corrective Action Response: The SFA submitted documents as part of the CA response and the finding was closed prior to the SA on-site portion.

Finding 3 – Food Safety

The SFA did not take and record temperatures for all hot and cold foods served. Taking temperatures identifies if food is safe to serve. This information should be recorded in the applicable fields on daily production records.

Corrective Action: Provide the date that the finding was brought into compliance or the planned date of completion. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. Provide a written statement that the SFA understands the

requirements for temperatures to be taken for all hot and cold foods. Submit three days' worth of production records to show that temperatures are being taken and recorded.

Due Date for CAP Completion: November 1, 2019

Corrective Action Response: Attachment with the following language was submitted: "Our holding cabinet temperature has been turned up to hold at 135 or higher. Production record for Yogurt Parfait will be held at 41 or lower in the refrigerator until serving time. I have spoken and re-trained my staff on the importance of time and temp charting. On November 6, 2019 the health inspector from Central District Health Department was in to do my bi-annual health inspection so I spent some time speaking with him about this finding. He stated that we work off time after our products are cooked up to or above 165 degrees. Everything we serve is never held longer than the four hours which is allowed before it must be disposed of do to being in the temperature danger zone (TDZ). Normally we don't hold any cooked food longer than about 45 minutes and usually much shorter time than that."

Finding 4 – Offer versus Serve (OVS)

All food service line staff must receive annual OVS training when OVS is implemented. The Director has not had OVS in the last two years. Technical Assistance (TA) was provided during the last administrative review on this requirement. OVS training is available through the State agency training portal and a training log is available in MyIdahoCNP Download Forms. Two non-reimbursable meals were observed during the review due to this resulting in meals counted being disallowed.

Corrective Action: Food service breakfast and lunch line staff must complete the separate breakfast and lunch OVS online trainings in the CNP training portal. Upload certificates of completion for all line staff.

Due Date for CAP Completion: December 18, 2019

Corrective Action Response: Certificates were uploaded in MyIdahoCNP that training for all staff has taken place.

Commendations

- Good work meeting all breakfast meal pattern requirements for the week of menu review.
- The staff was very friendly and helpful. A pleasure to work with!
- Cyndi was very organized, making the review go smoothly. It was a pleasure to review the Basin school district.
- The meal served was delicious and seemed to be well received by the students.
- The students at the school were well behaved and very polite.
- A Smart Snack tracking log has been set up to allow groups to sign up for one of the eight slots available during the school year. This is a good practice.

Technical Assistance (TA)

Certification and Benefit Issuance

- Per the Eligibility Manual, when determining Free and Reduced Applications, income should not be converted to annual unless various income frequencies are reported.

Please make use of the Income Eligibility Guidelines chart. Need to verify that you are using the correct income category. Be aware of pay reported in frequencies of every two weeks versus twice monthly.

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. 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 Administrative Reviews, may result in fiscal action.
 - The federal regulations require all menus K-12 to be planned that meet the minimum daily and weekly requirements for Meat/Meat Alternative, Grain, Vegetables and their subgroups.
 - Keep in mind that sweet crackers, such as animal and graham crackers (Bug Bites crackers), credit as a grain-based dessert. Replace the graham crackers served with the ready-made salad with a non-sweet grain item such as a whole grain-rich breadstick or roll that provides at least one oz. eq. per serving.
 - Review the recipe yield and ingredient amounts for the Green Salad recipe. The amount of romaine lettuce in the recipe appears to only be enough for about 3/8 cup lettuce (1/8 cup creditable dark green vegetable) per one cup serving.
 - The SFA must ensure that CN Labels or Product Formulation Statements for processed products are maintained in order to document an item's compliance with the meal pattern. This is a repeat TA.

Food Safety (HACCP)

- Independent contractor CN Resource provided the following TA:
 - During the review, the food safety plan was discussed with the SFA. The SFA must have a food safety plan that complies with the requirements and the SFA must ensure that all elements of the plan are implemented. The SFA should be following the procedures as outlined in the plan and maintaining all required records. All hot and cold foods should have temperatures taken and recorded. The completed temperature logs must be kept on file for a minimum of six (6) months.

Buy American Provision

- Per 7 CFR 210.21 (d) Sponsors must purchase, to the maximum extent practicable, domestic commodities and products for use in the NSLP.

- A domestic commodity or product is an agricultural commodity produced in the US, and a food product that is processed in the US using substantial agricultural commodities.
- 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 in (7 CFR 210.21 (d)). 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. The SFA should require suppliers to attest that their final food products are either 100% domestic commodities, or a food product containing over 51% domestic food components, by weight or volume. 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). The SFA must keep documentation justifying the limited exception(s); make use of the document available in Download Forms. The out of compliance product observed was Pineapple from Mexico, Bananas from Guatemala and Tropical Fruit from Thailand.

Offer versus Serve (OVS)

- All staff must be trained on OVS annually. This was given as TA during the last review and rose to a finding during this review. The director has not had OVS in the last two years. Other training as well as OVS training is available through the State agency training portal and a training log is available in MyIdahoCNP Download Forms.

Local School Wellness Policy (LWP)

- 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. Ensure the wellness assessment (e.g., Idaho Wellness Policy Progress Report) is available to the public; posting to the school /district website and/or in a school newsletter would support this requirement.
- The Wellness Policy was updated on December 12, 2018 and an annual assessment was conducted on October 15, 2019 and posted to the website. Some of the language to meet requirements was not updated. Update Wellness Policy information regarding foods and beverages sold during school to students to reflect Smart Snacks regulations as well as marketing to students. Copy of the SA assessment given during review.

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 (7 CFR 210.30). 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. The Idaho Child Nutrition Programs digital learning portal contains multiple courses that could be used to meet training requirements.

- Employee training tracking Logs must include the key area/topics and training subjects completed with certificates, agendas, and sign-in sheets retained for backup. The SA has made available a template tracking log prompting this information and Professional Standards Learning Objectives and Topics with Codes which can be found on the USDA Professional Standards Website.
- All Foodservice staff training provided by the Director should include a sign-in sheet and a dated agenda documenting the length of time and topics covered. These hours can contribute to the Professional Standards requirements. Proof of training documentation must be kept on file at the SFA for three years plus the current year.
- Substitutes and non-food service staff helping in the cafeteria must have Civil Rights training when hired and annually thereafter to ensure compliance with Civil Rights regulations.
- A Professional Standards questionnaire was completed to document education and or experience of the director. The Professional Standards for School Nutrition Program Employees brochure was provided.

School Breakfast and SFSP Outreach

- SFAs must inform eligible families of the availability of reimbursable breakfasts served under the School Breakfast Program (SBP) and Summer Food Service Program (SFSP). At the beginning of the school year, the SFA must send all households informational packets with Free and Reduced Meal Applications. In addition, schools must send reminders, regarding the availability of the SBP, multiple times throughout the school year. (7 CFR 210.12 (d))

Special Provision Options

- Provision 2 Base Year (SY17-18) benefit issuance was previously validated by the SA on October 9, 2017. The retention of all required Provision 2 documentation was confirmed during the administrative review. Daily meal count records by student name and eligibility are maintained in binders and kept in a locking fireproof cabinet in the bathroom in the school kitchen. The current Provision 2 cycle expires at the end of SY20-21. If you wish to continue with Provision 2 breakfast, you must contact the SA prior to the expiration date to see if you qualify for an extension. Please ensure all required Provision 2 documentation, including base year daily meal count records by student name and eligibility, is maintained per requirements.

Resource Management Comprehensive Review

- Revenue from Nonprogram Foods
 - A new NPRFT tool was partially completed by the State agency and technical assistance was given to have the district complete the tool for the review. The compliant NPFRT was e-mailed to the state agency to show compliance with this requirement.

Procurement

- A procurement review has been completed. Please follow the guidance provided in a separate closure letter.

Your review is now closed.

Fiscal action in the amount of \$4.40 was determined from this review due to unallowable meals being selected by students not following the OVS guidelines, however it is below the \$600 threshold set by USDA, so will be disregarded. 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, MHS, SNS
NSLP Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Cyndi Watson, Food Service Supervisor, Basin School District

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1400 Independence Avenue, SW

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(3) email: program.intake@usda.gov.

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