



December 31, 2019

Dr. Bruce Bradberry, Superintendent
Whitepine School District
502 1st Avenue
Deary, ID 83823

Dear Superintendent Bradberry,

On November 12, 2019, State Department of Education (SDE) Coordinators Jennifer Butler and Lynda Westphal conducted an Administrative Review of Whitepine 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:

- Deary School (grades 4-12)

The State agency would like to thank Linda Hennigar and the staff of Whitepine 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

Two application errors were identified resulting in a 1.43% error rate. One application was incomplete due to missing a household total. A second application included a pay stub that indicated the net income was reported instead of the gross. During the review, the household was contacted to obtain the missing household total. No change in benefit was required. The household incorrectly reporting net income was changed from free to reduced. A letter of adverse action was mailed to the household.

Corrective Action: Upload an updated benefit issuance list showing the student and that the change occurred following the 10-day adverse action period.

Due Date for CAP Completion: December 3, 2019

Corrective Action Response: All letters of adverse action were uploaded and changes were made to applications and benefit issuance list.

Based on the improved accuracy of application determinations and a lower administrative error of 1.43%, the second review of applications, required following the previous administrative review, will no longer be required and the practice may be discontinued if the district so wishes.

Finding 2 – Meal Pattern

The lunch meal service is not structured to comply with the required age/grade group meal pattern requirements when serving multiple menus and/or age/grade groups. Students in grades 7-8 are following the 9-12 meal pattern.

Corrective Action: Provide the date that the finding was brought into compliance or the planned date of completion, the name(s) and title(s) of the SFA representative(s) that will ensure compliance, and a written plan for how the students in grades 7-8 will receive the correct meal pattern.

Due Date for CAP Completion: October 28, 2019

Corrective Action Response: The SFA uploaded a response under attachments which said, "We changed the age groups from 4-6 and 7-12 to 4-8 and 9-12. We were always serving them the correct amount, we had them grouped this way because of lunch serving times." This response has been accepted and the finding was closed prior to the on-site review.

Finding 3 – Wellness Policy (repeat finding)

On July 29, 2016, the USDA Food and Nutrition Service (FNS) finalized regulations to create a framework and guidelines for written wellness policies established by LEAs. The final rule requires LEAs to fully comply with the requirements of the final rule by June 30, 2017. Federal legislation requires school districts to implement a local wellness policy that must include language:

- Permitting parents, students, school board, PE teachers, school health professionals, school food service staff, administrators, and community members to participate in the development, implementation, review, and update of the local wellness policy.
- Identifying wellness policy leadership of one or more LEA and/or school official(s) who have the authority and responsibility to ensure each school complies with the wellness policy.
- Specifying measurable goals for nutrition education, nutrition promotion, physical activity, and other school-based activities to promote student wellness that are written with consideration for evidence-based strategies.
- Addressing nutrition guidelines for all foods and beverages sold on the school campus during the school day and for providing school meals that adhere to Federal meal pattern requirements.
- Identifying nutrition standards for non-sold foods and beverages available during classroom and school celebrations.
- Stating a policy for food and beverage marketing that allows the marketing and advertising of only those foods and beverages that meet Smart Snacks in School nutrition standards.
- Addressing an evaluation conducted once every three years of the wellness policy and the extent to which schools are in compliance, how the district policy compares to model wellness policies, and the progress made in attaining local wellness policy goals.
- Identifying a way to share the wellness policy content and implementation with the public.

For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs School Wellness website.

Corrective Action: Upload a plan to have a compliant Wellness Policy adopted by the board by the end of the year. Neither the Wellness Policy on the web site nor the one uploaded had an adopted date listed on the bottom of the policies. Having dates will assist with documenting the triennial review requirements.

Due Date for CAP Completion: December 3, 2019

Corrective Action Response: The School Board and Administrators are working on approving a Wellness Policy. Per the Superintendent on December 20, 2019, “We hope to have all our policies up to date long before then” [end of the school year].

Finding 4 – Meal Counting and Claiming – Reimbursable Meals

An adult trained in Offer vs Serve (OVS) must confirm that each student selected a reimbursable meal in order to claim the meal for reimbursement. During the second breakfast service, students lay their ID cards on the counter and go through the serving line to select food items, with fruit as the last choice. Later, staff uses the cards to enter names in to the point of service (POS) software. An adult was present on the line, but not ensuring that a reimbursable meal consisting of at least three items (one item being at least ½ cup of fruit) were taken. On the day of SA on-site review, nine meals were missing the minimum ½ cup of fruit. The SA will calculate fiscal action for the non-reimbursable meals.

Corrective Action: Food service breakfast and lunch line and POS staff must complete the separate breakfast and lunch OVS online trainings in the CNP training portal. Upload

certificates of completion for all line staff. Also upload a plan to ensure that a trained adult confirms that students select a reimbursable meal in order to claim the meal for reimbursement. One idea would be to re-organize the serving line to help ensure fruit is always selected first.

Due Date for CAP Completion: December 3, 2019

Corrective Action Response: The SFA uploaded a plan stating that the fruit has been moved to the front of the serving line. One employee ensures that students take their fruit. OVS trainings have been completed with certificates and training agendas uploaded.

Finding 5 – Meal Counting and Claiming – Monthly Claim

A systemic error was discovered; there were inaccuracies in the October 2019 monthly claim with a la carte being added to the meal count. The Food Service Director will develop a procedure to ensure accurate meal claiming and will train applicable employees.

Corrective Action: Upload a procedure to ensure a la carte is not added to any claims in the future.

Due Date for CAP Completion: December 3, 2019

Corrective Action Response: When the assistant finishes the FS4 form at the end of each month, the Food Service director will go back through the daily reports and make sure that all of the numbers match. Both will review the numbers and sign each FS4 form.

Finding 6 – Professional Standards

Annual required professional standard training hours are not being met for part-time employees. Develop a plan to ensure required hours can be met over the course of the year. Consider implementing a process that ensures the required trainings – food safety, OVS, and civil rights- are conducted at the beginning of each school year and adequately documented. Other ongoing trainings should be built into the plan on a periodic basis. Technical Assistance (TA) on professional standard requirements was provided during the last review. The SFA was aware of requirements and had training logs, but expressed difficulty in finding time and methods to train staff. SA suggests each employee create their own account for the Idaho CNP online training portal.

Corrective Action: Upload a plan and timeline on how annual training requirements will be met. The plan should address a timeline that has goals of total hours to be met by specific dates to ensure that the total required hours are met by the end of the school year.

Due Date for CAP Completion: December 3, 2019

Corrective Action Response: Food service staff have agreed to complete 1 hour of training per month for the remainder of this school year 2019-20. Civil Rights training has been completed by all. The Civil Rights Training agenda and sign in form were uploaded.

Finding 7 – Offer versus Serve (OVS)

All food service line and POS staff must receive annual OVS training when OVS is implemented. This has not occurred and the SA observed that OVS was not correctly implemented. Online OVS training is available through the Idaho CNP training portal and provides a certificate of completion. Group staff training must include an agenda and sign-in sheet that specifically identifies that "OVS breakfast" and/or "OVS lunch", as applicable, was

part of the training agenda. 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.

Corrective Action Food service breakfast and lunch line and POS 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 3, 2019

Corrective Action Response: The SFA has completed and uploaded certificates, training agenda, and sign in form the OVS trainings for Breakfast and Lunch.

Commendations

- CN Resource provided the following commendation: The school makes a lot of homemade items. Today they had homemade soup and the students were very complimentary of that. The staff also set up a great salad bar with a wide variety of fruits and vegetables.
- The salad bar today was beautiful with a lot of fresh fruit and vegetables. The Pink Pearl apple was a wonderful surprise.

Technical Assistance (TA)

Certification and Benefit Issuance

- One application was approved correctly, but after the household was notified of the eligibility the household explained they reported the incorrect income and provided a new application with updated income. The household total box was blank on the second application. Because it was less than a week between the submissions of the two applications, the SFA was advised to fill in the empty field using the information from the previously submitted application. The SFA was also advised that had it been a longer duration or the reason for the submission of a new application unknown, the SFA should call the household to confirm the household total if the field is left blank.
- Schools may not require households to complete and submit an application. It is the household's choice to complete an application to apply for meal benefits. However, LEAs must inform households that they may receive meal benefits if they are eligible. Requiring households to submit an application is an unallowable use of time and resources.

Meal Counting and Claiming

- OVS for lunch only requires 3 items be taken (not 4). Follow up with the State agency with any questions after completing OVS training.

Dietary Specifications and Nutrient Analysis

- Independent contractor CN Resource completed the menu review and provided the following TA:

- Often USDA recipes are used with changes and modifications made. Standardize the recipes so that true yields and portion sizes can be determined. To be standardized recipes must include:
 - All ingredients in the recipe.
 - Correct measures and specific weight/measure of each ingredient.
 - Serving/portion sizes for each age/grade group.
 - The true yield made by the recipe.
 - Clear and complete preparation steps and directions.
- Ensure USDA recipes are updated to include any changes or modifications made. This includes the following recipes for the week of menu review: muffin, pancake, biscuit, breakfast sandwich recipes, nacho meat, nacho cheese, croutons, brownie, and cookie recipes.
- The notes written on the back of the production records for “Late Breakfast” should be included on the actual production records. For the future, include this information or create a production record for “Late Breakfast” only.
- A Child Nutrition Label or Product Formulation Statement was not submitted for all processed menu items. This documentation was secured for the menu items listed below, in order to determine meal pattern crediting. A sponsor should secure this documentation and maintain on file for processed food products.
 - Menu items include BeneFIT Bars.
- Secure a Product Formulation Statement (PFS) for the donuts. The spec sheet submitted included a meal pattern crediting statement but was not an official PFS. Reference the link below for more information.
<https://fns-prod.azureedge.net/sites/default/files/cn/TA07-2010v3os.pdf>
- Ensure production records include the food items served. Some food items were included on the production records and were not served, such as crackers and extra items on the salad bar (jalapenos, pickles, etc.). The Nacho Cheese recipe sent shows that ½ c portion is served. This contributes 2.5 oz. eq. meat/meat alternate per serving. With the meat added (1.5 oz) and the cheese on the salad bar, this adds up to almost 5 oz. eq. meat/meat alternate for the day. This amount could contribute to excess calories and sodium.

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.
- Applies to all food/beverage products purchased using funds from the non-profit food service account.
- Limited exception (to be used as a last resort with documentation)
 - When a product is not produced or manufactured in the US in sufficient and reasonable quantities of satisfactory quality

- When competitive quotes, bids, or proposals reveal the cost of a US product is significantly higher than the foreign product
- The State reviewers gave an example of the Buy American provision documentation as an example.

Offer versus Serve (OVS)

- Train staff annually on OVS for both breakfast and lunch. All staff training should include an agenda and sign-in sheet and training documentation should be maintained on file at the SFA for three years plus the current year. OVS training is available through the State agency training portal and a training log is available in MyIdahoCNP Download Forms.
- In order for a meal to be reimbursable under OVS, the meal must contain a minimum of at least 1/2 cup fruit and/or vegetable along with two other full creditable components at lunch or two other creditable items at breakfast. OVS reduces waste by allowing students to decline some meal options along with not taking the full serving of fruit or vegetable required to be offered under the meal pattern.
- Prior to meal service, staff should discuss the crediting amount of food items and what is required for a reimbursable meal under OVS. The crediting amount listed on the production record will guide this conversation.

Verification

- Ensure the complete information is included on the letter to the families. The timeline to file a hearing and the hearing official's contact information is missing.

Civil Rights

- The full non-discrimination statement (NDS) is required on household letters. The second page of the template letter contained the NDS, but only the first page was being sent to households. Ensure the NDS is included on all household notifications.

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. TA given to the principal on the Wellness Policy and the Progress Report. A copy of a partially completed one was given with some suggestions.
 - *ISBA Policies 8200, 8210, 8230, 8235, 8240, 8250, 2310, 2305, 2315, and 7310 encompass the wellness policy if all are adopted.*

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. Vending, school stores, and fundraising need to comply with specific

nutrition standards. Refer to [Guide to Smart Snacks](#) available at the USDA website. Documentation of compliance for all foods sold in vending machines must be available. The [Smart Snacks Product Calculator](#) is a useful tool that produces a report that can be used to confirm and document compliance.

- Per 7 CFR 210.11, All fundraisers, exempted and compliant, food and non-food, 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 and tracking form available [on the Child Nutrition website](#) . TA was given to the principal on Smart Snack tracking.

Professional Standards

- Training standards apply to all school nutrition program employees, regardless of student enrollment in the school district or size of the Local Educational Agency (LEA). Note: If hired January 1 or later, an employee must only complete half of the required training hours.
 - Directors – must complete at least 12 hours of annual continuing education/training. These required hours are in addition to the food safety training required in the first year of employment.
 - Staff working an average of at least 20 hours per week - must complete at least 6 hours of annual continuing education/training.
 - Part time staff working less than 20 hours per week - at least 4 hours annual continuing education/training, regardless of the number of part-time hours worked. (7 CFR 210.30 Professional Standards Regulations)
- The Food Service Director was hired before July 1, 2015; however, a Professional Standards questionnaire was completed to document education and or experience. The Professional Standards for School Nutrition Program Employees brochure was provided.

Resource Management – Paid Lunch Equity

- On several occasions, the Board agreed to pay food service for the difference of the loss of revenue of not raising the paid lunch price in order to keep meal prices the same. There needs to be a corresponding deposit from general funds that is labeled as such in the financial statements.

Procurement

- A procurement review is currently being completed. Kat Forstie, Procurement Specialist is waiting for some answers in order to complete the review. Please follow the guidance provided in a separate closure letter.

Your review is now closed.

Fiscal action in the amount of \$121.50 is to be assessed from this review, 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
Linda Hennigar, Food Service Supervisor, Whitepine 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.

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