



December 30, 2019

Judi Sharrett, Superintendent
Plummer-Worley Jt. School District
1255 E. Street
Plummer, ID 83851

Dear Superintendent Sharrett,

On November 13, 2019, State Department of Education (SDE) Coordinators Jennifer Butler and Lynda Westphal, along with USDA Sr. Program Specialist John Kirwin, conducted an Administrative Review of Plummer-Worley 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)

The site reviewed was Lakeside Elementary School (operating Community Eligibility Provision).

The State agency (SA) would like to commend Michelle Renfrew and the entire staff of Lakeside Elementary School 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:

Findings and Corrective Action Plan (CAP)

Finding 1 - Meal Counting and Claiming

A systemic claiming error was discovered; the October 2019 claim was overclaimed by 5 meals. Fiscal action will be calculated for this error. Technical assistance was provided on methods to calculate the claim to help reduce inaccuracies. It was also demonstrated how the Point of Service software, being used for other purposes, could be used to calculate the claim.

CAP: Develop a plan to ensure accurate meal claiming and train applicable employees as backup. Upload the plan explaining the process to be used and persons to be trained into MyIdahoCNP Review Attachments.

Due Date for CAP Completion: December 5, 2019; completed November 19, 2019.

Corrective Action Response: A plan was uploaded that outlined a process in which daily meal counts will be checked and added onto a weekly tracking sheet. The weekly counts will be transferred to a monthly tracking sheet. The monthly consolidation worksheets will be used calculate the claim totals.

Finding 2 - Local School Wellness Policy (LWP)

The LWP was found out of compliance with the USDA Final Rule. 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. Technical Assistance (TA) was provided during the last AR (January 12, 2017) advising that LEAs were required to comply fully with the requirements of the final rule by June 30, 2017. More information is available on the SA [School Wellness webpage](#).

- During the review, documentation was reviewed showing that the district is working toward adopting missing Idaho School Board Association (ISBA) policy sections.

CAP: Provide a written plan for how and a timeline for when the wellness policy language will be brought into compliance with Federal requirements.

Due Date for CAP Completion: December 5, 2019; completed December 18, 2019.

Corrective Action Response: Previously adopted ISBA sections related to the LWP had been revised in 2018 and 2019, but five missing ISBA sections were brought to the board, with final approval on November 18, 2019. The LEA adopted all required ISBA policy sections to create a wellness policy compliant with the final rule requirements.

Finding 3 - Civil Rights

The hearing official must complete the full civil rights training on an annual basis. This is a repeat finding from the last review and a process must be implemented to ensure this requirement is met each year.

CAP: Upload a dated sign-in sheet to provide documentation that the hearing official watched the required civil rights training. This training video is available on the [SA website](#).

Due Date for CAP Completion: No further action required; completed prior to onsite review.

Corrective Action Response: A signed training agenda was uploaded showing the superintendent watched the 2019 Civil Rights training video on October 7, 2019.

Finding 4 - Meal Components and Quantities

Independent contractor CN Resource (CNR) completed the menu review and found for the week of menu review, the alternate breakfast menu did not meet the minimum weekly requirement for grain. A grain was offered daily, however the weekly minimum requirement was not met.

CAP: Provide a written statement that the weekly grain requirement is 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.

Due Date for CAP Completion: September 20, 2019; completed September 17, 2019.

Corrective Action Response: The SFA now offers a yogurt, string cheese, or toast option along with the cereal bowl to ensure the weekly minimum is met when the alternate breakfast meal is selected.

Commendations

- Michelle is new to her role and has a positive, can-do attitude. She readily accepted any feedback provided by SA reviewers.
- Michelle was receptive to suggestions regarding the meal counting issue and is willing to implement the electronic claiming option in the Point of Service software.
- Sharon is great with the kids and her enthusiasm is contagious.
- CNR provided the following commendations:
 - Michelle and her staff seem to have really great relationships with the students. The meal service period was observed to be a friendly and enjoyable experience for the students.
 - Excellent work meeting all meal pattern requirements for lunch for the week of menu review.

Technical Assistance (TA)

Dietary Specifications and Nutrient Analysis

- Pre-K is served in the cafeteria and present when older grades arrive, but are served at a time prior to the older grades arriving at lunch and after they left for breakfast. This difference in service times does not meet the requirements to be considered comingled. Clarification was provided on expectations of comingling. The Pre-K meal pattern was discussed.
- Pre-K children should not be offered chocolate milk as it is out of compliance with the CACFP meal pattern.

Civil Rights

- The condensed Frontline Staff civil rights training document is only for non-food service employees such as teachers, secretaries, custodians, or volunteers that assist with program participants. This training cannot be used for foodservice staff, the determining, confirming, or hearing officials, or their supervisors, who are required to complete the full civil rights training annually.

SFA On-Site Monitoring

- The on-site review for both breakfast and lunch at all school sites shall take place prior to February 1 of each school year. Only 50 percent of the schools need to be reviewed at breakfast at least once every two years (7 CFR 220.11(d)(1)). Be sure to have a plan to alternate which school site receives the breakfast review each year and hold that review on a separate date from the lunch review.

Local School Wellness Policy (LWP)

- When using ISBA polices, there are multiple sections that must be adopted for a compliant LWP. Ensure that all required sections are combined together when sharing the LWP. Prior to the AR, only one section was included on the district's website, after all sections have been approved, ensure the complete policy is publicly available on the district's website.

Smart Snacks

- Compliance documentation to support vending machine and a la carte products must be kept. The [Smart Snacks Product Calculator](#) is a useful tool that produces a report that can be used to confirm and document compliance.

Professional Standards

- 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. There is also a food safety training module that may be beneficial.
- 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](#).
- 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.

Buy American Provision

- 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)). 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 products observed on site were pineapple from the Philippines, grape tomatoes and cucumbers from Mexico, and canned mandarin oranges from China.

Fresh Fruit and Vegetable Program (FFVP)

- The “Buy American” requirement in the National School Lunch Program (as provided in 7 CFR 210.21(d)) applies to purchases made with FFVP funds. Bananas were served on the day of review and require exemption documentation.
- Schools must widely publicize the FFVP. This can be done through posting the grant award on the school website, creating a bulletin board, or writing a short statement for the school newsletter.

Procurement

- A procurement review is currently being completed. Please follow the guidance provided in a separate closure letter.

Community Eligibility Provision (CEP)

- Direct Certification (DC) reports for April 1 data must be run each year.
- The current CEP approval expires at the end of SY 22-23 and you must qualify to continue operation of this special provision. If you intend to start a new CEP cycle, you must notify the State agency of your intent to elect CEP no later than June 30, 2023 and provide enrollment lists and valid direct certification documents, by sites, as of April 1, 2023.

Fiscal Action

Due to the October claim error, fiscal action results in \$14.41. However, since this amount falls under the \$600 threshold, the fiscal action will be disregarded and no financial adjustment will occur.

Your review is now closed.

There is no fiscal action resulting from this review. 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,



Jennifer Butler, MEd, SNS
NSLP Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Michelle Renfrew, Child Nutrition Director, Plummer- Worley 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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