



December 30, 2019

Jim Doramus, Superintendent
Salmon River School District
117 Ace's Place
Riggins, ID 83549

Dear Superintendent Doramus,

On November 5, 2019, State Department of Education (SDE) Coordinators Jennifer Butler and Lynda Westphal conducted an Administrative Review of Salmon River School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) Operating Provision 2 breakfast option
- USDA Foods
- Fresh Fruit and Vegetable Program (FFVP)
- Afterschool Snack Program (ASSP)

The site reviewed was Riggins Elementary School.

The State agency (SA) would like to commend Linda Kern and the entire staff of Salmon River 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:

Findings and Corrective Action Plan (CAP)

Finding 1 – Certification and Benefit Issuance

Four application errors resulted in a 6.45% error rate. One application was determined incorrectly resulting in a reduction of benefits from free to reduced; one application was incomplete with missing a household total; two students receiving free benefits had not submitted applications for the new school year and their benefits were not changed following the 30-day carryover period. Fiscal action will be calculated on the benefit issuance errors.

- During the review, a copy of the adverse action letter sent to the household advising the student will change to reduced price on November 15 was provided. The missing household number was obtained and added to the application. The two students who had not submitted applications for the new year were changed to paid as of the date carryover ended.

CAP: Upload an updated benefit issuance list with the corrected benefits after the student is changed on November 15.

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

Corrective Action Response: Benefits were correctly modified, as applicable, with changes validated by SA.

Finding 2 – Verification

During Verification, documentation for only one source of income was provided. Two sources of income were indicated on the application and additional steps must be taken to request documentation to verify the accuracy of the other reported source of income.

- During the review, the household was contacted to request the missing income documentation.

CAP: Determine benefits after all income documentation has been received. Apply benefit as determined on the updated benefit issuance list. Notify the SA with the results of verification.

Date for CAP Completion: Due November 20, 2019, completed November 19, 2019.

Corrective Action Response: The SFA changed the student's benefit to paid as the missing proof of income was not provided as requested.

Finding 3 –Meal Counting and Claiming

Inaccurate Point of Service (POS) processes of identifying reimbursable meals at the time of service were observed. Students must select the required quantity of food to make a reimbursable meal. These reimbursable meals must be counted at the POS when the meal is selected. Under Offer versus Serve (OVS), meals that contain fewer than three components

(NSLP) or items (SBP), or do not contain at least ½ cup fruit or vegetable, are not reimbursable (7 CFR 210.10 (e)). Fiscal action will be calculated for the non-reimbursable meals.

- During breakfast in the cafeteria, students self-select items from the counter and milk cooler and a staff member marks off students participating in breakfast. Several students put their food choices on the table and then went to the milk cooler. Some students were asked to take a milk if they didn't have one which is not in line with OVS. The SA identified two students that did not select a fruit choice and sat at a location where it may not have been evident to the POS they had not taken a reimbursable meal.
- During breakfast in the classroom, student helpers serve all menu options to all students in the classroom. A teacher counts the students who participated in breakfast and then calls for all unwanted food items to be returned. The student helpers who picked up the breakfast in the classroom meal, pulled only one type of milk out of the milk cooler not allowing students in the classroom a choice of milk. Students passed out a variety of two grain bar flavors and either bananas or orange slices without giving students a choice in what they wanted, this caused some interruption with students wanting something different than what they received.

CAP: Develop a plan to count correctly at the POS for both the lunchroom and classrooms ensuring that all children receive a reimbursable meal at the time of being counted. Upload a narrative identifying changes to be made and clearly address if the meal service is OVS or Serve, as a combination of both were observed and not a clear practice of either meal type implemented as required.

Date for CAP Completion: Due November 20, 2019; completed November 19, 2019.

Corrective Action Response: The SFA uploaded a plan that explains the students will follow OVS in the breakfast room and Serve in the classroom. In the breakfast room, signage has been posted to assist in students taking a reimbursable meal and the POS has been moved to the end of the line so that the selected meal can be shown before students take their seat. In the classroom, students wanting breakfast will be given a choice of milk and a full cup of fruit along with a grain item. Unwanted items can be placed in a share bucket after everyone has been served.

Finding 4 – Non-program Food Revenue

It was discovered that the SFA purchased food items for parent and faculty meal functions. This is considered catering of non-program foods. The costs recouped did not include a sufficient markup to cover the cost of the food, labor, storage, and delivery of the products. When selling food to any organization outside food service, the time ordering, preparing, and/or storing foods must be accounted for and a process to adequately apply a cost mark up to all catered/sold foods and for individual a la carte items sold during meal service to cover all costs.

- During renewal, the alternate assessment form was completed for the non-program food revenue tool. The alternate assessment cannot be used when catering occurs.

CAP: Develop a procedure to adequately apply a cost mark up to all catered/sold foods and implement an invoicing process to receive payments to cover all costs as they are incurred. Upload this procedure in to MyIdahoCNP. Complete and upload the full Non-program Food Revenue Tool (NPFRT) for the week of menu for all breakfast and lunch menus.

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

Corrective Action Response: The SFA uploaded a plan stating that a catering menu will be developed with recipe and food costs calculated and entered into the SA's a la carte pricing tool in order to adequately apply a cost mark up. The SFA will implement an invoicing system in which invoices will be sent to the district office as events occur and ensure that the SFA is reimbursed for all nonprogram and a la carte foods sold to the district. The NPFRT was completed for the week of October 7-10, 2019, and indicates compliance.

Finding 5 – Local School Wellness Policy (LWP)

The LWP (adopted in 2009 and 2010) 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 (April 5, 2017) advising that LEAs were required to comply fully with the requirements of the final rule by June 30, 2017.

- During the review, documentation was reviewed showing that the district is working on modifying related ISBA policy sections and preparing to take them to the November 18, 2019 board meeting for the first reading.

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

Date for CAP Completion: Due November 20, 2019; completed November 19, 2019.

Corrective Action Response: The LEA submitted proposed policies to the board for the first reading on November 18, 2019. The third and final reading is scheduled for January 20, 2020. The SFA advises the adopted policies will be posted on the district's website by January 25, 2020.

Finding 6 – Meal Components and Quantities - Breakfast

Independent contractor CN Resource (CNR) completed the menu review and found for the week of review, the breakfast menu did not meet the daily fruit and milk requirements. Fruit was offered daily, however the minimum required portion size was not met. One milk type was offered at breakfast, but regulations require that a variety of at least two milk types are offered with each meal daily. During the last AR, TA was provided on clearly indicating the required 1 cup fruit offering on the production record.

CAP: Provide a written statement that the daily fruit and milk requirements are now met.

Date for CAP Completion: Completed October 7, 2019.

Corrective Action Response: CNR closed this finding after approving the uploaded response.

Finding 7 – Meal Components and Quantities - Lunch

CNR completed the menu review and found for the week of review, the lunch menu did not meet vegetable portion or subgroup requirements. Vegetables were offered daily, however the minimum required portion size was not met. Additionally, the minimum weekly requirement for the dark green vegetable subgroup was not met due to an insufficient quantity offered.

CAP: Provide a written statement that the daily vegetable and dark green vegetable subgroup requirements are now met.

Date for CAP Completion: Completed October 7, 2019.

Corrective Action Response: CNR closed this finding after approving the uploaded response.

Commendations

- The food service director wears many hats and does a great job with overseeing the child nutrition programs. She was very open to all suggestions provided by the SA and was very responsive in preparing for the Administrative Review.
- CNR advised on a great job making corrections to menu and daily production records to reflect that all meal components are being offered in the correct quantities for breakfast and lunch.

Technical Assistance (TA)

Certification and Benefit Issuance

- When multiple income frequencies are reported, all income should be converted to an annual amount when determining benefits. It was discovered that some applications with differing income frequencies were incorrectly converted to a monthly income amount.
- The benefit issuance list must come from the POS software used to calculate the claim. This list is used to confirm students are being counted and claimed at the correct benefit. During the review, the SFA discovered how to add a column that listed the date of eligibility for each student.

Verification

- When performing Verification of Free and Reduced Applications, the Confirming Official must check the application prior to sending out the letter for Verification. The verified application did not include the Confirming Official's signature to indicate this process occurred.

Meal Counting and Claiming

- To assist with claim counts, record the student worker exchange meals as a regular meal, but change the charge amount to zero in the POS so counting errors are avoided.

Dietary Specifications and Nutrient Analysis

- Pre-K is served in the cafeteria with older grades, but all menu items are placed at each seat of the table for ease (serve-style). Pre-K is served the K-5 meal pattern. Clarification was provided on expectations when Pre-K is comingled. The Pre-K meal pattern and other service styles were discussed as an option for both breakfast and lunch.

Meal Components and Quantities

CNR completed the menu review and provided the following TA:

- 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 menu did not meet milk requirements. Regulations require that a variety of at least two milk types are offered with each meal daily. Only one milk type was offered. Offer an assortment of at least two milk types from 1% or fat-free flavored or unflavored milk. Ensure that unflavored milk is offered at each meal service.
- The federal regulations require specific serving sizes of fruit/vegetable for breakfast. Servings were often less than the required 1 cup serving, daily except Tuesday. Consider serving ½ cup fresh, frozen, canned fruit, or ½ cup 100% full-strength juice with the current menu to meet fruit requirements.
- Ensure that production records accurately reflect all menu items offered, particularly the milk choices and fruits.
- A sponsor must maintain product documentation and nutrition facts labels from the manufacturer for commercially prepared foods. Many of the labels submitted were generated by the distributor or vendor. Obtain labels directly from the manufacturer of the product or from the product packaging and keep on file, so they can easily be referenced when determining menu compliance.
- A Child Nutrition Label or Product Formulation Statement was not submitted for all processed menu items. This documentation was secured for the French toast sticks and mini bagels with strawberry cream cheese, in order to determine meal pattern crediting. A sponsor should secure this documentation and maintain on file for processed food products.

Food Safety

- Food safety manuals (HACCP) were available for both the kitchen located at the HS and the cafeteria area at the ES. The HS manual is from 2005 and should be updated. Both manuals need to be customized for their locations and signed and dated with the implementation date.

Offer versus Serve (OVS)

- OVS is optional for all grades at breakfast and for K-8 at lunch; it is mandatory for 9-12 at lunch. OVS is not an option for PK unless they are comingled with K-5. SA reviewers observed inconsistencies with operating OVS at breakfast in the cafeteria. OVS was not implemented during breakfast in the classroom, requiring a full cup of fruit to be provided. Ensure teachers and staff have a clear understanding of meal service requirements.

After-school Snack Program (ASSP)

- Although during the ASSP service operation all children received a reimbursable snack consisting of 2 creditable items, it was evident that at times they have been given an option to only select one. SA reviewers witnessed, on occasion, the server ask if the students wanted both, if a student declined one option she would ask that they please take it and put it in the basket next to her. This practice of taking both and returning an unwanted item did not seem to be a regular practice. The server counted children eating a snack afterwards to confirm the meal count, rather than marking children off as

each snack was served. It is recommended that the SFA consider a share-table in a location away from the POS that students could place unwanted items.

Fresh Fruit and Vegetable Program (FFVP)

- 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.

SFA On-Site Monitoring

- The SFA On-Site Review Checklist should be completed in full by indicating either *Yes* or *No* to all questions (or *NA* when an applicable option) on the form. Several questions under both General Areas and Meal Counting and Claiming System were not marked making the form incomplete. Corrective Action is required to correct questions marked as *No* during the on-site review.
- Breakfast on-site reviews are covered in 7 CFR 220.11(d)(1) which states: every school year, each school food authority with more than one school shall perform no less than one on-site review of the breakfast counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) of this chapter, as specified by FNS, for a minimum of 50 percent of schools under its jurisdiction with every school within the jurisdiction being reviewed at least once every two years. The on-site review shall take place prior to February 1 of each school year.

Local School Wellness Policy (LWP)

- 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; posting to the school /district website and/or in a school newsletter would support this requirement.
- For more information regarding local wellness policies, please visit the [Idaho SDE Child Nutrition Programs School Wellness website](#).

Special Provision Options

- Provision 2 Base Year (SY17-18) benefit issuance was previously validated by the SA on September 20, 2017, during a base year review. The retention of all required Provision 2 documentation was confirmed during this administrative review. Records are kept in a filing cabinet and binder. 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. The SA recommends placing all base year records in one location to have all required items together in one place.

Resource Management Comprehensive Review

- Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure that all revenue from the sale of non-program foods accrues to the non-profit school food service account; and that revenue available to support the production of reimbursable school meals does not subsidize the sale of non-program foods. *SP 20-2016 Nonprofit School Food Service Account Non-Program Food Revenue Requirements* memorandum provides guidance on the revenue requirements including options for assessing compliance to fulfill the requirements in section 206 of the Healthy, Hunger-Free Kids Act of 2010.

Procurement

- A separate procurement review was closed on November 11, 2019. Please follow the guidance provided in the procurement review closure letter.

Fiscal Action

Due to benefit issuance and meal counting and claiming errors, fiscal action results in \$206.45. 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
Linda Kern, Child Nutrition Director, Salmon River School District

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

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