



**SHERRI YBARRA**  
SUPERINTENDENT OF  
PUBLIC INSTRUCTION

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December 19, 2016

Mr. Pal Sartori  
Cascade School District  
5 South 3<sup>rd</sup> Ave. W.  
Cascade, ID 83644

Dear Mr. Sartori,

On December 8, 2016, State Department of Education (SDE) Coordinators Lynda Westphal and Jennifer Butler conducted an Administrative Review of Cascade School District for the following United States Department of Agriculture (USDA) programs:

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

Cascade High School was the school site reviewed.

The State agency (SA) would like to commend JoAnn Suggs and Anita Waite and the entire staff of the Cascade 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 (HHFKA), 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 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- Civil Rights***

School foodservice authority staff who interact with program applicants or participants (i.e., cafeteria staff, Free and Reduced Application approval staff) and their supervisors, as well as the Hearing Official, must have annual civil rights training. The Superintendent is listed as the Hearing Official so must have USDA Civil Rights training.

**Timeframe for CAP completion:** December 22, 2016

**SFA Response to CAP:** On December 22, 2016, a signed agenda was uploaded with the Superintendent now being trained in Civil Rights.

### ***Finding 2- Meal Pattern and Production Records***

Production records for both breakfast and lunch included inaccurate crediting amounts for several items during the week of review. The inaccurate crediting at lunch made the menu short by .25 oz. eq. grains on Monday, short .25 cup fruit on Tuesday for the HS grade group, and short .25 cup vegetable on Friday. The crediting totals for four breakfast items and six lunch items must be corrected. Also, three recipes need to be edited to accurately reflect the correct portion/ingredients.

**Timeframe for CAP completion:** December 22, 2016

**SFA Response to CAP:** On December 22, 2016, all corrected recipes and production records were uploaded and this CAP is now closed.

## Fiscal Action

There is no fiscal action at this time. Should you wish to appeal these findings please follow the appeal procedures on the [State Agency Appeal Procedures](#) document.

## Commendations

- All applications were approved correctly and matched the number of students in the claim. The SA appreciates this attention to detail in your work.
- The Civil Rights binder was beautifully organized and follows all best practices.
- Cafeteria mural stating "Rockin' Rambler Restaurant" follows Smarter Lunchrooms Movement best practices.
- Good use of labels and dates on food products in storage.
- This is the first school that has their Nonprogram Food Revenue tool completed and in compliance with all of the backup documentation. It is apparent that Joann worked hard on getting all of the numbers.

# Technical Assistance (TA)

## **Certification and Benefit Issuance**

- Gave TA that the liaison needs to certify a homeless student in writing (not a note that you talked to the liaison).

## **Financial Management Review**

- Adult meals at \$3.50 are less than the required \$3.65. Please come up with a plan to increase prices or have the general funds pay for the difference. Plan is to increase by 25 cents next year.

## **Dietary Specifications and Nutrition Analysis**

- Gave TA that the district does not need to continue to use NutriKids (nor pay for the updates) to ensure compliance with the meal pattern. If the district utilizes cycle menus and they are entered correctly in the meal compliance worksheet and are showing that all components are met, then the calories should be in compliance also. Using low sodium foods and watching the saturated fat of foods will ensure compliance with these nutrients.
- TA was provided to modify the Production Record to indicate the actual number of items served. Currently, the production record only identifies portions planned and portions prepared.
- TA was provided to provide information on leftovers, Anita immediately was receptive to feedback and wrote more detailed notes on the production records to explain what happened to leftovers between the various grade levels.
- During the week of review for menu compliance (Nov. 7-11), 3 grain-based desserts were served to the 9-12 graders totaling 2.5 oz. eq. Only 2 oz. eq. of grain based desserts can be served during a week. Consider limiting desserts to only one day a week. During the review week, four days had dessert. Consider limiting desserts to just one day per week to make it something to look forward to. Calories can be increased through vegetable portions, rather than desserts.

## **Local School Wellness Policy**

- 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. (§210.30) 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 of the wellness policy once every three years 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: <http://www.sde.idaho.gov/cnp/hne/wellness.html>.

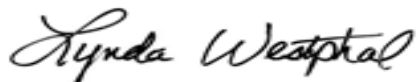
### **Professional Standards**

- 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, effective July 1, 2015. 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; options include the FNS online tracking tool at <http://www.fns.usda.gov/school-meals/professional-standards> and two Professional Standards tracking resources available in MyIdahoCNP under Download Forms in the Professional Standards section.

## **Your review is now closed.**

If you wish to discuss any of these findings, please contact me at (208) 332-6820. Thank you for your support of the Child Nutrition Programs.

Sincerely,



Lynda Westphal, MHS, SNS  
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs  
JoAnn Suggs, Food Service Director, Cascade School District

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