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May 18, 2017

Ms. Teresa Fabricius
Fruitland School District
401 Iowa Ave.
Fruitland, Idaho 83619

Dear Ms. Fabricius,

On April 5, 2017, State Department of Education (SDE) Coordinators Jennifer Butler and Heather Blume conducted an Administrative Review of Fruitland Schools for the following United States Department of Agriculture (USDA) programs:

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

The State agency (SA) would like to thank Scherri Farley, Food Service Director and the entire staff of Fruitland school food service 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 that 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- Certification and Benefit Issuance

- Three applications (affecting three students) were approved in error and benefits must change from free to reduced eligibility status.
- One application (affecting two students) was missing income frequency and was determined to be incomplete. The family must be contacted to gather the required information.
- One application (affecting one student) was approved in error and benefits must change from reduced to free eligibility status.
- One application (affecting one student) was approved in error and benefits must change from reduced to denied status.

Timeframe for CAP completion: April 19, 2017

SFA Response to CAP:

- The families were notified of change in status and the benefit issuance list updated no more than three days after notification was sent for an increase in benefits and no less than 10 calendar days for a reduction in benefits.
- The family with the application missing income frequency was contacted and the required information was obtained.
- Five of the six updates were completed while reviewers were on-site. The final application was uploaded after a determination was made and the benefit issuance list was uploaded to reflect status changes.

Finding 2- Civil Rights

- The USDA long non-discrimination statement is for usage on all documents of more than one page or one sheet of paper and is available at the State agency [Civil Rights Training and Resources](#) web page. The long statement ends with, “This institution is an equal opportunity provider.”
- The SFA must have a civil rights procedure for receiving and processing complaints of discrimination within the school meal program. This procedure must include that the State agency will be notified of the complaint within three working days. An example of a procedure is available on the State agency website under [Civil Rights Training and Resources](#) web page.
- SFA staff that interacts 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. Teresa Fabricius is listed as the Hearing Official so must have USDA civil rights training, which is located under the “Training” tab of the [CNP Resource Center website](#).

Timeframe for CAP completion: April 19, 2017

SFA Response to CAP:

- The civil rights statement on the menu was corrected and uploaded into MyIdahoCNP on April 6, 2017.
- A copy of the Civil Rights Procedure was uploaded into MyIdahoCNP on April 6, 2017.
- The Hearing Official received civil rights training on April 17, 2017, and the sign-in sheet and agenda was uploaded into MyIdahoCNP.

Finding 3- Offer versus Serve

- All staff must be trained on Offer versus Serve (OVS) annually. Please train staff on OVS for this school year and make a plan to hold OVS training at the beginning of next school year. 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 webinars are available on the SA website and may be used for training.

Timeframe for CAP completion: April 19, 2017

SFA Response to CAP:

- A dated sign-in sheet was uploaded into Review Attachments section of MyIdahoCNP and an explanation of the training was uploaded into MyIdahoCNP on May 10, 2017.

Commendations

- It was noted that the district uses the Idaho Wellness Policy Progress Report to measure the implementation of the district wellness policy. While the policy must be updated to align with the final rule, it is great to see the implementation being measured.
- Many training topics are covered each month during a 1-hour staff meeting. This ensures that part-time staff meets their required professional training standards. This is a best practice and demonstrates the SFA's commitment to the foodservice program for ensuring that ongoing training takes place.
- District staff has worked to plan menus and source products to exceed Level 1 Sodium Targets; the middle school is well on its way to meeting level 2 targets. A similar level of sodium compliance is anticipated at other district schools. Saturated fat level was also well below less than 10% of total calories.
- The SFA switched out tomato paste with fresh tomatoes that are pureed and procured from the local Farmer's Market, resulting in better tasting, lower sodium menus.
- District staff was organized and had the menu and nutrition information ready for the review.
- The Verification process was very thorough and complete. It was exactly what the reviewers needed. The State agency commends the food service director on the verification process.
- The food service staff took the time to prepare homemade buns for the taco burger and they smelled, looked, and tasted wonderful!
- Meals prepared and offered included a variety of choices, fresh fruits at both breakfast and lunch meals and a varied salad bar at lunch.
- Site staff and district staff were open to suggestions for improved and displayed general care and concern for the students served.

Technical Assistance (TA)

Certification and Benefit Issuance

- Gave TA that the DC list has a column for Foster student matches which does not confer eligibility to the entire household.

Civil Rights

- If no civil rights complaints are received during the school year, the best practice is to write "No complaints" on the applicable school year complaint log and retain the record (three years plus the current year).

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. Please utilize the online Smart Snack calculator to determine product compliance and discuss with vendors about only providing Smart Snack compliant food items.

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 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: [School Wellness Webpage](#)
- Please see the comments on the Fruitland Wellness Policy, which is uploaded into MyIdahoCNP.

Food Safety

- The Idaho Department of Health & Welfare updated the Food Code to come in line with the current FDA Food Code. This includes a new requirement that all food safety plans must include a procedure for cleaning up bodily fluids. A HACCP Bodily Fluid Cleanup sample was located at the Foodservice Director's office, but had not yet been disseminated to school sites to be included in the food safety manual. The director is in the process of personalizing the procedure for the district and had clean-up kits available at each site.
- All HACCP procedures should be covered annually. Staff training must be documented with an agenda and sign-in sheet and must be kept on file for three years plus the current year. (CFR210.13(c))

Meal Counting and Claiming-Lunch

- Ensure that the computer screen is not visible to students in order to avoid overt identification of meal benefit. Also, if the practice of passing out a note to students who have an account balance is continued, please also provide another type of note, perhaps with a positive or motivational quote, to all students to avoid overt identification.
- TA was given for accurate reflection of components contributions in Nutrikids. TA was given to add additional M/MA to PBJ sandwich offering to meet weekly minimum. Some TA was given prior to the 3-13-17 nutritional review via phone or email. Final review completed at site visit.
- TA was given on completing production records throughout the day as work is completed; a notebook with details is an additional tool the staff can choose to use, but production record should be filled out as work is completed. Clarified with staff that production records do not need to look “perfect” but rather legible. Reviewers expect occasional food spills, notes of additional foods added to menu, and different hand writing. Production records should be neat and complete, but not a perfect document with no variations or cross outs. This TA was given to entire staff.
- TA was given to include recording of temperatures as they are taken on the production record. TA was given on food quality and food safety; recommend thawing frozen yogurt fruit parfaits in refrigerator and serving later in week if time for thawing on Monday morning to lunch is not sufficient for thawing for lunch service.
- TA was given on batch cooking for last of breakfast line for items such as breakfast pizza which may not retain quality when cooked item is chilled, frozen and reheated. Also noted that if pizza runs out due to student choice, two other options are available for breakfast, so decision could be to cook enough for most students to have choice, but not overproduce for leftovers or discards.

The meal compliance worksheet for the targeted review week did not meet the weekly minimum for M/MA due to offering of 1 oz. as PBJ sandwich three times a week. School revised menu to include a 1 oz. cheese stick when PBJ is offered, which brought the menu into compliance.

Dietary Specifications and Nutrient Analysis

- An independent contractor, Laura Thomas, provide TA for accurate reflection of components contributions in Nutrikids.
- TA was given for completion of meal compliance sheet in Nutrikids to have milk choices reflected accurately at both breakfast and lunch.
- TA was given to have Nutrikids meal compliance sheet accurately reflect the higher levels of grains offered daily; initial sheets showed more grains than were being offered. Updated sheet was uploaded.
- This is a clarification comment rather than TA - the lunch menu did not include non-creditable cheese items for the week of review. The monthly menu does include nachos and the recipe calls for a powdered cheese nacho mix.
- TA was given to update recipes to reflect current practices - no garlic salt in kitchen, only garlic powder - an older recipe listed garlic salt as ingredient.
- TA was given to increase offering of vegetables at the sandwich line. While the salad bar is encouraged, adding bags of vegetables may encourage increased consumption. Some students may not take time to create a salad, but would grab and eat raw veggies. Also could vary choice in bag to alternate veggies and fruits, with additional offered for student choice at sandwich line.

Your review is now closed.

The total fiscal action is \$9.95 for breakfast and \$29.74 for lunch. Since these amounts are below the \$600 threshold for each program, fiscal action will be disregarded. Should you wish to appeal any of these findings please follow the appeal procedures on the [State Agency Appeal Procedures](#) document. 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,



Heather Blume, MS, RD, LD
Child Nutrition Program Coordinator

Cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Scherri Farley, Food Service Director, Fruitland School District

“This institution is an equal opportunity provider”