



December 4, 2017

Mr. Shawn Woodward, Superintendent
Lake Pend Oreille School District #084
1520 Baldy Mountain Road
Sandpoint, ID 83864

Dear Superintendent Woodward,

On November 7-8, 2017, State Department of Education (SDE) Coordinators Lynda Westphal and Jennifer Butler conducted an Administrative Review of Lake Pend Oreille SD for the following United States Department of Agriculture (USDA) programs:

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

The sites reviewed were Washington Elementary and Sandpoint Middle Schools.

The State agency (SA) would like to commend Ms. Coleman, Child Nutrition Director and the entire staff of Lake Pend Oreille 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 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 – Wellness Policy

The Wellness Policy was found to be noncompliant for the third review in a row.

During the Administrative Review on November 17, 2011, the Wellness Policy was a new USDA regulatory requirement and the SA reviewers gave Technical Assistance (TA) to bring the policy into compliance with these new regulations. Again, during the Administrative Review on November 11, 2014, the Wellness Policy was found to still be noncompliant. Due to the repeat noncompliance, this area moved from TA to a “finding”. (Below is an excerpt from the 2014 Administrative Review.)

On May 18, 2016, during the district’s application renewal, the district’s Wellness Policy was sent to the SA. The uploaded policy continued to be out of compliance. Even though the Wellness Policy was still noncompliant, the SA did move forward and approved the district’s renewal packet for school year 16-17. During the June 2017 renewal, the District Child Nutrition Director uploaded a new Wellness Policy with changes that were supposed to go to the board for approval in July 2017. As of October 3, 2017, the document on the District’s website is still the 2009 wellness policy and is out of compliance.

The Child Nutrition Director has worked hard to get the Wellness Policy in compliance and to the Board prior to the review. Per correspondence with the Child Nutrition Director, the Wellness Policy is due to have a second reading on November 14, 2017.

Timeframe for CAP completion: November 22, 2017

Sponsor Response to CAP: On November 17, 2017, the Child Nutrition Director sent an e-mail stating that the school board approved the revised Wellness Policy on November 14, 2017. The draft minutes were attached to the e-mail and saved in the sponsor file.

Finding 2 – Food Safety

Child Nutrition Directors must have at least eight hours of food safety training every five years.

Timeframe for CAP completion: November 22, 2017

Sponsor Response to CAP: Complete the ICN course to fulfill this requirement and upload a training certificate indicating successful completion of at least eight hours food safety training. The Child Nutrition Director completed the online course in the evening on November 7, 2017, completing this corrective action during the Administrative Review.

Finding 3 – Applications

There were three applications (out of 450 reviewed) that needed to be corrected, resulting in a .67% error rate.

Timeframe for CAP completion: November 22, 2017

Sponsor Response to CAP: All applications needing corrections were fixed prior to the exit conference of the review.

Fiscal Action

Due to the small number of application errors that were corrected immediately, the amount of fiscal action was determined to be \$21.10, which is below the \$600 threshold and will be disregarded.

Commendations

- Thank you to the Child Nutrition Director, Ms. Coleman, for being so organized with her paperwork. Her hard work on maintaining excellent files made it easy to insure that all CNP regulations are being followed.
- Tisha Whatcott, RD, LDN, Child Nutrition Contractor observed that Bobbi was well organized and had all the paperwork that was needed to conduct the nutrition portion of the review readily available and the review went well.
- Ms. Coleman works hard on nutrient analyzing her menus to make sure the children get the proper nutrition within the regulatory guidelines.
- Ms. Coleman has a six week menu and meets with staff two times a year to get feedback on the menus and makes adjustments as needed.
- The Lake Pend Oreille Child Nutrition Program holds an annual Leadership Professional Development Retreat that covers all required annual staff training, provides in-depth training on various topics, and gives an opportunity for additional coaching on specific areas of need.
- All kitchen staff are CPR trained, have had a Hepatitis A vaccination, and hold SNA certification.
- This cafeteria at Sandpoint Middle School was so bright and inviting - thanks to a recent grant and upgrade with the Smarter Lunchroom project. The staff obviously takes great pride in their jobs and it shows. Students and staff alike all appear happy to be eating in here!
- Staff wore appropriate hair restraints as required per section 2-402.11 of the Idaho Food Code.
- Ms. Coleman had a copy of the new Medical Statement Form for Meal Accommodations. Since this form is so new it is nice seeing it in use.
- The *Policies and Procedures used to Administer Federal Funds* is a well-written policy developed as a team effort among all Federal Programs.

Technical Assistance (TA)

Verification

- When performing Verification of Free and Reduced Applications, the Confirming Official cannot be the same person as the Determining Official (the person who approves the application). There must be another person checking the application prior to sending out the letter for Verification. Although Meal Time is considered the Determining Official and Bobbie the Confirming Official, Bobbie is the one to enter the application data into Meal Time for determination. Next year, have a separate person double check the applications selected for Verification for the confirmation step.

Offer versus Serve

- The Child Nutrition Director might want to have an Offer versus Serve refresher course for her staff.

Food Safety and Buy American Provision

- The warehouse, where a majority of the food is stored, must request a food safety inspection.
- Starting July 1, 2018, a person in charge needs to have an approved Food Safety training with a proctored exam, such as ServSafe, Prometric, etc. A list of approved courses can be found on the [Department of Health and Welfare website](#).

Resource Management

- Complete the Nonprogram Food Revenue Tool every year. The May 2017 Tool was validated during this review and TA was given that a new one should be completed before renewal starting in April 2018.

Civil Rights

- Update the Civil Rights Statement on the menus posted on the website to the correct non-discrimination statement. **Completed prior to review.**
- Update the Civil Rights complaint procedure on the web site to remove outdated language. **Completed prior to review.**
- Add the full non-discrimination statement to the bottom of the webpage. **Completed prior to review.**
- Have products on hand to handle food allergy statements (e.g. gluten intolerance must have gluten free bread).

Professional Standards

- Some managers were short in training hours in one year; however, they can meet the training requirements over a two-year period.
- The FS Director should organize the Professional Standards folder by employee, not date, to make it easier to review.

Reporting and Recordkeeping

- The Food Service Office would benefit from their internet access being restored promptly. Not having this access makes their job more difficult.

Procurement

- The Procurement Review completed by Keddington & Christensen, LLC identified two areas that need to be addressed in the current procurement policies, the Buy American provision for food needs to be included in the RFP and affirmative steps to be taken to assure that small, minority and women's business enterprises and labor surplus firms are used when possible. This letter was provided to the school district earlier this school year and should be used to update the *Policy and Procedures Used to Administer Federal Funds* manual developed by the district.

Your review is now closed.

Fiscal Action in the amount of \$21.10 will be disregarded. Should you wish to appeal any of these findings please follow the appeal procedures on the State Agency Appeal Procedures document attached to the end of this letter.

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, S.N.S.
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Bobbie Coleman, Child Nutrition Director, Lake Pend Oreille SD

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