



May 10, 2017

Kent Stokes
Mountain View School District
714 Jefferson
Grangeville ID 83530

Dear Mr. Stokes,

On April 3, 2017, State Department of Education (SDE) Coordinators Tamara Donovan and TJ Goodsell conducted an Administrative Review of Mountain View 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, base year 2005-06, at Clearwater Valley Elementary School, Clearwater Valley High School, and Elk City School
- Afterschool Snack Program (ASSP)
- Fresh Fruit and Vegetable Program (FFVP)
- USDA Foods

Clearwater Valley Elementary School and Grangeville High School were the school sites reviewed.

The State agency (SA) would like to commend Polly Hagen and the entire staff of the Mountain View 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

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- 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*

SFA 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. Kent Stokes is listed as the Hearing Official so must have USDA civil rights training. Training is available at the [SA website](#). Provide a dated sign in sheet to provide documentation that the Hearing Official received civil rights training.

Timeframe for CAP completion: April 21, 2017

SFA Response to CAP: Superintendent Stokes completed training while the SA was on-site.

Finding 2- *Special Provision Options*

Complete Provision 2 Breakfast base year information was not located / retained. It is a requirement that this data be available to document/support claiming percentages. Please continue to search for the missing documents; if records cannot be located, the sponsor may elect to establish a new Provision 2 base year. The SA provided the Food Service Director with information regarding establishing a new base year via email. A new base year may be established in SY 2017-18. During the establishment of a base year, all students may eat breakfast at no charge. Communicate with the SA regarding how you would like to proceed.

Timeframe for CAP completion: April 21, 2017

SFA Response to CAP: The SA was notified that all Provision 2 base year documents could not be located and that a new Provision 2 breakfast base year will be established in 2017-18 for Clearwater Valley Elementary, Clearwater Valley High School, and Elk City School.

Finding 3- *Certification and Benefit Issuance*

Meal benefit issues were identified involving eight students. Three students had incomplete applications due to household size; two students continued meal benefits after the carry over period ended; and three students had applications with calculation determination errors.

Contact households to confirm family size and get names of additional members; change carry over students to paid status; send notification letters to households to inform them of the change in status and update the benefit issuance list. Standard letters are available in MyIdahoCNP under Download Forms. Note, per the Eligibility Manual, all households for whom benefits are to be reduced or terminated must be given ten calendar days' written advance notice of the change. Upload the updated benefit issuance list and copies of the letters into MyIdahoCNP Review Attachments.

Timeframe for CAP completion: April 21, 2017

SFA Response to CAP: On April 4, 2017, while the SA was on-site, the Food Service Director updated the benefit issuance document for the two students who did not require a notification letter to be sent. The two letters of notification were prepared to send to the households as well. On April 18, The FS Director uploaded proof that the benefit statuses were updated.

Finding 4- Verification

Verification-related benefit issues were identified involving two students. Documentation that the family provided during verification determined that the students' meal benefit status would change from free to reduced and a notification letter was sent, but the status was not updated in the software system/benefit issuance document.

Update the benefit issuance list and provide proof of meal status changes.

Timeframe for CAP completion: April 21, 2017

SFA Response to CAP: On April 3, 2017, while the SA was on-site, the benefit issuance document was updated by the Food Service Director.

Finding 5- Resource Management Nonprogram Food Revenue Tool (NPFRT)

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. Please upload a completed NPFRT into MyIdahoCNP Review Attachments.

Timeframe for CAP completion: April 21, 2017

SFA Response to CAP: On May 4, 2017, a completed NPFRT with supporting information was uploaded into MyIdahoCNP.

Finding 6- Afterschool Snack Program (ASSP)

In the ASSP, the fruit / vegetable component must be $\frac{3}{4}$ cup and the portion size of all items served must be listed on the production records. The production record currently being used has a space to include the portion size. For more information, please visit the Idaho School Nutrition Reference Guide ASSP section, located on the SDE Child Nutrition Programs (CNP) website.

Timeframe for CAP completion: May 1, 2017

SFA Response to CAP: On April 17, 2017, the SA received an email stating portion sizes will be consistently recorded on the production record, two or more items will continue to be offered, a minimum $\frac{3}{4}$ cup portion size for fruit / vegetable will be available, and these topics be covered during ASSP training.

Commendations

- The food service staff was receptive to input from the SA reviewers, completing many tasks while the SA was on site.
- At Grangeville High School, a point of service employee had a nice rapport with the students.
- The Kitchen Manager at Clearwater Valley Elementary School kept the kitchen spotless and food was well organized and labeled. The food service staff was efficient with their prep time and service went smoothly.

Technical Assistance (TA)

Certification and Benefit Issuance

- Last school year's eligibility status can carry over 30 operating days into the new school year, allowing time for households to reapply without interruption of benefits. Ensure that households who do not qualify for meal benefits after the carry over period ends are changed to paid meal status. Failure to reapply during the carryover period is not a denial of benefits for the current school year. LEAs are not required to notify families or send reminders. A notice of adverse action is not required as eligibility was not established for the current school year. (7CFR 245.6)
- Only have one Determining Official to ensure a consistent, accurate procedure and to track that civil rights training occurs annually for the Determining Official.
- Per the Eligibility Manual, when determining free and reduced applications, income should not be converted unless various income frequencies are reported. Please make use of the Income Eligibility Guidelines chart.
- Please use the "Official Use Only" section on all Free and Reduced Applications to document the date of determination and the date that a notification letter was sent.
- Ensure notification letters inform households of who to contact with questions (the district NSLP Determining Official) as well as who to contact regarding an appeal (the NSLP Hearing Official).
- Best practice is that student names (i.e., a current enrollment list) are run through Direct Certification (DC) monthly, so that new students, as well as any new matches available, may be identified. Once the students are identified, print / save the record for three years plus the current year (the state DC system does not save information).
- If a household provided only annual income on an application, the SFA must ensure that the amount is an accurate reflection of the household's current income and that it qualifies under the Special Situations portion of the Eligibility Manual. The determining official may need to contact the household for further clarification of the information provided on the application.
- Make notes on applications to document any follow up information obtained from the household (date, who was spoken with, information collected, and initial).

Verification

- Please use the "Official Use Only" section on the free and reduced income application to document confirmation and verification. Also, keep copies of letters sent to households and include DC match lists in file.

Fresh Fruit and Vegetable Program (FFVP)

- Production records for FFVP must be completed. The records will support food costs associated with the program and document that produce served meets requirements.
- Widely publicize FFVP; ideas include newsletter, website, and school announcements.

School Breakfast and Summer Food Service Program (SFSP) Outreach

- SFAs must inform eligible families of the availability of reimbursable breakfasts served under the School Breakfast Program (SBP) and SFSP. Schools must send reminders regarding the availability of the SBP multiple times throughout the school year. (7 CFR 210.12 (d))

Food Safety

- At Clearwater Valley Elementary School, bulk items such as sugar, flour, brown sugar, etc., placed in large buckets should be dated.

Meal Components and Quantities

- Provide breakfast pizza crediting documentation.

Civil Rights

- If operating Provision 2 Breakfast, please use the applicable public release template available in MyIdahoCNP under Download Forms.

Local School Wellness Policy

- On July 29, 2016, the USDA Food and Nutrition Service finalized regulations to create a framework and guidelines for written wellness policies established by LEAs. (§210.30) Mountain View School District's wellness policy was adopted May 2014 and amended February 2017. 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](#).
- Heather Blume, Coordinator of Nutrition Assessment and Promotion at the State Department of Education, is an excellent resource for guidance and questions related to the Wellness Policy: hblume@sde.idaho.gov, 208.332.6902.

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) to increase consumption of healthful foods during the school day and support a healthy school environment; any vending, school stores, and fundraising need to comply with specific nutrition standards. The vending machines at Grangeville High School offer a few products in compliance, but many of the products are not Smart Snacks compliant. The SA provided a copy of "A Guide to Smart Snacks in Schools" to the Grangeville HS Activities Director and reviewed the SDE website. Additional Smart Snacks information and resources, including a sample site tracking form, can be found at the CNP Smart Snacks website.

- Per current Idaho policy, ten exempted food sales of no more than four days in length may be approved by school site administrator. Exempt food sales beyond those ten must be approved by the State Department of Education.

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. It is required that some form of documentation be kept on file to show Professional Standards compliance; options include the FNS online tracking tool available at the USDA website and two Professional Standards tracking resources available in MyIdahoCNP under Download Forms.

Your review is now closed.

Due to benefit issuance errors of 2.56%, total fiscal action was \$233.15. Since this amount is below the \$600 threshold, fiscal action will be disregarded. Should you wish to appeal these findings please follow the appeal procedures on the [State Agency Appeal Procedures](#) document. If you would like 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,



Tamara Donovan, RD, LD, SNS
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Polly Hagen, Food Service Director, Mountain View School District

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