



November 21, 2017

Certified Mail Receipt #7013 1710 0000 9755 9467

Charles Shackett, Superintendent  
Bonneville Joint School District  
2461 East 24 North  
Idaho Falls, ID 83401

Dear Mr. Shackett

On November 14-16, 2017, State Department of Education (SDE) Coordinators Jennifer Butler and Tamara Donovan conducted an Administrative Review of Bonneville Joint School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Free Community Eligibility Provision (CEP) Option at Falls Valley ES
- Fresh Fruit and Vegetable Program (FFVP) at Falls Valley ES
- USDA Foods

The sites reviewed were the Ammon ES, Sandcreek MS, and Falls Valley ES.

The State agency (SA) would like to commend Heather Plain and the entire staff of Bonneville Joint 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 – Verification**

One online application selected for Verification should have been changed from Free to Reduced. The income change was correctly calculated manually based on the received documentation, but the new income amounts were not either entered into the online application software program correctly, or the changes were not saved resulting in no change in benefits.

**Timeframe for CAP completion:** None. The application determination was corrected while SA reviewers were onsite and the notice of adverse action was sent to the household on November 15, 2017.

### **Finding 2 – Community Eligibility Provision (CEP)**

While onsite, SA reviewers validated April 1, 2014, data for CEP. This resulted in a change to the CEP percentages currently in use.

**Timeframe for CAP completion:** None. MyIdahoCNP was corrected to calculate claims using the validated percentages. The newly validated CEP percentages will be used for November 2017 and all subsequent SY17-18 claims. The claims for August, September, and October have been adjusted using the new claiming percentages and fiscal action has been calculated for the difference.

## Fiscal Action

The SA discovered that incorrect claiming percentages were being applied to the CEP claim at Falls Valley ES. The SA applied the correct percentage and adjusted previously filed claims, resulting in an over claim of \$1613.24. The over claim totals for each month were: August: \$103.90, September: \$737.95, and October: \$771.39. The SA has adjusted the filed claims and applied the correct claiming percentages to be applied to all subsequent claims.

## Commendations

- SA contractor Shawna Durbin, RD, LD, conducted the menu analysis for the review week and found no areas of concern or requiring technical assistance. Keep up the great job of serving compliant meals and menus.
- An outstanding job was done to ensure that all off-site modules were completed and all supporting documentation was uploaded by the due date. Immediate communication and follow up was provided as requested. The organization, communication, dedication, and initiative were a tremendous help to SA reviewers and is greatly appreciated.
- No eligibility determination and benefit issuance errors were discovered within the statistical sample reviewed. Keep up the great work on managing paper and online applications; the detailed comments are very valuable in tracking changes and follow-up conversations with households.

- Posting the Smart Snacks Calculator link on the district's website is a best practice and allows all interested parties to have access to this tool.
- Regarding non-program food revenue, good practices are in place with the use of the catering quote form with line items of food and supply costs and labor hours associated with the event, as well as, with the POS terminal palette set up to have the prices of a la carte items separated for easy and fast charging.
- Great use of creative breakfast promotion flyers.
- The taco cups served at Ammon and Falls Valley Elementary Schools looked great - colorful and fresh.
- The staff at Ammon Elementary School was efficient with cleaning between serving times and worked well as a team.
- The staff at Sandcreek Middle School was calm during the rush of students.
- The staff of Falls Valley Elementary School is appreciated and loved by their students as evidenced by the Kindness Day notes that were received and posted in the cafeteria.

## Technical Assistance (TA)

### **Certification and Benefit Issuance**

- During the 30-day carryover period, 10-days' notice of adverse action is not required as eligibility had not yet been established for the current school year. Eligibility takes affect the date the determination is made (7CFR 245.6(c)(2)).
- The SA recommends printing the "Free and Reduced Application" report from the Horizon One Source software instead of the "Detailed Application" report in order to capture all information required for benefit determination.

### **Verification**

- As part of the verification process, please ensure that a copy of all letters from the SFA to the household and any documentation or correspondence received from the household is retained as part of a complete verification file.

### **Meal Counting and Claiming**

- The green "Note from the Cafeteria" includes options to mark various comments from friendly notes to account balance comments. These notes are intended to be provided randomly to students to help prevent overt identification. Please ensure that a good mix of friendly notes are given to balance the account balance notes, so students are not overtly identified as paid or reduced.

### **Offer Versus Serve (OVS)**

- All staff has received the required annual OVS training, but some confusion was observed by SA reviewers. Consider implementing a practice of gathering kitchen staff each day before meal service to cover the crediting of menu items and how they impact OVS choices. This would help limit confusion when production record crediting has changed and new menu options are served.
- At Sandcreek MS breakfast, the smoothie was on the menu as an "extra". Four students initially did not take a reimbursable meal possibly due to thinking the smoothie was a fruit or the smoothie was a creditable item. The students were asked to select additional

food to make a reimbursable meal. The State agency suggested that 1/2 cup of fruit (pureed strawberries, pureed bananas, and OJ) plus 4 oz yogurt be combined to make a smoothie that would credit toward the meal pattern as 1/2 cup of fruit and 1 oz grain at breakfast which should help students select a reimbursable meal, while also saving money.

- The SFA has already begun to recalculate the smoothie recipe to credit.

### **Resource Management**

- A Capital Expenditure Request must be submitted for review and approval prior to the purchase of any item over \$5,000, including annual maintenance fees of previously procured software.

### **Civil Rights**

- Ensure the civil rights folder contains the SFA's procedure for receiving and processing Civil Rights complaints to ensure all complaints associated with Child Nutrition Programs are forwarded to the State agency within three (3) working days. (CFR210.15(a)(6))
- Ensure the Civil Rights complaint log is dated annually, with a new log started each year. If no complaints were received during the school year, best practice is to write "No complaints" on the log at the end of the school year; keep on file (three years plus the current year).
- The long non-discrimination statement in the civil rights folders at each school site must be updated to include the correct USDA non-discrimination; statement available at the State Agency website.

### **Local School Wellness Policy (LWP)**

- The final rule on wellness policies (§210.31) required LEAs to be in compliance by June 30, 2017. The LEA's current LWP was last revised February 2015 and is missing required elements making it noncompliant. The LEA's assessment completed in October 2017 and posted on the district's website also indicates noncompliance. The wellness policy committee must continue to work to get the LWP compliant with the final rule.
- For more information regarding local wellness policies, please visit the [Idaho SDE Child Nutrition Programs School Wellness website](#).

### **Smart Snacks**

- All fundraisers, both exempted and compliant, must be tracked. Per state policy, a maximum of 10 exempted fundraisers per school site per year may be approved by the school administrator. An exempted fundraiser can be for a maximum of four consecutive school days. All exempted fundraisers beyond 10 must be pre-approved by the State agency using the Request form. (7CFR 210.11) Details available at the [Idaho SDE Smart Snacks website](#).
  - The SFA advised that tracking forms were distributed to all schools this school year with the expectation that fundraisers are recorded and monitored.
  - During the day of review, at Sandcreek MS, the "Jamba Juice Wednesday" fundraiser was occurring and "Popcorn Friday" was talked about.

- 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. Non-compliant vending machines were located at Sandcreek MS. Although strides have been made this year by district administration to work toward becoming compliant with federal regulations; efforts must be continued.
- Only 12 oz or less nonfat plain milk, 1% plain milk, nonfat flavored milk, and 100% fruit juice is compliant with Smart Snacks beverage standards. Sandcreek MS CNP was selling 12 oz portions of hot chocolate to students during breakfast. Although allowable for high school, the hot chocolate (packet/machine) is not Smart Snack compliant for middle school students. The State agency suggests that the SFA consider warming 12 oz or less nonfat chocolate milk for an a la carte hot chocolate drink option.

### **Procurement**

- A separate procurement review was completed by Keddington & Christensen, LLC. on September 8, 2017. No findings requiring corrective action were found, but four areas of technical assistance were noted. Please follow the guidance provided in your NSLP Procurement Review completed by Keddington & Christensen, LLC.

### **Special Provision Options**

- Direct Certification reports for April 1 data have been run each year. The current CEP approval for Falls Valley ES expires at the end of SY 2017-2018.

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

Due to incorrect CEP claiming percentages, fiscal action results in \$1613.24. Should you wish to appeal any of these findings please follow the appeal procedures on the [State Agency Appeal Procedures](#) document located on the Idaho Child Nutrition Programs website.

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 H. Butler, M.Ed., S.N.S.  
NSLP Coordinator

cc: Colleen Fillmore, P.h.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs  
Heather Plain, Child Nutrition Director, Bonneville Joint School District

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