



December 4, 2017

Mr. Rob Sauer, Superintendent  
Homedale School District #370  
116 East Owyhee Avenue  
Homedale, ID 83628

Dear Superintendent Sauer,

On November 30, 2017, State Department of Education (SDE) Coordinators Teresa Goodsell and Tamara Donovan conducted an Administrative Review of Homedale School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- Provision 2 School Breakfast Program (SBP)
- Fresh Fruit and Vegetable Program (FFVP) at Homedale Elementary School
- Special Milk Program (SMP) at Homedale Elementary School
- USDA Foods

State Agency contractor Steffanie Sandoval, MS, RD, LD, conducted the menu analysis for the review week. The site reviewed was Homedale Elementary School.

The State agency (SA) would like to commend Vicki Eby, Child Nutrition Director, and the entire staff of Homedale 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 – Certification and Benefit Issuance**

- For one Free / Reduced application (with two students), a household number of "1" instead of "4" was entered into the software system. This error led to a denial of meal benefits during the determination process. The students should have been receiving free benefits since 10/11/17, the date of determination.
- One Reduced application (with two students) appeared to be inaccurately determined. All households for whom benefits are to be reduced or terminated must be given ten calendar days' written advance notice of the change (Eligibility Manual).

**Timeframe for CAP completion:** None.

### **Sponsor Response to CAP:**

- The application determination was corrected while SA reviewers were onsite and the notification letter informing the household of the increase in benefits status was immediately sent.
- On the day of SA review, benefit status was confirmed by contacting the family who provided clarification on the income listed on the application, which resulted in no change in benefits.

## Commendations

- The Homedale School District has done a great job updating their Local Wellness Policy. The district incorporated requirements from the final rule by using the Idaho School Wellness Progress Report to assess the policy and made those results available for the public on the district website.
- The Food Service Director, Ms. Vicki Eby, was very organized when providing the menus, CN labels, product formulation statements, and recipes used at Homedale Elementary School. This made the menu and meal compliance portion of the review go quickly.
- Free and Reduced applications were all very well organized and easily reviewed. Documentation was clearly marked and applications were cross-referenced prior to State agency arrival. Foodservice staff works diligently to ensure that benefits are provided to all eligible students.
- The staff was very friendly and quick to catch students who were about to walk away without a reimbursable meal.
- At Homedale Elementary School, Smart Snacks regulations are followed; Exempt fundraisers are tracked and the school is on target for compliance.

# Technical Assistance (TA)

## Verification

- The Hearing Official must not also serve as the Determining, Confirming, or Verifying Official.

## Fresh Fruit and Vegetable Program

- The school must widely publicize the FFVP. This is accomplished through school newsletters and via the district website. Consider utilizing the television in the elementary school cafeteria to announce the fresh fruit or vegetable of the day.

## Food Safety and Buy American Provision

- Each SFA is required to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories, as applicable (7 CFR 210.21 (d)). (broccoli from Mexico) If a product from another country is sourced, then the food service must have proof that the domestic product is significantly higher in price or not available in sufficient quantities. The Buy American Provision is included in SFA solicitation documents for the purchase of commercial foods. Products must be checked upon receipt and not accepted if the products do not comply with the Buy American Provision, unless there is documentation to justify the exception (exorbitant pricing or product shortages).
- Fresh apple cases were stored on the floor of the walk in cooler. TA provided to have cases stored at least 6" off the floor. This was corrected on site and food boxes are now stored on a plastic pallet.

## Civil Rights

- Ensure this school year's Civil Rights complaint logs have the school year noted.

## Special Provision Options

- Provision 2 Base Year (SY16-17) benefit issuance was previously validated by the SA on September 27, 2016. The retention of all required Provision 2 documentation was confirmed during the administrative review. Daily meal count records by student name and eligibility are maintained on a thumb drive and all other Base Year records are kept in a box at the elementary school. The current Provision 2 cycle expires at the end of SY19-20. If you wish to continue with Provision 2 breakfast, you must contact the SA prior to the expiration date to see if you qualify for an extension.

## Procurement

- A separate procurement review was completed by Keddington & Christensen, LLC. on September 26, 2017. No findings requiring corrective action were found, but six areas of technical assistance were noted. Please follow the guidance provided in your NSLP Procurement Review.

## Your review is now closed.

There is no fiscal action resulting from this review. 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,



Teresa Goodsell, BS, S.N.S.  
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs  
Vicki Eby, Child Nutrition Director, Homedale SD

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