



January 25, 2018

Mr. Dennis Chesnut, Superintendent  
Horseshoe Bend School District  
398 School Drive  
Horseshoe Bend, ID 83629

Dear Superintendent Chesnut,

On January 18, 2018, State Department of Education (SDE) Coordinators Tamara Donovan and Teresa Goodsell conducted an Administrative Review of Horseshoe Bend 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 option
- Afterschool Snack Program (ASSP) – At Horseshoe Bend Middle School
- USDA Foods

The site reviewed was the Horseshoe Bend Middle School.

The State agency (SA) would like to commend Trudy Carpenter and the entire staff of Horseshoe Bend 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

One application (four students) had incorrect benefit issuance due to not including all income reported when determining the free and reduced application; this resulted in an error percentage of 4.40% in the statistical sample of applications reviewed by the SA. Once all income was included in the determination, the meal benefit changed from free to reduced status.

#### Corrective Action:

Update the benefit issuance list and notify the household of the reduction in meal benefits (see SA notification letter in Download Forms). Provide a copy of the letter to the SA.

**Due Date for CAP Completion:** February 1, 2018

#### Corrective Action Response:

On the day of SA review, the benefit issuance list was updated and a notification letter to the household was prepared, a copy of which was uploaded into MyIdahoCNP Review Attachments.

### Fiscal Action

Due to a benefit issuance error rate of 4.40%, fiscal action results in \$147.90. However, since this amount falls under the \$600 threshold, the fiscal action will be disregarded and no financial adjustment will occur.

### Commendations

- The Food Service Director was receptive to SA input, completing many tasks while the SA was on site. Documentation and files were complete and deadlines were met which made the administrative review run more smoothly.
- Menus featured a variety of fresh and canned fruits as well as fresh and cooked vegetables. The staff served the meal in a very friendly atmosphere.
- The Food Service Director had a good relationship with the students. She engaged them with a sense of humor and made sure all students received a reimbursable meal.
- A number of students thanked the food service staff for the well prepared lunch meal. The students made good use of the share table.

## Technical Assistance (TA)

### Certification and Benefit Issuance

- Best practice is to write follow up information received from the household directly on the free and reduced application; sticky notes were used, but they may become separated from the application.

### Verification

- The original application selected for verification did not indicate the eligibility determination. Make sure to mark the results of application determination.
- When performing verification of Free and Reduced Applications, the Confirming Official must check the application prior to sending out the verification selection letter. Verification must be in line with requirements outlined in 7 CFR 245.6a.
- One application was selected for verification. No change occurred in the meal status of the students; however there is no indication that the family received proper notification of the results for verification. If a notification is auto-generated from an existing software system, a copy of the notification must be retained in the SFA's records.

### Meal Components and Quantities

- Independent contractor Laura Thomas completed the menu review and provided the following TA:
  - Include all grain and vegetable choices on the menu board.
  - Ensure all high school menus offer 2 ounce equivalent grain. Revise cornbread recipe so that it is whole grain rich. Original recipe was developed using USDA 100% whole wheat flour. USDA flour is now a 60/40 blend, so when it is combined with enriched cornmeal, the product is not whole grain. This was taken care of prior to the SA on-site visit; the Food Service Director is using 100% whole wheat flour.
  - Make sure the legume vegetable subgroup is offered daily. On the day of independent contractor review, legumes were missing from the salad bar. On the day of SA review, legumes were available.
  - Update production record to reflect options available.

### Food Safety

- Maintain logs for thermometer calibration and other sanitation solution records.

### Reporting and Recordkeeping

- Ensure production records contain all required documentation (such as all temperatures and times, documentation of amount of leftovers, and what was done with leftovers).

### Resource Management

- The school district is in the process of creating a Meal Charge Policy. The item is on the February school board agenda. The SA provided resources to the Food Service Director.
- The SY2016/17 Fund 290 contained the following entries: \$30.13 for bacon, \$132.28 food purchase. These two purchases were for personal use by food service staff; the Fund 290 was reimbursed in full by the staff member. TA provided that child nutrition

funds must only be used for allowable, allocable, and reasonable child nutrition purchases.

- USDA Foods (formerly known as commodities) must be noted as revenue and as expenses in the Fund 290. Please refer to accounting practices, consider a separate detail section in the Fund 290 with a “USDA Foods” description.

### **Procurement**

- A separate procurement review was completed by Keddington & Christensen, LLC; please follow the guidance previously provided.

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

The fiscal action identified above will be disregarded. Should you wish to appeal any of these findings please follow the appeal procedures found on the State Agency Appeal Procedures document attached to 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,



Tamara Donovan, RDN, LD, SNS  
NSLP Coordinator

cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs  
Trudy Carpenter, Child Nutrition Director, Horseshoe Bend School District

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# State Agency Appeal Procedures

## School Meal Programs – Administrative or Follow-up Review

School food authorities may appeal the denial of all or part of a Claim for Reimbursement or withholding payment arising from administrative or follow-up review activity conducted by the State Agency under 210.18 of this part.

### The appeal process outlined in 7 CFR 210.18 (p) reads as follows:

1. The written request for a review shall be postmarked within 15 calendar days of the date the appellant received the notice of the denial of all or a part of the Claim for Reimbursement or withholding of payment, and the state agency shall acknowledge the receipt of the request for appeal within 10 calendar days;
2. The appellant may refute the action specified in the notice in person and by written documentation to the review official. In order to be considered, written documentation must be filed with the review official not later than 30 calendar days after the appellant received the notice. The appellant may retain legal counsel, or may be represented by another person. A hearing shall be held by the review official in addition to, or in lieu of, a review of written information submitted by the appellant only if the appellant so specified in the letter of request for review. Failure of the appellant school food authority's representative to appear at a scheduled hearing shall constitute the appellant school food authority's waiver of the right to a personal appearance before the review official, unless the review official agrees to reschedule the hearing. A representative of the state agency shall be allowed to attend the hearing to respond to the appellant's testimony and to answer questions posed by the review official;
3. If the appellant has requested a hearing, the appellant and the state agency shall be provided with at least 10 calendar days advance written notice, sent by certified mail, return receipt requested, of the time, date and place of the hearing;
4. Any information on which the state agency's action was based shall be available to the appellant for inspection from the date of receipt of the request for review;
5. The review official shall be an independent and impartial official other than, and not accountable to, any person authorized to make decisions that are subject to appeal under the provisions of this section;
6. The review official shall make a determination based on information provided by the state agency and the appellant, and on Program regulations;
7. Within 60 calendar days of the state agency's receipt of the request for review, by written notice, sent by certified mail, return receipt requested, the review official shall inform the state agency and the appellant of the determination of the review official. The final determination shall take effect upon receipt of the written notice of the final decision by the school food authority;
8. The state agency's actions remain in effect during the appeal process;
9. The determination by the state review official is the final administrative determination to be afforded to the appellant.

Appeals must be directed to:  
Brandon Phillips  
Financial Specialist, Public School Finance  
State Department of Education  
PO Box 83720  
Boise, Idaho 83720-0027  
(208) 332-6983  
E-mail: [bcphillips@sde.idaho.gov](mailto:bcphillips@sde.idaho.gov)

### **USDA Nondiscrimination Statement**

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To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

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