



March 21, 2018

Chester Bradshaw, Superintendent
Rockland School District
321 East Center
Rockland, ID 83271

Dear Mr. Bradshaw,

On March 6, 2018, State Department of Education (SDE) Coordinators Teresa Goodsell and Jennifer Butler conducted an Administrative Review of Rockland School District for the following United States Department of Agriculture (USDA) programs:

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

The State agency (SA) would like to commend Bonnie Woodworth and the entire staff of Rockland 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

Notification for denial of benefits did not meet the requirements as stated in 7 CFR 245.6(c)(7). Households with children who are denied benefits must receive prompt, written notification of their denial. The notification may be provided by mail or e-mail to the adult household member who signed the application. Written notice must include:

- Reason for denial of benefits;
- Right to appeal;
- Instructions on how to appeal (including Hearing Official information); and
- Ability to reapply for free and reduced price benefits at any time during the school year.

Corrective Action: Update the notification letter for denial of benefits and upload a copy into MyIdahoCNP under the review attachments.

Timeframe for CAP Completion: March 21, 2018

Sponsor Response to CAP: The SFA uploaded a copy of the denial of benefits notification letter into MyIdahoCNP. This finding was corrected and closed on the day of review.

Finding 2 – Certification and Benefit Issuance

Two applications (five students total) were missing social security information. As stated in 7 CFR 245.6(c)(7), if a household provides an incomplete application or does not meet the eligibility criteria for free or reduced priced benefits, the application must be denied. These incomplete applications, resulting in a 6.67% error rate, will be calculated for fiscal action.

Corrective Action: Contact the family to obtain social security information.

Timeframe for CAP completion: March 21, 2018

Sponsor Response to CAP: The SFA contacted both households and completed the missing information on the applications. This finding was corrected and closed on the day of review.

Fiscal Action

Due to application errors, fiscal action was \$226.91. However, since this amount falls under the \$600 threshold, the fiscal action will be disregarded and no financial adjustment will occur.

Commendations

- Rockland has an outstanding School Breakfast announcement! Great job encouraging participation and the benefits of a good breakfast before starting the school day.
- The Rockland 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 to the public on the district website. The SHAC announcement for recruiting committee members from the community to come and participate is a wonderful example of going

the extra mile - great job! Adding the assessment piece to the end of the school district Wellness Policy is a good way to ensure the policy is reviewed and assessed as required.

- A separate procurement review was completed by Keddington & Christensen, LLC. The results concluded that the Rockland School District complies with all procurement requirements under Title 2 U.S. Code of Federal Regulations (CFR) Part 200. No areas of concern were identified.
- *Lunchroom Olympics* is an innovative idea to help eliminate food waste and promote participation in the meal service. A financial contribution to support this effort was provided by a community business. It is nice to see community involvement to encourage meal participation at the local school.
- National School Breakfast Week, March 5 – 9, 2018, was being celebrated during the onsite portion of the Administrative Review. Students participated in a “my favorite breakfast” poster contest and received stickers for breakfast participation.

Technical Assistance (TA)

Civil Rights

- All School Foodservice Authority staff who interact with program applicants or participants must have annual civil rights training. This includes any kitchen substitutes regardless of the hours worked.

Meal Counting and Claiming

- The opportunity to assist as a student worker should be made available to all interested students, even if only from the senior class. Since only one student is needed to assist, a process should be identified in which that student is fairly selected from the pool of all interested students and claimed at their applicable eligibility.

Dietary Specifications and Nutrient Analysis

- Independent contractor Shawna Durbin completed the menu review and provided the following TA:
 - Sugar was added to canned applesauce; however, under the Dietary Specification Assessment Tool – Breakfast, the SFA indicates that canned fruits are packed in water, fruit juice, or light syrup. The practice of adding sugar should be discontinued unless the recipe is tested to ensure that the sugar does not exceed the age grade calorie limits.

Resource Management

- The CNP Fund 290 reflects several non-program food revenues from "excess food sold to community" that does not meet the requirement for Non-program Foods Sale Transactions under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f). The school food service may provide goods and services to an outside entity only if all costs, including labor and any other costs incurred, are covered by the entity being served by the school food service operations. SFA must determine

the actual cost of any items sold and use the Non-Program Food Revenue Tool (NPFRT) to ensure items being sold meet this requirement.

- The SY16-17 CNP Fund 290 contained entries for food purchases that were for personal use by food service staff; the Fund 290 was reimbursed in full by staff member(s). Child Nutrition funds must only be used for allowable, allocable, and reasonable child nutrition purchases. Separate this practice by providing purchases orders to vendors for staff purchases to ensure there are no comingled food purchases in the Child Nutrition Programs; payments should be made directly to the vendor and not be reflected in the CNP Fund 290.
- 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. The State agency provided FD-104 guidance memo as well as instructions on generating the Value of Commodities (PAL) report to ensure future compliance.

Your review is now closed

Fiscal action in the amount of \$226.91 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,



Teresa Goodsell, BS, SNS
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Bonnie Woodworth, Child Nutrition Director, Rockland 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

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, 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.

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