



April 19, 2019

Michelle Capps, Superintendent
Murtaugh School District
500 W. Boyd
Murtaugh, ID 83344

Dear Superintendent Capps,

On January 29, 2019, State Department of Education (SDE) Coordinators Heather Blume and Lynda Westphal conducted an Administrative Review of the Murtaugh School District for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was Murtaugh Elementary School serving pre-kindergarten through 5th grade, operating Provision 2 breakfast.

The State agency (SA) would like to commend Audrey Gray, and the staff of Murtaugh Elementary School 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 Meal Components and Quantities- Breakfast

The milk substitute served during the week of menu review did not meet nutrient standard requirements.

Corrective Action: 1. Provide a written statement that the milk requirement is now met.

Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance.

2. Submit any necessary documentation to demonstrate that the menu findings listed under step 1 are now corrected. This documentation may include: production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.

Due Date for CAP Completion: January 7, 2019

Corrective Action Response: Doctor's notes from each of the two students needing a milk alternative were turned in on Dec 19 2018 & Jan 3, 2019. Both parents request serving almond milk alternatives to their child.

Finding 2 Local Wellness Policy

The Local School Wellness Policy must be in compliance with the USDA Final Rule established in July 2016, including the requirement that report(s) on the progress towards goals stated in the wellness policy be publicly available. The final rule requires LEAs to fully comply with the requirements of the final rule by June 30, 2017.

Corrective Action: Please provide a plan for how and when the wellness policy language will be brought into compliance with Federal requirements. Ensure the wellness assessment (e.g., Idaho Wellness Policy Progress Report) is available to the public; posting to the school /district website and/or in a school newsletter would support this requirement.

Due Date for CAP Completion: February 13, 2019

Corrective Action Response: District provided a plan to bring the policy into compliance on January 31, 2019.

Finding 2 Certification and Benefit Issuance

One application, impacting three students, was determined as free and should have been reduced. Another application, impacting three students was determined as reduced and should have been free. Three applications were incomplete as they did not have the adult signature and four applications were incomplete as they did not have the social security number, nor indicate "no SSN".

Corrective Action: Contact the families to notify them of changes to eligibility status and collect the information that was missing from the incomplete applications.

Due Date for CAP Completion: February 13, 2019

Corrective Action Response: The Food Service Director sent notification letters to families while reviewers were onsite and collected the information missing from applications on the day of review, January 29, 2019.

Based on the administrative error of 10.63% associated with certification and benefit issuance, the SFA will be required to conduct a second review of applications beginning school year 2019-20, and continuing until further notice. A second review of applications requires a re-evaluation by the Confirming Official of the eligibility determination made by the Determining Official, based on the information provided by the household on the application. Depending on the outcomes of this second review, the SFA may be required to complete this process until the next administrative review. A Second Review of Applications Report will need to be filed as well while this requirement is in place. Please reference the Independent Review of Applications section in the Eligibility Manual, a copy of which is available in MyIdahoCNP Download Forms.

Commendations

- It was a pleasure to work with the staff at Murtaugh SD. The quote wall in the cafeteria is wonderful!
- Audrey, the Foods Service Director had good organization of paperwork, making the review process go smoothly.
- Audrey and her staff do well in handling emergencies. They were quick to respond during a bodily fluids incident, remove the students from the cafeteria, protect the food, clean up and sanitize and allow the children to get another meal. It was the best handling of an incident that I have seen.
- Staff evaluations are completed on an annual basis, which is a good practice and not commonly seen during reviews.

Technical Assistance (TA)

Verification

- The sponsor did not verify the appropriate number of free and reduced-price applications, i.e., 3% or 1.5% of the approved applications on file as of October 1 annually, as required by 7 CFR 245.6a. The corrective action plan was approved when verification was submitted in November, 2018.

Resource Management

- By federal law, SDE must approve any capital expenditures greater than, or equal to, \$5,000. Ensure that the Capital Expenditure Request form is completed in MyIdahoCNP in order to request prior approval.

Civil Rights

- A procedure for receiving and processing Civil Rights complaints must state that all complaints associated with Child Nutrition Programs are forwarded to the State agency within three working days. Please add this procedure to your civil rights file, a compliant procedure is located on the State agency civil rights web page. (7 CFR 210.15(a)(6))

Meal Counting and Claiming

- It was discovered that PowerLunch backdates the application to the beginning of the month when a student's status changes. Recommend considering other point of service software (e.g., Mosaic, which is a new NutriKids application that works with PowerSchool) to make the counting and claiming more accurate.

Procurement

- A separate procurement review is scheduled to be completed in school year 2019-2020; please follow the guidance provided.

Special Provision Options

- **All records adequately maintained.** Provision 2 Base Year (SY16-17) benefit issuance was previously validated by the SA on October 6, 2016. The retention of all required Provision 2 documentation was confirmed during the administrative review. All documents are hard copy and stored in a white and blue box. The current Provision 2 cycle expires at the end of SY2020. 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.

Fiscal Action

Due to the benefit issuance error rate, fiscal action resulted in \$9.94. However, since this amount falls under State agency disregard threshold, no financial adjustment will occur.

Your review is now closed.

No fiscal action will be taken as a result of 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 SDE web page](#).

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,



Heather Blume, MS, RD, LD, SNS
NSLP Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Audrey Gray, Child Nutrition, Murtaugh School District

Civil Rights

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- (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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