



March 8, 2019

James Shank, Superintendent
Cassia County School District
3650 Overland Road
Burley, ID 83318

Dear Dr. Shank,

On January 29-31, 2019, State Department of Education (SDE) Coordinators Tamara Donovan and Jennifer Butler conducted an Administrative Review of Cassia County 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)
- Fresh Fruit and Vegetable Program (FFVP)
- USDA Foods

The sites reviewed were Raft River Elementary School (operating the FFVP), Burley Junior High School (operating the ASSP), and Oakley Junior Senior High School, which operate Provision 2 breakfast, base year 2016-17. An abbreviated review of Cassia County Junior Senior High School, which operates Community Eligibility Provision, was conducted.

The State agency (SA) would like to commend Angela Rodriguez and the staff of Cassia County 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 (two students) listed “five” as the number in the household but only four names were written on the application.

Corrective Action: Contact the household to confirm the number in the household and the income; revise benefits and notify the household, as applicable.

Due Date for CAP Completion: February 15, 2019

Corrective Action Response: On the day of SA on-site review, the SFA contacted the household and noted that the fifth household member did not have income so the meal benefit did not change.

Finding 2 Meal Counting and Claiming

An adult trained in Offer vs Serve (OVS) must confirm that each student selected a reimbursable meal in order to claim the meal for reimbursement. During the breakfast service at Burley Junior High School, students were counted by an adult at the POS (point of service) and then the students went through the serving line to select food items, with fruit as the last choice. An adult was not present at the end of the line to ensure that a reimbursable meal consisting of at least three items (one item being at least ½ cup of fruit) were taken. On the day of SA on-site review, four meals were missing the minimum ½ cup of fruit, so these meals did not qualify for reimbursement. An additional five students were reminded of the need to select a fruit by food service staff. The four non-reimbursable meals were removed from the day’s meal count and were not claimed for reimbursement.

Corrective Action: Notify the SA of the plan to ensure an adult confirms that students select a reimbursable breakfast in order to claim the meal for reimbursement. One idea would be to re-organize the serving line.

Due Date for CAP Completion: February 15, 2019

Corrective Action Response: On the day the SA was on-site, the site manager and food service director (FSD) decided to move the fruit component to the front of the serving line (as is done at lunch) where an adult trained in OVS is stationed. The FSD communicated with all site

managers regarding the need to implement OVS properly; additional OVS training was provided to applicable staff.

Finding 3 Meal Components and Quantities - Burley Junior High School

Contractor CN Resources conducted the menu review and identified that for the week of menu review, the Burley Junior High School lunch menu did not meet the minimum 1 ounce equivalent (oz. eq.) daily and 9 oz. eq. weekly requirements for the meat/meat alternate (m/ma) and the minimum ½ cup fruit component. On Thursday, a 0.50 m/ma oz. eq. “tornado” was offered; consider serving two or serve topped with cheese to meet the m/ma minimum requirement. Beans/peas may be credited as either m/ma or as the legume vegetable subgroup in the same recipe/meal; it is up to the menu planner to determine how legumes are credited each day and to note this on the production record. On Tuesday, the tangerine (120 count) only provided 3/8 cup fruit; consider serving two tangerines to each student, serving a larger tangerine count size, or adding at least 1/8 cup of any other fruit to serve with one tangerine to meet the fruit minimum serving size.

Corrective Action: Provide a written statement documenting that the daily and weekly m/ma alternate and fruit requirements are 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. Submit any necessary documentation to demonstrate that the menu findings 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 11, 2019

Corrective Action Response: The menu and recipe were changed to reflect a “tornado with cheese” to meet the m/ma daily and weekly requirements; beans will not be duplicitously counted towards both the m/ma and the legume vegetable sub-group. The Food Buying Guide will be used for crediting purposes, production records will be reviewed to ensure meal pattern compliance, and two tangerines will be reflected in menu planning to meet the proper fruit portion size.

Finding 4 Civil Rights

The USDA non-discrimination statement must be used on printed materials and web-based materials referencing the food and nutrition programs. Ensure the school food service web page contains the long USDA non-discrimination statement, which is available on the SA website.

Corrective Action: Post the USDA long non-discrimination statement on the school food service web page; notify the SA when the web page has been updated.

Due Date for CAP Completion: February 15, 2019

Corrective Action Response: On January 23, 2019, the USDA long non-discrimination statement was available on the food service web page and the short statement was posted on the on-line menus.

Finding 5 Civil Rights

The hearing official must have annual USDA civil rights training, available at the SA website.

Corrective Action: Upload a dated sign in sheet to provide documentation that the hearing official received USDA civil rights training.

Due Date for CAP Completion: February 15, 2019

Corrective Action Response: During the SA on-site review, the hearing official completed USDA civil rights training; documentation was uploaded.

Finding 6 Afterschool Snack Program (ASSP)

The ASSP requires documentation that a reimbursable snack was taken by each student in order to claim for reimbursement; snack counts are not based on attendance. At Burley Junior High School, students were signing two attendance sheets and these were used for snack counting/claiming. The SA provided an ASSP Certification Sheet for training people with duties in the ASSP. Utilize the ASSP training available in the CNP Training Portal to train food service staff.

Corrective Action: Upload documentation, into MyIdahoCNP under the CAP, to show that all people working in the enrichment program with duties in the ASSP staff have been trained (signed ASSP Certification Sheets) and upload training certificates to show that the food service staff completed online ASSP training in the CNP Training Portal.

Due Date for CAP Completion: February 15, 2019

Corrective Action Response: An agenda/sign in sheet was uploaded into MyIdahoCNP to show that all people working in the enrichment program with duties in the ASSP had been trained and documentation was uploaded showing that the food service staff completed online ASSP training in the CNP Training Portal.

Finding 7 Afterschool Snack Program (ASSP)

The SFA must conduct a self-review of each afterschool snack operation twice per year that follows these guidelines: The SFA conducts the first self-review during the first four weeks that the afterschool snack program begins each school year; and conducts the second self-review of the afterschool snack program prior to the end of each school year.

Corrective Action: Locate the snack review forms that were completed or conduct an ASSP review; upload a copy into MyIdahoCNP Review Attachments.

Due Date for CAP Completion: February 15, 2019

Corrective Action Response: On February 4, 2019, the SFA uploaded completed snack review forms.

Finding 8 Offer vs Serve (OVS)

There is no documentation that annual training on Offer Versus Serve (OVS) took place for all kitchen staff. Training was documented for kitchen managers and cashiers at the beginning of the year with the expectations that managers would train their line staff. Although this training likely occurred as expected, it was not documented. SA Reviewers observed incorrect implementation of OVS. Online OVS training is available through the [SA training portal](#) and provides a certificate of completion. Group staff training must include an agenda and sign-in sheet that specifically identifies that "OVS breakfast" and/or "OVS lunch", as applicable, was part of the training agenda. Training documentation should be recorded on the Professional Standards tracking log and maintained on file at the SFA for three years plus the current year.

Corrective Action: Upload certificates of completion or sign-in training agendas showing completion of OVS training by food service line staff.

Due Date for CAP Completion: February 15, 2019

Corrective Action Response: On the day of SA on-site review, a sign in sheet was uploaded showing staff completed OVS in-person training. Staff will also complete on-line training per the FSD.

Finding 9 Special Provision – Burley Junior High School

While validating the retention of base year 2016-17 records, it was discovered that the daily meal count records for Burley Junior High School included “open student” meal counts. The open student counts are not associated with a specific student or their eligibility status and all were counted as free eligibility, regardless of the student’s actual eligibility status. When establishing a base year, all meal counts must be claimed at the eligibility of the participating students. The open student meal counts claimed as free may have inflated the free claiming percentages making the base year claiming percentages for Burley Junior High School inaccurate. The SFA has a choice of two options:

- 1) Discontinue Provision 2 free breakfast at Burley Junior High School and return to standard counting and claiming on April 1, 2019, upon students returning to school after Spring Break. The SFA will need to establish a paid price for the breakfast meal. Households must be notified that free breakfast is discontinued and students participating in breakfast at the Burley Junior High School must pay for meals at their determined eligibility rate, or general funds can pay for all students to continue to eat breakfast at no charge. Burley Junior High School may elect to establish a new base year next school year.
- 2) The open student counts from SY 16-17 monthly claims may be able to be removed from the daily meal count records for the entire 16-17 school year in order to recalculate participation percentages. The SFA must provide clear, valid supporting documentation, in Excel format, to identify every open student and the impact on percentages. The new claiming percentages would then be set up for Burley Junior High School to use for the duration of Provision 2 breakfast operating under the base year. In addition, all submitted claims for this current school year will be adjusted and fiscal action calculated for the over claims filed due to inaccurate claiming during the base year establishment.

Corrective Action: Notify the SA in writing (an email will suffice) which option has been elected so that the SFA and SA can proceed with either returning to standard counting and claiming or validating the SFA’s daily meal count corrections and adjusting the base year percentage and calculating fiscal action.

Due Date for CAP Completion: February 15, 2019

Corrective Action Response: On February 7, 2019, the food service director uploaded a letter, copied to the Superintendent and the Assistant to the Superintendent / Clerk of the Board that stated: *Per the State Corrective Action Plan, Cassia County Joint School District No. 151 will discontinue Provision 2, Free Breakfast at the Burley Junior High School and return to standard counting and claiming on April 1, 2019, for students returning to school after spring break. We will establish a price for the breakfast meal and compensate that amount from the Cassia*

County Joint School District general funds for all full and reduced students to continue eating breakfast with no charge to their accounts.

Finding 10 Meal Counting and Claiming - Oakley Junior Senior High School

The Oakley Junior Senior High School (and Oakley Elementary School) breakfast claims were identified as being inaccurate due to the point of service (POS) counting methods used to calculate the monthly claims. Oakley Junior Senior High School students were allowed to get breakfast at the elementary school or at the junior senior high school. Junior senior high school students used the POS at the elementary school and entered their ID numbers; therefore a meal was associated with their name so that their name can later be pulled out of elementary student meals to identify junior senior high school students for claiming. The students who participated in the grab and go breakfast at the junior senior high school site wrote their names down in a notebook. Those meals were then entered into the elementary school POS as "open student", rather than by name. Without a student name, junior senior high meals were counted with the elementary school meals. The two Oakley school sites have different Provision 2 breakfast claiming percentages, so the percentages were applied to inaccurate numbers which resulted in the inaccurate reimbursement for both sites. The SA retrieved the junior senior high school POS meal counts as well as the student names written in the notebook to identify daily breakfast meal counts for December 2018 and January 2019.

The SA has requested backup claim information for November 2018 to ensure that junior senior high meal counts were not inadvertently included (i.e., double claimed) with the elementary school counts due to the POS systems at these school sites only producing reports for the elementary schools which required the need to pull out the junior senior high counts.

The SA will re-calculate the December 2018 claim for Oakley. At the time of the on-site review, the POS was set up only to run reports for Oakley Elementary School; Junior Senior High School students could be pulled out by using a grade level query for 8-12 grades. However, this query was not accurate if "open student" was used and no student name was associated with the meal to identify a grade level.

NOTE: The same issue was also identified for the two Raft River sites and must be addressed.

Corrective Action: Submit a written procedure to the SA (an email will suffice) describing changes to be made to the meal counting and claiming system to provide accurate breakfast meal counts for Oakley Elementary School and Oakley Junior Senior High School, as well as for Raft River Elementary School and Raft River Junior Senior High School. The procedure should include eliminating the use of open student counts for junior senior high students and entering those students by name (or assigned ID number) into the POS so that junior senior high counts can be identified for the claim. Submit the January 2019 meal count documentation for Oakley Elementary School and Oakley Junior Senior High School to the SA for review and validation prior to submitting the January claim.

Due Date for CAP Completion: February 15, 2019

Corrective Action Response: The SA reviewed the November 2018 claims for Oakley and Raft River Elementary Schools and confirmed that the system that was in place did not double count 8-12 grade students. On February 7, 2019, the SFA uploaded a written procedure that will ensure accurate breakfast meal counting and claiming for the Oakley and Raft River schools.

January 2019 Oakley Elementary School and Oakley Junior Senior High School breakfast meal count documentation was reviewed and validated by the SA.

Commendations

- The food service director and administrative assistant were well prepared for the administrative review. Documentation relating to the child nutrition program was organized and ready for review. The time and effort the FSD put into preparing for the review allowed the reviewers to work efficiently.
- The FSD and administrative assistant were receptive to SA recommendations, implementing changes immediately.
- Great job accurately and fully completing the "For Official Use Only" portion on the back of the application. This was specifically notable for the verification process.
- Outstanding job meeting all the requirements for the week of menu review at Raft River Elementary School. All daily and weekly meal component and food quantity requirements were met for lunch for the week of menu review.
- The kitchen at Oakley Elementary School was well organized and the food service staff worked well as a team.
- Excellent job with personal hygiene, hand washing, glove use, kitchen cleanliness, storage organization, and positive interaction with all the students at Oakley Junior Senior High School. Thanks for doing a great job!
- At Burley Junior High School, the staff greeted students warmly and created a welcoming environment.
- The managers and cashiers training held at the beginning of the year is a comprehensive training covering multiple topics. This training is well documented per best practices and even includes the applicable professional standards training topic codes.

Technical Assistance (TA)

Certification and Benefit Issuance

- The SA recommends that Free and Reduced Applications be date stamped upon receipt to allow students to receive benefits as of the date of receipt as opposed to the date of determination (SP11-2014). Additionally, the date stamp will document that eligibility was determined within the ten operating day window.
- When making notes on applications to document follow up with the household, include the date, name of person contacted, information collected, and official's initials.

Meal Counting and Claiming

- The Almo and Albion school sites completed daily manual meal counts by marking participating students on a site roster. The food service office then calculated those counts for the monthly claim. The SA recommends that the site count the daily marks and provide a monthly count for each student on the site roster before providing the

roster to the foodservice office. The food service should then also count the totals as an edit check prior to submitting the claim for reimbursement.

- The Point of Service (POS) software was set up only to run reports for Oakley Elementary School and included all elementary, junior, and high school students. In order to calculate the monthly claim, junior senior high school student totals were pulled out by using a grade level query for 7-12 graders. This query was not accurate if the "open student" option was used and no student name was associated with meal to identify a grade level. In order to identify accurate claims for Oakley Elementary and Oakley Junior Senior High, the practice of using "open student" must be stopped. This practice appeared to only be occurring at breakfast as all students ate lunch in the cafeteria and were run by name through the POS.
- Similar claiming methods were used at Raft River Elementary and Raft River Junior Senior High Schools. Students were entered into the POS by name during lunch, but breakfast included "open student" counts that contributed to inaccurate claims.
- The SA recommends that the SFA explore combining rural sites that eat in the same cafeteria as single K-12 sites. This would remove some element of human error and improve claim accuracy. Impacted sites include Raft River (2 sites), Oakley (2 sites), and Declo (3 sites).

Meal Components and Quantities

- Independent contractor CN Resources completed the menu review and provided the following TA: the results of the menu review were provided to the SFA in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served within the SFA must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews may result in fiscal action.
- Ensure complete menu crediting documentation is on file to support meal pattern compliance (the hot dog bun product formulation statement was not readily available for CN Resources review).
- The SFA must ensure that all sites are keeping accurate and complete production records for the meals they produce. The records must be completed throughout meal service and maintained every day. At a minimum the production records should include the name of the item, the recipe or item number, the portion size, the number of servings planned, prepared, and actually served, and the component contribution amount. All kitchen staff should be trained on completing production records and meal pattern so staff can complete the records accurately. All changes/substitutions to the menu or food prep and portion size adjustments to meet meal pattern requirements need to be made to the production records. The FSD is revising the SFA's production record template. Please review the Production Record section of the Idaho School Nutrition Reference Guide available at the SA website.
- The breakfast meal pattern requires 1 cup milk, 1 oz. eq. grain, and 1 cup fruit. When implementing Offer versus Serve, the meal pattern must be met a choice of four food items allowing students to decline one option. Students must take at least ½ cup fruit

(or vegetable) and two other creditable items for a reimbursable meal. On the day of review, the pre-bagged grab and go breakfast meal served at Oakley Junior Senior High School, contained required milk and grain components and ½ cup fruit juice. All bagged meals comprised a reimbursable meal due to the OVS Provision of only ½ cup fruit to be selected. However, the meal pattern requirement was not met due to not having 1 cup of fruit available for each student. Service options were discussed, including having a serving bowl with a variety of fresh or canned fruit available for students to select the additional ½ cup required to be made available to them.

- The 9-12 grade lunch meal pattern requires 1 cup milk, 2 oz. eq. grain, 2 oz. eq. meat/meat alternate, 1 cup vegetable and 1 cup fruit daily. For 6-8 grades, 1 cup milk, 1 oz. eq. grain, 1 oz. eq. meat/meat alternate, ¾ cup of vegetable and ½ cup fruit are the minimum daily requirements. When implementing Offer versus Serve, students must take at least ½ cup fruit and/or vegetable and three other creditable items for a reimbursable meal. On the day of review, the lunch meal at Oakley Junior Senior High School, offered two entrée options that combined the grain, meat/meat alternate, and vegetable components. The breakfast sandwich entrée option did not meet the daily meal pattern requirement due to only providing ¼ cup vegetable (2 oz. hashbrown triangle). All breakfast sandwich meals comprised a reimbursable meal due to students also selecting at least ½ cup fruit. However, the meal pattern requirement was not met due to not having at least 1 cup of vegetable available for each student selecting that entrée option. It was also identified that the production record had planned to have onion rings served with both meal options, but none were served. When a vegetable is planned, but not available to be served, it should be replaced by a vegetable within the same subgroup.

Offer vs Serve (OVS)

- The SA recommends that kitchen managers and food service line staff complete OVS online training available in the CNP Training Portal to ensure understanding.

Food Safety

- Document and maintain logs for thermometer calibration. Calibrate thermometers a minimum of once a week and any time the thermometer is dropped.
- Per 7 CFR 210.21 (d), if a product from another country is sourced, then the SFA must have documentation that the domestic product is significantly higher in price or not available in sufficient quantities. The SFA had dated documentation from one vendor that listed specific fresh produce items, country of origin, and the months those food items would be from those countries due to insufficient quantities available in the US. Another vendor listed example canned food items that would not be sourced domestically, with an indication that the box would advise on the county of origin. There was no date associated with that documentation. The first form of documentation meets the requirement for insufficient quantities, but the second form does not. The SA has a “Buy American Exemption Form” that could be utilized to meet the requirement to document either exemption or all food products requiring documentation. While the SA reviewers were onsite, the exemption form was completed for canned pineapple

from Thailand and canned mandarin oranges from China. Continue to complete and retain the exemption form for all applicable food items.

Afterschool Snack Program (ASSP)

- The Afterschool Snack Program must maintain records including production records, completed on a daily basis (documenting changes or substitutions as applicable) to show component compliance and note the serving size for all components as well as the number of portions prepared, served, and leftover for every day the ASSP operates.
- The baby carrots served on the day of SA on-site review may not have been $\frac{3}{4}$ cup. Conduct a yield study to document correct serving sizes or serve two packages of carrots to each student. Ensure the snack is a minimum of two of the following components:
 - Grain: 1 oz. eq. whole grain or enriched grain/bread
 - Protein: 1 oz. eq. meat or meat alternate
 - Fruit or Vegetable: $\frac{3}{4}$ cup serving of fresh, frozen, canned, or dried, or 6 fl. oz. of 100% fruit or vegetable juice
 - Milk: 8 fl. oz. low-fat plain, or fat free plain or flavored fluid milk
- Utilize the ASSP Training Certification Sheet, available in MyIdahoCNP Download Forms, to train ASSP staff at all ASSP sites; it is valuable documentation to have staff members sign/certify that they understood training on the actual training form. Best practice is to make a copy of the signed sheet for staff reference.

Resource Management

- The non-program food revenue tool (NPFRT) that was uploaded did not list all Reimbursement Rates per Meal on the Meal Cost and Revenue Sheet tab for breakfast. Ensure this part is completed on the SY 18-19 NPFRT that will be uploaded during NSLP annual application renewal.

Civil Rights

- Medical Statement Forms for students with special dietary needs must be completed and signed by a recognized medical authority in the State of Idaho in order to be able to deviate from the meal pattern.

Smart Snacks

- All fundraisers, both exempted and compliant, must be tracked. Per state policy, a maximum of ten 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 ten must be pre-approved by the State agency using the Request form (7CFR 210 (b)(2)). Additional information is available at the SA Smart Snacks webpage. The FSD provided a tracking form to the principals.
- The SA provided *A Guide to Smart Snacks School*, reviewed requirements of food sold during the school day, and referenced a resource link to ensure food sold meets Smart Snacks rules.

Special Provision Options – Provision 2

- Three separate Provision 2 breakfast base years are operated by Cassia County School District. The benefit issuance documentation from these base years was validated by the SA during the base years. The retention of required Provision 2 base year records was confirmed during the AR. Please ensure all required Provision 2 documentation is continued to be maintained per requirements. Currently, documents are kept in boxes and file folders by school year and/or school site and electronic records are saved on a thumb drive. The SA recommends keeping these base year records together by year and clearly label them so they are not unintentionally discarded. Schools may request a four year extension of Provision 2 prior to expiring if the income level of the school’s population has remained the same or improved only negligibly.
 - Base year SY 15-16 for 1 site (Almo ES) expires the end of SY 18-19.
 - Base year SY 16-17 for 9 sites (Burley JHS, Burley SHS, Declo ES, Declo JHS, Declo SHS, Oakley ES, Oakley Jr-Sr, Raft River ES, and Raft River Jr-Sr) expires the end of SY 19-20.
 - Base year SY 18-19 for 5 sites (Albion ES, Dworshak ES, Mtn View ES, White Pine ES, and John Evans ES) expires the end of SY 21-22. Base year benefit issuance was validated October 11, 2018.
- Due to the potential financial burden of providing meals at no charge to households, at least a 65% or higher Free and Reduced percentage (<35% Paid) should be achieved to participate in Provision 2 breakfast. Anything lower may be unsustainable and compound losses over the four year cycle. The SA encourages the district to evaluate current claiming percentages on a monthly or quarterly basis and consider the sustainability of operating Provision 2. Schools electing Provision 2 must pay, with funds from non-Federal sources, any difference between Federal reimbursement and the cost of serving breakfasts at no charge to all participating students.
- While validating the retention of base year SY 18-19 records, previously validated, “open student” counts were also discovered for Dworshak Elementary School and Mountain View Elementary School. Those open student counts occurred at the beginning of the school year and were removed from the meal counts prior to submitting the monthly claims for reimbursements. Since the practice of using the open student option at breakfast was stopped once identified, the invalid eligibility counts were removed prior to claiming, and the SFA continues to monitor the daily meal counts, the SA considers the base year claiming totals valid. Continue to monitor and disallow any open student meal counts as all participating students must be claimed at their determined eligibility during the base year.
- The FSD will need to edit the Burley Junior High School site application in the SY 18-19 application packet in MyIdahoCNP. Question number eight will need to be changed to reflect “pricing” for SBP and student prices will need to be included. Once the FSD edit is complete, the packet must be submitted for SA approval. Once the packet is submitted, the SA will modify the Internal Use Only section as applicable. The SA Coordinator assigned to the packet will get an email notification of the packet submission; please let the on-site reviewers know when the application has been edited and submitted.

Patricia will need to use the actual free, reduced, and paid meal counts for all Burley Junior High claims beginning April 2019.

Special Provision Options – Community Eligibility Provision (CEP)

- Maintenance of CEP records for SY 14-15 (data year used) and SY 15-16 (first cycle year) were previously validated by the SA using April 1, 2015, data for Cassia County Junior / High School Alternative School. Direct Certification reports for April 1 data have been run each year. The current CEP approval expires at the end of SY 18-19. Records have been retained; ensure all CEP records continue to be maintained as per requirements.
- As your district is in the fourth year of a CEP cycle, you may qualify to continue participating in CEP for one grace year if your district-wide Identified Student Percentage (ISP) is less than 40 percent but at least 30 percent. Reimbursement for schools participating in a grace year is based on the ISP as of April 1 in Year 4 of the current four-year cycle. The *Community Eligibility Provision (CEP) Planning & Implementation Guidance* states that if the LEA, group of schools, or individual school regains an ISP meeting the 40 percent threshold as of April 1 of the grace year, the State agency may approve a new four-year cycle beginning the following school year. If the ISP as of April 1 of the grace year does not meet the 40 percent ISP requirement, the LEA must return to standard counting and claiming, or enroll in another special Provision option for the following school year.
- If you intend to elect CEP/start a new CEP cycle, you must do the following by June 30, 2019:
 - Notify the State agency of your intent to elect CEP, listing site(s), and
 - Upload, into MyIdahoCNP Application Attachment List, enrollment lists and valid direct certification documents, by site(s), as of April 1, 2019.

Procurement

- A separate procurement review will be completed in SY 20-21; please follow the guidance provided.

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 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,



Tamara Donovan, RD, LD, SNS

NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Angela Rodriguez, Child Nutrition Director, Cassia County School District

Civil Rights

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotope, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at [the USDA website](#), 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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