



April 23, 2019

Geoffrey Thomas, Superintendent  
Madison School District #321  
290 N. 1st E.  
Rexburg, ID 83440

Dear Superintendent Thomas,

On March 11 - 12, 2019, State Department of Education (SDE) Coordinators Teresa Goodsell, Tamara Donovan, and Heather Blume conducted an Administrative Review of Madison School District for the following United States Department of Agriculture (USDA) programs:

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

The sites reviewed were Kennedy Elementary School (operating NSLP) and Madison High School (operating SBP and NSLP).

The State agency (SA) would like to commend Dave Keck and the staff of Madison 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

Four applications (eleven students) had inaccurate income information, with two applications noting hourly pay rates as the income frequency. Eight applications (multiple students) were missing information to document why benefit determination was changed.

**Corrective Action:** Contact households to confirm income and benefit status. Document information in the comment section of application software. Upload the following information into MyIdahoCNP (MICNP): clear and complete application notes and, as applicable, the household benefit change notification letter and the benefit issuance page(s) showing the student's benefit was changed. Provide a written procedure to the SA explaining how application updates will be handled.

**Due Date for CAP Completion:** March 27, 2019

**Corrective Action Response:** On March 28, 2019, the SFA uploaded a written explanation for all application errors along with a procedure for ensuring application updates in the future will include copious notes that support any eligibility status changes made. The SFA also uploaded all supporting documentation for income applications that had a change in status including notification letters sent to households and the benefit issuance page with changes to eligibility status as required. The SFA provided written communication with the software provider for changes in software that will reduce application errors resulting from hourly pay and unborn children claimed on an application.

### Finding 2 Certification and Benefit Issuance

Per the Administrative Review Manual, the USDA Non-Discrimination Statement must be included on documents referencing USDA Child Nutrition Programs. The long statement is for use on longer documents and can be found on the CNP website under Civil Rights

**Corrective Action:** Update the notification of eligibility letter sent to households to reflect the correct non-discrimination statement.

**Due Date for CAP Completion:** March 27, 2019

**Corrective Action Response:** On the day of SA on-site review, the SFA corrected the household notification letter and provided a copy to the State agency.

### Finding 3 Offer versus Serve (OVS)

Multiple entree choices are offered at breakfast on the same line, which causes confusion since breakfast is not operated using OVS style meal service.

**Corrective Action:** Upload a plan for simplifying meal service or converting to OVS into MICNP.

**Due Date for CAP Completion:** March 27, 2019

**Corrective Action Response:** During the SA on-site review, the SFA uploaded a plan to add an additional Point of Service through the remainder of SY18-19 and will revisit OVS for SY19-20.

#### **Finding 4 Local Wellness Policy (LWP)**

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:** March 27, 2019

**Corrective Action Response:** On March 28, 2019, the SFA uploaded a plan into MICNP that states the school board and superintendent will utilize the ISBA wellness policy in entirety. The updated wellness policy will be posted to the school district website once finalized and the triennial assessment requirement will be met moving forward.

#### **Finding 5: Professional Standards**

Professional standards training is occurring and some documentation (sign-in sheets / training certificates) are retained, but training hours are not being tracked as required. Develop a plan for tracking training hours in order to comply with the Professional Standards requirements; options include the FNS online tracking tool and two tracking resources available in MICNP under Download Forms in the Professional Standards section. Ensure documentation is retained to support hours listed.

**Corrective Action:** Upload compliant training tracking logs into MICNP for all service employees.

**Due Date for CAP Completion:** March 27, 2019

**Corrective Action Response:** On March 26, the SFA uploaded a plan for tracking future employee trainings and included a completed tracking log for each individual currently employed by CNP. The tracking spreadsheet includes key area and topics, length of trainings, and year to date totals.

### **Commendations**

- Outstanding job meeting all of the requirements for the meal pattern. All daily and weekly meal component and food quantity requirements were met for the week of menu review.
- The food service staff at Kennedy ES were upbeat and welcoming - the students reciprocated with smiles and "thank you's".
- The staff at the high school worked diligently to ensure quality meals and exceptional customer service was provided to the students. They were also friendly and open to feedback from the State agency.
- The cafeteria in the high school has a very pleasant and appealing atmosphere, with the variety of seating options, large windows, and interesting ceiling and light fixtures.

- District staff efficiently responded to questions and provided requested documentation.

## Technical Assistance (TA)

### Certification and Benefit Issuance

- 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.
- To help ensure accurate application determination, please preview electronic applications for income entries and follow up as needed.

### Verification

- There was no documentation that a confirmation review took place prior to sending out verification notification letters. Recommend printing a hard copy of each application selected for verification and documenting the confirmation review took place. .
- Please attempt to directly certify students selected for verification before sending the verification notification letter to the household.

### Civil Rights

- Disabilities must be documented with a medical statement form signed by a recognized or licensed medical authority within the state. In the state of Idaho, a disability may only be determined by the following recognized medical authorities: licensed physician (Medical Doctor or Doctor of Osteopathy), physician assistant, nurse practitioner, or dentist. Sponsors are required to make substitutions for appropriately documented medical disabilities and must keep all documentation in regards to disabilities, foods to be omitted, and menu substitutions. The meal pattern may be altered only if a valid medical statement form, signed by a recognized medical authority is on file.

### Smart Snacks

- As per 7 CFR210.11(b)(2), schools must keep track of food sales that occur within the school day, but outside of food service. Only foods sold in school and intended for consumption during the school day (from midnight until 30 minutes after the end of school) fall under Smart Snacks regulations. Smart Snacks information and resources, including a sample site tracking form, can be found at the SA website. The principal at Kennedy ES began tracking Smart Snacks on the day of SA review.

### Food Safety

- Ensure that the most current food safety inspection is posted; this was taken care of on the day of menu review.
- 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)). Products in the warehouse and reviewed sites were assessed for the country of origin and were found to be out of compliance (canned mandarin oranges from China; fresh tomatoes 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. Include the Buy American Provision 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). Please make use of the exception form in MICNP.

- The Idaho Department of Health & Welfare updated the Food Code to come in line with the current FDA Food Code. This includes a new requirement that all food safety plans must include a procedure for cleaning up bodily fluids. A HACCP Bodily Fluid Cleanup sample is located in MICNP in the Download Forms section under the Food Safety heading. Also include employee exclusions and restrictions in the food safety manual and train on these procedures.

### **Meal Components and Quantities – Breakfast and Lunch**

- Independent contractor CN Resource (CNR) provided the following:
  - During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal.

### **Procurement**

- A separate procurement review will be completed during school year 2020-21. The State Agency will provide a closure letter following completion of corrective action (if needed); please follow the guidance provided.

### **Fiscal Action**

Due to the benefit issuance error rate, fiscal action results in \$226.70. 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,



Teresa Goodsell, BS, SNS  
NSLP and USDA Foods Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs  
Dave Keck, Child Nutrition Director, Madison 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, audiotape, 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](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.