



October 29, 2018

Tony Bonuccelli, Superintendent
Moscow Charter School
1723 East F Street
Moscow, ID 83843

Dear Mr. Bonuccelli,

On October 24, 2018, State Department of Education (SDE) Coordinators Tamara Donovan and Lynda Westphal conducted an Administrative Review of Moscow Charter School for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- USDA Foods

The site reviewed was Moscow Charter School.

The State agency (SA) would like to commend Lashelle Wilson and the entire staff of Moscow Charter 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 – Civil Rights

Update the non-discrimination statement on the meal benefit, direct certification, and verification notification letters to the USDA non-discrimination statement available on the SA website. Ensure materials contain the correct civil rights statement.

Corrective Action: Revise the notification letters and upload copies into MyIdahoCNP.

Due Date for CAP completion: November 8, 2018

Corrective Action Response: On the day of SA review, the notification letters were revised and copies uploaded into MyIdahoCNP Review Attachments.

Finding 2 – Revenue from Nonprogram Foods

Free milk was provided to students that qualified for free meal benefits. The NSLP is a school meal program; a la carte milk must be purchased to ensure the cost of milk is covered.

Corrective Action: Inform households that milk may be purchased in accordance with minimum pricing requirements (in SY 2018-19 milk is priced at \$0.50). Revise the household meal benefit notification letter, removing free milk references. Upload copies of these documents into MyIdahoCNP.

Due Date for CAP completion: November 8, 2018

Corrective Action Response: On the day of SA review, the meal benefit notification letter was revised and a letter to households informing them that milk is included in the school meal and that a la carte milk may be purchased for \$0.50 was uploaded into MyIdahoCNP Review Attachments.

Commendations

- Thank you for being open to having the review date changed to accommodate another food service director's need. This was appreciated.
- The Food Service Director was receptive to SA input, completing tasks while the SA was on site. Documentation and files were complete and deadlines were met which made the administrative review run more smoothly.
- Recordkeeping at the school was very organized making the review of the documents go smoothly.
- During the day of CNR on-site review, the serving line staff member was very careful and followed all food safety precautions during set up and meal service. Nicely done.

During the day of SA on-site review, the serving line staff member was very conscientious with food safety, washing her hands in between glove changes. She was also very good at measuring out the amount of food to go onto each tray.

Technical Assistance (TA)

Certification and Benefit Issuance

- The following must be added to the DC notification to household letter: the USDA long non-discrimination statement and an inquiry regarding additional children in the household. On the day of SA review, a revised household notification letter was uploaded into Review Attachments.

Dietary Specifications

- Independent contractor CN Resources completed the menu review and provided the following TA:
 - Recommended serving canned fruits packed in 100% juice, lite syrup, or water instead of heavy syrups.
 - Suggested reviewing the recipe to ensure the yield/ingredient measures are correct and the recipe is standardized. Diced tomatoes and tomato paste were substituted for tomato puree in the spaghetti and meat sauce recipe during the week of menu review. The measures for each were provided by the SFA. The total vegetable crediting for the tomatoes products calculated at 1 cup per serving. The recipe serving size is 1 cup (including the meat, sauce, and spaghetti).

Offer vs Serve

- The SFA either needs to pre-plate everything and require all students to take the milk component (serve) - OR – allow students to go through the line and be allowed to decline all but three food items, one of which must be at least ½ cup fruit and vegetable (OVS).

Local School Wellness Policy

- A copy of the most recent assessment on the implementation of the local school wellness policy must be available to the public.

Smart Snacks

- Provided *A Guide to Smart Snacks in School*, reviewed requirements of food sold during the school day, and referenced a resource link to ensure food sold meets Smarts Snacks rules.

Professional Standards

- Staff involved in meal service must have annual OVS training. This was completed on the day of SA review.

Procurement

- A separate procurement review will be completed by Keddington & Christensen, LLC; 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
Lashelle Wilson, Child Nutrition Director, Moscow Charter School

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Office of the Assistant Secretary for Civil Rights
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Washington, D.C. 20250-9410;
(2) fax: (202) 690-7442; or
(3) email: program.intake@usda.gov.

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