



December 17, 2018

Leslie Wells, Superintendent
Mullan School District
345 Park Street
Mullan, ID 83846

Dear Mr. Wells,

On November 14, 2018, State Department of Education (SDE) Coordinators Tamara Donovan and TJ Goodsell conducted an Administrative Review of Mullan School District for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was Mullan Schools (operating Community Eligibility Provision, data year 2016-17).

The State agency (SA) would like to commend Lisa Hileman, Cathy Anderson, and the staff of Mullan 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.

This was the SA determined finding and the SFA response to the finding:

Findings and Corrective Action Plan (CAP)

Finding 1 Meal Counting and Claiming

The October 2018 claim included the November 1 counts (i.e., breakfast 66, lunch 74) due to a non-systemic human error. As the claim had already been approved and paid, the SA Financial / Claim Specialist recommended not including November 1 counts in the November 2018 claim.

Corrective Action: Submit the claim for reimbursement for November 2018; do not include the November 1 breakfast and lunch counts since these meals have already been reimbursed. Upload the November daily meal count spreadsheets for breakfast and lunch into MyIdahoCNP Review Attachments.

Due Date for CAP completion: December 6, 2018

Corrective Action Response: On November 30, 2018, the SFA submitted the November claim: 1173 breakfasts and 1403 lunches and provided the November 2018 daily meal count sheet to the SA. The figures did not include November 1, 2018, counts (66 breakfasts and 74 lunches).

Commendations

- The food service staff demonstrated commitment to operating compliant child nutrition programs that meet student needs. They were responsive to requests for information and were a pleasure to work with during the off-site and on-site sections of the review.
- All files and documents were organized and readily available for SA review. Great job, Cathy!
- Lisa and Merri do a fine job of food presentation at breakfast and lunch. The breakfast bar looked so colorful and inviting with a wide variety of selections displayed.
- Excellent work meeting all meal pattern requirements for both breakfast and lunch for the week of menu review.
- The kitchen was very organized and clean.
- Food service employees were efficient in their job duties and interacted well with the students. The students showed excellent manners and the school staff clearly strive to create a caring environment.

Technical Assistance (TA)

Civil Rights

- Ensure the use of the current USDA nondiscrimination statement; an incorrect statement was used in the off-site section of the civil rights module. On the day of SA review, the correct statement was in use.

Meal Components and Quantities

- Independent contractor CN Resources completed the menu review and provided the following TA after the on-site nutrition review via email:
 - Recommend adding milk as a line item on the production record to show number of planned, actual served, and leftover for each type of milk served. At a minimum the production records should include the name of the item, the recipe or item number, the portion size, the number of planned portions, the component contribution amount and the number of actual servings. All kitchen staff should be trained on completing production records so that everyone can complete the records.

Offer Versus Serve (OVS)

- Junior high students were given the choice between fluid milk (milk component) and juice (fruit component) in OVS implementation. Students must be able to select both since milk and fruit are required meal components in the USDA meal pattern. Reminder that milk may be declined under OVS.

Resource Management

- Ensure that the general fund continues to cover the difference between the cost and the pricing of milk a la carte.
- USDA Foods (formerly known as commodities) must be noted as revenue and as expenses in the Fund 290. Please consider a separate detail section in the Fund 290 with a “USDA Foods” description as a revenue line item as well as an expense line item. The State agency provided FD-104 guidance memo as well as instructions on generating the Value of Commodities (PAL) Report to ensure future compliance.

Smart Snacks

- School vending in the junior / senior high school did not comply with the Smart Snacks federal regulations Public Law 111-296, clarified in 7 CFR 210.11. The SA provided *A Guide to Smart Snacks in Schools* booklet and emailed Smart Snacks resource links to Cathy. Ensure documentation of Smart Snacks compliance is retained.
- Reminder that fundraisers must be tracked. Per state policy, a maximum of ten exempted fundraisers per school site per year may be allowed. An exempted fundraiser can be for a maximum of four consecutive school days. All exempted fundraisers beyond ten must be pre-approved by the SA using the request form. Details are available at the SA Smart Snacks web page where a fundraising tracking form may also be found.

Special Provision Options - Community Eligibility Provision (CEP)

- CEP records for SY 2016-17 (data year used) / SY 2017-18 (first cycle year) were maintained on file; ensure all CEP records continue to be maintained as per requirements. Direct certification reports for April 1 data have been run each year. The current CEP cycle expires at the end of SY 2020-21.

Procurement

- Follow guidance provided in the separate procurement review to be conducted by an independent contractor (currently Keddington & Christensen, LLC) in school year 2020-21.

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
Lisa Hileman, Child Nutrition Director, Mullan School District

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