



January 8, 2019

Andrew Grover, Superintendent
Melba School District
6870 Stokes Lane
Melba, ID 83641

Dear Superintendent Grover,

On November 28, 2018, State Department of Education (SDE) Coordinators Teresa Goodsell and Tamara Donovan conducted an Administrative Review of Melba School District for the following United States Department of Agriculture (USDA) programs:

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

The State agency (SA) would like to commend Julie Allison and the entire staff of Melba 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

Out of a sample size of 220 students, 15 students had benefit issuance errors. Errors included the following: unclear household number information, missing income information, and determination errors (i.e., income frequency of every two weeks vs. twice per month were transposed).

Corrective Action: The Determining Official must contact households, as applicable, gather and document needed information, make a benefit determination, and send notification letters to households if the meal benefit changed. Upload copies of the notification of benefit letters sent to households and a copy of the updated benefit issuance list into MyIdahoCNP Review Attachments.

Due Date for CAP Completion: December 13, 2018 extended to January 7, 2019

Corrective Action Response: On December 4, 2018, the SFA uploaded copies of all notification documents; however, the updated benefit issuance list for one household was not provided. On January 7, 2019, the SFA uploaded the necessary documents supporting the corrective action requirement.

Finding 2 – Civil Rights

Ensure the direct certification notification letter contains the correct USDA non-discrimination statement; the non-discrimination statement is available on the SA website. Additionally, the SFA letter does not provide households an opportunity to self-report other household members who may be eligible for benefits.

Corrective Action: Revise the notification letters and upload copies into MyIdahoCNP Review Attachments. If the SFA prefers to use the State agency (SA) provided letter, it is available in the download forms section of MyIdahoCNP.

Due Date for CAP Completion: December 13, 2018

Corrective Action Response: On December 4, 2018, the SFA uploaded the SA notification letters available in the download forms section of MyIdahoCNP, which will be used for notifying households whose students are categorically eligible for free meals as a result of being directly certified.

Finding 3 – Civil Rights

SFA staff, who interact with program applicants or participants (i.e., cafeteria staff, Free and Reduced Application approval staff) and their supervisors, as well as the Hearing and Confirming Official, must have annual civil rights training. Melba Superintendent is listed as the Hearing Official, therefore must complete USDA civil rights training. Training is available on the [SA website](#).

Corrective Action: Upload a dated sign in sheet to provide documentation that the Hearing and Confirming Official received civil rights training.

Due Date for CAP Completion: December 13, 2018

Corrective Action Response: On December 11, 2018, the SFA uploaded documentation confirming that both the Hearing and Confirming officials completed the required Civil Rights training.

Finding 4 – Local Wellness Policy (LWP)

LEAs are required to establish a plan for measuring Local Wellness Policy implementation to include identifying one or more persons with the responsibility and authority to ensure each school complies with the policy. The LWP 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: Provide a copy of the recently revised policy (August 2018) for review by SA. Ensure an 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: December 13, 2018

Corrective Action Response: On December 5, 2018, the SFA uploaded copies of the revised LWP, which includes ISBA sections adopted on August 14, 2018, along with a copy of the completed Idaho Wellness Policy Progress Report. The SFA website is currently under construction; however, SFA confirmed the assessment will be made available to the public when the site is reintroduced.

Finding 5 – Meal Components and Quantities (Breakfast)

Independent contractor CN Resources completed the menu review. During the week of menu review, the breakfast menu met the daily requirement for grain but did not meet the minimum weekly requirement for grain (insufficient quantities). To help in meeting the weekly grain requirement, meat/meat alternate products may credit as a grain once the daily grain requirement is met. 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 must meet 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.

Corrective Action: Provide a written statement and necessary documentation to demonstrate the weekly grain and whole grain-rich 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. 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: November 1, 2018

Corrective Action Response: The SFA provided necessary documentation prior the SA on-site review. The cereal bar meal choice was removed from the menu, thus meeting the weekly grain requirement. The non-whole grain-rich cereal choices were replaced with whole grain-rich products.

Finding 6 – Meal Components and Quantities (Lunch)

Independent contractor CN Resources completed the menu review. During the week of menu review, insufficient quantities were noted; the lunch menu did not meet:

- The minimum daily vegetable requirement
- The minimum weekly requirement for the red/orange vegetable subgroup

- The minimum weekly requirement for the starchy vegetable subgroup
- The minimum weekly requirement for meat/meat alternate
- The whole grain-rich requirement

Corrective Action: Provide a written statement and necessary documentation to demonstrate the daily vegetable, red/orange and starchy vegetable subgroups, weekly meat/meat alternate, and whole grain-rich requirements 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. 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. 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 must meet 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.

Due Date for CAP Completion: November 1, 2018

Corrective Action Response: The SFA provided necessary documentation prior to SA on-site review:

- Replaced celery with $\frac{3}{4}$ cup serving of carrots on menu for Monday
- Increased mashed potato serving to $\frac{1}{2}$ cup on Wednesday
- Increased meat sauce serving to $\frac{1}{2}$ cup on Thursday
- Increased servicing size of dark leafy green to 1 cup on Thursday
- Pasta that is not whole grain-rich is considered an “extra” and whole grain-rich product (rolls) will be served with the pasta to meet the daily grain requirement
- Replaced corn dogs with a product that has whole grain breading

Finding 7 – Resource Management

Journal entry 290-710410 Food Service General Supplies dated May 3, 2018, for \$120 is an unallowable charge per 7CFR 200.445(a). Costs of goods or services for personal use of the non-Federal entity's employees are unallowable regardless of whether the cost is reported as taxable income to the employees. The purchase of support shoes for food service employee(s) is not an allowable use of CNP funds.

Corrective Action: Please provide supporting documentation reversing the expenditure. LEA general funds can cover this cost or employee can reimburse the CNP Fund 290 account.

Due Date for CAP Completion: December 13, 2018

Corrective Action Response: On December 4, 2018, the SFA uploaded a copy of the journal entry reversing the \$120 unallowable expenditure.

Finding 8 – SFA On-Site Monitoring

According to 7 CFR 210.8 (a)(1) and 7 CFR 220.11 (d)(1), each SFA with two or more feeding sites must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating NSLP and 50% of schools operating SBP under its jurisdiction prior to February 1, each school year. Ensure each site has a breakfast review every other year. Opening the elementary school as a

second site led to the form completion requirement. The form is available in MyIdahoCNP Download section.

Corrective Action: Complete the reviews for each site for SY 2018-19 and upload copies into MyIdahoCNP Review Attachments.

Due Date for CAP Completion: December 13, 2018

Corrective Action Response: On December 4, 2018, the SFA uploaded a copy of the completed School Food Authority On-Site Review Checklist with notations that the tool will be used for training substitutes when necessary. A corrective action plan with an implementation date of June 30, 2019, was outlined for identified deficiencies.

Finding 9 – Special Milk Program (SMP)

The SMP may only be an option if students do not have access to a school meal program. With the opening of the new elementary school and the corresponding schedule changes, pre-school children have access to the SBP.

Corrective Action: The Food Service Director (FSD) must discuss options with the administration (co-mingle at breakfast and/or lunch, adjust schedule, offer milk and/or juice as catering based on non-program food revenue tool, etc.) and will notify the SA of the decision (email will suffice) and will update their sponsor application as needed.

Due Date for CAP Completion: December 13, 2018

Corrective Action Response: On the day of SA review, the FSD uploaded written confirmation and revised the sponsor application to reflect the discontinuation of the SMP, with October 2018 as the last SMP claim.

Commendations

- The FSD was receptive to suggestions for food safety review, monitoring and revision of SOPs, and was making plans for staff training for all food service staff in district, not just at site visited. All staff were responsive to answering questions and receptive to suggestions, technical assistance, and corrective action. Excellent positive attitudes.
- Students are served many food choices in a warm and friendly environment.
- Student helpers are well trained to ensure food safety practices are followed. They are friendly and courteous to students receiving meals.
- Food service staff practice proper food safety procedures throughout meal prep and service.
- At the high school, a Smart Snacks tracking form is used which includes planned fundraising events. A total of six exempt fundraisers were scheduled for the school year indicating compliance with Smart Snack regulations.

Technical Assistance (TA)

Verification

- Make use of letter templates in MyIdahoCNP Download forms.
- Attempt to directly certify students that are selected for verification prior to the confirmation review.

- Reviewed need to contact household to clarify if any income for adult added to application.
- Make notes on applications to document additional information obtained from the household, including the date, the name of the household member spoken with, the information collected, and the initial of person who collected the information.

Meal Components and Quantities – Breakfast

- Independent contractor CN Resources provided the following:
 - The federal regulations require weekly minimum amounts of grains to be served. All grains served must be whole grain-rich in order to meet the whole grain-rich requirement. To be considered whole grain-rich, the product must be comprised of at least 50% whole grain ingredients, with the remaining grain ingredients enriched. An easy way to determine this is by looking at the ingredient list. For more information on identifying products that meet the whole grain-rich criteria, refer to the [USDA's Whole Grain Resource](#).

Meal Components and Quantities – Lunch

- Independent contractor CN Resources provided the following:
 - The federal regulations require menus to be planned that meet the minimum weekly meat/meat alternate requirement.
 - All grains served must be whole grain-rich (WGR) in order to meet the WGR requirement.
 - The federal regulations require a minimum of 3/4 cup of vegetable to be offered each day for grades K-6. Please keep in mind that leafy green vegetables are creditable at half volume. Weekly subgroups of vegetables must be met for each grade group.
 - An official Child Nutrition (CN) label or signed Product Formulation Statement (PFS) was not provided for the pizza rippers served on Tuesday. The documentation submitted was used for crediting, but proper documentation should be secured and kept on file. A CN label/PFS was not submitted for the macaroni and cheese product served on Monday. This menu item is considered an “extra” per the SFA and was not included on the USDA worksheet.

Food Safety

- The SFA must have a complete food safety plan that includes all of the required sections as specified by USDA. Recommended separating receiving and storage into two separate SOPs for clarity to address temperature records in all storage areas recorded daily.
- A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes Standard operating procedures to provide a food safety foundation.
- Ensure that storage temperatures are within the correct range and take corrective action when the temperature goes above or below the range. Dry storage had a thermometer; however, temperatures were not recorded consistently.

Smart Snacks

- Schools must meet the minimum requirement in 7 CFR 210.11, for all foods and beverages sold in school (also known as Smart Snacks in School) to increase consumption of healthful foods during the school day and support a healthy school environment. Food and beverages sold to students must comply with specific nutrition standards, must be tracked as exempt

fundraiser(s), or must be inaccessible during the school day (defined as midnight the day before until 30 minutes after the school day ends). The SA discussed Smart Snacks regulations with the Food Service Director. Per state policy, a maximum of ten exempted fundraisers per school site per year may be approved. 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. Smart Snacks tracking was being done at the high school, but not the elementary school. Reviewed that the ten exempt are per site, so a separate tracking form is needed for the elementary school as well.

Professional Standards

- All food service employees had training tracking logs except for the FSD; however, a training tracking log for the FSD was implemented on day of SA review.

School Breakfast and SFSP Outreach

- Schools participating in the SBP must notify families of the availability of school breakfasts at the beginning of the school year and must send reminders regarding the availability of the SBP multiple times throughout the school year (e.g., post information to the district webpage, send menus home).

Procurement

- A separate procurement review will be completed by contractors (currently Keddington & Christensen, LLC) during SY 2018-19. A closure letter will be sent by the State agency following completion of corrective action (if needed); please follow the guidance provided.

Special Provision Options

- Provision 2 Base Year (SY 2015-16) benefit issuance was previously validated by the SA on November 18, 2015. The retention of all required Provision 2 documentation was confirmed during the administrative review. Base Year records are kept on thumb drive and in the SFA office. The current Provision 2 cycle expires at the end of SY 2018-19. If the SFA wishes to continue with Provision 2 breakfast, contact the SA prior to the expiration date to see if you qualify for an extension.

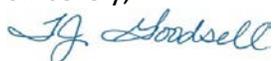
Your review is now closed.

Fiscal action in the amount of \$158.80 resulting from this review will be disregarded because it is below the State agency threshold of \$600.00. 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, B.S., S.N.S.
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Julie Allison, Food Service Director, Melba School District

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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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