



January 21, 2020

Woody Woodford, Superintendent
Mountain View School District #244
714 Jefferson
Grangeville, ID 83530

Dear Superintendent Woodford,

On November 11, 2019, State Department of Education (SDE) Coordinators Teresa Goodsell and Jessica Spoja conducted an Administrative Review of Mountain View School District for the following United States Department of Agriculture (USDA) programs:

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

The State agency would like to thank Polly Hagen, Maureen Burney, and the staff of Mountain View 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, however Idaho has received a waiver to conduct reviews on a five-year schedule 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:

Finding and Corrective Action Plan (CAP)

Finding 1 – Certification and Benefit Issuance

Multiple free and reduced applications were inaccurately determined, additionally the State agency found several of the applications included in the statistical sample were unavailable for validation.

Corrective Action: Application errors must be resolved and the Benefit Issuance List (BIL) updated to reflect corrections, while missing applications must be located and made available to the State agency (SA) for review. Please inform households of the change in status, and update the BIL for incorrectly determined applications. Standard notification letters are available on MyIdahoCNP, under *Download Forms*. All households for whom benefits are to be reduced or terminated must be given ten calendar days' written advance notice of the change; all households for whom benefits are to be increased are effective immediately and must be implemented no later than three operating days (Eligibility Manual). Upload copies of all letters sent to households, copies of the identified missing applications for validation by the SA, and the updated BIL. Additionally, as a result of the numerous certification and benefit issuance errors, all staff who are working to determine eligibility must complete the *2019 Benefit Issuance* and *2019 Eligibility Determination* trainings available through the Child Nutrition Training Portal and upload copies of each certificate of completion.

Due Date for CAP Completion: November 26, 2019

Corrective Action Response: On November 21, 2019, the SFA uploaded copies of the certificates of completions for the required trainings for all staff who determine applications for eligibility status. On November 22, 2019, the SFA also provided copies of all the applications that were initially missing from the statistical sample, letters sent to households, and an updated BIL validating changes to student eligibility status were completed correctly.

Finding 2 – Verification

Confirming official must complete a review of the originally determined application, prior to beginning the verification process, by using the "Official Use Only" section of the free and reduced income application to document confirmation and verification.

Corrective Action: Please complete the verification training titled *2019 Enhanced Verification*, located in the Child Nutrition Training Portal, and upload a copy of the certificate of completion.

Due Date for CAP Completion: November 26, 2019

Corrective Action Response: On November 21, 2019, the SFA uploaded a copy of the certificate of completion for the required training.

Finding 3 – Food Safety

Bodily Fluids procedure must be included in the HACCP manual, located at each site within the district, to ensure staff receive the appropriate training on this process.

Corrective Action: Upload a copy of the bodily fluids clean-up procedure into MyIdahoCNP. Additionally, provide a written statement to indicate that the HACCP manual at each site will be updated to include these instructions.

Due Date for CAP Completion: November 26, 2019

Corrective Action Response: On November 21, 2019, the SFA uploaded a copy of the bodily fluids' procedure, and sent a written statement acknowledging the procedure has been included in the HACCP plan.

Commendations

- The school has a nice salad bar that all grades can enjoy. It was wonderful to see the kindergarten and first grade students choosing fruits and vegetable!
- Excellent work meeting all breakfast and lunch meal pattern requirements for the week of menu review!

Technical Assistance (TA)

Certification and Benefit Issuance

- Multiple errors in determinations were identified:
 1. Income listed on the application was not included in the total household income.
 2. Total income, including child income, was not included in eligibility determination.
 3. Applications were incomplete due to missing household numbers and social security numbers; contacting the software vendor to make this a required field may help eliminate this issue.
 4. Unnecessary conversion to annual and monthly amounts; only convert when multiple income frequencies are listed on the application.
 5. Unborn children may not be counted as a household member.

Verification

- Households for whom benefits are to be reduced, or terminated, must be given ten calendar days' written advance notice of the change prior to making the change. One student, whose benefit changed from reduced to paid status, did not receive the ten-day notice.

Local Wellness Policy

- A report on the progress towards goals stated in the Local School Wellness Policy must be publicly available. Posting to the school district website and/or in a school newsletter, would support this requirement.

Resource Management

- Paid meal funds, deemed "abandoned" or "stale", can accumulate in the child nutrition program fund 290. However, the SFA must ensure that no funds reclaimed are a result of a student's account balance who was determined eligible for reduced priced meals.

Your review is now closed.

Fiscal action in the amount of \$335.92 is to be assessed from this review. However, it is below the \$600 threshold set by USDA, so it will be disregarded. 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, MPA, SNS
NSLP and USDA Foods Program Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Polly Hagen, Food Service Director, Mountain View School District

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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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