



July 31, 2020

Chad Martin, Superintendent  
Jefferson Jt. School District  
3850 E 300 N  
Rigby, ID 83442

Dear Superintendent Martin,

On February 11, 2020, State Department of Education (SDE) Contractor, Kerry McKaig, with CN Resource (CNR), conducted an on-site review of the meal program, and from June 30 – July 29, 2020, Coordinator Teresa Goodsell conducted an off-site review process for the Administrative Review of the Jefferson Jt. School District due to the current COVID-19 pandemic for the following United States Department of Agriculture (USDA) programs:

- School Breakfast Program (SBP)
- National School Lunch Program (NSLP)
- USDA Foods
- Fresh Fruit and Vegetable Program (FFVP)

The SA reviewed Roberts Elementary School (FFVP), Midway Elementary School, and Jefferson Alternative High School.

The State agency would like to thank Debra Timm and the staff of Jefferson Jt. 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 (AR) 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 AR 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: Civil Rights

School Foodservice Authority 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 Official must have annual civil rights training. Jefferson had a mid-year change in administration and the newly hired Superintendent, listed as the Hearing Official, had not completed the required training. Civil Rights training is available on the [CNP Training Portal](#).

**CAP:** Please provide documentation to support the Hearing Official has received the required Civil Rights training.

**CAP Completion:** July 8, 2020

**CAP Response:** On July 8, 2020, the SFA provided an email confirmation from the Hearing official which stated the Civil Rights training video had been viewed.

## Commendations

- The foodservice director was very diligent in preparing for the AR and completed all off-site modules in a timely manner. The hard work continued after the AR was changed to a desk review, requiring additional paperwork to be scanned and uploaded. The effort put into this review during a stressful time is greatly appreciated.
- Fantastic job on certification and benefit issuance! Due to the total number of students certified for free or reduced price benefits, the State agency had to review a statistically valid sample of 525 free and reduced eligibility determinations and found zero errors.
- The verification official did a superb job with the verification process. Households included in the verification pool received well documented follow-ups, excellent responses to insufficient documentation when received by a household, and all applications in the pool were re-determined correctly with eligibility status changes made as required based on documentation provided by the households.

CNR made the following commendations:

- Outstanding job meeting the requirements for the meal pattern. All daily and weekly meal component and food quantity requirements were met for the week of menu review.
- Midway's team members had excellent portion control and great, positive interactions with all students and sang Happy Birthday to one girl in the serving line. The staff at Jefferson Alternative offers lots of positive interactions with all of the students. They do an excellent job with the production records and dating the food.

## Technical Assistance (TA)

### Resource Management

- Program regulations at 7 CFR Parts 210.14 and 220.13(i) require an SFA to establish a nonprofit school food service account, in which all reimbursements and other revenues from all food service operations conducted by the SFA, principally for the benefit of school children, are retained and used only for the operation or improvement of the nonprofit school food service. SFAs must observe the restrictions on the use of nonprofit food service revenues so that all revenue is used for operating the meal service and/or improving its quality and efficiency. Revenue sources include (but are not limited to) Federal meal reimbursement, State meal reimbursement, children's and adults' payments for SMPs meals and a la carte items and interest.

The State agency identified several expenditures in the Fund 290 nonprofit food service account that may be unallowable under the allowable and unallowable cost guidance; line items include retirement plaques, staff incentive meals, and "Melaleuca products for staff". The SA provided a copy of the *Allowable and Unallowable Cost Guidance* which provides clarification on determining whether a cost meets the criteria of "Necessary; Reasonable; and Allocable".

### Food Safety

CNR discussed the following requirements with the SFA:

- The SFA must post a copy of the most recent food safety inspection in a publicly visible location at the site.
- The SFA must have a food safety plan that complies with the requirements and the SFA must ensure that all the elements of the plan are implemented. The SFA should be following procedures as outlined in the plan and maintaining all required records.

### Fresh Fruit and Vegetable Program

- The State agency determined that a claiming error existed resulting in an under claim of \$35.00 (one case of mini peppers was not claimed for reimbursement). There was also an error in the invoice pricing entered into the claim on two different products (mini peppers were claimed for reimbursement at \$34 per case but invoiced at \$35 per case while cucumbers were claimed at \$35 per case but the invoiced price was \$34 per case). Since the case quantities for both products was the same, this error did not result in either an under claim or an over claim. Make sure to edit check claims against invoicing pricing before submitting reimbursement claims.

### Special Provisions

- Provision 2 Base Year (SY19-20) benefit issuance was previously validated by the SA on October 21, 2019. Retention of all required Provision 2 documentation was confirmed during the administrative review via a ZOOM meeting. Daily meal count records by student name and eligibility are maintained on a thumb drive and all other Base Year records are kept on the same thumb drive. The current Provision 2 cycle expires at the

end of SY22-23. If you wish to continue with Provision 2 breakfast and/or lunch, you must contact the SA prior to the expiration date to see if you qualify for an extension.

- Because all breakfast meals are served at no charge to children in Provision 2 schools, the school is no longer receiving payment from households who would normally be paying the reduced price and full price for meals. Therefore, the district may need to make up the difference between Federal reimbursement and meal costs. A school considering Provision 2 must evaluate whether the savings in administrative costs associated with simplifying meal counting, cash handling, and claiming procedures under Provision 2 offset the costs of providing breakfast to all children at no charge.

### Procurement

- A procurement review was completed. Please follow the guidance provided in the separate closure letter.

### Fiscal Action

There is no fiscal action resulting from this review.

### Your review is now closed.

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 Coordinator

cc: Debra Timm, Food Service Director, Jefferson Jt. School District  
Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs

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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](mailto:program.intake@usda.gov).

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