



April 18, 2024

Antonio Bonuccelli, Administrator
Moscow Charter School
1723 E. F St.
Moscow, ID 83843

Dear Administrator Bonuccelli,

On March 27, 2024, Idaho Department of Education Coordinators Cambria Steffler and Jax Dunham conducted an Administrative Review (AR) 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 the Moscow Charter School.

The State agency (SA) would like to commend Laura Miller 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 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 an alternate 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:

FINDINGS AND CORRECTIVE ACTION PLAN (CAP)

Finding 1 – Certification and Benefit Issuance

A statistical sample of 41 students resulted in a 4.88% error rate. One application, affecting two students, was approved using a case number. The students on this application did not appear on the state match report and the household must be contacted for further clarification. (Page 34 of the Eligibility Manual for School Meals)

CAP: Contact the household to request further documentation for their case number. If no documentation is received, send an adverse action letter, and change the household to a paid benefit. Upload all documentation to MyIdahoCNP, including an updated benefit issuance list if applicable.

Date: Completed March 27, 2024

Response: The FSD contacted the household while the SA was on-site. The household provided a letter from DHW and a screenshot of the account information stating the household receives TAFI benefits. The students in the household who are receiving the TAFI benefits do not attend Moscow Charter School and will not appear on their DC list.

Finding 2 – Meal Counting and Claiming

Prior to the submission of a monthly claim for reimbursement, the SFA must review the meal count data for each school to ensure the accuracy of the claim per CFR 210.8(a)(2). While reviewing the claim, the SA noted a discrepancy of three meals. The SFA utilizes a manual counting and claiming system and does not have an edit check process to ensure accuracy of the claim. Three students with a reduced-price meal eligibility were placed in the "free" meal column which resulted in the free meals being overclaimed by three and the reduced meals being underclaimed by three.

CAP: Complete the NSLP Corrective Action Procedure form outlining a procedure for how claims will be reviewed prior to submission. Include in this procedure who will oversee this process, when this process will take place, and how the review will be completed.

Date: Due April 11, 2024; Completed April 4, 2024

Response: The food service director completed an NSLP corrective action procedure form outlining the procedure to ensure the accuracy of the claim before it is submitted. The meal counts will be consolidated by the business manager, and the food service director will double check the counts before submitting the claim.

Finding 3 – Local School Wellness Policy

LEAs must assess their wellness policy at least once every three years on the extent to which schools are in compliance with the district policy, the extent to which the local wellness policy

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compares to model local school wellness policies, and a description of the progress made in attaining the goals of the local wellness policy [7 CFR 210.31(e)(2)]. LEAs must make this assessment available to the public in an easily understood manner [7 CFR 210.31(d)(3)].

CAP: Upload a plan identifying who at the LEA will be responsible for completing the triennial assessment(s), how the assessment(s) will be completed, what steps will be taken to ensure this requirement is met on a triennial basis, and how this/these assessment(s) will be made available to the public in an easily understood manner.

Date: Due April 11, 2024; Completed April 9, 2024

Response: The food service director uploaded an NSLP corrective action procedure form outlining that the administrator of the school and the food service director will ensure the triennial assessment is completed every three years. This assessment will be posted to the website.

Finding 4 – Professional Standards

Per 7 CFR 210.30(b)(1)(v), Food Service Directors must have at least eight hours of food safety training at least every five years. A free, online course, Food Safety in Schools, is available through the Institute of Child Nutrition (ICN). This can be used to meet the requirement.

CAP: Upload a training certificate indicating successful completion of at least eight hours food safety training into MyIdahoCNP.

Date: Due April 11, 2024; Completed March 28, 2024

Response: The food service director uploaded a certificate of completion for eight hours of food safety training from ICN.

Finding 5 – Food Safety

SFAs are required to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories, as applicable [7 CFR 210.21 (d)]. If a product from another country is sourced, then the SFA must have documentation that the domestic product is significantly higher in price or not available in sufficient quantities. The SFA has a vended meal contract and does not store agricultural commodities or products on site as a result. However, per question 2 in the Q&A section of SP38-2017, any entity that purchases food or food products on behalf of the SFA must follow the same Buy American provisions and exceptions. The SFA does not have documentation for products sourced from outside the United States on file from the entity that they received vended meals from. The SFA must ensure that this information is retained on file as applicable.

CAP: Upload an NSLP Corrective Action Procedure Form detailing how the SFA will ensure that Buy American documentation will be retained on file. In this form, be sure to describe how the SFA will receive the appropriate Buy American documentation from the entity that they receive meals from.

Date: Due April 11, 2024; Completed April 4, 2024

Response: The food service director uploaded an NSLP corrective action procedure plan for obtaining the Buy American documentation. The FSD will work with their meal vendor to obtain the documentation for the non-compliant foods used in the meals.

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Finding 6 – Meal Components and Quantities - Lunch

Crediting information is vital to ensure that reimbursable meals are being served. When reviewing the production record from the day of review, it was noted that crediting information was omitted. Upon checking production records from the current year, it appears that crediting information is omitted from the production record on a semi-consistent basis (~10% of the time). The SFA must ensure that the production record is filled out with crediting information each day from the vendor of the meals as they have access to the crediting information. If it is discovered that crediting information is omitted from production records during the following Administrative Review, fiscal action may be taken.

CAP: Complete and upload the Corrective Action Procedure Form detailing how the SFA will ensure that production records are filled out adequately each day before meal service from the entity vending meals. In this form, be sure to include wording on how the staff member picking up the vended meals checks to ensure that crediting information is included each day before the meals are taken to Moscow Charter School.

Date: Due April 11, 2024; Completed April 4, 2024

Response: An NSLP corrective action procedure form was completed for ensuring production records are completed at the time of meal pick up. The food service director will review all production records daily to ensure completion.

COMMENDATIONS

- The FSD is very well organized and had materials ready for review. She was quick to accept any recommendations and had a positive attitude.
- The staff at Moscow Charter school are warm and welcoming. They had a great rapport with the students and help to create a healthy learning environment.
- The food safety manual (HACCP plan) was very well written and has standard operating procedures that are applicable to the specific operations at the school.

TECHNICAL ASSISTANCE (TA)

Verification

- Per page 24 of the Eligibility Manual for School Meals, households must report gross income when reporting for free and reduced applications. Gross income is defined as all money earned before deductions such as income taxes, employee's Social Security taxes, insurance premiums, and bonds. When looking at pay stubs for verification, ensure that gross income is used and not net income.

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - A Child Nutrition Label or Product Formulation Statement can be used to determine how processed food items contribute to the meal pattern. Without

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this documentation it may be difficult to determine if the meal component was satisfied.

- The Child Nutrition (CN) Label submitted for the turkey frank (issue date 09-02) and beef steak burger (issue date 08-14) showed an expired CN number. The CN number was verified as active on the USDA CN Label Verification Report.
- Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus. The submitted production records did not provide adequate information. It is a requirement of the federal regulations to maintain complete and accurate production records.
 - Portion sizes for all items are listed as 1. A more descriptive portion size should be used to easily determine the amount offered. For fruit and vegetables, consider using the cup measure (i.e.- 1 cup, $\frac{3}{4}$ cup etc.). For single items consider, 1 each, 1 roll, 1 package. Entrée items such as fish sticks, consider using a portion size such as 4 sticks or the weight of the item.

Reporting and Recordkeeping

- Food service records (7 CFR 210.15) must be maintained for three years plus the current year to document compliance with program regulations and the service of reimbursable meals.

Smart Snacks

- The SFA is tracking exempt fundraisers occurring after the school day. Only foods sold in school and intended for consumption during the school day (from midnight until 30 minutes after the end of school) fall under Smart Snacks regulations. Please note that all fundraisers, including exempted and compliant, must be tracked. Per state policy, a maximum of 10 exempted fundraisers per school site per year may be approved by the school administrator. A fundraiser can be for a maximum of four consecutive school days. All exempted fundraisers beyond 10 must be pre-approved by the State agency using the request form (7 CFR 210.11).

FISCAL ACTION

Due to benefit issuance errors, NSLP fiscal action results in \$1.20. However, since this amount falls under the \$600 threshold, the fiscal action will be disregarded, and no financial adjustment will occur.

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.

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Sincerely,

Cambria Steffler

Cambria Steffler, MS, RD

NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Laura Miller, Child Nutrition Director, Moscow Charter School

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