



January 4, 2024

James Gilbert, Superintendent  
Mountain Home School District  
470 North 3<sup>rd</sup> East  
Mountain Home, ID 83647

Dear Superintendent Gilbert,

On October 16-17, 2023, State Department of Education (SDE) Coordinators Cambria Steffler, Cassandra Thompson, Jax Dunham, Jennifer Butler, and Financial Specialist Kat Forstie conducted an Administrative Review (AR) of Mountain Home School District for the following United States Department of Agriculture (USDA) programs:

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

The sites reviewed were Hacker Middle School and North Elementary School.

The State agency (SA) would like to commend Levi Vick, Norma Meyers, and the entire staff of Mountain Home 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 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**

The LEA (not the computer system) is ultimately responsible for determining eligibility for free or reduced-price meals. The LEA must ensure their computer system meets all requirements and performs all functions as outlined in this guidance with a high degree of accuracy. During the review, it was noted that the SFA's application software does not require households to enter the number of household members on the application. The determining official may sign or initial and date a separate sheet of paper that could then be attached to a batch of applications. Alternatively, the official may make a note to the electronic file. [Page 72 Eligibility Manual for School Meals]

**CAP:** Contact your application software to determine if this can be added as a requirement for households who submit an online application. Additionally, develop a plan for how online applications will be determined, including who will be checking the online applications and who will sign the individual or batch of applications.

**Date of CAP Completion:** Due November 3, 2023; Returned for Correction; Completed November 16, 2023

**Response:** The SFA contacted the application software and households will now be required to enter in the number of total household members before submitting the application. The SFA completed an NSLP corrective action plan outlining how all applications will be determined by the SFA, not the application software.

### **Finding 2 – Certification and Benefit Issuance**

Six applications affecting 12 students were determined using a categorical eligibility number (SNAP/TAFI) provided by the household, but the students were not able to be located on a DC list. Additionally, 1 student without an application was determined as directly certified due to providing the SFA with a SNAP number. The SFA must follow up with the households to gather necessary information to determine whether or not the students are receiving the correct benefits. If it is discovered that invalid numbers were submitted in the categorical eligibility section of the application, the according households must be sent an adverse action letter noting that their benefits will be changed to paid after 10 calendar days.

**CAP:** Once all responses from households have been collected and the 10 calendar days have passed, upload the applications noting the information gathered from the households, any

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adverse action letters sent to households, and an updated benefit issuance list confirming that the correct benefits are now being issued.

**Date of CAP Completion:** Due November 1, 2023; Completed October 27, 2023

**Response:** All households have been contacted to confirm the case number. Households either resubmitted an application to be determined with income or were matched on the DC list through a single match. The benefit issuance list has been updated with the correct benefits for each student.

### **Finding 3 – Certification and Benefit Issuance**

A statistical sample of 1469 students resulted in a 2% error rate. Ten applications, affecting 32 students, required follow up. Two applications affecting 5 students were miscalculated and resulted in changes of free to reduced. Seven applications did not accurately reflect the household members but did not result in a benefit change at this time. One application was missing an income amount as the household did not put an amount down, but instead put "SSI". If the benefit changes when household members or income are updated, the benefit will need to be changed following an adverse action letter.

**CAP:** Contact households on applications to correct missing information. For applications that need to change benefit status, notify the household with an adverse action letter. Upload a benefit issuance list and documentation showing all changes have been made.

**Date of CAP Completion:** Due November 1, 2023; Returned for Correction; Completed November 16, 2023

**Response:** The SFA uploaded the corrected applications and the benefit issuance list with all needed corrections.

### **Finding 4 – Verification**

Per 7 CFR 245.6a (h), all verified applications must be readily retrievable. All documents submitted by the household for the purpose of confirming eligibility, reproductions of those documents, or annotations made by the determining official indicating which documents were submitted by the household and the date of submission also must be retained, along with all relevant correspondence between the households selected for verification and the school or LEA. This documentation, including documentation concerning any appeals, must be kept by the SFA to demonstrate compliance with the verification requirements. The documentation must be kept for a minimum of three years after the date of the year to which it pertains to.

**CAP:** Complete the *NSLP Procedure Corrective Action* form addressing the procedure to be implemented to support Verification requirements including retaining benefit determination records and household letters to support the verification report submitted to the State agency. Upload the completed form to MyIdahoCNP for review.

**Date of CAP Completion:** Due November 1, 2023; Returned for Correction; Completed November 16, 2023

**Response:** The SFA completed the NSLP Procedure Corrective Action form outlining the procedure for completing and maintaining the verification documents together for three years plus current.

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### Finding 5 – Civil Rights

The USDA nondiscrimination statement (NDS) must accompany any printed and web-based materials referencing FNS programs. Web pages associated with program operation should list the full USDA NDS with details on participants' right to file a complaint. The SFA does not have the current full NDS on the child nutrition website. The current full NDS is available in both English and Spanish on the SA website under [Civil Rights](#).

**CAP:** Post the full USDA NDS on the school food service webpage. Notify the SA when the website has been updated.

**Date of CAP Completion:** Due November 1, 2023; Returned for Correction; Completed November 17, 2023

**Response:** The correct USDA NDS is on the school food service webpage.

### Finding 6 – Local School Wellness Policy

During the review, it was determined the LEA has not completed their triennial assessment of their local 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 compares to model local school wellness policies, and the progress made in attaining the goals of the local wellness policy. LEAs must make this assessment available to the public [7 CFR 210.31(e)(2)]. LEAs must inform the public about progress toward meeting the goals for the local school wellness policy and compliance with the local school wellness policy by making the triennial assessment available to the public in an accessible and 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 assessment will be made available to the public in an easily understood manner.

**Date of CAP Completion:** Due November 1, 2023; Returned for Correction; Completed November 17, 2023

**Response:** The FSD has completed the NSLP Corrective Action Procedure form outlining that a new position is being created in the district (Food Service Coordinator) and one of their job duties will be to maintain the wellness policy and complete the triennial assessment.

### Finding 7 – Local School Wellness Policy

Each LEA is required to establish a compliant local wellness policy for all schools participating in the National School Lunch Program and/or School Breakfast Program under the jurisdiction of the local educational agency. The local school wellness policy is a written plan that includes methods to promote student wellness, prevent and reduce childhood obesity, and provide assurance that school meals and other food and beverages sold and otherwise made available on the school campus during the school day are consistent with applicable minimum Federal standards. [7CFR 210.31(a)]. The LWP was found out of compliance. During the previous administrative review, technical assistance was issued noting noncompliance for not including specific measurable goals for nutrition education, nutrition promotion and physical activity.

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While some effort was made to address this, some links on pages for Procedure 4, 5, and 6 are closed, retired, or irrelevant.

**CAP:** Upload a plan identifying who at the LEA will be responsible to ensure the LWP is compliant with Federal regulations, how the policy will be updated, and when a compliant policy will be available to the public.

**Date of CAP Completion:** Due November 1, 2023; Returned for Correction; Completed November 17, 2023

**Response:** The FSD uploaded an NSLP Corrective Action Procedure outlining the procedure for maintaining the LWP. The procedure will be implemented by the new Food Service Coordinator position the district is creating.

### **Finding 8 – Professional Standards**

Per SP05-2020, the SFA maintains oversight and responsibility for planning, administering, implementing, monitoring, and evaluating the school meal programs, therefore, the FSD for a district must be within the SFA. 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 \(ICN\)](#) and can be used to meet this requirement.

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

**Date of CAP Completion:** Due November 1, 2023; Completed October 31, 2023

**Response:** The FSD uploaded a certificate of completion for the 8-hour ICN food safety training.

### **Finding 9 – Afterschool Snack**

The SFA is required to conduct two self-monitoring reviews for each Afterschool Snack Program (ASSP), the first within 4 weeks of the beginning of operation and the second near the end. Technical Assistance was given during the last Administrative Review (AR) about the SFA using the wrong on-site monitoring form for ASSP. During the current AR, the SFA was still using the incorrect on-site monitoring form for ASSP. The on-site monitoring form was completed correctly, and a signature was missing from the ASSP leader.

**CAP:** Complete an ASSP on-site review form using the correct form and upload the form to MyIdahoCNP.

**Date of CAP Completion:** Due November 1, 2023; Completed October 31, 2023

**Response:** The FSD completed the ASSP self-monitoring review.

## **COMMENDATIONS**

- The SFA's Smart Snacks binder was very organized and included all necessary documentation to ensure that Smart Snacks standards are followed.
- All staff at Mountain Home School District were very responsive and quick to provide the State agency with the information requested. Suggestions made by the State agency were quickly noted and adopted.

- The staff at Mountain Home School District show a genuine passion for ensuring that students receive enticing and nutritious meals to help fuel them throughout their educational day.
- Hacker Middle Schools service line had excellent signage and design allowing for students to better understand what a reimbursable meal consists of. The eye-catching appearance of the service line also led students to get excited about school breakfast and lunch.

## TECHNICAL ASSISTANCE (TA)

### Certification and Benefit Issuance

- When contacting the household for information, be sure to include the name of the household member who provided the information and sign and date all notes added to the application. When making edits or changes to an application, the best practice is to use a different colored pen. Be sure to always initial and date changes with a note of why a change occurred and who in the household provided the new information to ensure that notes are clear and concise.
- Migrant students can only be certified using the state’s direct certification software. Migrant students cannot have a free benefit determined by a migrant liaison. All migrant students will be reflected on the state’s DC software within 24 hours of receiving the migrant status from the liaison. The SFA is encouraged to check the state’s DC software if they are aware of a student with a migrant status.
- During the review of applications, it was noted that some applications had zero income. While the applications are able to be approved with no income listed, it is best practice to contact the household to confirm that this is accurate. If this is accurate for the household income, they may be eligible for other services in the community.

### Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - Secure a current Product Formulation Statement for the pepperoni to keep on file. The documentation submitted was outdated from 2015.
  - The CN label submitted for the spicy chicken patty was outdated. A current CN number and Product Formulation Statement was secured to confirm crediting.
  - Review the crediting for the granola in the parfait. The amount of oats calculated at 3.5 oz. eq. grain and the recipe credited at 2 oz eq. grain.

### Civil Rights

- Per FNS 113-1, all “And Justice for All” posters must be displayed in a specific size of 11” width by 17” height. Though Hacker Middle School has the “And Justice for All” poster posted in the correct size in the cafeteria, there are multiple posters that have been

printed and posted in dimensions smaller than the required size. It is recommended that the SFA dispose of all posters that do not meet the required display size.

### **Food Safety**

- While on-site at Hacker Middle School, it was noted that the implemented date on some of the HACCP plan standard operating procedures (SOPs) were not signed and dated. The SFA must complete this section for all SOPs to ensure that the HACCP has been validated.
- While the SFA must have a written food safety plan for compliance with Hazard Analysis Critical Control Point (HACCP) program criteria found in 7 CFR 210.13(c), there were some food safety violations observed at North Elementary School. The dehydrated potato peels were past the "best by" date. There was also a box of butter that was covered in a brown liquid with meat thawing above it. Consider reviewing food safety procedures to ensure proper protocols are being followed.

### **Buy American Provision**

- 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 process for completing the Buy American exception forms, but documentation for quick oats from Canada was not available during the AR.

### **School Breakfast and SFSP Outreach**

- SFAs must cooperate with Summer Food Service Program (SFSP) sponsors to distribute materials to inform families of the availability and location of free SFSP meals for students when school is not in session [7 CFR 210.12 (d)(2)]. SFAs should promote locating summer meal locations by advertising the Summer Meal Site Finder (<https://www.fns.usda.gov/meals4kids>) or texting the word "FOOD" or "COMIDA"; to 304-304 to see nearby options. Best practice is to include SFSP promotion and ways to locate meals on the SFA's website.

## **FISCAL ACTION**

Due to benefit issuance errors, fiscal action results in \$8.80 for NSLP and \$1.50 for SBP. 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.

Sincerely,

Cambria Steffler  
Cambria Steffler, MS, RD  
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Levi Vick, Child Nutrition Director, Mountain Home School District  
Jennifer Butler, MEd, SNS, NSLP Coordinator, Idaho Child Nutrition Programs

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U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; or
2. **fax:**  
(833) 256-1665 or (202) 690-7442; or

3. **email:**

[Program.Intake@usda.gov](mailto:Program.Intake@usda.gov)

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