



April 17, 2024

Colton Sweesy, Superintendent
Elevate Academy Nampa
11425 Orchard Avenue
Nampa, ID 83651

Dear Superintendent Sweesy,

On February 7, 2024, Idaho Department of Education Coordinators Cassandra Thompson and Cambria Steffler conducted an Administrative Review (AR) of Elevate Academy Nampa for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was Elevate Academy Nampa.

The State agency (SA) would like to commend Heather Ekeland and the entire staff of Elevate Academy Nampa 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

Debbie Critchfield, Superintendent of Public Instruction

(208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov

- 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 – Offer versus Serve

There is no documentation that required annual OVS training took place for all kitchen/line staff. Online OVS training is available through the SA training portal and provides a certificate of completion. Group staff training must include an agenda and sign-in sheet that specifically identifies that "OVS breakfast" and/or "OVS lunch", as applicable, was part of the training agenda. Training documentation should be recorded on the Professional Standards tracking log and maintained on file at the SFA for three years plus the current year.

CAP: Upload certificates of completion or sign-in training agendas showing completion of OVS training by food service line staff.

Due Date: February 22, 2024; Completed February 12, 2024

Response: The Food Service Director uploaded individual training logs for each member of the Child Nutrition team, as well as agenda/sign-in sheet for each training. The uploaded information indicates that OVS training for both breakfast and lunch was completed on August 11, 2023.

Finding 2 – Civil Rights

The Elevate Academy Nampa website had the full NDS statement on their website, however the statement was in two different fonts and separate background colors. The differences in font and background make it difficult to easily identify whether both sections are the same topic. The 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 full NDS is available in both English and Spanish on the SA website under [Civil Rights](#).

CAP: Post the full USDA NDS in the same font and background color on the school food service webpage. Notify the SA when the website has been updated.

Due Date: February 22, 2024; Completed February 12, 2024

Response: The NDS has been posted on the Elevate Academy Nampa website that has the same font and same color background as requested by the SA.

Finding 3 – 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. This documentation is required to be updated annually. The SFA shared they do not have Buy American documentation for the current school year.

CAP:

1. Complete and retain the SA’s “Buy American Exception Form” for all food products requiring documentation.
2. Complete the NSLP Corrective Action Form to identify a procedure to follow annually regarding maintaining the required documentation for Buy American food products.

Due Date: February 22, 2024; Completed February 13, 2026

Response: The Food Service Director uploaded Buy American Exception Forms for Mandarin Oranges, Bananas, and Pineapple Chunks as directed. The NSLP Corrective Action Procedure Form was also uploaded into MyIdahoCNP to indicate how non-domestic items will be handled moving forward.

COMMENDATIONS

- The kitchen staff did a great job at offering the students the different food options available to them. They had a lovely rapport with the students and worked well together as a team.
- The cafeteria has a TV monitor that shows the breakfast and lunch menus. This is beneficial as the students can see in advance the great food offerings at Elevate Academy Nampa. It is obvious the students enjoy eating in the cafeteria. The participation is high, and the students choose to select various options that ensure no child goes hungry at this location.
- The Food Service Director was well prepared for the Administrative Review. When reviewing the kitchen, the SA witnessed a tidy kitchen with appetizing food being prepared. It was noted that the fresh veggies in the refrigerator were extremely appetizing, and the different colors of the prepared vegetables were beautiful. The Food Service Director’s (FSD) record keeping was organized and easy to read. The SA commends the FSD for their binder with CN labels and other information that clearly states the equivalents in each item. It was a pleasure to be in her kitchen today.

TECHNICAL ASSISTANCE (TA)

Meal Components and Quantities - Breakfast

Independent contractor CNResource completed the menu review and provided the following TA:

During the Administrative Review the results of the menu review were provided to the sponsor in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served must meet all daily and weekly meal pattern requirements for the specific grade group. The sponsor 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.

- A Child Nutrition Label or Product Formulation Statement can be used to determine how processed food items contribute to the meal pattern. Without this documentation it may be difficult to determine if the meal component was satisfied.

- A current Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not submitted for all processed menu items. This documentation was secured for the menu items listed below, to confirm meal pattern crediting. A sponsor should update CN labels and PFS documentation regularly, ensuring they are not expired (more than 5 years old).
- Cherry Frudel- a PFS was not submitted, this documentation was secured.
- Turkey Sausage Patty- the spec sheet submitted was outdated, the current spec sheet and PFS was secured.
- Oatmeal Chocolate Chip 2.5 oz. Benefit Bar- the PFS submitted was outdated, the current PFS was secured.
- Oatmeal Chocolate Chip Mini Benefit Bar- the PFS submitted was outdated, the current PFS was secured.
- Reference the link below for more information on the CN labeling program.
<https://www.fns.usda.gov/cn/labeling-program>

Meal Components and Quantities – Lunch

During the Administrative Review the results of the menu review were provided to the sponsor in a detailed Menu Review Results Report by CNResource. Recommendations were included to bring all areas into compliance. All menus served must meet all daily and weekly meal pattern requirements for the specific grade group. The sponsor 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.

- A Child Nutrition Label or Product Formulation Statement can be used to determine how processed food items contribute to the meal pattern. Without this documentation it may be difficult to determine if the meal component was satisfied.
 - A Child Nutrition Label or Product Formulation Statement was not submitted for all processed menu items. This documentation was secured for the Brookwood Farms BBQ Pork and J&J Snack Foods Cinnamon Churros to confirm meal pattern crediting. A sponsor should maintain this documentation on file to document meal pattern requirements as met.
 - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for Tyson Chicken Nuggets, State Fair Chicken and Cheese Crisпитos and Foster Farms Mini Corn Dogs. The spec sheet submitted included a CN number and meal pattern crediting statement but was not an official CN Label or PFS. The CN number was verified as active on the USDA CN Label Verification Report.
 - The Child Nutrition (CN) Label submitted for Advance Pierre Rib Patties showed an expired CN number. The CN number was verified as active on the USDA CN Label Verification Report.
 - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the Frosted Birthday Cookie. The spec sheet submitted included a meal pattern crediting statement but was not an official CN Label or PFS.

- Reference the link below for additional guidance on evaluating processed product documentation and the CN labeling program.
<https://www.fns.usda.gov/cn/labeling-program>
- A standardized recipe is a recipe that has been carefully adapted and tested to ensure that it will produce a consistent product each time it is prepared. The recipes submitted were not always written in standardized format with complete information. Items on the menu that need standardized recipes include the following:
 - The Chili and Cheese Nachos Recipe was not clear in quantity served and labels provided for the recipes did not all match the recipe ingredients, such as the cheese sauce. Two different recipes were submitted which did not reflect the correct cheese sauce used and amount of tortilla chips. All changes made to the recipe should be clearly noted.
 - The Tossed Salad Recipe submitted did not include a yield. All recipes should have the true yield made by the recipe.
 - Standardize the recipes so that true yields and portion sizes can be determined. To be standardized, recipes must include at a minimum the following:
 - ❖ All ingredients in the recipe.
 - ❖ Correct volume or weighted measure of each ingredient.
 - ❖ Serving/portion sizes for each grade group.
 - ❖ The true yield made by the recipe.
 - ❖ Clear and complete preparation steps and directions.
- It is acceptable to use USDA recipes, however any changes made to the recipe need to be clearly noted. Any ingredients not used in a recipe must be noted as such. Reference the link below for a list of Team Nutrition and USDA recipes.
<https://www.fns.usda.gov/tn/team-nutrition-recipes>

Food Safety

- All storage areas must have a temperature log. This includes all milk coolers, refrigeration, freezer, and dry storage. Make sure there are internal and external thermometers. Log dry storage area temperatures daily with the cooler temperatures.

Professional Standards

- The FSD conducts monthly training for the food service staff. These trainings each have their own agenda/sign-in sheet. However, training courses are not transferred to each staff member's individual training logs on a regular basis. It is recommended the individual training logs are updated regularly.

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

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,

Cass Thompson

Cassandra Thompson, BS
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Heather Ekeland, Child Nutrition Director
Lisa Velasquez, COO Elevate Academy
Diane Alvarado, Consultant Elevate Academy

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