



April 24, 2024

Cody Fisher, Superintendent
Glenns Ferry School District
639 N. Bannock Street
Glenns Ferry, ID 83623

Dear Superintendent Fisher,

On February 29, 2024, Idaho Department of Education Coordinators Cassandra Thompson and Cambria Steffler conducted an Administrative Review (AR) of Glenns Ferry School District for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was the Glenns Ferry Schools.

The State agency (SA) would like to commend Heather Castillo and the entire staff of Glenns Ferry 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

A statistical sample of 119 applications resulted in a 7.56% error rate. Four applications, impacting nine students, were either missing signatures, had income issues or the Total Household Members Box was not completed. Follow-up with households to obtain the required information.

CAP: Change student benefits, if necessary, as required after the 10-day grace period. Upload into MyIdahoCNP any adverse action letters, corrected applications, and a new benefit issuance list that reflects any changes in benefits, including the date the benefit changes took effect.

Due Date: March 15, 2024; completed March 4, 2024

Response: The SFA uploaded an adverse action letter into MyIdahoCNP notifying the family of a change in benefits. This student went from free to paid. A benefit issuance list confirming the date student benefits were changed, was uploaded as well.

Finding 2 – Verification

One application was verified incorrectly. The household provided paystubs, but the net pay was used instead of the gross pay. The benefit for this household will change from reduced to paid.

CAP: Send an adverse action letter notifying the household of a change in benefit. Update the benefit issuance list and upload a copy to MyIdahoCNP.

Due Date: March 15, 2024; completed March 11, 2024

Response: The SFA sent an adverse action letter that resulted in a paid benefit due to no response from the family. The SFA uploaded a benefit issuance list to MyIdahoCNP which documents the date of change in benefits.

Finding 3 – Meal Components and Quantities – Breakfast

For the week of menu review, the K-5 breakfast menu did not meet the minimum daily requirements for fruit. This was due to 57.14% of fruit for the week being in the form of juice. No more than 50% of the fruit offerings may be in the form of juice. More fruit is necessary to bring the meal into compliance.

1. The daily minimum of 1 cup of fruit was not met on January 8, 2024, and January 9, 2024, for grades K-5.
 - One half fresh orange was served on these two days. The USDA Food Buying Guide indicates a whole fresh orange is creditable at 1/2 cup fruit. Consider offering a whole orange with these meals, to meet the 1 cup daily fruit requirement.

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- By following the suggestions outlined to meet the daily fruit requirement, the weekly juice requirement will also be met.

CAP:

1. Provide a written statement that the fruit requirements are now met. Include a detailed statement to describe what specific changes were made to the menu, for the week of review, to correct all menu review findings and bring the menu into compliance.
2. Submit supporting documentation to demonstrate that the menu findings listed under step one is now corrected. This documentation may include menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.
3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: February 12, 2024; completed February 5, 2024

Response: The production records for the dates indicated above, were uploaded into MyIdahoCNP under attachments. The updates made in the production records for the week of review show a full orange along with 2 other fresh fruit varieties and a 1/2c of juice are served at breakfast. This change adequately fulfills the fruit requirement.

Finding 4 – Infant and Pre-K Meal Pattern Checklist – Breakfast

The SFA must ensure that grain-based desserts are not served as creditable items as part of the reimbursable meal to the Pre-K age/grade group. On January 9, 2024, the SFA served cereal bars as part of the reimbursable meal.

CAP: Please submit one week of completed Production Records and Menus as well as all CN labels, Product Formulation Statements and Recipes, as applicable, for the week of February 5-9, 2024. Please describe below in the Contracting Entity Corrective Action Response box the processes that will be put into place to prevent this finding from reoccurring in the future at all sites.

Due Date: February 12, 2024; completed February 14, 2024

Response: The SFA completed one week of production Records and menus, as well as all CN labels, Product Formulation Statements and Recipes, as applicable, for the week of February 5-9, 2024. The SFA also described the processes that will be put into place to prevent this finding from reoccurring in the future.

Finding 5 – Water

Per 7 CFR 210.10(d)(4) and SP 39-2019, water cannot compete with milk in the meal pattern and cannot be served on the service line. The SFA has a water cooler with cups at the end of the service line for students to access.

CAP: Move the water cooler away from the meal service line. Upload a picture of where the water cooler is located.

Due Date: March 15, 2024; completed February 29, 2024.

Response: On the date of review, the SFA relocated the water cooler from the service line to the cafeteria. The relocation was witnessed by the SA, therefore, it is not necessary to upload a picture proving the relocation.

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Finding 6 – Food Safety

Each SFD is 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 FSD must have proof that the domestic product is significantly higher in price or not available in sufficient quantities. Include the Buy American Provision in SFA solicitation documents for the purchase of commercial foods. Products must be checked upon receipt and not accepted if the products do not comply with the Buy American Provision unless there is documentation to justify the exception (exorbitant pricing or product shortages). The SFA did not have the required documentation for canned jalapenos from Mexico and pineapple tidbits from Vietnam.

CAP: Use the NSLP Corrective Action form to create a procedure for completing Buy American documentation. Upload a Buy American Exception form for the pineapple tidbits from Vietnam and the jalapenos from Mexico.

Due Date: March 7, 2024; completed March 6, 2024.

Response: The SFA uploaded to MyIdahoCNP a NSLP Corrective Action Procedure Form that documents the process that will be utilized moving forward regarding Buy American products. The SFA also uploaded a properly completed Buy American form for the pineapple tidbits from Vietnam and jalapenos from Mexico.

COMMENDATIONS

- The Food Service Director (FSD) was well prepared for the Administrative Review. Applications were waiting for the SA when they arrived, as well as other documents that were necessary to complete the review. It was also appreciated that the FSD listened intently to the advice shared during the review process and understood the reasoning for the advice given. She and her staff do a fantastic job, and it was a pleasure to be in her kitchen!
- The cafeteria staff worked together so well. They prepared the meals with swiftness and expertise. They ensured the areas were well maintained and sanitized.
- The number of items on the salad bar was amazing and the freshness of the vegetables was extremely appealing. The students participated by taking more than the minimum requirement, which demonstrated they really enjoyed the salad bar. Great job!

TECHNICAL ASSISTANCE (TA)

Meal Components and Quantities - Lunch

Independent contractor CN Resource completed the menu review and provided the following TA:

- 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.

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- 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, or adjustments made must be documented as well.
- When using chicken that does not credit ounce for ounce, ensure this is clearly noted on the recipe and the measure is adjusted to achieve the desired crediting.

Civil Rights

- Institutions participating in or administering USDA programs are required to display the appropriate “And Justice for All” poster in their facilities where it can be viewed by customers. The breakfast carts for middle and high school students did not have the "And Justice for All" poster posted in a location that is easily visible to students. The SA recommends having this poster hung up on the serving carts during the grab and go meal service in the hallway.

Food Safety

- Update your HACCP Food Safety Plan and Standard Operating Procedures to fit your individual facilities’ needs. A sample copy is available at the following website: <https://theicn.org/icn-resources-a-z/standard-operating-procedures/> This reviewer discussed the SOP's and how the plan should reflect the procedures. For example, the Food Safety Inspection Report, Thermometer Calibration Logs, Dishwater Logs, etc.

Smart Snacks

- 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. (7CFR 210.11) Details available at the [SDE CNP Smart Snacks website](#).

FISCAL ACTION

Due to benefit issuance errors, fiscal action resulted in \$103.95. 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,

C. Thompson

Cassandra Thompson, BS
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Heather Castillo, Food Service Director, Glens Ferry School District

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