



January 17, 2024

Mark Kress, Superintendent
Snake River School District #052
103 S. 900 W.
Blackfoot, ID 83221-6065

Dear Superintendent Kress,

On October 11-12, 2023, State Department of Education (SDE) Coordinators Cassandra Thompson and Jennifer Butler conducted an Administrative Review (AR) of Snake River School District for the following United States Department of Agriculture (USDA) programs:

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

The sites reviewed were Riverside Elementary School and Snake River Middle School.

The State agency (SA) would like to commend Rene Osman and the entire staff of Snake River 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 – 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 must also be retained along with all relevant correspondence between the households selected for verification and the school or local education agency (LEA). This documentation, including documentation concerning any appeals, must be kept by the LEA to demonstrate compliance with the verification requirements when LEAs are reviewed by State or Federal officials. The documentation must be kept for a minimum of three years after the date of the fiscal year to which they pertain.

CAP: Complete the *NSLP Procedure Corrective Action* form addressing the procedure to be implemented to support Verification requirements including retaining benefit determination records to support the verification report submitted to the State agency. Once completed, upload the form into the MyIdahoCNP compliance module.

Due Date: November 10, 2023; completed November 9, 2023.

Response: The Food Service Supervisor uploaded the *NSLP Procedure Corrective Action* form that detailed the corrective action that Snake River School District will implement to maintain compliance. Included was a timeline for the verification process that indicates specific deadlines for each item. All communication to families regarding verification will be stored together (selected for verification letters, proof of income, determination letter and if applicable, adverse action letter). All records will be maintained for three years, plus the current year.

Finding 2 – Civil Rights

Household notification letters must include the full USDA Non-Discrimination Statement (NDS) when advising of approval or denial of benefits (7 CFR § 210.23). Three different form letters in Titan software used to communicate eligibility contained the short NDS.

CAP: Update all household notification template letters in the software system to include the current full NDS.

Due Date: November 10, 2023; completed November 9, 2023.

Response: The Food Service Supervisor uploaded the *NSLP Procedure Corrective Action* form that detailed the corrective action that Snake River School District will implement to maintain compliance. This included the completion of updating all household notification template letters to contain the current full NDS.

Debbie Critchfield, Superintendent of Public Instruction

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

Finding 3 – Local School Wellness Policy

Per 7 CFR 210.31(e)(2), LEAs must assess their implementation of the wellness policy at least once every three years on the extent to which each school is in compliance with the district policy, the extent to which the district's policy compares to model local school wellness policies, and a description of the progress made in attaining the goals of the local wellness policy. LEAs must make this assessment available to the public in an easily understood manner (7 CFR 210.31(d)(3)). Efforts were made to assess school compliance but were not completed within the required timeframe. There was no indication that the wellness committee met and assessed the district's policy and compared it to model policies.

CAP: Upload a plan identifying who at the LEA will be responsible to complete the triennial assessments for the district policy and each school's implementation, how the assessments will be completed, and what steps will be taken to ensure this requirement is met on a triennial basis, including notifying the public in a timely manner. Also note when the wellness committee will meet to ensure requirements under 7 CFR §210.31.

Due Date: November 10, 2023; completed November 9, 2023.

Response: The Food Service Supervisor uploaded the *NSLP Procedure Corrective Action* form that detailed the corrective action that Snake River School District will implement to maintain compliance. This includes assessing the wellness policy on a triennial basis, and once presented to and approved by the Board of Trustees, the policy will then be made available to the public.

COMMENDATIONS

- The director was well prepared for the review and very organized. She asked good questions and was open to any feedback or suggestions. It is evident that she takes pride in what she does! She has a good understanding of how the software programs work and the SA plans to contact her for inquiries or to recommend as a resource for other districts throughout the State using the same program.
- The staff at Riverside Elementary School were outgoing and kept an inviting kitchen and cafeteria. It was nice to see how the teachers and paraprofessionals assisted with the POS and serving condiments, as well as the principal helping clean up the cafeteria.
- The kitchen manager at Snake River Middle School maintains a beautiful kitchen and cafeteria. The dry storeroom is clean, organized, and her manuals and logs were easily accessible. Her demeanor while working with the student helpers at both breakfast and lunch service was friendly and approachable. It was noted she had a huddle with her helpers to review serving sizes and answer any questions the students had. Her smile is contagious, and her upbeat personality ensures a positive culture. The State agency was impressed to discover the extra effort taken to recycle the used #10 cans. Not only does the recycling effort reduce waste, but it also provides a small amount of petty cash that is used to purchase decorative items for the kitchen and cafeteria. Pictures were taken and this idea will be shared with other districts around the State. It was a pleasure to be in her kitchen today.

Debbie Critchfield, Superintendent of Public Instruction

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

TECHNICAL ASSISTANCE (TA)

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. 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].

Food Safety

- The outdated HACCP manual (2005 NFSMI) should be updated with more current standard operating procedures (SOPs). Ensure all kitchen and cafeteria staff are trained in these food safety elements each year [7 CFR 210.13(c)]. Please refer to the following link for sample SOPs offered from the Institute of Child Nutrition (ICN): <https://theicn.org/icn-resources-a-z/standard-operating-procedures/>.
- Training sign-in sheets were located directly behind the training agenda. However, the sign-in sheets did not consistently have a header specifying what the training was, when it occurred, who facilitated the training, the length of time, or which topics were covered. The SA recommends the sign in sheet notes the type of training, date of training, trainer name, length of time, and topics covered.
- Tabs for the SOPs are recommended. Currently, if an emergency occurred, it would be necessary to look through each page of the HACCP binder to find the appropriate SOP. This would not be efficient in an emergency situation.

Verification

- The verifying official (either the determining or confirming official) must sign and date the bottom portion of the application at the conclusion of verification. The results of the process should be marked on the application as well as when the notice letters were sent.

School Breakfast and SFSP Outreach

- SFAs must inform eligible families of the availability of reimbursable breakfasts served under the SBP. In addition to providing all households informational packets with Free and Reduced Meal Applications, schools must send reminders regarding the availability of the SBP multiple times throughout the school year (7 CFR 210.12 (d)). The foodservice page on the district's website would be a good location to promote the breakfast program.
- 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

Debbie Critchfield, Superintendent of Public Instruction

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

(<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.

Paid Lunch Equity

- Consistent with 7 CFR 210.14(e)(4)(i), SFAs are not required to raise their paid lunch price by more than 10 cents for SY 2023-24 from the last year they charged for paid lunches. SFAs can still choose to raise the price by more than 10 cents. The target weighted average lunch price for SY 2023-2024 is \$3.56. The SA recommends evaluating the current paid lunch prices in preparation for increasing prices for SY 2024-2025.

Local School Wellness Policy

- Each year, stakeholders (parents, students, teachers, board members, etc.) must be provided with the opportunity to participate in the development, implementation, periodic review, and update of the local school wellness policy as stated in 7 CFR 210.31(d)(1).
- LEAs must designate at least one LEA official(s) with oversight authority as responsible for determining the extent to which each school under their jurisdiction is in compliance with their wellness policies [7 CFR 210.31(e)(1)]. In addition to the official(s) identified, other stakeholders must be permitted to be involved in the review process as described in 7 CFR 210.31(d)(1). LEAs are also encouraged to identify a wellness champion at each school that would assist with the implementation and monitoring of the policy at the school level.
- 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)].
- For more information on Local Wellness Policy requirements, visit the following webpage:
<https://www.fns.usda.gov/tn/local-school-wellness-policy>

Meal Components and Quantities – Lunch

Independent contractor CN Resource 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 grades 2-3. 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 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

Debbie Critchfield, Superintendent of Public Instruction

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

recipes submitted were not always written in standardized format with complete information.

- Review the Hamburger Gravy recipe for accuracy. The crediting showed 1 oz. eq. meat/meat alternate, and the amount of ground beef calculated at 2 oz. eq. meat/meat alternate per serving.
- Review the Scrambled Eggs recipe for accuracy. The amount of liquid egg for 170 servings should be included, as the CN label is based on the liquid weight.
- 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 Product Formulation Statement was not submitted for Doritos. This documentation was secured to confirm meal pattern crediting. This documentation was uploaded to MyIdahoCNP where the files may be accessed. A sponsor should maintain this documentation on file to document meal pattern requirements as met.
- The fruit in the smoothie served on 9/13/23 credits as fruit juice. With the fruit juice not served on 9/12/23, the requirements were met to keep fruit juice under half of the fruit offerings for the week.

Food Safety

- The site had Mandarin Oranges from China and Pineapple from Vietnam. The documentation was available for the Mandarin Oranges. The Pineapple had documentation for other countries, but not Vietnam. Technical Assistance was provided for Buy American. The director had to contact the vendor for an updated document for this country of origin. The updated document was uploaded into MyIdahoCNP.

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,

Cassandra Thompson

Cassandra Thompson, BS
NSLP Coordinator

Debbie Critchfield, Superintendent of Public Instruction

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

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Jennifer Butler, MEd, SNS, NSLP Coordinator, Idaho Child Nutrition Programs
Rene Osman, Child Nutrition Director, Snake River School District

CIVIL RIGHTS NONDISCRIMINATION STATEMENT

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:**
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

This institution is an equal opportunity provider.