



March 28, 2024

Wendy Oldenkamp, Superintendent
Vision Charter School
19291 Ward Road
Caldwell, ID 83605

Dear Superintendent Oldenkamp,

On January 30, 2024, Idaho Department of Education Coordinators Cassandra Thompson and Jax Dunham conducted an Administrative Review (AR) of Vision Charter School for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was Vision Charter School

The State agency (SA) would like to commend Debbie Martin and the entire staff of Vision 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 sample of 133 students resulted in a .75% error rate. One application affecting one student is incomplete due to the listed number of household members not matching the number of names listed on the applications.

CAP: Contact the household to confirm the number of household members matches the number listed on the application. Include notes detailing the name of who was contacted, the date of contact, a note detailing the correct household members and numbers, and initials from the determining official. Once all information is gathered, upload the complete applications.

Due Date: February 12, 2024; Completed February 8, 2024

Response: The SFA uploaded a copy of the application that was missing the number of family members in the household box. The necessary information was obtained, and the conversation was documented on the application.

Finding 2 – Meal Counting and Claiming

Per 7 CFR 210.8 (a) the school food authority shall establish internal control which ensure the accuracy of meal counts prior to the submission of the monthly Claim for Reimbursement. It was noted that the SFA mis-typed the free lunch claim number while submitting the December claim. 680 free lunches were served and 608 were claimed. This resulted in 72 underclaimed meals.

CAP:

1. Revise the December NSLP claim to show that 680 meals should be reimbursed.
2. Complete the NSLP Corrective Action Plan form to create a process to avoid this error from occurring again.

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

Response: The Food Service Director revised the December NSLP claim to add the 72 underclaimed meals. The NSLP Procedure Corrective Action form was also uploaded into MyIdahoCNP. The new procedure will help ensure all steps of the process are completed moving forward.

Finding 3 – Meal Components and Quantities: Lunch

For the week of menu review, the K-5 and 9-12 lunch menus did not meet the minimum daily and weekly requirements for meat/meat alternate. 7 CFR 210.10 (b)

- The federal regulations require menus to be planned that meet the daily minimum 1 oz. eq. meat/meat alternate requirement for grades K-5. This requirement was not met on Thursday, with only 0.75 oz. eq. offered.

- The federal regulations require weekly minimum amounts of meat/meat alternate to be served. The weekly requirement of 6.5 oz. eq. was not met for grades K-5. The menu offered a minimum of 5.75 oz. eq. of meat/meat alternate throughout the week.
- The federal regulations require menus to be planned that meet the daily minimum 2 oz. eq. meat/meat alternate requirement for grades 9-12. This requirement was not met on Thursday, with only 1.75 oz. eq. offered.
- The federal regulations require weekly minimum amounts of meat/meat alternate to be served. The weekly requirement of 8 oz. eq. was not met for grades 9-12. The menu offered a minimum of 7.75 oz. eq. of meat/meat alternate throughout the week.

CAP:

1. Provide a written statement that the daily and weekly meat/meat alternate 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 1 are 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: November 30, 2023; Completed December 22, 2023

Response: The updated production record shows an increase to 2 sausage patties for K-5, and an increase to 3 sausage patties for 9-12 to meet the daily and weekly meat/meat alternate requirements. The FSD uploaded the requested documentation into MyIdahoCNP to show the meals are now in compliance.

Finding 4 – Meal Components and Quantities: Lunch

All food service staff should receive annual offer versus serve (OVS) training when OVS is implemented. The FSD accidentally took the SFSP OVS training and has not taken OVS lunch training for SY 23-24.

CAP: Complete the OVS lunch training in the CNP Digital Learning Portal and upload the training certificate once completed.

Due Date: February 14, 2024; Completed February 6, 2024

Response: The Food Service Director uploaded a copy of her certificate showing completion of OVS-Lunch.

Finding 5 – Civil Rights

The incorrect non-discrimination statement (NDS) is included on the SFA's website. The SFA currently has the NDS for the Supplemental Nutrition Assistance Program (SNAP) and Food Distribution Program on Indian Reservations (FDPIR) on their website. The correct USDA NDS for all other FNS nutrition assistance programs can be located at the following link:

<https://www.fns.usda.gov/civil-rights/usda-nondiscrimination-statement-other-fns-programs>.

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

Due Date: February 14, 2024

Response: The Vision Charter school lunch website has the full USDA nondiscrimination statement in English and Spanish verified by the State agency on March 27, 2024 and is located here: [Lunch Menu - Vision Charter School](#)

Finding 6 – 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 7 CFR 210.9 (c) (7). The SFA has not completed ASSP monitoring for SY 2023-2024. An ASSP monitoring form can be found in section 15 of MyIdahoCNP's download forms.

CAP: Complete the first monitoring form for the school year and upload a completed copy. Utilize the NSLP Corrective Action Plan form to detail how ASSP monitoring will be completed for the second review of SY 2023-2024 and in future years.

Due Date: February 14, 2024, Completed February 13, 2024

Response: The Food Service Manager uploaded the self-monitoring review paperwork of their first review, as well as the NSLP Correction Action Procedure form to help ensure this will be completed moving forward.

COMMENDATIONS

- The Wellness Policy and procedures set up to support it are well thought out and thorough. It's clear that this is a priority for Vision Public Charter School. Good job! Thank you!
- The Food Service Director and staff show dedication to running a compliant program. Your efforts make a difference and are greatly appreciated!
- The Food Service Director has great notes on applications. This may be of great benefit to you in the future. Nice work!

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- When determining a free and reduced meal application, ensure that the total income and frequency of income used to determine the eligibility are noted on the application.
- Ensure that a direct certification list is run at or around the beginning of the school year to identify and notify households of benefits in a timely manner 7 CFR 245.6 (b) (3).

Verification

- Error prone applications are applications that document a monthly income within \$100 of the Income Eligibility Guidelines. Error prone applications must be a priority when selecting households for verification.
- Though the results of verification letters included all required information, it was noted that one of the households selected for verification was provided a letter with the

hearing official details left blank. Ensure that all benefit notification letters include hearing official information in the case that a hearing is requested from a household.

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 CNResources. 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.
 - The manufacturer documentation confirmed the serving size of 2 sausage patties credited at 1.75 oz. eq. meat/meat alternate.
 - ❖ For K-5, a serving size of 1 each credited at only 0.75 oz. eq., not meeting the daily requirements. Increase the serving size to 2 sausage patties per serving to meet daily requirements.
 - ❖ For K-5, consider the following suggestions to help meet the weekly meat/meat alternate requirement.
 - Serve 2 Chicken and Chili Crisпитos on Wednesday to increase the meat/meat alternate to 2 oz.
 - Serve 2 sausage patties with 0.5 oz slice of American cheese on Thursday to increase the meat/meat alternate to 2.25 oz. eq.
 - ❖ For 9-12, consider adding a slice of cheese to the sausage patty to meet the full 2 oz. eq. requirement or search for a sausage product that credits at 2 oz. eq. for 2 patties. By following the suggestions outlined to meet the daily meat/meat alternate requirement, the weekly requirement will also be met.
- 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.
 - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for Tony's breakfast pizza. 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.
- Many labels originally submitted were generated by the distributor or vendor. Obtain labels directly from the manufacturer of the product or from the product packaging and keep them on file, so they can easily be referenced when determining menu compliance.
- 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. 7 CFR 210.10 (a) (3)

- Production records with planned numbers for each item should be accessible before each meal service.
- Planned portion sizes for each grade group must be documented on the production records. The planned portion sizes were not documented for condiments on the submitted production records.

Meal Components and Quantities - Breakfast

- During the Administrative Review the results of the menu review were provided to the sponsor in a detailed Menu Review Results Report by CNResources. 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 (PFS) 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 PFS was secured for the following menu items to confirm meal pattern crediting. A sponsor should maintain this documentation on file to document meal pattern requirements as met.
 - Oatmeal Chocolate Chip Mini BeneFIT Bar
 - Oatmeal Chocolate Chip BeneFIT Bar
 - Oatmeal Raisin BeneFIT Bar
 - Apple Cinnamon BeneFIT Bar
- The Product Formulation Statement submitted for the following menu item had an expired date (more than 5 years). This documentation was secured to confirm meal pattern crediting.
 - Buena Vista Coffee Cake (now called Cinnamon Crumble)
- Many labels originally submitted were generated by the distributor or vendor. Obtain labels directly from the manufacturer of the product or from the product packaging and keep them on file, so they can easily be referenced when determining menu compliance.
- 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.
- Production records with planned numbers for each item should be accessible before each meal service.
- Planned portion sizes for each grade group must be documented on the production records. The production records submitted did not document portion sizes.

- The production records submitted documented 1 oz. eq. as the creditable grain amount for all grain items. Several of the items credited at 2 oz. eq. grain. Ensure correct crediting is documented on production records.
- To document meal compliance, particular information must be recorded on the production record. Going forward, include these items:
 - Portion size
 - Planned quantities to prepare
 - Quantity prepared
 - Quantity served
 - Total leftovers and action taken to store them

Food Safety

- Though the SFA has a current HACCP manual available for staff, the manual is missing an employee exclusion standard operating procedure (SOP) that is required by Idaho Food Code. A sample employee exclusion SOP is available in the Download Forms section of MyIdahoCNP.

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 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,

C. Thompson

Cassandra Thompson, BS
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Debbie Martin, Food Service Director

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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

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