

May 24, 2023

Alan Felgenhauer, Superintendent
Culdesac Jt. School District
600 Culdesac Avenue
Culdesac, ID 83524

Dear Superintendent Felgenhauer,

On April 4, 2023, State Department of Education (SDE) Coordinators Cambria Steffler and Pamela Murray conducted an Administrative Review (AR) of Culdesac Jt. 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 Culdesac School.

The State agency (SA) would like to commend Shirley Boyer, Poppy Filipponi, and the entire staff of Culdesac Jt. 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 a five-year 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

One application affecting one student did not have a household signature on the application. The application was determined with the correct benefit based on the income, but the application should have been returned for a signature before it was determined.

CAP: Contact the household to get a signature for the application. Upload a copy of the corrected application.

Date of CAP completion: Due April 19, 2023; Completed April 10, 2023

Corrective Action Response: The SFA uploaded a copy of the corrected application.

Finding 2 – Verification

The sponsor completed verification for the required number of applications, however, all the required documentation was not kept together for review. The verification folder did not contain the required documents. The student was changed from a reduced benefit to a free benefit through direct certification, but there was no documentation showing this process. The DC list this student was on was pulled after the verification process had started. The SA confirmed that this student is directly certified and the free benefit is correct. It is recommended that all correspondence and documentation should be kept on file together. The best practice for verification documentation includes a copy of the selected application(s), a copy of the initial letter sent to the household(s), a copy of the second request letter(s) (if required), a copy of all submitted documentation, and a copy of the final determination letter(s) advising households of the results of verification.

CAP: Complete the [verification training](#) in the online training portal and upload the certificate of completion.

Date of CAP completion: Due April 19, 2023; Submitted April 18, 2023; Returned for correction; Completed May 1, 2023

Corrective Action Response: The SFA uploaded a training certificate for the verification training.

Finding 3 – Civil Rights

The district website does not have the USDA nondiscrimination statement (NDS). The NDS must accompany any web-based materials referencing USDA FNS programs. The full statement must be included on all web material and outreach material. The full statement is available on the State Agency website.

CAP: Post the full NDS or a link to it on the website and provide a link to the updated webpage.

Date of CAP completion: Due April 19, 2023; Completed April 10, 2023

Corrective Action Response: The SFA updated the website with the correct NDS.

Finding 4 – Civil Rights

The notification of Direct Certification letter only includes the short NDS. As outlined in 7CFR 245.5(a), notification letters including information regarding student eligibility must include the full USDA NDS. The full statement must be included on all web material and outreach material when notifying potentially-eligible participants how to apply for benefits or when informing participants about their right to file a complaint. As the district uses the SA template notification of Direct Certification, they must develop a practice in which template letters are obtained annually to ensure the most current version is being used.

CAP: Obtain the Direct Certification notification letter from Download Forms and upload a copy.

Date of CAP completion: Due April 19, 2023; Completed April 25, 2023

Corrective Action Response: The SFA uploaded a copy of the letter template with the correct NDS.

Finding 5 – Offer vs Serve

Staff members that serve meals for the NSLP and SBP programs must be trained in Offer vs Serve. The kitchen staff has not completed the Offer vs Serve trainings for breakfast and lunch.

CAP: Complete the OVS trainings for breakfast and lunch in the online training portal and upload the certificates of completion.

Date of CAP completion: Due April 19, 2023; Completed April 18, 2023

Corrective Action Response: The SFA uploaded copies of training certificates for both breakfast OVS and lunch OVS trainings.

Finding 6 – Professional Standards

The SFA does not have an updated training tracking log for the food service staff. The USDA has established minimum Professional Standards for school nutrition professionals who manage and operate the National School Lunch and School Breakfast Programs. The standards provide annual training requirements for all school nutrition professionals. It is required that some form of documentation be kept on file to show Professional Standards compliance. A training tracking log template can be found on the SDE website.

CAP: Upload a completed training tracking log for all kitchen staff.

Date of CAP completion: Due April 19, 2023; Completed April 25, 2023

Corrective Action Response: The SFA uploaded a completed tracking log for all kitchen staff members.

Finding 7 – 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. During the lunch meal service, water was served in Styrofoam cups next to the milk cooler on the service line.

CAP: Provide a written statement explaining where the water will be moved to during the meal service times.

Date of CAP completion: Due April 19, 2023; Completed April 5, 2023

Corrective Action Response: The SFA uploaded a written statement saying the water has been moved to a separate table away from the service line. The water will remain there until a water fountain is installed in the cafeteria.

Finding 8 – Breakfast Meal Components and Quantities - Grain

Independent contractor CN Resource (CNR) conducted the menu review and identified the weekly grain requirement was not met for grades K-8 and 9-12. The federal regulations require a weekly minimum amount of grains to be served for K-8, 6.5 oz. eq, and 7.0 oz. eq for grades 9-12. The menu for the week of review offered a minimum of 6 oz. eq. of grain throughout the week for all grades.

CAP: Provide supporting documentation and a written statement that the whole grain requirements are now being met for both grades. 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. Supporting documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes.

Date of CAP completion: Due February 22, 2023; Completed February 14, 2023

Corrective Action Response: Revised production records and supporting documentation were uploaded to indicate corrections were made. A whole grain apple cinnamon bar (71g) was added to the meal service which counts as 2 oz eq grain.

Commendations

- On the Culdesac District website there was a great picture of a lunch meal tray and breakfast items. This is a great way to showcase the school meals.
- Kitchen staff know the students and have a great rapport with them. It's clear that the students are happy to come to the cafeteria and enjoy eating the meals provided there.
- CNR reviewer noted an outstanding job meeting was done meeting all lunch meal pattern requirements for the week of menu review.

Technical Assistance (TA)

Certification and Benefit Issuance

- Four apps were determined correctly, but did not have the determination section filled out by the determining official. Paper applications need to have a determination marked and signature from the determining official.

Meal Components and Quantities

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

- 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.
 - For breakfast the CN label submitted included a CN number and meal pattern crediting statement that was outdated for the Apple Cinnamon Toast. The CN number was verified as active on the USDA CN Label Verification Report.
 - For lunch the documentation submitted for the Chicken Patty was not an official CN Label. The manufacturer was contacted, and a CN Label was obtained which

included a watermark. The original CN Label from the product packaging (without the watermark) should be secured and kept on file. The CN number was verified as active on the USDA CN Label Verification Report.

- Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus. Production records with planned numbers for each item should be accessible before each meal service. Served numbers and leftover numbers need to be recorded at the end of meal service to ensure accuracy. These numbers are not only important for forecasting but as a backup system for meal counting and claiming.

Civil Rights

- The "And Justice for All" poster posted at the entrance to the school is outdated however, two current posters are on display at the cafeteria. FSD will provide another current poster to the front office asking that the old one posted outside be replaced.

Professional Standards

- Training standards apply to all school nutrition program employees, regardless of student enrollment in the school district or size of the Local Educational Agency (LEA). Note: If hired January 1 or later, an employee must only complete half of the required training hours.
 - Directors – must complete at least 12 hours of annual continuing education/training. These required hours are in addition to the food safety training required in the first year of employment.
 - Managers - must complete at least 10 hours of annual continuing education/training.
 - Staff working an average of at least 20 hours per week - must complete at least 6 hours of annual continuing education/training.
 - Part-time staff working less than 20 hours per week - at least 4 hours annual continuing education/training, regardless of the number of part-time hours worked. (7 CFR 210.30 Professional Standards Regulations)

Local School Wellness Policy

- The Local Wellness Policy must include language specifying guidelines in regards to nutrition promotion to promote student wellness, the current policy includes minimal language in regards to the promotion of only items that meet the Smart Snack standards. SA provided a copy of the district's policy and a SA completed progress report with notes to consider. The current director informed the SA that the district will be meeting next month to complete the assessments, IT has been made aware that the assessments will be going onto the District's website.
- FNS regulation 7 CFR 210.31(e)(2) require that, at least once every three years, local educational agencies (LEAs) assess compliance with the local school wellness policy and make assessment results available to the public. FNS issued nationwide waivers delaying the deadline for the first triennial assessment to June 30, 2023. Culdesac SD has opted-into Waiver #7 and has a self-reported due date for completion of the

triennial assessment by 3/31/2023. At the time of this review, the triennial assessment had not been completed as required.

Resource Management

- Though the SFA completed an attestation of compliance in regards to a positive fund balance for SY2022-2023. The current weighted average of \$3.25 is below the target weighted average price of \$3.31 for SY 2022-2023. The SFA should keep this discrepancy in price in mind when preparing to increase lunch prices in following school years.

Your review is now closed.

There is no fiscal action resulting from this review.

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
Jennifer Butler, MEd, SNS, Lead NSLP Coordinator, Idaho Child Nutrition Programs
Shirley Boyer, Child Nutrition Director, Culdesac Jt. School District
Poppy Filippini, Child Nutrition Director, Culdesac Jt. School District

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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

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