



December 27, 2022

Jason Moss, Superintendent
Grace School District
704 S Main
Grace, ID 83241

Dear Superintendent Moss,

On November 17, 2022, State Department of Education (SDE) Coordinators Cambria Steffler and Jennifer Butler conducted an Administrative Review (AR) of Grace School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) Operating Provision 2 breakfast option

The site reviewed was Grace Jr-Sr High School.

The State agency (SA) would like to commend Kelli Aplanalp and the entire staff of Grace 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 – Civil Rights

The Food Service web page included a link to an outdated Nondiscrimination Statement (NDS) in both English and Spanish. Update the non-discrimination statement to the correct USDA non-discrimination statement.

CAP: Update the links to access the correct English and Spanish NDS.

Completed: 11/17/2022

Corrective Action Response: Food Service Director sent updated links to IT and the NDS was corrected while the SA was on site.

Commendations

- CN Resource completed the menu review and provided the following commendation: Excellent work meeting all breakfast and lunch meal pattern requirements for the week of menu review. Excellent job serving all meal requirements and a large variety of vegetables to choose from.
- The Food Service Director was well prepared for the Administrative Review and was open to feedback and willing to make changes based on observations and input.
- The State Agency wants to commend the students at Grace High School for their respectful behavior during the breakfast and lunch services. This behavior reflects the positive leadership from the Child Nutrition staff and the rest of the staff at Grace School District.

Technical Assistance (TA)

Verification

- Applications are determined by the director and confirmed by the software system, but since the online application does not report this information, it is recommended to record the officials name and dates as well as add verifying official name and date to record the required steps are taking place.

Meal Counting and Claiming

- While reviewing the claim, the SA noted a discrepancy in the claim at the elementary school. Upon further investigation, the claim was submitted correctly, but there was a discrepancy between two separate reports. The software reported one additional meal, but the claim had the correct meal count. The SA strongly advises to follow up with the

software and the district's IT staff to determine what the cause of the discrepancy was, and continue to monitor future claims closely to avoid any claim errors.

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - 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.
 - Secure a Child Nutrition (CN) Label for the hamburger patty.

Professional Standards

- Although staff is trained annually on Offer vs Serve, Civil Rights, and Food Safety, these trainings several months after the start of the school year. These trainings should be completed at or near the beginning of the school year. All staff training should include an agenda and sign-in sheet and training documentation should be maintained on file at the SFA for three years plus the current year. Training webinars are available on the State agency website and may be used to complete these trainings.

Local School Wellness Policy

- A revised LWP is currently being reviewed by the committee prior to board approval. The SA demonstrated assessment and implementation tools located on the Idaho School Wellness Policy website. As discussions continue, ensure that the final policy includes language that addresses the following:
 - Permitting parents, students, school board, PE teachers, school health professionals, school food service staff, administrators, and community members to participate in the development, implementation, review, and update of the local wellness policy.
 - Identifying wellness policy leadership of one or more LEA and/or school official(s) who have the authority and responsibility to ensure each school complies with the wellness policy.
 - Specifying measurable goals for nutrition education, nutrition promotion, physical activity, and other school-based activities to promote student wellness that are written with consideration for evidence-based strategies.
 - Addressing nutrition guidelines for all foods and beverages sold on the school campus during the school day and for providing school meals that adhere to Federal meal pattern requirements.
 - Identifying nutrition standards for non-sold foods and beverages available during classroom and school celebrations. Stating a policy for food and beverage marketing that allows the marketing and advertising of only those foods and beverages that meet Smart Snacks in School nutrition standards.

- Addressing an evaluation conducted once every three years of the wellness policy and the extent to which schools are in compliance, how the district policy compares to model wellness policies, and the progress made in attaining local wellness policy goals.
- Identifying a way to share the wellness policy content and implementation with the public.

School Breakfast and SFSP Outreach

- SFAs must send reminders regarding the availability of the SBP throughout the school year (7 CFR 201.12 (d)). The website includes a lunch menu that includes lunch pricing and a statement about breakfast being free. Breakfast at the Jr. Sr. HS is served at 10:00 AM, and was referred to as "snack". As breakfast is free to all students under Provision 2, steps should be taken to promote the breakfast meal and remind families of the availability for students to participate.

Smart Snacks

- Per Public Law 111-296 as clarified in 7 CFR 210.11, "All Foods Sold in School," vending, school stores, and fundraising need to comply with specific nutrition standards. These Smart Snacks standards can be found at the State Department of Education, Child Nutrition Programs, School Meal Programs, Smart Snacks website.
- Schools must meet the minimum requirement in 7 CFR 210.11, for all foods and beverages sold in school (also known as Smart Snacks in School) to increase consumption of healthful foods during the school day and support a healthy school environment. Food and beverages sold to students must either comply with Smart Snack specific nutrition standards, be tracked as exempt fundraiser(s), or be inaccessible during the school day (defined as midnight the day before until 30 minutes after the school day ends). Refer to [A Guide to Smart Snacks School](#) available at the USDA website.
- All fundraisers, both exempted and compliant, including non-food sales, must be tracked. Per state policy, the school administrator may approve a maximum of ten exempted fundraisers, per school site, per year. An exempted fundraiser can be for a maximum of four consecutive school days. All exempted fundraisers beyond ten must be pre-approved by the SA using the Request form (7CFR 210 (b)(2)). Details and a tracking form are available on the [SDE CNP Smart Snacks web page](#).

Resource Management Comprehensive Review

- The USDA's target weighted average price for SY22-23 is \$3.31 (rounded to \$3.30) for student paid lunches. The SFA's prices are below equity with an approved \$3.05 weighted average price (\$3.00 and \$3.10). Consider an increase greater than 10 cents next year to get closer to USDA's target weighted average price.

Special Provision Options

- Provision 2 Base Year (SY17-18) benefit issuance was previously validated by the SA on 9/17/2017. The retention of all required Provision 2 documentation was confirmed during the administrative review. Daily meal count records by student name and

eligibility are maintained on a thumb drive and all other Base Year records are kept in a box in the food service office.

- The current Provision 2 cycle expires at the end of SY24-25. At that time, if you wish to continue with Provision 2 breakfast, you must contact the SA prior to the expiration date to see if you qualify for an extension. Please ensure all required Provision 2 documentation, including base year daily meal count records by student name and eligibility, is maintained per requirements.

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) 332-6861.

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
Kelli Aplanalp, Child Nutrition Director, Grace School District
Jennifer Butler, MEd, SNS, Lead NSLP Coordinator, Idaho Child Nutrition Programs

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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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