



March 9, 2023

Rob Sauer, Superintendent  
Homedale Jt. S.D. #370  
116 East Owyhee Ave.  
Homedale, ID 83628

Dear Superintendent Sauer,

On February 7, 2023, The State Department of Education (SDE) Coordinators Jamie Gibson, Cambria Steffler, and Pamela Murray conducted an Administrative Review (AR) of Homedale Jt. S.D. #370 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 sites reviewed were the Homedale Middle School (implementing the FFVP) and Homedale High School.

The State agency (SA) would like to commend Teresa Bettleyon and the entire staff of Homedale SD 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 alternative 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 nondiscrimination statement must accompany any printed materials referencing FNS programs. The full statement must be included on outreach material when notifying potentially-eligible participants how to apply for benefits or when informing participants about their right to file a complaint. One letter template used for verification has an outdated version of the non-discrimination statement (NDS). Another template only has the short statement, but should contain the full NDS.

**CAP:** Update the verification letter templates and upload a copy.

**CAP completed:** 2/17/2023

**Corrective Action Response:** Letter template that included the incorrect NDS were uploaded with the correct long NDS.

### Finding 2 – Food Safety

The Idaho Department of Health & Welfare updated the Food Code to include a requirement that all food safety plans must include an employee exclusion policy. An employee exclusion policy template is located in Download Forms under the Food Safety section.

**CAP:** Create and upload a copy of the employee exclusion policy and add to current Hazard Analysis Critical Control Point (HACCP) manuals.

**CAP completed:** 2/17/2023

**Corrective Action Response:** The Food Safety Plan was updated to include employee exclusion policy with an implemented date indicated.

## Commendations

- The director was very organized and had all required information uploaded in a timely manner.
- Food items served on the day of the review were organized and offered in a very appealing manner. The meal service line moved quickly allowing for students to have ample time to consume meals.
- Application determination was done with good note taking and record retention. The SA was easily able to review applications.
- CNR reviewer advised the sponsor was doing a great job meeting meal requirements and serving a wide variety of good foods, which included fresh fruit and vegetables along with several options for a main dish.

- CNR reviewer also advised the sponsor had a very clean and organized kitchen and storage components. Food items were dated, and temperatures were logged daily.

## Technical Assistance (TA)

### Certification and Benefit Issuance

- While on site the SA identified the online system was deleting duplicate names. All income was reported and eligibility status were calculated correctly. The SA also noted the system was only flagging error prone applications when benefits would decrease. The SFA did reach out to Mosaic while the SA was on site to inform them of the discrepancy and they are working to identify how to resolve this.

### Verification

- The sponsor completed verification for the required number of students, however all the required documentation was not kept together for review. The verification documents provided for review did not contain the original application. 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 household(s), a copy of the second request letter(s) (if required), and a copy of the final determination letter(s) advising households of the results of verification.
- A second notification letter should be sent through mail to all households selected for verification. The SFA calls and emails households that fail to respond to the first notification of verification. The SFA documented that dates of phone calls, but the emails were not kept in the verification folder. Best practice is to keep documentation for all correspondence with a household with verification documents.
- As an online application system is utilized, the SFA will need to add details from the For Internal Use Only section of a paper app, including adding a space for the confirming official and the verifying official to sign and date as well as document the results of verification and when the required notices were sent.
- Applications that have completed the full verification process must be signed by the Verifying Official once the process is complete. The verifying official validates the verification process; the person who verifies the eligibility can be either the determining or confirming official.

### Meal Components and Quantities

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

- The submitted production records did not provide adequate information. It is a requirement of the federal regulations to maintain complete and accurate production records. The grades 9 – 12 need to be added to the production records.
- Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the Breakfast on a Stick. The spec sheet submitted included a meal pattern crediting statement but was not an official CN Label or PFS.

- Coffee drinks do not meet FDA's fluid milk standard of identity. Schools cannot offer premixed fluid milk flavored with coffee to meet the fluid milk requirements. However, if a student received fluid milk as part of a reimbursable meal and the student subsequently turned the fluid milk into a coffee drink using added flavors/powders/ice provided as an extra, this would be allowable in 9-12<sup>th</sup> grades.
  - If the students receive fluid milk as part of a reimbursable meal, and students subsequently turn the Program Food, (fluid milk), into a coffee drink (Nonprogram Food – defined at 7 CFR 210.14(f)(1)) using additional ingredient(s) – e.g., flavor/powder/syrup packets. This is because FNS does not currently prohibit/regulate caffeine as part of our meal or snack service Programs. However, the additional ingredients given to students to make the coffee drink are subject to the weekly dietary specifications for calories, sodium, and saturated fat.
  - USDA Guidance: According to 7 CFR 210.10(d)(1)(ii) all fluid milk served in the Program must be pasteurized fluid milk which meets State and local standards for such milk. All fluid milk must have vitamins A and D at levels specified by the Food and Drug Administration and must be consistent with State and local standards for such milk. Since coffee drinks do not meet FDA's fluid milk standard of identity, schools cannot offer fluid milk flavored with coffee to meet the fluid milk requirements.

### Offer versus Serve (OVS)

- Signage explaining what constitutes a reimbursable meal to students is present but it does not include the portion size (1/2 c) to take. SA suggested adding to the sign or placing additional signage in the room regarding the ½ cup minimum.

### Smart Snacks

- All fundraisers, both 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. An exempted 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 (b)(2)) Details available at <http://www.sde.idaho.gov/cnp/sch-mp/snacks.html>. While on site the SA saw multiple flyers for holiday fundraising with no log corresponding to the events taking place during the school day. Fliers were posted for a Goodies Sale of cookies, cupcakes, and suckers as well as a Cake Pop Sale for Valentine's day.

### Wellness

- As per 7 CFR 210.31(c)(3)(iii), marketing for all food and beverages sold on school must meet Smart Snack regulations. The vending machine outside the cafeteria contains marketing of products that do not meet Smart Snack regulations. SA advised meeting with the wellness policy committee to address the advertising at the high school.

### Resource Management Comprehensive Review

- Non Program Food Revenue

- The NPFRT is not in compliance with the Nonprogram Revenue Requirement. The price of milk on the A La Carte tab is showing that the food cost percentage is 60% which is above the industry standard of 40%. Food service must increase the price of nonprogram foods to become compliant
- Paid Lunch Equity
  - Though the SFA increased paid student lunch prices to reach the required weighted average of \$2.42, the target weighted average price is \$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.

## Procurement

- A procurement review was previously completed. Please follow the guidance provided by Procurement Specialist Kat Forstie in a separate closure letter.

## 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,

Jamie Gibson  
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Teresa Bettleyon, Child Nutrition Director, Homedale Jt. S.D. #370

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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](mailto:Program.Intake@usda.gov)

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