

April 24, 2023

Tim Perrigot, Superintendent
Wendell S.D. #232
850 E Main St.
Wendell, ID 83355

Dear Superintendent Perrigot,

On March 16, 2023, State Department of Education (SDE) Coordinators Jamie Gibson and Jax Dunham conducted an Administrative Review (AR) of Wendell School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Afterschool Snack Program (ASSP)
- Fresh Fruit and Vegetable Program (FFVP)
- USDA Foods

The site reviewed was Wendell Middle School.

The State agency (SA) would like to commend Bernadette Chandler and the entire staff of Wendell 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

A statistical sample of 253 students was reviewed. Two incomplete applications affecting five students were approved without social security information from the households. The SFA must contact the two households to receive the proper social security information to complete the applications.

CAP: Upload copies of the two applications showing that the correct social security information has been acquired and the applications are now complete.

CAP Completed: Due March 30, 2023; submitted March 16, 2023; approved March 17, 2023

CAP Response: The two households were contacted, and the required information was obtained. The two applications were uploaded showing all information has been obtained.

Finding 2 – Verification

When current benefits are to be reduced or terminated, written notice of adverse action must include the required elements per 7 CFR 245.6a(j). The SFA does not have an adverse action letter with the required elements at this time and is using the notification of benefits to notify household of status.

CAP: Create and upload an adverse action template letter with the required elements.

CAP Completed: Due March 30, 2023; submitted March 16, 2023; approved March 17, 2023

CAP Response: An adverse action template letter including all required information was provided.

Finding 3 – Verification

The household of one application pulled for verification failed to respond. The director did not update the benefit issuance list in the POS system after the verification process was completed. This was to be completed by the verification deadline of November 15, 2022, however the SFA may have an earlier due date. The two students need to be changed to paid status immediately.

CAP: Upload an updated benefit issuance list showing that the two students have been changed to paid.

CAP Completed: Due March 30, 2023; submitted March 16, 2023; approved March 17, 2023

CAP Response: A benefit issuance list was uploaded highlighting the benefit correction for the two students.

Finding 4 - Meal Components and Quantities – Breakfast and Lunch

Independent contract CN Resource (CNR) conducted the menu review and identified that the menu did not meet milk requirements for grades 5-8 for the week of the menu review.

Regulations require that a variety of at least two milk types are offered with each meal daily. Only one milk type was offered daily.

CAP: Provide supporting documentation and a written statement that the milk requirements are now being 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.

CAP Completed: Due February 22, 2023; submitted February 13, 2023; approved February 22, 2023

CAP Response: A statement in regards to the new process moving forward to meet the milk requirements was provided. Production records showing 2 types of milk being offered were uploaded.

Finding 5 - Meal Components and Quantities - Lunch

Independent contract CN Resource (CNR) conducted the menu review and identified that the subgroups of vegetables must be met for each grade group for the week of the menu review. The weekly starchy vegetable subgroup requirement was not met for grades 6-8. No starchy vegetables were planned this week.

CAP: Provide supporting documentation and a written statement that the starchy vegetable requirements are now being 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.

CAP Completed: Due February 22, 2023; submitted February 13, 2023; approved February 22, 2023

CAP Response: A statement in regards to the new process moving forward to meet the starchy vegetable requirements was provided. Production records for one day of the week include a serving of french-fries along with the product formulation statement.

Finding 6 - Meal Components and Quantities - Lunch

Independent contract CN Resource (CNR) conducted the menu review and identified that the daily minimum of 3/4 cup of vegetables for grades K-8 was not met for the week of the menu review. This requirement was not met on Thursday, with only 1/2 cup of green beans planned.

CAP: Submit supporting documentation to demonstrate the daily vegetable requirement is being 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.

CAP Completed: Due February 22, 2023; submitted February 13, 2023; approved February 22, 2023

CAP Response: An updated production record was uploaded showing the increase in the green bean serving to meet the requirement.

Finding 7 - Meal Components and Quantities - Lunch

Regulations require weekly minimum amounts of grains to be served. For the week of the menu review, the weekly requirement of 6.5 oz. eq. was not met for grades 6-8 for lunch. The menu offered a minimum of 6 oz. eq. of grain throughout the week.

CAP: Provide supporting documentation and a written statement that the weekly grain requirement is now being 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.

CAP Completed: Due February 22, 2023; submitted February 13, 2023; approved February 22, 2023

CAP Response: A statement with a new process moving forward to meet the weekly grain requirement was provided. Production records for the week were uploaded and include an increase serving size of the grain component for one day to meet the weekly requirement.

Finding 8 - Meal Components and Quantities - Lunch

Regulations require weekly minimum amounts of meat/meat alternate to be served each week. During the week of menu review, the weekly requirement of 7 oz. eq. was not met for grades 6-8. The menu offered a minimum of 6.25 oz. eq. of meat/meat alternate throughout the week.

CAP: Provide supporting documentation and a written statement that the weekly meat/meat alternate requirement is now being 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.

CAP Completed: Due February 22, 2023; submitted February 13, 2023; approved February 22, 2023

CAP Response: A statement with a new process moving forward to meet the weekly meat/meat alternate requirement was provided. Production records for the week were uploaded and include an increase serving size of the meat/meat alternate component for one day to meet the weekly requirement.

Commendations

- The director was very timely in completing the off-site portion of the review and was responsive to all follow up. All required information was uploaded for state agency review before the due date.
- The director showed determination in ensuring that Wendell School District operates a compliant program.
- The professional standards tracking log and ASSP documentation log was very well organized.
- The staff at Wendell Middle School had great rapport with students and quickly served meals. The students at the middle school seemed excited for lunch and knew how to quickly go through the line and POS.
- Forecasting was done well to minimize waste and leftovers at the middle school.

Technical Assistance (TA)

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.

Certification and Benefit Issuance

- Though one withdrawn student was still on the SFA's benefit issuance list, the student was listed as inactive in the point of service and is no longer receiving meal benefits. The SFA must ensure that any withdrawn students are not included on the benefit issuance list to ensure that any potential claiming errors are negated.
- Per the Eligibility Manual, when determining Free and Reduced Applications, income should not be converted to annual unless various income frequencies are reported; make use of the Income Eligibility Guidelines chart.
- While on site, supporting documentation for McKinney-Vento students was included for the wrong school year. Correct documentation for the current school year was also provided. The SA advised only using current year documentation to ensure accurate eligibility determination. The McKinney-Vento Liaison should provide the Food Service Director with an updated homeless student list at the beginning of each school year to ensure that all of the eligible students have the proper documentation for the school year.

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 was not submitted for all processed menu items. This documentation was secured for the chicken used in the soup in order to confirm meal pattern crediting. SFAs should maintain this documentation on file to document meal pattern requirements are met.

Wellness

- The completed triennial assessment of the Local Wellness Policy must be available to the public. The assessment was completed but was not publicly available. The director has since ensured the completed assessment is on the district website.

Procurement

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

Fiscal Action

Due to benefit issuance errors, fiscal action results in \$148.30. However, since this amount falls under the \$600 threshold, the fiscal action will be disregarded and no financial adjustment will occur.

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,

Jax Dunham

Jax Dunham, BS, RDN
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Jennifer Butler, MEd, SNS, NSLP Coordinator, Idaho Child Nutrition Programs
Bernadette Chandler, Child Nutrition Director, Wendell School District #232

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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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