



Idaho Department of Education

April 26, 2024

Jane Ward, Superintendent
Aberdeen School District
382 W. Washington
Aberdeen, ID 83210

Dear Superintendent Ward,

On February 27, 2024, Idaho Department of Education contractor CN Resource (CNR) conducted an Administrative Review (AR) of Aberdeen School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP) *operating Provision 2 lunch*
- School Breakfast Program (SBP) *operating Provision 2 breakfast*
- USDA Foods
- Afterschool Snack Program (ASSP)

The site reviewed was Aberdeen Schools

The State agency (SA) would like to commend Lisa Hincks and the entire staff of Aberdeen 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 an alternate schedule to evaluate Critical and General Areas of Review, including:

- Performance Standard 1: Meal Access and Reimbursement

Debbie Critchfield, Superintendent of Public Instruction

(208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov

- 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 findings determined by CNR and the SFA response to the findings:

FINDINGS AND CORRECTIVE ACTION PLAN (CAP)

Finding 1 – Meal Counting and Claiming

The SFA submitted an inaccurate breakfast claim for reimbursement in January. This was a non-systemic issue of human error due to insufficient counting and/or claiming procedures [7 CFR 220.11]. The Provision 2 high school student tally sheet for January 8, did not match the number of meals claimed. The SFA marked 61 meals on the tally sheet, but only claimed 51 for reimbursement.

CAP: Provide a written statement of the new/revised edit check process to be implemented to ensure an accurate counting and claiming system.

Date: Due March 21, 2024; completed March 19, 2024

Response: The sponsor provided a statement explaining a double check process will be implemented weekly to ensure that the correct numbers will be submitted on the monthly reimbursement claim form.

Finding 2 – Meal Components and Quantities - Fruit

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily and weekly requirements for fruit. The federal regulations require a minimum of 1 cup of fruit to be offered each day for grades 9-12. This daily minimum requirement was not met on Thursday, with only 1/2 cup planned. The federal regulations require minimum weekly amounts for fruit. The weekly minimum of 4 cups was not met for grades 9-12, with only 3.5 cups.

CAP: Provide a written statement identifying how the daily and weekly fruit requirements are now met along with documentation demonstrating the correction.

Date: Due March 21, 2024; completed March 18, 2024

Response: For future cycle menus, production records have been updated. The updated production records show fruit juice added to the chili meal for high school to meet daily and weekly fruit requirements.

Finding 3 – Meal Components and Quantities – Meat/Meat Alternate

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirements for meat/meat alternate. The federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent meat/meat alternate requirement for grades 9-12. This requirement was not met on Thursday, with only 1.75 oz. eq. in the chili recipe.

CAP: Provide a written statement identifying how the daily meat/meat alternate requirement is now met along with documentation demonstrating the correction.

Debbie Critchfield, Superintendent of Public Instruction

(208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov

Date: Due March 21, 2024; completed March 18, 2024

Response: Production records for future cycle menus were updated to meet the daily minimum requirement. The updated production records show a 1 oz cheese stick added to the high school chili meal.

Finding 4 – Meal Components and Quantities – Vegetable Subgroup

For the week of menu review, the K-5, 6-8, and 9-12 lunch menu did not meet the minimum weekly requirement for the beans/legumes vegetable subgroup. Beans/legumes were offered, but not in large enough quantities to meet the weekly requirement. The $\frac{1}{2}$ cup weekly bean/legumes vegetable subgroup requirement was not met, with only $\frac{1}{4}$ cup planned.

CAP: Provide a written statement that the beans/legumes subgroup requirements are now met along with documentation demonstrating the correction.

Date: Due March 21, 2024; completed March 18, 2024

Response: Production records and menu planning documents have been updated for future use. The updated production records show $\frac{1}{2}$ cup baked beans added to the weekly menu for all grades.

COMMENDATIONS

- The school did a great job making sure their program meets the rules and regulations. Their hard work during the Administrative Review process was greatly appreciated.
- During the on-site review, the school did a great job feeding healthy nutritious meals to students.

TECHNICAL ASSISTANCE (TA)

Meal Components and Quantities

- During the Administrative Review, the results of the menu review were provided to the sponsor in a detailed Menu Review Results Report. 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.
- Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus.
 - Ensure portion sizes are clearly documented on production records. The portion size for the French toast sticks was unclear. Additional communication provided clarification on portion size served.
 - The juice offered to grades 9-12 daily was a 6.75 oz. serving size, which credited at $\frac{3}{4}$ cup fruit juice. Update the crediting on production records from $\frac{1}{2}$ cup to $\frac{3}{4}$ cup fruit juice. Ensure at least $\frac{3}{4}$ cup of fresh, canned, or frozen fruit is offered to

Debbie Critchfield, Superintendent of Public Instruction

(208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov

grades 9-12 daily with the $\frac{3}{4}$ cup juice to maintain no more than 50% of fruit offerings from juice.

- Updated Product Formulation Statement (PFS) for the strawberry and grape peanut butter sandwiches were secured as the submitted documentation was more than 5 years old.
- The Child Nutrition (CN) Label submitted for the French toast sticks included a watermark. Be sure to secure for your records the actual CN label from the product packaging, without the watermark. The CN number was verified as active on the USDA CN Label Verification Report.

Civil Rights

- Update your special needs dietary accommodations form with the required information. The current *Medical Statement Request for Meal Accommodation Due to a Medical Condition* form is available in Section 2 of Download Forms in MyIdahoCNP.

Special Provisions

- The current Provision 2 cycle expires at the end of SY 26-27, and you must qualify to continue operation of this special provision cycle. If you wish to continue with Provision 2 breakfast and lunch, you must contact the SA prior to the expiration date to see if you qualify for an extension.

FISCAL ACTION

Due to an inaccurate meal count submitted in January's claim, the SFA lost \$ 24.65 in reimbursement. The SFA is implementing an edit check process to help ensure accurate counts are submitted in future claims. 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,

Jennifer Butler

Jennifer Butler, MEd, SNS
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Lisa Hincks, Child Nutrition Director, Aberdeen School District

CIVIL RIGHTS NONDISCRIMINATION STATEMENT

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

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

This institution is an equal opportunity provider.