



February 16, 2024

Kelli Schroeder, Superintendent
Filer School District #413
700 B Stevens Street
Filer, ID 83328

Dear Superintendent Schroeder,

On November 29, 2023, State Department of Education (SDE) contractor Child Nutrition Resource (CNR) conducted an Administrative Review (AR) of Filer School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- USDA Foods

The site reviewed was Filer High School.

The State agency (SA) would like to commend Ginger Fisher and the entire staff of Filer 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
- 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 and technical assistance determined by CNR and the SFA response to the findings:

FINDINGS AND CORRECTIVE ACTION PLAN (CAP)

Finding 1 – Meal Counting and Claiming

After reviewing the edit checks and talking with the director, it was noted that reduced-price lunch for Filer Middle School was incorrectly keyed into the claim for reimbursement and submitted to the State agency for the month of review. This resulted in an underclaim of 10 reduced price lunches for the month of October.

CAP: Provide a plan detailing how the SFA will ensure meal counts from the edit check will accurately and correctly be entered into the claim for reimbursement. Additionally, the SFA must update the NSLP claim for reimbursement for the month of October.

Due Date: January 12, 2024; completed January 3, 2024.

Response: The SFA adjusted their October NSLP claim to accurately reflect the number of reduced lunches claimed. Additionally, the SFA noted that a two-person verification process for monthly claims has been adopted. The Child Nutrition Director will input the claim, and the Child Nutrition Administrative Assistant will verify that the numbers are correct. Once the numbers have been verified, the claim will be submitted.

Finding 2 – Civil Rights

The nondiscrimination statement (NDS) must accompany any printed and web-based materials referencing FNS programs. Web pages associated with program operation should list USDA NDS with details on participants' right to file a complaint. The SFA does not have the current full NDS on their website. The full NDS is available in both English and Spanish on the SA website under [Civil Rights](#).

CAP: Update the NDS on the child nutrition webpage to the current full NDS. Once complete, notify the reviewer to confirm the correction has been made.

Due Date: January 12, 2024; completed January 3, 2024.

Response: The district's child nutrition webpage now contains the current full NDS.

Finding 3 – Professional Standards

The United States Department of Agriculture has established minimum Professional Standards for school nutrition professionals who manage and operate the National School Lunch and School Breakfast Programs (7 CFR 210.30). 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 including training tracking logs to ensure annual

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professional standard training hours are met. The SFA does not currently utilize training tracking logs. The SA has a tracking log in MyIdahoCNP's Download Forms which may be used.

CAP: Develop a plan for tracking training hours in order to comply with the Professional Standards requirements. Explain this plan and the frequency of the tracking (monthly, quarterly, weekly).

Due Date: January 12, 2024; completed January 3, 2024.

Response: The SFA has utilized the SA's training tracking log. The SFA will continue to complete ongoing training each month and track trainings as they are completed.

Finding 4 – Meal Components and Quantities – Lunch

Red/orange vegetables were offered, but not in large enough quantities to meet the weekly requirement. The 1-¼ cup weekly red/orange vegetable subgroup requirement was not met for grades 9-12 with only 1 cup offered.

CAP: Provide a written statement that the red/orange vegetable subgroup requirements are now 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. Submit supporting documentation to demonstrate that the menu finding listed is now corrected. This documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.

Due Date: January 12, 2024; completed January 3, 2024.

Response: The SFA updated the menu and production record on October 3, 2023, to note that the salsa quantity offered was increased from ¼ cup to ½ cup to meet the weekly requirement for the red/orange vegetable subgroup for grades 9-12.

Finding 5 – Meal Components and Quantities – Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirements for meat/meat alternate. It is required that menus be planned to meet the minimum daily 2-ounce equivalent meat/meat alternate requirement for grades 9-12. This requirement was not met on October 5, 2023, with only 1.5 oz. eq. offered.

CAP: Provide a written statement that the meat/meat alternate requirement is now 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. Submit supporting documentation to demonstrate that the menu finding listed is now corrected. This documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes.

Due Date: January 12, 2024; completed January 3, 2024.

Response: The updated production record, menu, and product formulation statement (PFS) show that an egg roll (1 oz. eq. meat/meat alternate) was added to October 5, 2023, to increase the total meat/meat alternate to 2.5 oz. eq. for the day.

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COMMENDATIONS

- The Food Service Director (FSD) responded quickly to any questions or concerns, and she is very knowledgeable. The FSD was quick to fix any issues and look into any concerns during the Administrative Review.
- The kitchen staff at Filer High School were warm and welcoming. The kitchen was clean and organized, and the kitchen staff had a great rapport with the students.

TECHNICAL ASSISTANCE (TA)

Meal Counting and Claiming

- It was recommended that another person such as the Child Nutrition Administrative Assistant review the claim for reimbursement numbers and compare to the edit check numbers for breakfast and lunch before submitting the claim to the State agency.

Verification

- Attempt to directly certify students selected for verification before sending the verification notification letter to the household. According to 7 CFR 245.6a(c)(2), verification efforts are not required for children who have been certified under direct certification procedures.

Meal Components and Quantities – Breakfast

- 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.
- Update the crediting for the Lemonade Stand Smoothie recipe.
 - The recipe includes 8 cups apple juice and 12 cups applesauce to total 20 cups fruit for 32 servings, which is 5/8 cup fruit per serving. Please note pureed fruit in a smoothie is credited as juice; therefore, this recipe credits at 5/8 cup fruit juice.
 - The recipe includes 16 cups of yogurt or ½ cup per serving, which is creditable at 1 oz. eq. meat/meat alternate.
- Ensure current menu documentation is secured and kept on file to confirm crediting. The powdered donut product formulation statement (PFS) submitted was outdated from 2016. Contact the manufacturer to secure a current PFS.

Meal Components and Quantities – Lunch

- The PFS submitted for the diced chicken was outdated. A current PFS was secured and uploaded showing a 2.47 oz. portion credits at 2 oz. eq. meat/meat alternate

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(MMA). This chicken was used for the Grilled Sweet and Sour Chicken recipe on Thursday 10/5/23.

- Increase the measure of diced chicken in this recipe to 75 ounces with a yield of 30 to credit at 2 oz. eq. MMA per serving or consider finding a chicken that credits straight across as 1 oz. equals 1 oz. eq. MMA to meet requirements with 60 oz. for 30 servings.
- The Child Nutrition (CN) Label submitted for the sausage patty showed an expired CN number (issue date 7/2017). The CN number was verified as active on the USDA CN Label Verification Report.

Food Safety

- A food safety manual (HAACP) was located in the kitchen, and the SFA is in the process of customizing it to reflect the needs of the kitchen. All staff must be trained on HAACP procedures to insure the service of safe food (CFR210.13(c)).

Professional Standards

- Ensure that the hearing official for the school district continues to take the required civil rights training annually.
- Hiring standards are dependent upon the student enrollment of the school district. If a director oversees more than one SFA, the sum of the student enrollment determines the hiring standard – the program director has to meet the hiring standards for the LEA size that reflects the total student enrollment. Information pertaining to Professional Standards can be found at: <https://www.sde.idaho.gov/cnp/sch-mp/hiring-training.html>.

Resource Management

- It is recommended that the SFA establish a separate food service revenue code to record sales of extra milk. The SFA must have the ability to separate program revenues from non-program revenues.

FISCAL ACTION

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,

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
Ginger Fisher, Child Nutrition Director, Filer School District #413

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