



June 4, 2024

Kim Bacon, Principal  
Northwest Children's Home, Inc.  
419 22<sup>nd</sup> Avenue  
Lewiston, ID 83501

Dear Principal Bacon,

On April 29, 2024, Idaho Department of Education Coordinators Cambria Steffler and Jax Dunham conducted an Administrative Review (AR) of Northwest Children's Home 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 the Lewiston Education Center.

The State agency (SA) would like to commend Anne Auverson and the entire staff of Northwest Children's Home 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 SA determined findings and the SFA response to the findings:

## FINDINGS AND CORRECTIVE ACTION PLAN (CAP)

### Finding 1 – Meal Counting and Claiming

A systemic claiming error was discovered during the review of the February claim for both breakfast and lunch. The breakfast claim submitted for February was 263, but the meal counts from the student check-off list showed a count of 356. This resulted in an underclaim of 93 meals. The lunch claim submitted for February was 525, but the meal counts on the student check-off list showed a count of 425 meals. This resulted in an overclaim of 100 meals. The review noted that several students were double counted as they were in multiple classrooms, and one student was not counted due to receiving a sack lunch.

**CAP:** Complete an NSLP Corrective Action Procedure form outlining the process for checking the claim for accuracy prior to submission. In this procedure, outline who will be responsible for completing the claim, who will be responsible for checking the claim for accuracy, and how double counted meals will be checked to ensure they are not counted twice.

**Date:** Due April 15, 2024; Returned for correction; Completed May 21, 2024

**Response:** The FSD has uploaded an NSLP Corrective Action Procedure form outlining the procedure for the meal counts to be double checked prior to submittal of the monthly claim. The meal counts will be reviewed by two administrators for accuracy and then submitted to the claims preparer for submission.

### 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 the full USDA NDS with details on participants' right to file a complaint. The incorrect NDS was posted to the district's website and must be updated to the current version. The full NDS is available in both English and Spanish on the SA website under [Civil Rights](#).

**CAP:** Post the current, full USDA NDS on the school food service webpage. Notify the SA when the website has been updated.

**Date:** Due February 15, 2024; Completed March 18, 2024

**Response:** The SFA updated the NDS on the website.

### Finding 3 – Local School Wellness Policy

Per 7 CFR 210.31(e)(2), LEAs must assess their implementation of the wellness policy at least once every three years on the extent to which schools are in compliance with the district policy, the extent to which the local wellness policy compares to model local school wellness policies, and a description of the progress made in attaining the goals of the local wellness policy. LEAs must make this assessment available to the public in an easily understood manner (7 CFR

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210.31(d)(3)). No assessment was provided identifying each school's adherence to the current policy. Since Northwest Children's Home Inc. is an RCCI not a district, assess the policy in comparison to a model RCCI policy, available in Download Forms or on the SA's website.

**CAP:** Upload a plan identifying who at the LEA will be responsible to complete the triennial assessment for the policy, how the assessment will be completed, and what steps will be taken to ensure this requirement is met on a triennial basis including notifying the public in a timely manner.

**Date:** Due April 15; Returned for correction; Completed May 17, 2024

**Response:** The FSD uploaded an NSLP corrective action procedure plan outlining the procedure for completing the triennial assessment for the Local School Wellness policy. The Wellness Committee will be responsible for completing the triennial assessment. The Board of Directors will be responsible for approving the assessment.

#### **Finding 4 – Offer vs Serve**

Per the meal service review, there appears to be a lack of understanding of what constitutes a reimbursable meal under offer versus serve breakfast and lunch. It was noted that several students were walking away with just a juice during the breakfast meal service and being counted as a full reimbursable meal. At lunch, students were provided with all components and told to not eat what they did not want.

**CAP:** Complete the OVS breakfast and OVS lunch trainings and upload certificates of completion, or an agenda and sign-in sheet for the training. Additionally, complete the NSLP Corrective Action Procedure outlining a procedure for OVS, including who will be responsible for ensuring students take a reimbursable meal during both meal services and how staff members will be trained annually in OVS meal requirements.

**Date:** Due April 15, 2024; Returned for correction; Completed May 17, 2024

**Response:** The FSD provided a training sign-in sheet and an NSLP corrective action procedure plan outlining the procedure for staff members to be trained annually and who will be responsible for making sure OVS is implemented properly.

#### **Finding 5 – Meal Components and Quantities - Lunch**

For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement for the red/orange vegetable subgroup. 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 supporting documentation to demonstrate that the menu findings are 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.

**Date:** Due February 16, 2024; Completed February 15, 2024

**Response:** The updated production record and USDA Foods in Schools sheet shows that 1/2 cup sweet potato fries are served on 2/9/24 instead of regular potato fries. The weekly red/orange vegetable requirement is now met.

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### **Finding 6 – Meal Components and Quantities - Lunch**

For the week of menu review, the K-8 and 9-12 lunch menus did not meet the minimum daily requirements for vegetables. The federal regulations require a minimum of  $\frac{3}{4}$  cup of vegetable to be offered each day for grades K-8. This requirement was not met on Wednesday, with only  $\frac{1}{4}$  cup offered. The federal regulations require a minimum of 1 cup of vegetable to be offered each day for grades 9-12. This requirement was not met on Monday and Wednesday, with only  $\frac{3}{4}$  cup and  $\frac{1}{4}$  cup offered. The federal regulations require minimum weekly amounts for vegetables. The weekly minimum of 5 cups was not met for grades 9-12, with only  $4\frac{1}{4}$  cups offered.

**CAP:** Provide supporting documentation to demonstrate that the menu findings are 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.

**Date:** Due February 16, 2024; Returned for correction; Completed February 29, 2024

**Response:** The recipe submitted for potato salad shows a  $\frac{2}{3}$  cup serving credits as  $\frac{1}{2}$  cup vegetable. The updated production record shows a  $\frac{1}{2}$  cup serving was offered, which credits as  $\frac{3}{8}$  cup vegetable. The total vegetable on 2/7/24 is now  $1\frac{1}{8}$  cup which meets the daily requirements for grades 9-12.

### **Finding 7 – Meal Components and Quantities - Lunch**

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirements for fruit. The federal regulations require a minimum of 1 cup of fruit to be offered each day for grades 9-12. This requirement was not met on Tuesday, with only  $\frac{7}{8}$  cup(s) offered.

**CAP:** Provide supporting documentation to demonstrate that the menu findings are 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.

**Date:** Due February 16, 2024; Completed February 15, 2024

**Response:** The updated production record shows  $\frac{1}{4}$  cup kiwi added to 2/6/24 to meet the daily fruit requirement.

### **Finding 8 – Meal Components and Quantities - Lunch**

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirements for grain. The federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent grain requirement for grades 9-12. This requirement was not met on Monday, with only 1 oz. eq. offered.

**CAP:** Provide supporting documentation to demonstrate that the menu findings are 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.

**Date:** Due February 16, 2024; Completed February 15, 2024

**Response:** The updated production record shows that the serving size for rolls was increased to two rolls to meet the daily grain requirement for 2/5/24.

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### **Finding 9 – Meal Components and Quantities - Lunch**

For the week of menu review, the K-8 and 9-12 lunch menus did not meet the minimum daily and weekly requirements for meat/meat alternate. The federal regulations require menus to be planned that meet the daily minimum 1 oz. eq. meat/meat alternate requirement for grades K-8. This requirement was not met on Tuesday, with 0 oz. eq. offered. A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not available for the Philly Cheesesteak served on Tuesday. Therefore, meal pattern crediting could not be determined as met. The federal regulations require weekly minimum amounts of meat/meat alternate to be served. The weekly requirement of 9 oz. eq. was not met for grades K-8. The menu offered a minimum of 8.25 oz. eq. of meat/meat alternate throughout the week. The weekly requirement of 10 oz. eq. was not met for grades 9-12. The menu offered a minimum of 8.75 oz. eq. of meat/meat alternate throughout the week.

**CAP:** 1. Provide supporting documentation to demonstrate that the menu findings are 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.

**Date:** Due February 16, 2024; Returned for correction; Completed February 20, 2024

**Response:** The recipe for the Chicken Philly credits as 3 oz. eq. meat/meat alternate (Chicken= 2 MMA, Cheese = 1MMA) according to the labels submitted. The daily and weekly requirements for meat/meat alternate are now met.

### **COMMENDATIONS**

- The staff at Northwest Children's Home were very warm and welcoming, and they show interest in operating a compliant program. Any issues were quickly addressed, and the team worked together to address any discrepancies.
- The Food Service Director was well organized for the review and was prompt to answer any questions from the State agency.

### **TECHNICAL ASSISTANCE (TA)**

#### **Verification**

- If benefits are decreased as a result of verification, SFAs must provide 10 days advance notification to households that are to receive a reduction or termination of benefits, prior to the actual reduction or termination [7 CFR 245.6a(j)]. Though the SFA now operates under CEP for the Ed Center and Universal free meals for the RCCI, this practice must be implemented if adverse action is needed for verification if the SFA ever accepts free and reduced applications in the future.

#### **Food Safety**

- Though the SFA has a current HACCP manual available for staff, the manual is missing an employee exclusion standard operating procedure (SOP) that is required by Idaho Food

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Code. A sample employee exclusion SOP is available in the Download Forms section of MyIdahoCNP.

### School Breakfast and SFSP Outreach

- SFAs must inform eligible families of the availability of reimbursable breakfasts served under the SBP (7 CFR 210.12 (d)). The foodservice page on the district's website would be a good location to promote the breakfast program. Posting the breakfast menu to the district/school website is one way of promoting the availability of breakfast.
- SFAs must cooperate with Summer Food Service Program (SFSP) sponsors to distribute materials to inform families of the availability and location of free SFSP meals for students when school is not in session [7 CFR 210.12 (d)(2)]. SFAs should promote locating summer meal locations by advertising the Summer Meal Site Finder (<https://www.fns.usda.gov/meals4kids>) or texting the word "FOOD" or "COMIDA" to 304-304 to see nearby options. Best practice is to include SFSP promotion and ways to locate meals on the SFA's website.

### Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus. The submitted production records did not provide adequate information. It is a requirement of the federal regulations to maintain complete and accurate production records.
    - Production records did not state grade groups.
    - Substitute menu items and serving sizes were not always clear and complete.
    - The products listed on the production records did not always match the label that was actually served. 1% Chocolate milk is pre-printed on the production records; however, a fat-free chocolate milk carton label was submitted. Update the production records to reflect fat-free chocolate milk.
  - A standardized recipe is a recipe that has been carefully adapted and tested to ensure that it will produce a consistent product each time it is prepared. It is acceptable to use USDA recipes, however any changes made to the recipe need to be clearly noted. Any ingredients not used in a recipe must be noted as such.
  - A sponsor should obtain current manufacturer nutrition facts labels and maintain a file with copies of all products used as part of school meals. The roll and hamburger bun labels submitted were generated by the distributor or vendor. Obtain labels directly from the manufacturer of the product or from the product packaging and keep them on file, so they can easily be referenced when determining menu compliance.

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- A Product Formulation Statement was not submitted for all processed menu items. This documentation was secured for the menu items in order to confirm meal pattern crediting. A sponsor should maintain this documentation on file to document meal pattern requirements as met.
- The Child Nutrition (CN) Label submitted for the sliced turkey included a watermark. Please 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.
- A Child Nutrition Label or Product Formulation Statement can be used to determine how processed food items contribute to the meal pattern. Without this documentation it may be difficult to determine if the meal component was satisfied. The documentation submitted for the potato salad was not acceptable and meal pattern crediting could not be determined.
- A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not submitted for the round egg patty. Choose a product with this documentation in order to determine meal pattern crediting. The egg patty was not included in the review; however, meal pattern requirements were met with the French toast planned.
- A sponsor should obtain current manufacturer nutrition facts labels and maintain a file with copies of all products used as part of school meals. The nutrition facts label submitted for the granola was expired, dated January 2017. This documentation was secured and uploaded for your reference.

## **FISCAL ACTION**

Due to meal counting and claiming errors, fiscal action results in \$337.75 for NSLP. An underclaim in SBP resulted in \$188.16. However, since this amount falls under the \$600 threshold, the fiscal action will be disregarded, and no financial adjustment will occur. The SFA may adjust their breakfast claim if they choose, however the SA will not initiate payment of underclaim in response to 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,

*Cambria Steffler*  
Cambria Steffler, MS, RD  
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Anne Auverson, Child Nutrition Director, Northwest Children's Home, Inc.

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Washington, D.C. 20250-9410; or
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