



Idaho Department of Education

April 30, 2024

Mike Smith, Superintendent
Richfield School District #316
555 N Tiger Drive
Richfield, ID 83349

Dear Superintendent Smith,

On February 29, 2024, Idaho Department of Education Director Lynda Westphal and Coordinator Jax Dunham conducted an Administrative Review (AR) of Richfield School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
 - Operating Provision 2 breakfast option
- Fresh Fruit and Vegetable Program (FFVP)
- USDA Foods

The site reviewed was the Richfield School.

The State agency (SA) would like to commend Kathryn Brownlee, Cynthia Rhodes, and the entire staff of Richfield 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:

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- 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 152 student benefits resulted in a 2.62% error rate. One application affecting 4 students is incomplete due to not having an adult signature.

CAP: Contact the household to have the signing adult sign the application. Once the signature is received, upload the complete application.

Date of CAP Completion: Due March 15, 2024; completed March 11, 2024.

Corrective Action Response: The incomplete application was uploaded showing that the proper adult signature has been obtained and that the application is now complete.

Finding 2 – Special Provision Options – Provision 2 Breakfast

Provision 2 Base Year (SY 2016-2017) benefit issuance was previously validated by the SA on August 25, 2016. However, during the administrative review, the retention of all required Provision 2 documentation could not be confirmed due to missing records. Since the required base year records have not been maintained, the SA would generally require the district to immediately return to standard counting and claiming procedures and calculate fiscal action. However, the SA is extending previous USDA guidance and allowing the SFA to continue their claiming procedure through the end of the school year.

CAP: Notify the SA by March 8, 2024, whether or not the missing base year records have been located. If records are not located, the SFA must begin standard counting and claiming procedures at the beginning of SY 2024-2025. If the SFA wishes to participate in Provision 2 Breakfast next school year, they will need to establish a new base year during the next school year.

Date of CAP Completion: Due March 15, 2024; completed March 5, 2024.

Corrective Action Response: The SFA notified the SA via email that required Provision 2 base year documentation could not be located. The SFA must return to standard counting and claiming for breakfast for SY 2024-2025 or enroll in a new Provision 2 base year if they wish to continue offering free breakfast to students.

Finding 3 – Offer Versus Serve

No Offer vs Serve signage was posted. Section 7 CFR 210.10(a)(2) of the NSLP regulations and section 7 CFR 220.8(a)(2) of the SBP regulations require that SFAs must post signage to identify the planned reimbursable meals (i.e., all offered full meals), including the components and

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portions and any choices or combination of choices available within each component. This signage must be located near or at the beginning of each serving line.

CAP: Utilize the SBP and NSLP OVS posters by posting them in the cafeteria at or near the service line. Once this has been completed and the posters have been filled out completely, upload a picture showing that this has been completed.

Date of CAP Completion: Due March 15, 2024; completed March 14, 2024.

Corrective Action Response: An image was uploaded showing that the SFA has posted signage for both SBP and NSLP noting what constitutes a reimbursable meal.

Finding 4 – Civil Rights

The incorrect non-discrimination statement (NDS) is included on the direct certification notification letter. The correct USDA NDS can be located at [USDA's website](#). The SA provides template letters, available in Download Forms, which can be utilized.

CAP: Update the direct certification notification letter template to include the current full NDS. Upload the updated letter into MyIdahoCNP.

Date of CAP Completion: Due March 15, 2024; completed March 5, 2024.

Corrective Action Response: The SFA uploaded the State agency's notice of direct certification template letter with the current full NDS noting that the letter would be used by the SFA going forward.

Finding 5 – Professional Standards

Per 7 CFR 210.30(b)(1)(v), Food Service Directors must have at least eight hours of food safety training at least every five years. A free online course, *Food Safety in Schools*, is available through the [Institute of Child Nutrition \(ICN\)](#).

CAP: Upload a training certificate indicating successful completion of at least eight hours food safety training into MyIdahoCNP.

Date of CAP Completion: Due March 15, 2024; completed March 5, 2024.

Corrective Action Response: A certificate of completion was uploaded showing that the FSD completed 8 hours of food safety training via ICN's *Food Safety in Schools* course.

Finding 6 – Buy American

SFAs are required to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories, as applicable [7 CFR 210.21 (d)]. If a product from another country is sourced, then the SFA must have documentation that the domestic product is significantly higher in price or not available in sufficient quantities. Documentation for products sourced from outside the United States was not available.

CAP: Complete the NSLP Corrective Action Procedure Form noting how the SFA will retain the SA's Buy American Exception Form and backup documentation for all food products sourced from outside of the United States.

Date of CAP Completion: Due March 15, 2024; completed March 14, 2024.

Corrective Action Response: The SFA uploaded an NSLP Corrective Action Procedure Form noting that they will now retain the SA's Buy American Exception Form along with backup documentation for all food products sourced from outside of the United States. The SFA noted

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that the Food Service Director and Food Service Manager will be responsible for ensuring the procedure is followed effective February 29, 2024.

Finding 7 – Meal Components and Quantities – Breakfast

For the week of menu review, the K-12 breakfast menu did not meet the minimum daily requirements for fruit. The daily minimum of 1 cup was not met on 1/11/24 for grades K-12, with only ½ cup offered.

CAP: Provide a written statement that the fruit 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 is now corrected. This documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes.

Date of CAP Completion: Due February 20, 2024; returned for corrections; completed March 18, 2024.

Corrective Action Response: The SFA updated the production record for January 11, 2024, shows at least 1 cup fruit offered to meet daily requirements.

Finding 8 – Meal Components and Quantities – Breakfast

For the week of menu review, the K-12 breakfast menu did not meet the whole grain-rich requirement. At least 80% of the grains offered weekly must be whole grain-rich to meet requirements. The menu met 63.64% whole grains for the week of review for grades K-12.

CAP: Provide a written statement that the whole grain-rich 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 is now corrected. This documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes.

Date of CAP Completion: Due February 20, 2024; returned for corrections; completed March 18, 2024.

Corrective Action Response: The ingredients listed for the waffles and bagels for the week of menu review now show they are whole grain-rich product. The whole grain-rich requirement is now met.

Finding 9 – Meal Components and Quantities – Lunch

For the week of menu review, the K-6, 7-8, and 9-12 lunch menus did not meet the minimum ½ cup weekly requirement for the beans/legumes vegetable subgroup. There were no beans/legumes offered this week.

CAP: Provide a written statement that the beans/legumes vegetable subgroup 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 is now corrected. This documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes.

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Date of CAP Completion: Due February 20, 2024; returned for corrections; completed March 22, 2024.

Corrective Action Response: The updated production records show vegetable subgroup requirements are now met with at least ½ of the beans/legumes subgroup being offered.

Finding 10 – Meal Components and Quantities – Lunch

For the week of menu review, the K-6, 7-8, and 9-12 lunch menus did not meet the minimum ½ cup weekly requirement for the dark green vegetable subgroup. There were no dark green vegetables offered this week.

CAP: Provide a written statement that the dark green vegetable subgroup 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 is now corrected. This documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes.

Date of CAP Completion: Due February 20, 2024; returned for corrections; completed March 18, 2024.

Corrective Action Response: The updated production records show 1 cup broccoli offered on January 10, 2024 to all grades to meet the weekly dark green vegetable subgroup requirement.

Finding 11 – Meal Components and Quantities – Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily and weekly requirements for vegetables. Federal regulation requires a minimum of 1 cup of vegetable to be offered each day for grades 9-12. This requirement was not met on 1/9/24 & 1/10/24, with only ¾ cup offered. Additionally, the weekly minimum of 4 cups was not met for grades 9-12, with only 3 ½ cups offered.

CAP: Provide a written statement that the vegetable 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 is now corrected. This documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes.

Date of CAP Completion: Due February 20, 2024; returned for corrections; completed March 18, 2024.

Corrective Action Response: The updated production records show at least 1 cup vegetable offered daily to grades 9-12 to meet daily and weekly vegetable requirements.

Finding 12 – Meal Components and Quantities – Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily and weekly requirements for fruit. Federal regulation requires a minimum of 1 cup of fruit to be offered each day for grades 9-12. This requirement was not met on 1/8/24, 1/9/24, and 1/10/24, with only ½ cup to 7/8 cup offered. The federal regulations require minimum weekly amounts for fruit. The weekly minimum of 4 cups was not met for grades 9-12, with only 2 7/8 cups offered.

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CAP: Provide a written statement that the fruit 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 is now corrected. This documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes.

Date of CAP Completion: Due February 20, 2024; returned for corrections; completed March 18, 2024.

Corrective Action Response: The updated production records show at least 1 cup fruit offered daily to meet the daily and weekly fruit requirements for grades 9-12

Finding 13 – Meal Components and Quantities – Lunch

For the week of menu review, the K-6, 7-8, and 9-12 lunch menus did not meet the whole grain-rich requirements. At least 80% of the grains offered weekly must be whole grain-rich to meet requirements. The menu met 44.83% whole grains for the week of review for grades K-6, and the menu met 43.33% whole grains for the week of review for grades 7-12.

CAP: Provide a written statement that the whole grain-rich 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 is now corrected. This documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes.

Date of CAP Completion: Due February 20, 2024; returned for corrections; completed March 18, 2024.

Corrective Action Response: The submitted vendor labels show the buns, noodles, and breadsticks used in the menu for the week of review are whole grain-rich.

Finding 14 – Meal Components and Quantities – Lunch

For the week of menu review, the K-6, 7-8, and 9-12 lunch menus did not meet the minimum daily requirements for grain. Federal regulation requires menus to be planned that meet the daily minimum 1 oz. eq. of grain for grades K-8 and 2 oz. eq. of grain for grades 9-12. This requirement was not met on 1/9/24 and 1/11/24. Additionally, the weekly requirement of 8 oz. eq. was not met for grades 9-12 as the menu offered a minimum of 7.5 oz. eq. of grain throughout the week.

CAP: Provide a written statement that the grain 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 is now corrected. This documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes.

Date of CAP Completion: Due February 20, 2024; returned for corrections; completed March 22, 2024.

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Corrective Action Response: The updated production record shows the serving size of chow mein increased to 4 oz. Daily and weekly grain requirements are now met for all grades.

Finding 15 – Meal Components and Quantities – Lunch

For the week of menu review, the K-6, 7-8, and 9-12 lunch menus did not meet the minimum daily and weekly requirements for meat/meat alternate. Federal regulation requires menus to be planned that meet the daily minimum 1 oz. eq. of meat/meat alternate for grades K-8 and 2 oz. eq. of meat/meat alternate for grades 9-12. This requirement was not met on 1/9/24 and 1/11/24. Additionally, the weekly requirement of 7 oz. eq. was not met for grades K-6 and 8 oz. eq. was not met for grades 9-12 as menu offered a minimum of 4 oz. eq. of meat/meat alternate throughout the week. A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not available for the orange chicken served on 1/9/24 or for the meatballs served on 1/11/24. Therefore, meal pattern crediting could not be determined as met. Choose a product with either a CN Label or PFS in order to determine meal pattern crediting.

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

Date of CAP Completion: Due February 20, 2024; returned for corrections; completed March 22, 2024.

Corrective Action Response: The CN number on the CN label submitted for the meatballs was verified as active on the USDA CN label verification report with 5 meatballs crediting as 2 oz. eq. meat/meat alternate. The PFS with CN number was secured for the Orange Chicken noting that a 2.90 oz serving credits as 2 oz. eq. meat/meat alternate. The crediting on the production record was used to show that the meat/meat alternate requirements have now been met.

Please note that fiscal action will not be applied to menu findings as a result of this Administrative Review. If it is discovered in the subsequent review that there is an excessive amount of menu findings, the SA will take applicable fiscal action for the week of menu review.

COMMENDATIONS

- The SFA did a great job preparing for the review. Documentation was uploaded promptly, and all records and review materials were well organized to ensure the review went smoothly.
- Richfield School District has done a great job with their Wellness Policy. The Triennial Assessment was completed timely and thoroughly, and the Implementation and Monitoring Plan is much appreciated. This shows that the school district is committed to the wellbeing of their students and staff which promotes a healthy community.

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- The team at Richfield was warm and welcoming. They were fast to implement any suggestions that the SA provided, and they asked great questions.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- One household noted on a free and reduced application a baby that had not been born and added this to the household member total. This did not result in a change in benefit, but if there is a baby that has not been born, this child cannot count toward the household member number until the birth of the baby.

Verification

- The SFA did not give the household that terminated benefits as a result of verification 10 calendar days notice before the termination of benefits. LEAs 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)].
- The verifying official (either the determining or confirming official) must sign and date the verification portion of the free and reduced application at the conclusion of verification. The results of the process should be marked on the application as well as when the notice letters were sent.

Meal Counting and Claiming

- The district is not counting student helpers at the POS. Instead, they are adding student helpers to meal counts retroactively before submitting the claim. The SFA should investigate their software to put in a button to automatically count the student helpers without charging them to lessen the chance of errors when claiming.

Offer Versus Serve

- Though the kitchen staff has been trained on NSLP and SBP Offer vs Serve (OVS), the staff originally trained on SFSP OVS. Ensure that appropriate OVS training is completed annually for NSLP and SBP to avoid confusion.

Meal Components and Quantities – Breakfast

- 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 menu items listed below, in order to confirm meal pattern crediting. The SFA should maintain this documentation on file to document meal pattern requirements as met.
 - 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 to maintain complete accurate production records.

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- Grades on production records under Planned # of Students to be served and Planned Portion Size (by grade grouping) are combined into grade groups of K-6 and 7-12 that are not appropriate to meet meal pattern requirements. Grades under these categories should be grouped according to the School Breakfast Program Meal Pattern as K-5, 6-8, and 9-12.

Meal Components and Quantities – Lunch

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - Consider adding ½ cup pinto beans or black beans with the corn dogs served on 1/10/24 to meet the ½ cup bean/legumes vegetable subgroup requirement.
 - Serving sizes documented were not always clear and complete. The serving size of the meatballs, spaghetti noodles, and spaghetti sauce were not listed on the production records. The meatballs, spaghetti noodles, and spaghetti sauce should be listed separately on production records, or a recipe for the spaghetti should be created.

Food Safety

- The SFA is utilizing the ICN HACCP template to create and adopt their updated food safety manual. Please note that this manual is missing an employee exclusion standard operating procedure (SOP) that is required by Idaho Food Code. A sample SOP for employee exclusion can be found in MyIdahoCNP's download forms.
- During the breakfast meal service, the share table items were returned without washing. The kitchen staff should ensure they are washing items from the share table before being returned for service.
- Independent contractor CN Resource completed the menu review and provided the following TA:
 - During the review, the food safety plan was discussed with the SFA. The SFA should ensure the SOPs acknowledged by a signature and use the topics for training purposes for the kitchen staff.

Professional Standards

- Consider implementing a process that ensures the required trainings - food safety, OVS, and civil rights - are conducted at the beginning of each school year and adequately documented. When new employees are hired ensure necessary training is received within the first 30 days.

School Breakfast and SFSP Outreach

- 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-

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304 to see nearby options. Best practice is to include SFSP promotion on the SFA's website.

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
Kathryn Brownlee, Child Nutrition Director/Admin Assistant, Richfield School District
Cynthia Rhodes, Kitchen Manager, Richfield School District

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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

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