



April 11, 2025

Randy Jensen, Superintendent
American Falls School District
827 Fort Hall Ave
American Falls, ID 83211

Dear Superintendent Jensen

On January 28, 2025, Idaho Department of Education contractor CN Resource (CNR) conducted an Administrative Review (AR) of American Falls 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
- USDA Foods
- Fresh Fruit and Vegetable Program (FFVP)
- Afterschool Snack Program (ASSP)

The site reviewed was J.R. Simplot Elementary School.

The State agency (SA) would like to commend Lisa Krell and the entire staff of American Falls 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 SA determined findings and the SFA response to the findings:

FINDINGS AND CORRECTIVE ACTION PLAN (CAP)

Finding 1 – Certification and Benefit Issuance

The nondiscrimination statement (NDS) must accompany any printed and web-based materials referencing FNS programs (FNS Instruction 113-1: Civil Rights Compliance and Enforcement). The direct certification notification letter and the denial letter did not include the full nondiscrimination statement.

CAP: Upload a copy of the direct certification notification letter with the updated full nondiscrimination statement.

Due Date: Due February 12, 2025; Completed January 2025

Response: The FSD uploaded copies of the direct certification notification letter and the application denial letter with the correct full nondiscrimination statement.

COMMENDATIONS

- The Child Nutrition Director was very prepared and cooperative in providing requested documents during the off-site and on-site assessments, and her and her staff maintain outstanding operational records.
- The students and cafeteria staff demonstrated respect and friendliness. The cafeteria was nicely decorated with themed nutritional posters and provided a pleasant dining experience for its students and staff.

TECHNICAL ASSISTANCE (TA)

Meal Components and Quantities

- The submitted production records did not provide adequate information. It is a requirement of the federal regulations to maintain complete and accurate production records. The products listed on production records did not always match the label and/or portion that was actually served.
 - The serving size for apple slices was documented as 4 ounces and the label submitted showed a 2-ounce product was served.
 - The serving size for juice was documented as 4 ounces and per documentation submitted the juice was 4.23 ounces.

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- The serving size for raisins was documented as 4 ounces and per documentation submitted the raisins package was 1.16 ounces.
- A Child Nutrition Label or Product Formulation Statement (PFS) was not submitted for all processed menu items. A PFS was secured for the menu items listed below, to confirm meal pattern crediting. A sponsor should maintain this documentation on file to document meal pattern requirements as met.
 - Sun Chips
 - Blueberry Lemon Bites
 - Pancake Wrap
 - Oatmeal Chocolate Chip BeneFIT bar
- Secure an official PFS from the manufacturer for the 2-ounce sliced apples package to confirm the ½ cup fruit crediting, as documented on the secured spec sheet.
- The Child Nutrition (CN) Label submitted for the pepperoni pizza showed an issue date of 4/2018. The CN number was verified as active on the USDA CN Label Verification Report.

SFA On-Site Monitoring

- According to 7 CFR 210.8 (a)(1) and 7 CFR 220.11 (d)(1), each SFA with two or more feeding sites must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating NSLP and 50% of schools operating SBP under its jurisdiction prior to February 1, each school year. The SFA completed on-site monitoring last school year on 1/29/2024. The SFA should complete on-site monitoring for this school year before February 1, 2025.

Resource Management

- If the SFA is going to provide adult meals free of charge to other employees who help with lunch meals, the SFA must ensure that documentation to support the direct benefit to the meal service is maintained such as duty schedules or task assignment records. A Program Adult is defined as those who work directly with the meal service at the site as either a food service volunteer only or a paid food service employee. Non-program adult meals such as those who do not work in any direct way with the meal service, such as a teacher or school staff, must be charged the minimum adult meal price per USDA regulations or non-federal funding must be used to cover the cost of the meal as USDA funds cannot be used to subsidize adult meals. "Idaho Point-of-Service and Meal-Counting" reference provided to SFA.

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,

Cambria Steffler

Cambria Steffler, MS, RD
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Lisa Krell, Child Nutrition Director, American Falls School District

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