



March 24, 2025

Matt Valedao, Superintendent
Bliss School District
601 E. US Hwy 30
Bliss, ID 83314

Dear Superintendent, Valedao,

On November 13, 2024, Idaho Department of Education Coordinators Cassandra Thompson, Jax Dunham and Jessica Medrano conducted an Administrative Review (AR) of Bliss 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 Bliss School.

The State agency (SA) would like to commend Sam Barker and the entire staff of Bliss 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

A sample of 77 student meal benefits resulted in a 11.69% error rate.

- One student was incorrectly noted as reduced and must be changed to free as they were found on the DC list.
- One student was incorrectly determined as free and must be changed to reduced as they were DC-Reduced Medicaid.
- One application, affecting one student, was incomplete due to not having social security information. There was no change in benefits.
- One student was incorrectly determined via application as reduced and must be changed to paid.
- One student was incorrectly determined as free due to not switching to paid after the 30-day carryover period. This student must be changed to paid.
- Four students on the SFA's DC lists were noted as paid on their software benefit issuance list, though they should have been documented as free via Direct Certification.

CAP: Send an adverse action to the households whose benefits are decreasing notifying them that their benefit will be reduced in ten calendar days. Once ten days have passed, change the applicable student benefits. Additionally, change the benefits of those who are increasing in benefit immediately. Furthermore, obtain the appropriate social security information from the incomplete application and make note of who was spoken to and what date the information was obtained on. Once completed, upload all adverse action letters, the application with complete social security information, and a new benefit issuance list documenting that all benefits have been updated appropriately.

Due Date: December 11, 2024; Completed December 28, 2024

Response: For the students who decreased in benefits, Adverse Action letters were sent and uploaded into MyIdahoCNP. The remaining students were changed to free on the benefit issuance list. The benefit issuance list was uploaded into MyIdahoCNP documenting the benefit corrections.

- *Based on the administrative error rate of over 10% associated with certification and benefit issuance, the SFA will be required to conduct a second review of applications beginning school year 2025-2026 and continuing until further notice. A second review of applications requires a re-evaluation by the Confirming Official of the eligibility determination made by the Determining Official, based on the information provided by the household on the application. Depending on the outcomes of this second review, the SFA may be required to complete this process until the next administrative review. A*

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Second Review of Applications Report will need to be filed as well while this requirement is in place. Please reference the Independent Review of Applications section in the Eligibility Manual, a copy of which is available in MyIdahoCNP Download Forms.

Finding 2 – Verification

Upon reviewing the SFA's verification file for SY 2024-2025, it was noted that the SFA over verified, as they selected two applications for verification instead of the one application required for their district. Additionally, one of the applications that the SFA selected was directly certified on September 5, 2024, prior to the start of verification. While the SA was on-site, the FSD completed and sent results in a verification determination letter to the household of the second application selected for verification, notifying them that their benefit had not changed. It was also noted that a verification finding was issued during the previous Administrative Review due to verification not being completed correctly.

CAP: Upload an NSLP Corrective Action Procedure form detailing how the SFA will ensure that verification is completed correctly in the future. Also include information on how the SFA will ensure the correct number of applications are selected for verification moving forward. In addition, share how the SFA will send the verification results promptly after a determination of benefits is made. The form should also include a description that Directly Certified students should not be selected during the verification process.

Due Date: December 11, 2024; Completed January 2, 2025.

Response: The Food Service Director completed and uploaded an NSLP Corrective Action Procedure form into MyIdahoCNP detailing how the SFA will ensure the verification process will be accomplished moving forward. The verification process includes a statement that students who are directly certified “should not” be selected during verification, as well as a strict verification timeline.

Finding 3 – Civil Rights

School Foodservice Authority staff who interact with program applicants or participants (i.e., Cafeteria staff, Free and Reduced Application approval staff) and their supervisors, as well as the Hearing Official, must have annual civil rights training. The Hearing Official has yet to complete the Civil Rights Training.

CAP: The Hearing Official must complete the online Civil Rights video. Once completed, the Hearing Official should sign and date the Civil Rights sign-in sheet or send the FSD an email stating the date the Civil Rights training was completed. Upload the Civil Rights Agenda/Sign-in Sheet, as well as the Hearing Officials training tracker log into MyIdahoCNP.

Due Date: December 11, 2024; Completed December 9, 2024

Response: The Hearing Official completed the Civil Rights training and the SFA uploaded a sign-in sheet, training log and email stating completion of said training. All items were uploaded into MyIdahoCNP.

Finding 4 – Local Wellness Policy

LEAs must assess their 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

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attaining the goals of the local wellness policy. LEAs must make this assessment available to the public in an easily understood manner (7 CFR 210.31(d)(3)) and (7 CFR 210.31(e)(2)).

CAP: Upload a plan identifying who at the LEA will be responsible for completing the triennial assessment, how the assessment(s) will be completed, what steps will be taken to ensure this requirement is met on a triennial basis, and how this assessment will be made available to the public in an easily understood manner. The Idaho Wellness Policy Progress Report is one tool available for completing the Triennial Assessment. You can find it on the SDE website: <https://www.sde.idaho.gov/cnp/sch-mp/wellness.html> or in MyIdahoCNP under download forms. Complete the Triennial Assessment and upload it into MyIdahoCNP.

Due Date: December 11, 2024; Completed December 11, 2024

Response: The Food Service Director will be responsible for completing the triennial assessment and a copy of the completed assessment was uploaded into MyIdahoCNP. The Triennial Assessment will also be available on the Bliss SD website by January 2025.

Finding 5 – 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. The Idaho Child Nutrition Programs digital learning portal contains multiple courses that could be used to meet several training requirements.

All Foodservice staff training provided by the Director should include a sign-in sheet and a dated agenda documenting the length of time and topics covered. These hours can contribute to the Professional Standards requirements. Proof of training documentation must be kept on file at the SFA for three years plus the current year. The food service director did not consistently have agendas and sign-in sheets for all training for the current school year. A training tracker log was also not available on the date of review.

CAP: Create a training tracker log for each food service team member and upload logs into MyIdahoCNP. Provide HACCP training for the food service team and upload the agenda and sign-in sheet for said training into MyIdahoCNP as well.

Due Date: December 11, 2024; December 24, 2024

Response: The food service director completed a training tracker tool for each food service team member on the morning of the AR and has been advised to update tracker logs continuously as training occurs. HACCP training was also provided, and a sign-in sheet and agenda were uploaded in MyIdahoCNP as well.

Finding 6 – Meal Components and Quantities - Lunch

For the week of menu review, the K-5 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-5 and one cup for grades 9-12. On Thursday, October 17, 2024, only $\frac{1}{2}$ cup was offered to K-5 and only $\frac{3}{4}$ cups of vegetables were offered to grades 9-12. Consider the following suggestion to meet requirements:

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- Increase the serving size of the cucumbers served on Thursday to meet the daily vegetable requirement of 3/4 cup total vegetables for grades K-5 and 1 cup total vegetables for grades 9-12.

CAP:

1. Provide a written statement to describe the specific changes made to the menu, for the week of review, to correct all menu review findings and bring the menu into compliance.
2. Submit supporting documentation to demonstrate that the menu findings listed under step 1 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.
3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: October 21, 2024; Completed October 21, 2024

Response:

1. The vegetable amounts increased for grades K-5 to 3/4 cup and 9-12 to 1 C. The food service director will continue to double check for the correct quantities of vegetables to ensure all meals are compliant and reimbursable.
2. The food service director uploaded production records and CN labels into MyIdahoCNP for crediting purposes.
3. The Food Service Director is the individual who oversees this area and will ensure future compliance.

Finding 7 – Meal Components and Quantities - Lunch

The federal regulations require menus to be planned to meet the daily minimum grain requirements. For the week of menu review, grades K-5 and 9-12 did not meet the minimum daily requirements:

K-5: The minimum daily grain requirement is 1 oz. equivalent.

- On Tuesday, October 15, 2024, only .5 oz. eq. was offered. Increase the serving size of taco shells to 2 per student.

Note for all grades: Two different taco shell labels were uploaded to MyIdahoCNP. Both taco shell labels offer different ounce equivalents. Ensure the correct taco shell is being utilized for a reimbursable meal.

9-12: The minimum daily grain requirement is 2 oz. eq.

- On Tuesday, October 15, 2024, 1 oz. eq. was offered. Add a side of 1 oz. eq. tortilla chips or ½ cup or more of rice to the current taco meal.
- Wednesday, October 16, 2025, add a grain on the side of the chicken nuggets, such as crackers, pretzels, a biscuit or breadstick. Reference the USDA Food Buying Guide to ensure the side grain item offers at least 0.75 oz. eq. whole grains per serving.
- Thursday, October 17, 2025, the meal pattern crediting for the chicken noodle soup could not be determined due to lack of documentation. Choose a product with a Child Nutrition (CN) label or Product Formulation Statement (PFS) to determine meal pattern

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crediting. Consider a soup that provides at least 1 oz. eq. whole grains per serving. If needed, make your own soup with a standardized recipe.

The federal regulations require menus to be planned to meet the weekly minimum grain requirements. For the week of menu review, grades K-5, 6-8 and 9-12 did not meet the minimum daily requirements:

K-5: The minimum weekly grain requirement is 8-9 oz. eq.

6-8: The minimum weekly grain requirement is 8-10 oz. eq.

- The menu offered 4.5 oz. eq. of grain throughout the week for both K-5 and 6-8. The SFA should meet the daily grain requirement of at least 1 oz. eq. grains each day to provide 5 oz. total grains for the week. In addition, add more grains over the week to meet your weekly requirements.
- See above meal pattern crediting suggestions for the chicken noodle soup and chicken nuggets.

9-12: The minimum weekly grain requirement is 10-12 oz. eq.

- The weekly requirement was not met for grades 9-12, as the menu offered 7.25 oz. eq. of grain throughout the week. By following the suggestions outlined above for K-5 and 6-8 to meet the daily grain requirement, the weekly grain requirement will also be met for grades 9-12.

CAP:

1. Provide a written statement to describe the specific changes made to the menu, for the week of review, to correct all menu review findings and bring the menu into compliance.
2. Submit supporting documentation to demonstrate that the menu findings listed under step 1 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.
3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: October 21, 2024; Completed October 29, 2024

Response:

- The production records were adjusted and uploaded into MyIdahoCNP for grades K-5 and 6-8 where two taco shells were served to meet the 1 oz. grain requirement to meet the daily grain requirements.
- The production records were adjusted and uploaded into MyIdahoCNP for grades 9-12 to meet daily requirements where 1 oz. eq. was added to the taco meal, a 1 oz. breadstick was added to the chicken nugget meal, and a PFS was located for a chicken noodle soup that credits 1 oz. of whole grains per serving to bring these meals into compliance.
- For the weekly requirements for grades K-5, 6-8 and 9-12, adjustments were made to meet the daily requirements. As a result, the weekly requirements are met as well.

Finding 8 – Offer versus Serve (OVS)

Schools using the OVS option in NSLP must have signage to help identify how to build a reimbursable meal. The appropriate signage was posted at the beginning of the service line in the cafeteria; however, the meal items planned for both breakfast and lunch on the day of the AR were not listed on the signage.

CAP: Complete the NSLP Corrective Action Procedure form and identify who will be responsible for updating the OVS signage daily. Ensure all questions on the form are answered completely, as this documentation will assist you in moving forward to ensure the OVS signage requirement is met.

Due Date: December 5, 2024; Completed January 2, 2025

Response: The Food Service Director uploaded the NSLP Corrective Action Procedure form and identified who will be responsible for updating the OVS signage daily.

Finding 9 – Offer versus Serve

There is no documentation that required annual OVS training took place for the FSD or kitchen/line staff. Online OVS training is available through the Idaho CNP Training Portal and provides a certificate of completion. The FSD must print her certificate of completion for both OVS Breakfast and OVS Lunch and upload certificates into MyIdahoCNP. Group staff training must include an agenda and sign-in sheet that specifically identifies that "OVS breakfast" and "OVS lunch", as applicable, were specified on the training agenda. Training documentation should be recorded on the Professional Standards training tracking log and maintained on file at the SFA for three years plus the current year.

CAP: All food service staff will complete the online OVS training courses (breakfast and lunch) that are available through the Idaho CNP Training Portal. The FSD must print her certificates of completion for both OVS Breakfast and OVS Lunch and upload certificates into MyIdahoCNP. The FSD will also upload an agenda, sign-in sheet and training tracker logs that specifically identify OVS breakfast and OVS lunch were part of the training agenda for the food service team. Training documentation should be maintained on file at the SFA for three years plus the current year.

Due Date: December 5, 2024; Completed December 19, 2024

Response: The appropriate OVS training was completed through the Idaho CNP Training Portal. Certificates were uploaded into MyIdahoCNP for the food service director, as well as an agenda, sign-in sheet, and updated training logs. All items specify OVS Breakfast and OVS Lunch were completed for the food service team.

COMMENDATIONS

- The Food Service Supervisor provides ongoing daily training at each meal service by reviewing the day's menu for both breakfast and lunch. During this discussion, the choices available and appropriate serving sizes for each item/component are reviewed with the food service line servers and cashier.
- The Food Service Supervisor and her team work well together in a supportive manner to adhere to program regulations and maintain program participation.

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- The students and staff demonstrated respect and friendliness, and it was a pleasure to witness this engaging correspondence.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- The income frequency listed on the application must be used to determine the application. If more than one frequency of pay is listed on the application, all income must be converted to an annual amount.
- When contacting the household for information, be sure to include the name of the household member who provided the information. Sign and date all notes added to the application as documentation if needed.
- The LEA's designated homeless liaison is responsible for determining if a student meets the requirements of the McKinney-Vento Act. For the SFA to identify a student as eligible for free meals, the student's name must be included on a list signed and dated by the homeless liaison. That information must be provided to the SFA in a valid format (date and validating signature) in a timely manner so that students can receive free meals as soon as that information is determined.

Meal Components and Quantities – Breakfast and Lunch

Independent contractor CN Resource completed the menu review and provided the following TA:

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 daily and weekly meal pattern requirements for each 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.

Breakfast

1. A Product Formulation Statement (PFS) was not submitted for the Cinnamon Toast Crunch Bar, which is the most accurate documentation for meal pattern crediting for this item. The documentation was secured for the menu item to confirm meal pattern crediting. A sponsor should maintain this documentation on file to document meal pattern requirements as met.
2. Only a grain PFS was provided for the Breakfast Tornado, but there could also be a meat/meat alternate PFS for meal pattern crediting. Consider obtaining the entire PFS with grains and meat to credit all meal components for this item. Meat/meat alternate was not credited.

Lunch

1. Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus.
 - All food items should be accurately documented in the production records.
 - Serving sizes documented were not always clear and complete.
2. The planned menu was not followed for the week of menu review. One of the substitutions made was not acceptable to meet program requirements.
 - The menu listed chips on Thursday, however, chips were not offered. If these had been creditable chips towards the grain components, it could have helped meet minimum requirements.

Food Safety

- The Buy American Provision's final rule codified in regulations 7 CFR 210.21 (d)(5)(iii) and 7 CFR 220.16 (d)(5)(iii) dated July 1, 2024, requires school food authorities to maintain documentation to demonstrate the use of exceptions. An optional template was provided by the on-site reviewer to the district to help organize documentation and keep track of costs related to non-domestic food purchases.

School Breakfast and SFSP Outreach

- SFAs must cooperate with the 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/summer/sitefinder>) or by texting the word “Food” or “SFSP” to 914-342-7744 to see nearby options. Best practice is to include SFSP promotion and ways to locate meals on the SFA’s website.
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Smart Snacks

- Both exempt and compliant fundraisers must be tracked. Per state policy, a maximum of 10 exempted fundraisers per school site per year may be approved by the school administrator. A fundraiser can be for a maximum of four consecutive school days. All exempt fundraisers beyond 10 must be pre-approved by the State agency. (7CFR 210.11) Details are available at the SDE CNP Smart Snacks website. Only one fundraiser has occurred during the current school year; however, this fundraiser has not been tracked. A fundraiser tracking form is available in download forms in section 21 (NSLP Wellness Policy) for your convenience to document fundraisers each school year.

Fresh Fruit and Vegetable Program (FFVP)

- The FFVP provides an opportunity to incorporate bite size nutrition lessons along with the service of the produce. The USDA encourages providing an enrichment activity

which is on page 8 of the handbook. Bliss Elementary school does not receive an enrichment activity consistently when produce is served during FFVP.

FISCAL ACTION

Due to nine benefit issuance errors, fiscal action results in \$186.49 for NSLP and \$56.10 for SBP. However, since this amount falls under the \$600 threshold, the fiscal action will be disregarded, and no financial adjustment will occur.

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,

Cassandra Thompson

Cassandra Thompson, BS
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Sam Barker, Child Nutrition Director

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