



March 15, 2025

Jeff Blaser, Superintendent  
Bruneau-Grand View Jt. School District  
39678 State Hwy 78  
Bruneau, ID 83604

Dear Superintendent Blaser,

On November 21, 2024, Idaho Department of Education Coordinators Cambria Steffler and Jax Dunham conducted an Administrative Review (AR) of Bruneau-Grandview Jt. 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)

The site reviewed was Bruneau Elementary School.

The State agency (SA) would like to commend Deidra Ingles and the entire staff of Bruneau-Grand View Jt. 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 statistical sample of 95 applications resulted in a 7.37% error rate. Six applications affecting seven students were either incorrectly determined or were incomplete applications. Two applications were incorrectly determined as free and should be changed to reduced. One application was incorrectly determined as reduced and should be changed to paid. Two applications had incorrect household numbers listed on the application. One application was missing the total household number and the social security number. Once the household numbers are determined for these three applications, the benefit can be determined which may or may not result in a change in benefit for these students.

**CAP:** Send notice of adverse action to the three households requiring a change in benefit. Upload a copy of the benefit issuance list once the benefits are corrected following the required waiting period outlined on the adverse action notice. For the applications not requiring a change in benefit, contact the households to confirm the total household number. Redetermine the applications with the correct household number. If determination changes the benefit status from F to R or R to paid, send the household a notice of adverse action and change benefit after the required waiting period. If determination changes from R to F, change determination immediately and notify the household. If determination does not change the benefit, you do not need to follow up with the household. Upload a copy of these applications noting the correct household number and a copy of the benefit issuance list with the correct determinations.

**Due Date:** Due December 13, 2024; Completed December 10, 2024

**Response:** The FSD has uploaded the adverse action letters, corrected applications, and a benefit issuance list showing all corrected benefits.

### Finding 2 – Verification

Although verification was completed by the SFA, some key elements were missing. First, the FSD did not complete the second attempt to notify the household that was selected for verification that they need to submit their documentation. The LEA must make at least one attempt to contact the household when the household does not adequately respond to the request for verification. Second, the final notice for the verification results was not sent to the household. [7 CFR 245.6a]

**CAP:** Send the notice of verification results to the household. After the required waiting period, change the student the benefit to paid. Upload a copy of the letter and the benefit issuance list reflecting the correct benefit has been issued. Additionally, complete the NSLP Corrective

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Action Procedure form outlining the process for verification. Include in this form the timeline for completing the required elements of verification and who will complete verification.

**Due Date:** Due December 13, 2024; Returned for Correction; Completed January 13, 2025

**Response:** The FSD uploaded a copy of the notice of verification results letter sent to the household and a copy of the benefit issuance list showing the benefit has been changed to paid. An NSLP Corrective Action Procedure form was also uploaded outlining the timeline for completing the required steps of verification and a statement saying the FSD will the staff member to complete verification.

### **Finding 3 – Civil Rights**

The nondiscrimination statement (NDS) must accompany any printed and web-based materials referencing FNS programs. The district's website does not contain the USDA non-discrimination statement. Web pages associated with program operation should list the full USDA NDS or the short statement with a link to the full statement for details on participants' right to file a complaint. Additionally, the household notification letters contain an outdated version of the non-discrimination statement. (FNS Instruction 113-1: Civil Rights Compliance and Enforcement).

**CAP:** Add the full USDA non-discrimination statement or the short statement and a link to the full statement. Once this is posted on the website, upload the link for review. Additionally, update the non-discrimination statement on the notification letters to households (F/R/D letter, DC letter, verification letter). Upload a copy of each of these letter templates with the correct NDS.

**Due Date:** Due December 13, 2024; Returned for Correction; Completed March 13, 2025

**Response:** The FSD has uploaded copies of the letter templates with the correct non-discrimination statement. The SFA has added the short NDS statement with a link to the full statement.

### **Finding 4 – Civil Rights**

School Food Authority (SFA) 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. There is no documentation showing that the determining officials or hearing officials completed annual civil rights training.

**CAP:** Upload certificates or a dated and signed agenda and sign-in sheet noting that the hearing official and determining officials have completed the 2024 Civil Rights training.

**Due Date:** Due December 13, 2024; Completed December 10, 2024

**Response:** The FSD uploaded an agenda and sign in sheet showing the required people completed the civil rights training.

### **Finding 5 – Local School 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 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). Per 7 CFR 210.31(e)(2).

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**CAP:** Upload a plan identifying who at the LEA will be responsible for completing the triennial assessment(s), 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.

**Due Date:** Due December 13, 2024; Returned for Correction; Completed January 15, 2024

**Response:** The FSD uploaded an NSLP Corrective Action Procedure Form outlining that the triennial assessment will be completed by the end of this school year and every three years after. The superintendent will be responsible for making sure the triennial assessment is completed.

#### **Finding 6 – Professional Standards**

The SFA currently does not have a system in place to track professional standards training hours. Employee training tracking logs must include the key area/topics and training subjects completed with certificates, agendas, and sign-in sheets retained for backup. The SA has made available a template tracking log prompting this information and Professional Standards Learning Objectives and Topics with Codes which can be found on the USDA Professional Standards Website in Download Forms.

**CAP:** Complete and upload the professional standards training tracking log for all food service employees.

**Due Date:** Due December 13, 2024; Completed December 10, 2024

**Response:** The FSD uploaded a professional standards training tracking log for each food service employee.

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

For the week of menu review, the K-5 lunch menu did not meet the minimum weekly requirement for the beans/peas/lentils vegetable subgroup. Beans/peas/lentils were offered, but not in large enough quantities to meet the weekly requirement. Subgroups of vegetables must be met for each grade group. The ½ cup weekly beans/peas/lentils vegetable subgroup requirement was not met for grades K-8, with only 1/8 cup offered.

**CAP:** Provide 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.

**Due Date:** Due October 3, 2024; Completed October 3, 2024

**Response:** The FSD added an additional ½ cup of pinto beans to the production records for future menus.

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

For the week of menu review, the K-5 lunch menu did not meet the minimum weekly requirement for the dark green vegetable subgroup. Dark green vegetables were offered, but not in large enough quantities to meet the weekly requirement. Subgroups of vegetables must

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be met for each grade group. The ½ cup weekly dark green vegetable subgroup requirement was not met for grades K-5, with only ¼ cup offered. Keep in mind that raw leafy green vegetables, such as lettuce and spinach, are creditable at half volume. Therefore, a one cup serving of fresh lettuce or spinach is creditable at ½ cup vegetable.

**CAP:** Provide 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.

**Due Date:** Due October 3, 2024; Completed October 3, 2024

**Response:** The dark green vegetable subgroup was brought into compliance with the addition of a salad added in a 1/2 portion totaling 1/2 cup dark green vegetable for the week.

## COMMENDATIONS

- The FSD had a positive attitude and showed willingness to run a compliant program. All suggestions were met with swift implementation. The director is new to the position and demonstrates enthusiasm and eagerness to learn.
- The dining and serving line areas were attractively decorated and provided a positive environment for healthy meal opportunities. Students were respectful and demonstrated good manners towards the cafeteria staff and school faculty. The day of review's lunch tray was colorful and nutritious featuring fresh vegetables and fresh fruit.

## TECHNICAL ASSISTANCE (TA)

### Verification

- Ensure the "For Official Use Only" portion of applications is completed correctly by the person listed as the determining, confirming, and verifying officials. The applications all had signatures from the determining official. However, the person determining the application does not match who is listed as the determining official in the application packet. Additionally, the confirming official has signed the verifying official box instead of the confirmation official box. Lastly, the determining and confirming official cannot be the same person. The confirmation review must be conducted by someone other than the determining official.

### Meal Counting and Claiming

- The SFA should continue to retain meal count backup for claims submitted on the day of submission since the SFA's POS software system makes updates to meal counts if reports are run at a later date due to changes in student eligibility after the claim is submitted.

### Offer Versus Serve

- The Food Service Director (FSD) has documentation regarding who took their back-to-school training at the beginning of the 2024-2025 school year that consisted of both an

agenda and sign-in sheet. The agenda indicated Offer Versus Serve (OVS) training was completed on 09/13/2024; however, the agenda did not specifically note that both OVS Breakfast and OVS Lunch were trained on. The FSD shared both OVS Breakfast and Lunch were reviewed at the back-to-school training. Ensure that training agendas specify that both OVS lunch and OVS breakfast trainings are included in future trainings.

### **Meal Components and Quantities**

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - The Child Nutrition (CN) Label submitted for the French Toast included a watermark. Please secure for your records the actual CN label from the product packaging, without the watermark.
  - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the PBJ. The spec sheet submitted included a CN number and meal pattern crediting statement but was not an official CN Label or PFS. The CN number was not active on the USDA CN Label Verification Report. An updated CN number was secured and verified as active on the USDA CN Label Verification Report.
  - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the Beef & Bean Burrito. The spec sheet submitted included a CN number and meal pattern crediting statement but was not an official CN Label or PFS. The CN number was verified as active on the USDA CN Label Verification Report.
  - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the Pizza Rippers. The spec sheet submitted included a meal pattern crediting statement but was not an official CN Label or PFS.
  - 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. See below for a description of problem areas noted in completing production records.
    - Juice type(s) was not recorded on the production records.
    - Milk types were not accurately recorded on the production records. Production record listed strawberry 1% but per communication from the sponsor, FF strawberry was offered

### **Civil Rights**

- Ensure the Civil Rights complaint log is dated annually, with a new log started each year. If no complaints were received during the school year, write "No complaints" on the log at the end of the school year and retain the documentation for three years plus the current year. Writing "No complaints" documents what occurred during the school year and helps to ensure the log is the final log and not an extra copy.

### **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 Code. A sample employee exclusion SOP is available in MyIdahoCNP's Download Forms.

### **Fresh Fruit and Vegetable Program (FFVP)**

- The Fresh Fruit and Vegetable Program (FFVP) provides an opportunity to incorporate bite sized nutrition lessons along with the service of the produce. It is recommended the FFVP includes an enrichment activity with each produce item offered.

### **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.

### **Special Provision Options**

- Provision 2 Base Year (SY22-23) benefit issuance was previously validated by the SA on 10/17/2022. The retention of all required Provision 2 documentation was confirmed during the administrative review. The current Provision 2 cycle expires at the end of SY25-26. If the SFA wishes to continue with Provision 2 breakfast, the SFA must contact the SA prior to the expiration date to see if they may qualify for an extension.

### **SFA On Site Monitoring**

- Per the previous school year's records, the SFA on-site monitoring forms were complete but omitted the signatures validating the forms. When completing the SFA on-site monitoring forms each school year, ensure that the included signature section is filled out properly.

## **FISCAL ACTION**

Due to benefit issuance errors, fiscal action results in \$61.32. 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,

**Debbie Critchfield, Superintendent of Public Instruction**  
**(208) 332-6800 | 650 W. State St., Boise, ID 83702 | [sde.idaho.gov](https://sde.idaho.gov)**

*Cambria Steffler*

Cambria Steffler, MS, RD

NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Deidra Ingles, Child Nutrition Director, Bruneau-Grand View Jt. School District

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