



April 25, 2025

Dena Allred, Superintendent  
Castleford School District  
500 Main  
Castleford, ID 83321

Dear Superintendent Allred

On February 27, 2025, Idaho Department of Education Coordinators Cambria Steffler, Jessica Medrano, Cassandra Thompson, and Jax Dunham conducted an Administrative Review (AR) of Castleford 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 Castleford School.

The State agency (SA) would like to commend Kim Aguirre and the entire staff of Castleford 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 156 applications resulted in a 1.92% error rate. Three students were noted as reduced but should be free via Direct Verification.

**CAP:** Update the students' benefits in the Benefit Issuance list to show a free benefit.

**Due Date:** Due March 14, 2025, Completed March 4, 2025

**Response:** The Food Service Director (FSD) uploaded a benefit issuance list showing that the students' benefits have been updated.

### Finding 2 – Verification

One application was incorrectly calculated as part of the verification requirements due to being calculated on net pay rather than gross income requiring student eligibility to be changed from free to reduced price.

**CAP:** Send an adverse action letter to the household notifying them that their benefit will be changed from free to reduced. Upload a copy of the adverse action letter and a copy of the benefit issuance list showing the household's benefit has been changed to reduced.

**Due Date:** Due March 14, 2024; Returned for Correction; Completed April 1, 2025

**Response:** The FSD uploaded a copy of the adverse action letter and the benefit issuance list showing the benefit has been changed. The FSD also uploaded a corrective action procedure form, and an example pay stub showing the gross income will be used for future verification.

### Finding 3 – 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 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:

- Wednesday January 15, 2025, with only 1.25 oz. eq. offered
- Thursday January 16, 2025, with only 1.5 oz. eq. Offered

A sponsor must maintain current product documentation and nutrition facts labels from the manufacturer for commercially prepared foods. Nutrition facts labels were not submitted for the buns served with the sloppy joes on Wednesday. If the bun offered on Wednesday is at least 1 oz eq grain, then daily grains will be met. Consider offering a dinner roll or bag of whole grain (WG) chips with the chicken tender meal to meet minimum requirements. The federal

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regulations require weekly minimum amounts of grains to be served. The weekly requirement of 8 oz. eq. was not met for grades 9-12. The menu offered a minimum of 7.75 oz. eq. of grain throughout the week. By following the suggestions outlined to meet the daily grain requirement, the weekly grain requirement will also be met.

**CAP:** Provide documentation to demonstrate that the menu findings for the week of menu review 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 January 21, 2025; Completed January 21, 2025

**Response:** The FSD uploaded documentation showing the grain component has been brought into compliance.

#### **Finding 4 – 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 fresh pineapple from Costa Rica and canned tropical fruit from Thailand was not available during the AR. Please also note that beginning SY 2025-2026, SFAs will be required to have less than 10% of commercial purchases come from non-domestic sources in the breakfast and lunch programs.

**CAP:** Upload the NSLP Corrective Action Procedure Form detailing how the SFA will complete the Buy American Exception Form for items not noted on the Federal Acquisition Regulation (FAR) list going forward.

**Due Date:** Due March 14, 2025; Completed March 11, 2025

**Response:** The FSD completed the NSLP Corrective Action form outlining the procedure for completing the Buy American documentation and all the completed buy American exception forms.

#### **Finding 5 – Infant and Pre-K Meal Pattern Checklist - Lunch**

The Child and Adult Care Food Program (CACFP) meal pattern must be followed when claiming Pre-K students under the NSLP. However, per SP37-2017, Pre-K students may be served the NSLP meal pattern and claimed under the NSLP if they are comingled with other K-5 grades as it may be challenging to determine during a meal service if a child is in preschool or K-5. In the current operation, Pre-K students are not currently comingled and are receiving the NSLP meal pattern.

**CAP:** Upload an NSLP Corrective Action Procedure Form detailing how the SFA will ensure that the Pre-K students are properly counted and claimed under an appropriate meal pattern.

**Due Date:** Due March 14, 2025; Completed March 4, 2025

**Response:** The FSD completed the NSLP Corrective Action Procedure form outlining that the Pre-K will now be comingling with the kindergarten class.

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## COMMENDATIONS

- The food service director has amazing organization skills for all of the required documentation needed for these programs. The level of organization allowed the SA to review all the necessary documentation quickly and efficiently.
- The food service staff does an excellent job of serving a large number of students in a quick, efficient and friendly manner!
- When the state agency viewed the walk-in refrigerator in the kitchen, the prepared fruits and vegetables looked glorious, as they were all prepared for the meal service. The bright colors were so vivid, inviting and fresh, which resulted in a lovely salad bar during the lunch service. The students at Castleford are most fortunate to have such wonderful daily variety.

## TECHNICAL ASSISTANCE (TA)

### 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. See below for a description of problem areas noted in completing production records.
    - Milk types and condiments were not recorded on the production records.
    - No dates were recorded on the production records
    - Fruit and salad bar servings are recorded in one line; serving amounts need to be recorded on separate lines.
  - 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. The recipes submitted were not always written in standardized format with complete information. The Sloppy Joe recipe does not state a serving size for the meat or utensil used to serve it. The production record indicated a different size meat portion for different grade groups. The serving size and utensil needed for each grade group should be noted on the recipe and production record.
  - 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 Child Nutrition (CN) Label submitted for the scrambled eggs included a watermark. Please secure for your records the actual CN label from the product packaging, without the watermark.

### Food Safety

- The HACCP manual is located in the food service director's office and contains all of the required documents. The state agency does recommend the SFA adds a "Last Reviewed"

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date at the beginning of their HACCP manual to ensure the most recent Standard Operating Procedures are being utilized each school year.

#### **Fresh Fruit and Vegetable Program - FFVP**

- The Fresh Fruit and Vegetable Program (FFVP) provides an opportunity to incorporate bite size nutrition lessons along with the service of the produce. It is recommended the FFVP includes an enrichment activity with each produce item offered.
- Administrative costs are at 10% as of January's claim. This was brought to the attention of the Food Service director, and administrative costs will no longer be charged.

#### **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.

#### **FISCAL ACTION**

Due to benefit issuance errors, fiscal action results in an underclaim of \$34.80. A financial adjustment will occur with the next claim reimbursement.

#### **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  
Kim Aguirre, Child Nutrition Director, Castleford School District

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