



March 13, 2025

Lisa Velasquez, Chief Operating Officer
Elevate Academy East Idaho
1873 Walton Avenue
Idaho Falls, ID 83401

Dear Chief Operating Officer Velasquez,

On November 6, 2024, Idaho Department of Education Coordinators Cassandra Thompson, Jax Dunham, Cambria Steffler and Jessica Medrano conducted an Administrative Review (AR) of Elevate Academy East Idaho 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 Elevate Academy East Idaho.

The State agency (SA) would like to commend Kelly Warren and the entire staff of Elevate Academy East Idaho 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

According to 7 CFR 245.6(c)(6)(ii), the LEA must notify the household, in writing, of eligibility established through direct certification. The notification must explain that the child is eligible for free or reduced benefits without further application. Further, the notification must clarify eligibility that free meal benefits extend to all school-aged children in the household and must inform households of how to notify the LEA of any additional school-aged children in the household not listed on the notification. Currently, the SFA does not have a process to send notification letters to households that have directly certified students.

CAP: Upload the DC notification template letter that the SFA will utilize going forward and send a DC Notification Letter to each family on your DC list. The notification letter must explain that the child is eligible for free or reduced benefits without further application. Further, the notification must clarify eligibility that free meal benefits extend to all school-aged children in the household and must inform households of how to notify the LEA of any additional school-aged children in the household not listed on the notification. Additionally, upload an NSLP Corrective Action Procedure Form noting how the SFA will ensure that DC notification letters are sent to households going forward. On this form, include who will be responsible for sending the DC notification letters and ensuring they state all required information.

Due Date: November 21, 2024; Extended to December 18, 2024; Completed December 11, 2024.

Response: The SFA uploaded the requested DC notification template letter that they will utilize moving forward. A DC Notification Letter was also sent to each family on their DC list containing the appropriate information. An NSLP Corrective Action Procedure Form was uploaded into MyIdahoCNP to ensure compliance moving forward.

Finding 2 – Certification and Benefit Issuance

A statistical sample of 131 applications resulted in a 4.58% error rate. Two applications, affecting two students, were calculated incorrectly, and required changes in benefits from Reduced to Paid. Four applications were documented as Medicaid Free on the benefit issuance list and had a change in benefits, as they were on the DC list as Medicaid Reduced.

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CAP: Upload any adverse action letters and the current benefit issuance list indicating benefits have changed after the required 10-day period has lapsed.

Due Date: November 21, 2024; Extended to December 18, 2024; Completed December 17, 2024.

Response: The SFA uploaded adverse action letters and a current benefit issuance list documenting the student benefits were corrected.

Finding 3 – Certification and Benefit Issuance

One application was denied due to being incomplete as the application did not list income and had the incorrect number of household members listed. In both cases, the family should have been contacted to verify if the family has income that was not documented and the number of household members. Due to the family stating zero income, this was also a missed opportunity to verify whether the family would benefit from community resources.

Four denied applications were calculated incorrectly, as they had more than one frequency of pay and the application was not converted to annual income. All four applications did not result in a change of benefits.

CAP: Contact the family to verify income and total household members. Document the call on the application, amend benefits as necessary and upload a benefit issuance list to document changes made. Complete the Tiny Bite video on Determining Applications, as well as the Path to Success training. Both courses are in the Resource Center and then click YouTube to select your training. Notify the state agency when training has been completed.

Due Date: November 21, 2024; Extended to December 18, 2024; Completed December 11, 2024.

Response: The SFA contacted the families to verify their household income and total number of household members. The call was documented on the application and there was no change in benefits. The SFA also completed the Tiny Bite video on Determining Applications and the Path to Success training.

Finding 4 – Verification

Verification requirements were not met for SY2024-2025. The details of the requirements not met are listed below:

1. The application pulled for Verification included a student on the State Direct Certification (DC) list. This list was obtained by the LEA on August 30, 2024, before Verification began, so the application should not have been included in the verification pool.
2. A second attempt to contact the household when the household does not respond to the original request for verification must be completed [7 CFR 245.6a(f)(6)]. There is no documentation that a second attempt was made to contact the households selected for verification before completing the verification process. Additionally, the original request for verification was mailed on October 1st with a submission deadline of October 9th. This does not give the households adequate time to respond to the verification request. The SA recommends following the sample verification timeline provided in Download Forms.
3. A confirmation review must take place before notifying the household of the request for verification. The confirming official, who must be a different individual than the

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determining official, must review an application prior to beginning the Verification process. This double check is a safeguard to ensure the application eligibility was determined correctly. The confirming official completes the "Official Use Only" box on the free and reduced meal application that has been selected for verification. Once the verification process has been completed and results determined, the verifying official (either the determining or confirming official) must sign and date the "For Official Use Only" portion of the application at the conclusion of verification. The process results should be marked on the application and when the notice letters were sent.

CAP: Due to Verification not being completed correctly, the SFA was advised to contact the SA Financial Specialist to request an extension of the November 15th deadline to no later than December 15, 2024. The SFA will need to select another application, verify this extra application, and complete all verification activities by December 15. Due to the SFA not being able to produce a copy of the second letter, the SFA will need to resend and upload the second letter, as well as final determination letters. Complete the verification training in the CNP training portal and upload a certificate of completion or an agenda and sign in sheet. Additionally, complete the NSLP Corrective Action Procedure Form outlining how the verification process will be completed annually. In this form, include who will be completing the verification process and the anticipated timeline.

Due Date: November 21, 2024; Extended to December 18, 2024; Completed December 17, 2024.

Response: The SFA contacted the state agency Financial Specialist to request an extension on their verification. The extension was approved. The SFA also selected another application to verify and complete all verification activities by December 15, 2024. Verification training was completed in the CNP Training Portal, and a certificate of completion was uploaded into MyIdahoCNP, as well as an agenda and sign-in sheet for this training. Additionally, the SFA completed and uploaded the requested NSLP Corrective Action Procedure form outlining how the verification process will be completed moving forward.

Finding 5 – Nonprofit School Food Service Account

Per 7CFR 210.14(a), Nonprofit school food service account means the restricted account in which all the revenue from all food service operations conducted by the school food authority principally for the benefit of school children is retained and used only for the operation or improvement of the nonprofit school food service. During the Administrative Review, the sponsor's Nonprofit School Food Service Account was missing a portion of their August 2024 claim (\$4,105.45). It was discovered the missing amount was mistakenly included in their General Funds as base state support.

CAP:

1. Utilizing non-federal funds, deposit \$4,105.45 into the SFA's Nonprofit School Food Service Account.
2. Upload a copy of the updated Nonprofit School Food Service Account that documents the deposit of \$4,105.45 to verify the entire August 2024 claim is accounted for.

Due Date: March 13, 2025; Completed March 13, 2025

Response: The Finance Manager transferred \$4,105.45 into the SFA's Nonprofit School Food Service Account and uploaded an updated Nonprofit School Food Service Account documenting the correction was made.

Finding 6 – Meal Counting and Claiming

Before submitting a monthly reimbursement claim, the SFA must review the meal count data for each school to ensure the accuracy of the claim per CFR 210.8(a)(2). The SFA has been using the Daily Transaction Summary Report to check their claim prior to submission. While the SA was on-site, it was noted that this report did not have the same meal counts as the edit check report generated from the software. While reviewing the claim, the SA noted discrepancies between the claim submitted and the edit check report generated from the POS. The meal count discrepancies are as follows:

- Overclaim of eighty-nine free lunches
- Overclaim of twenty-two reduced lunches
- Overclaim of sixty-five paid lunches
- Overclaim of twenty-nine free breakfasts
- Overclaim of seven reduced breakfasts
- Overclaim of fifteen paid breakfasts

CAP: Complete the NSLP Corrective Action Procedure form outlining the process for completing an edit check before submitting the claim each month. In this form, please include what reports will be utilized and who will be responsible for completing this edit check.

Due Date: **November 21, 2024;** Extended to December 18, 2024, Completed December 19, 2024.

Response: The SFA completed the NSLP Corrective Action Procedure form that appropriately outlines the process for completing an edit check to ensure accuracy prior to the submission of their monthly claims.

Finding 7 – Professional Standards

Per 7 CFR 210.30, the hearing official must complete annual civil rights training. Though the hearing official completed the frontline staff civil rights training, they did not complete the full civil rights training.

CAP: Upload a certificate or agenda and sign-in sheet noting that the hearing official has now completed the full annual civil rights training.

Due Date: **November 21, 2024;** Extended to December 18, 2024; Completed December 17, 2024.

Response: The SFA uploaded a certificate of completion documenting the hearing official has completed the annual civil rights training.

Finding 8 – Professional Standards

The SFA does not have a process in place to track employees' professional standards training hours. Employee training tracking logs must be kept that 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, Professional Standards Learning Objectives and Topics with Codes, found on the USDA Professional Standards Website. (7 CFR 210.30)

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CAP: Complete and upload a professional standards training tracker log for all food service employees.

Due Date: November 21, 2024; Completed November 11, 2024.

Response: The FSD completed and uploaded a professional standards training tracker log for all food service employees and will continue this process moving forward.

Finding 9 – Professional Standards

Food Service Directors must have at least eight hours of food safety training every five years. A free online course, Food Safety in Schools, is available through the Institute of Child Nutrition (ICN) and can be used to meet this requirement. The Food Service Director has yet to take this required course. (7 CFR 210.30)

CAP: Upload a training certificate indicating successful completion of at least eight hours of food safety training into MyIdahoCNP Review Attachments for the SA to review.

Due Date: November 21, 2024; Extended to December 18, 2024; Completed December 10, 2024.

Response: A certificate of completion was uploaded to MyIdahoCNP documenting the successful completion of the required 8 hours of food safety training.

Finding 10 – Meal Components and Quantities – Lunch

For the week of menu review, the 6-8 and 9-10 lunch menus did not meet the minimum 1/2 cup weekly requirement for the beans, peas, and lentil's vegetable subgroup. There were no beans, peas, or lentils offered this week. (7 CFR 210.10)

CAP: 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. Submit supporting documentation to demonstrate that the menu findings listed are now corrected. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: October 24, 2024, Completed October 29, 2024.

Response: The SFA provided a detailed response to correct the menu review findings to bring the menu into compliance, including supporting documentation. The SFA added Garbanzo Beans to the Elevate Salad for the week of review menu. The food service director is listed as the individual responsible for menu compliance.

Finding 11 – Meal Components and Quantities – Lunch

For the week of menu review, the 9-10 lunch menu did not meet the minimum daily 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 Monday, October 7, 2024, with only 1.75 oz. eq. offered. (7 CFR 210.10)

CAP: 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. Submit supporting documentation to demonstrate that the menu findings listed are now corrected and submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: October 24, 2024, Completed October 29, 2024.

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Response: The sponsor updated their menu to document future compliance. The recipe for macaroni salad now shows the amount of macaroni in the recipe increased to 6.5 lbs. for one hundred servings to credit as 2 oz. eq. grain per serving. The position responsible for menu compliance is the food service director.

Finding 12 – Meal Components and Quantities – Lunch

For the week of menu review, the 6-8 and 9-10 lunch menus did not meet the minimum daily and weekly requirements for meat/meat alternate (M/MA). The federal regulations require menus to be planned that meet the daily minimum meat/meat alternate requirement of 1 oz. eq. for grades 6-8 and 2 oz. eq. for grades 9-10. (7 CFR 210.10) This requirement was not met on:

- Monday, October 7, 2024, with 0 oz. eq. offered (Both 6-8 and 9-10) due to a missing Child Nutrition (CN) label or Product Formulation Statement (PFS) for the meatballs. As a result, the meal pattern crediting could not be determined.
- Thursday, October 10, 2024, only 1.5 oz. eq. was offered for grades 9-10. Per the Product Formulation sheet on the chicken nuggets, six chicken nuggets would be needed to provide a 2 oz. eq. serving.
- Friday, October 11, 2024, the turkey noodles only offered 1.75 oz. eq. M/MA for grades 9-10.
- The weekly requirement of 10 oz. eq. was not met for grades 9-10, with only 8 oz. eq. of M/MA being offered throughout the week.

CAP: 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. Upload supporting documentation into MyIdahoCNP to demonstrate the menu findings are now corrected. Submit the position title(s) of the School Food Authority that will oversee this area and ensure future compliance.

Due Date: October 24, 2024; Completed October 31, 2024

Response:

- The updated production record and meatball sub recipe show each sub gets five meatballs. The CN label submitted shows that five meatballs are credited as 2 oz. eq. M/MA.
- The updated production record shows the serving size of chicken nuggets for grades 9-10 was increased to six each to credit as 2 oz. eq. M/MA.
- The updated recipe for turkey and noodles shows the amount of turkey roast in the recipe for one hundred servings was increased to 20 lbs., which credits as 2 oz. eq. M/MA per serving.
- The updated recipe for Elevate Deli sandwich shows 1.5 oz turkey, 1.5 oz ham and one slice of cheese added to each sandwich in the instructions. This credits as 3 oz. eq. of M/MA to meet the weekly 10 oz. eq. requirement.

Finding 13 – Meal Components and Quantities – Lunch

For the week of menu review, the 6-8 and 9-10 lunch menus did not meet the minimum weekly 1/2 cup requirement for the dark green vegetable subgroup, as there were no dark green vegetables offered this week. (7 CFR 210.10)

CAP: 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. Upload supporting documentation into MyIdahoCNP to demonstrate the menu findings are now corrected. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: October 24, 2024; Completed October 29, 2024

Response: The SFA changed the Menu to include the Elevate Tossed salad which has dark greens, spinach, and romaine lettuce to meet the weekly requirement of dark green vegetables. The mixed vegetables were also changed to a Broccoli mix. An updated menu was uploaded into MyIdahoCNP reflecting all corrective actions. The Food Service Director will oversee this area to ensure future compliance.

Finding 14 – Offer versus Serve

All food service line staff must receive annual OVS training when OVS is implemented. There is no documentation that required annual OVS training occurred for all kitchen/line staff. Online OVS training is available through the SA training portal and provides a certificate of completion. Group staff training must include an agenda and sign-in sheet that specifically identifies that "OVS breakfast" and/or "OVS lunch", as applicable, was part of the training agenda. Training documentation should be recorded on the Professional Standards tracking log and maintained on file at the SFA for three years plus the current year.

CAP: All food service staff are to complete the OVS breakfast and OVS lunch training and upload a certificate of completion or an agenda and sign in sheet.

Due Date: November 21, 2024; Extended to December 18, 2024; Completed December 11, 2024.

Response: All food service line staff completed the OVS breakfast and OVS lunch training courses on the CNP learning portal. As requested, certificates of completion were uploaded into MyIdahoCNP.

COMMENDATIONS

- The SFA did a respectable job preparing for their administrative review. All the documents requested were laid out nicely, which enabled the SA team to jump right in and start working upon arrival. This was much appreciated, an excellent job!
- The food service team is doing a fantastic job of serving all grades (6-8 and 9-12) quickly and efficiently while correctly following the meal patterns and providing the required components.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- 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 students' names must be included on a list signed and dated by the homeless liaison. That information must be provided to the SFA in a timely

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manner so that students can receive free meals as soon as that information is determined.

- The food service director had a list of names on a McKinney-Vento list; however, the list was missing eligibility dates and a signature of the McKinney-Vento liaison. During the administrative review, the food service director obtained a signed McKinney-Vento list.

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, to confirm meal pattern crediting.
 - Cereal bar
 - Pancake on a stick
 - Granola

A sponsor must maintain this documentation to ensure meal pattern requirements are met.

- The Child Nutrition (CN) Label secured for the sausage links included a watermark. Please secure for your records the actual CN label from the product packaging, without the watermark.
- A standardized recipe is a recipe that has been carefully adapted and evaluated to ensure that it will produce a consistent product each time it is prepared. The recipes submitted were not consistently written in a standardized format with complete information. Items on the menu that need standardized recipes include the following:
 - The recipe for the breakfast plate must be updated to show the correct muffin being served.
 - The recipe for the parfait should be updated to include the correct granola being served.

Meal Components and Quantities – Lunch

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

- Recommendations were made to bring all areas into compliance. All menus served must meet all daily and weekly meal pattern requirements for the 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.
- 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.

Professional Standards

Consider implementing a process that ensures the required training (food safety, OVS, and civil rights) is conducted at the beginning of each school year and adequately documented. When new employees are hired, ensure necessary training is received prior to assuming duties.

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 304-304 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 \$1180.32 for school lunch and \$128.91 for school breakfast. The breakfast amount is under the \$600 threshold and will be disregarded. The NSLP adjustment will be withheld from a future claim. Should you wish to appeal this fiscal action, follow the appeal procedures on the [State Agency Appeal Procedures](#) document located on the Idaho Child Nutrition Programs website.

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,

C. Thompson

Cassandra Thompson, BS
NSLP Coordinator

cc: [REDACTED] Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Melissa Farrell, Food Service Director,
Shannon Taylor, Administrator

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