



March 27, 2025

Stoney Winston, Superintendent
Fruitland School District #373
401 Iowa Avenue
Fruitland, ID 83619

Dear Superintendent Winston,

On November 20, 2024, Idaho Department of Education Coordinators Cassandra Thompson, Cambria Steffler, Jax Dunham and Jessica Medrano conducted an Administrative Review (AR) of Fruitland School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- USDA Foods
- Afterschool Snack Program (ASSP)

The site reviewed was the Fruitland Elementary School.

The State agency (SA) would like to commend Amanda Reed and the entire staff of Fruitland 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 170 applications resulted in a 4.71% error rate. Eight applications, affecting 8 students, required changes in benefits:

- 2 students were on the benefit issuance list as SNAP free; however, the students cannot be located via the DC list. Change benefit from free to paid.
- One student was on the benefit issuance list as Migrant free; however, the student cannot be located via the DC list. Change benefit from free to paid.
- On 2 applications, only one of two incomes were utilized to determine benefits. The second income changed the status from being reduced to paid.
- Another application had two incomes where only one income was utilized to determine the benefit. There was no change in benefits due to this error.
- One application was incomplete due to the household size needing to be verified. Verify household size and complete the required corrective action.
- One application was incomplete due to household size needing to be verified. This same application also had a frequency of pay that was not able to be determined (monthly or every two weeks). Verify household size and frequency of pay. Complete the required corrective action.

CAP: Change student benefits as required on the benefit issuance list and send household notifications. Upload a copy of all notifications and a current benefit issuance list documenting all necessary changes that have been made, including effective dates.

Due Date: December 18, 2024; Completed December 17, 2024

Response: All changes were made to the benefit issuance list and uploaded into MyIdahoCNP for state agency review. Notification letters were sent to households indicating their student(s) current benefits. If an adverse action letter was sent, the SFA waited for the appropriate 10 days before updating the benefit issuance list.

Finding 2 – Verification

Verification requirements were not met. The errors for verification are listed below:

1. One application selected for verification was not verified correctly. The application stated the family had wages for two members of the household, however, income documentation was only received for one family member during the verification process.

2. The applications selected for verification did not have documentation that the confirmation review took place. The confirming official, who must be a different individual than the determining official, must review an application prior to beginning the Verification process. This ensures the application eligibility was determined correctly. Both officials complete 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, who can be either the confirming or determining official, must complete the “Official Use Only” box on the meal application. The hearing official is a separate individual with supervisory authority over the other officials that would oversee the hearing process and settle the eligibility if the confirmed original determination is disputed.
3. On their verification report, the FSD listed three sites. However, there are four sites in the district.

CAP:

1. Contact the household to verify whether the income information provided is the only income the household is receiving.
 - If the family has one income, change the household benefit from reduced to free and send a new notice of verification results to notify the household of the change in benefits, or
 - If incorrect, obtain the second income documentation and validate the application with both sets of income. Send the verification results letter to the family and upload all verification correspondence and income documentation into MyIdahoCNP.
2. Complete the NSLP Corrective Action Procedure form outlining the verification process, including who will be completing the confirmation review, as well as the timeline for this process.
3. Contact the senior financial specialist to see if the verification report can be amended with the correct number of sites in the district. Update the report if required. If not required, please include how this will be checked for accuracy in the NSLP Corrective Action Procedure Form.

Due Date: December 18, 2024; Extended to March 14, 2025; Completed March 19, 2025

Response:

1. The FSD uploaded an email from the family into MyIdahoCNP stating there is currently only one income in the household. Due to her spouse being out of the country for an unspecified amount of time, the family is being supported by her income only. The FSD also uploaded documentation that the student had a DC match stating he is Migrant since November 7, 2024. The family has since been changed to Migrant status on the benefit issuance list. The FSD completed and uploaded an NSLP Corrective Action Procedure form that outlines the verification process including who will be completing the confirmation review, as well as the timeline for this process.
2. The FSD uploaded an email from the Financial Specialist that states the verification report cannot be amended.

Finding 3 – Meal Counting and Claiming

Prior to the submission of a monthly claim for reimbursement, the SFA must review the meal count data for each school to ensure the accuracy of the claim per CFR 210.8(a)(2). While reviewing the claim, the SA noted discrepancies between the claim submitted and the edit check report generated from the POS. For the entire district, the meal count discrepancies are as follows:

- Underclaim of 482 paid lunches
- Underclaim of 47 reduced lunches
- Underclaim of 537 free lunches
- Underclaim of 145 paid breakfasts
- Underclaim of 26 reduced breakfasts
- Underclaim of 232 free breakfasts

For Fruitland Elementary School, the discrepancies are as follows:

- Underclaim of 482 paid lunches
- Underclaim of 62 reduced lunches
- Underclaim of 522 free lunches
- Underclaim of 141 paid breakfasts
- Underclaim of 26 reduced breakfasts
- Underclaim of 229 free breakfasts

When comparing Fruitland Elementary School's underclaimed numbers to the total number of underclaimed meals for the district, it appears that the majority of the underclaimed meals came from this site.

CAP: Complete the NSLP Corrective Action Procedure Form outlining the procedure for reviewing the claim prior to submission. On this form, indicate who will be responsible for reviewing the claim and what report(s) will be utilized when reviewing the claim.

Due Date: December 18, 2024; Completed December 9, 2024

Response: The FSD completed and uploaded the NSLP Corrective Action Procedure form that outlines the importance of reviewing the Edit Check Report prior to submitting all claims for reimbursement. The FSD is the individual who is responsible for submitting claims.

Finding 4 – Civil Rights

The nondiscrimination statement (NDS) must accompany any printed and web-based materials referencing FNS programs. Web pages associated with program operation should list the full USDA NDS with details on participants' right to file a complaint.

- The school website contains an outdated version of the non-discrimination statement.
- The verification letters contain an outdated version of the non-discrimination statement.

The full statement is available on the SA website under Civil Rights. It is recommended that a link to the full statement in a variety of languages be included. The recommended link to use is <https://www.usda.gov/non-discrimination-statement>. (FNS Instruction 113-1: Civil Rights Compliance and Enforcement).

CAP: Post the updated non-discrimination statement on the website and upload the link where it is posted for review.

Debbie Critchfield, Superintendent of Public Instruction

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Due Date: December 18, 2024; Completed December 5, 2024

Response: The updated NDS has been added to the school website in both English and Spanish. The FSD also uploaded a verification letter with the correct NDS.

Finding 5 – 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 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).

CAP: Complete the NSLP Corrective Action Procedure form and indicate 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. Complete the Triennial Assessment and make the assessment available to the public.

Due Date: December 18, 2024; Completed December 12, 2024

Response: The FSD completed and uploaded the NSLP Corrective Action Procedure form indicating who at the LEA will be responsible for completing the triennial assessment, how the triennial assessment will be completed and how the assessment will be shared with the public in an easily understood manner. The FDS has arranged for the triennial assessment to be added to a board meeting agenda and the Wellness Policy Progress Report will be discussed and completed no later than April of 2025.

Finding 6 – Food Safety

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 Sliced Jalapeños from Mexico was not available during the AR.

CAP:

1. Complete and retain the State Agency's "Buy American Exemption Form" for all food products requiring documentation.
2. Complete the NSLP Corrective Action Procedure form to identify and document who will be responsible for completing the Buy American Exemption forms.
3. Upload the Buy American Exemption Form for the Jalapeños, as well as the NSLP Corrective Action Procedure form into MyIdahoCNP.

Due Date: December 18, 2024; Completed December 5, 2024

Response:

1. The FSD completed and uploaded the appropriate Buy American documentation for sliced Jalapeños from Mexico.

Debbie Critchfield, Superintendent of Public Instruction

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2. The FSD completed and uploaded the NSLP Corrective Action Procedure form which identifies and documents who will be responsible for completing the Buy American Exemption forms moving forward.

Finding 7 – Meal Components and Quantities – Lunch

For the week of menu review, grades 1-4 did not meet the minimum daily requirements for vegetables. The federal regulations require a minimum of 3/4 cup of vegetable to be offered each day for grades 1-4. This requirement was not met on Monday, October 14, 2024, and Wednesday, October 16, 2024, with only ½ cup offered. Consider the following suggestions to help meet requirements:

- On Monday, offer ¾ cup broccoli.
- On Wednesday, ½ cup pork & beans are offered. Offer ¼ cup carrots or sweet potato fries, in addition to ½ cup pork & beans to meet Red/Orange vegetable subgroup requirement as well.

For the week of menu review, the lunch menu for grades 1-4 did not meet the weekly requirement for the red/orange vegetable subgroup. Red/orange vegetables were offered, but not in large enough quantities, with only 5/8 cup being offered. By following the suggestions outlined to meet the daily vegetable requirements, the weekly vegetable Red/Orange subgroup requirement will also be met.

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 15, 2024; Completed October 10, 2024

Response: The FSD updated and uploaded corrected production records documenting ¾ cups of broccoli will now be served on the Monday menu to meet the weekly vegetable requirement, and ½ cup of carrots were added to the Wednesday menu. This addition results in the weekly red/orange vegetable subgroup exceeding the requirements by offering 1 1/8 cups of this subgroup. The FSD is the responsible individual who will ensure these requirements are met moving forward.

COMMENDATIONS

- The food service supervisor is starting her first full year in the position. She is enthusiastic and expresses interest shadowing/mentoring with seasoned food service directors. The state agency appreciates her initiative.

- "At -A-Glance" Boards are present at each school food service operation to record quick inventory information. The boards are in the freezer, cooler and dry storage areas. This is a great practice to prevent over-ordering or running out of supplies.
- The students and staff demonstrated respect and friendliness. The state agency enjoyed witnessing these positive interactions.
- The cafeteria was beautifully decorated with student artwork. The serving line area was arranged to serve students promptly.

TECHNICAL ASSISTANCE (TA)

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 7-1-2024, 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.
- The Food Safety Plan (HACCP) must have an employee exclusion policy. This is required by Idaho Food Code. Please update your plan to come into compliance.

Meal Components and Quantities – Breakfast and Lunch

Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus. The uploaded production records did not consistently provide adequate information. See below for a description of problem areas noted in completing production records.

- Milk types offered were not clearly recorded on the production records. Be sure to include low-fat or fat-free/skim in addition to the flavor of the milk.
- Fruit types were not recorded on the production records.
- Graham cracker crediting needs updating. Per the Food Buying Guide Exhibit A, one 0.75 oz. package of graham crackers credits as 0.75 oz. eq. grain. A Product Formulation Statement was not submitted to credit otherwise.
- 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 always written in standardized format with complete information. Standardize the recipes so that true yields and portion sizes can be determined. To be standardized, recipes must include at a minimum the following:
 - All ingredients in the recipe.
 - Correct volume or weighted measure of each ingredient.
 - Serving/portion sizes for each grade group.
 - The true yield created by the recipe.
 - Clear and complete preparation steps and instructions.

Items on the menu that need updating of standardized recipes include the following:

- Fresh Veggie (Veggie bag)- 3 gallons plus 2 cups of fresh broccoli for 100 servings credits as ½ cup dark green vegetable; therefore, total meal contribution per recipe is 1 ½ cups vegetable.

FISCAL ACTION

During the Administrative Review, the state agency discovered Fruitland School District underclaimed \$3,243.88 in the claim submitted for the month of October 2024. Additionally, in your review, there was fiscal action in the amount of \$242.40 for the month of November 2024. Fiscal action will not be disregarded, and you have the right to appeal this decision. As a result, the state agency is reimbursing Fruitland School District \$3001.48 (\$3,243.88 - \$242.40).

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: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Amanda Reed, Food Service Director

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