



April 7, 2025

Mr. Ed Longfield, Superintendent  
Idaho Arts Charter School  
1220 5<sup>th</sup> Street N  
Nampa, ID 83687

Dear Superintendent, Longfield.

On February 13, 2025, Idaho Department of Education Coordinators Cassandra Thompson, Cambria Steffler and Jessica Medrano conducted an Administrative Review (AR) of Idaho Arts Charter School for the following United States Department of Agriculture (USDA) program:

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

The site reviewed was the Idaho Arts Charter School.

The State agency (SA) would like to commend Kristen Ludwig and the entire staff of Idaho Arts Charter School 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**

LEAs are encouraged to review direct certification lists to determine if any Assistance Program applications can be matched with names on your benefit issuance list. As stated at 7 CFR 245.6(b), if a household submits an application for directly certified children, the direct certification eligibility determination will take precedence. Any application disregarded because all children in the household were determined categorically eligible through direct certification must be retained and the date of disregard must be documented. If a match is not found, and the LEA considers the application to be questionable, the determining official should verify the application for cause. Five households submitted electronic applications where they stated they were SNAP or TANF. The SFA did not verify whether these students were on the DC list which resulted in students receiving an incorrect benefit as categorically eligible.

**CAP:** Contact the families who submitted electronic applications and state they were directly certified. Verify eligibility over the phone and request documentation of said benefits (including verifying whether students are on the DC list). If documentation cannot be provided, a letter of adverse action should be sent to the family. After the appropriate lead time, benefits should be changed to Paid.

**Due Date:** February 28, 2025; Completed February 27, 2025

**Response:** The benefits of five students from five households were in question, as they could not be located on the DC list on the day of the on-site administrative review.

- One student went from free to paid
- One student went from free to reduced.
- The other three applications had a sibling in their family where benefits extended and there was no change in benefits. The Food Service Director uploaded adverse action letters for those who had a decrease in benefit, current DC information and an updated benefit issuance list as documentation that these issues have now been resolved.

### **Finding 2 – Certification and Benefit Issuance**

A sample of 339 student meal benefits resulted in a 4.42% error rate:

- Thirteen students were transferred incorrectly to the benefit issuance list as TANF and must be changed to Medicaid-Reduced.
- One student was transferred incorrectly to the benefit issuance list as TANF and must be changed to Medicaid-Free. There is no change in benefit due to this error.
- One student was receiving a free benefit and was not changed to paid after the 30-day carryover period. This student must be changed to paid.

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**CAP:**

1. Send adverse action letters to the households whose benefits are decreasing, notifying them that their benefit will be reduced in ten calendar days.
2. Once ten days have passed, change the applicable student benefits to their proper eligibility on the benefit issuance list.
3. Upload all adverse action letters into MyIdahoCNP and ensure the new effective date allows for the 10-day waiting period.
4. Upload a new benefit issuance list into MyIdahoCNP documenting benefits have been updated appropriately.

**Due Date:** February 28, 2025; Completed April 1, 2024.

**Response:**

1. The Food Service Director (FSD) sent an adverse action letter to the households whose benefits decreased. The appropriate 10-day notice was documented in the letter.
2. The FSD uploaded the adverse action letters into MyIdahoCNP and benefits were updated after the 10-day waiting period.
3. The FSD updated and uploaded the benefit issuance list into MyIdahoCNP that reflects all changes made.

**Finding 3 – Verification**

One family that was selected for verification responded stating they had no income. Per page 109 on the eligibility manual, if a household is selected for verification, and the household's application indicates zero income, the LEA must request an explanation of how living expenses are met and may request additional written documentation or collateral contacts. The collateral contact may be asked to document the duration and type of assistance that is provided to the household. The household selected for verification did not provide any explanation of how living expenses are met and further explanation should have been requested.

**CAP:** Contact the household and request further explanation on how living expenses are met. Upload the documentation provided for review. If the household cannot provide an explanation, send an adverse action letter and change the benefit to be paid after the required waiting period. Upload a copy of the adverse action letter and benefit issuance list with the updated benefit.

**Due Date:** February 28, 2025; Completed February 27, 2025

**Response:** The Food service director contacted the family to verify how their living expenses are being met while unemployed. Per the mother of the family, she is still unemployed and is currently receiving financial assistance from her mother. There was no change in benefit.

**Finding 4 – Wellness Policy**

LEAs must assess their wellness policy at least once every three years to 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)).

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The policy uploaded under section 1005, Policy No. 569, was last reviewed October 28, 2020, and is not a triennial assessment. A more recent Policy No. 569 was found on the website but is still not a triennial assessment.

**CAP:**

1. Complete the NSLP Corrective Action Procedure form 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 this document in MyIdahoCNP under download forms.
2. Arrange to have the Triennial Assessment placed on an upcoming board meeting agenda prior to the end of the school year.

**Due Date:** February 28, 2025; Completed February 27, 2025

**Response:**

1. The Food Service Director completed the NSLP Corrective Action Procedure Form that identifies who is responsible for completing the triennial assessment and what steps will be taken to ensure this requirement is met on a triennial basis. The assessment will be placed on the school district website after completion.
2. The triennial assessment was discussed at a board meeting, completed, and placed on the school district website.

**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 a program requirement that each food service employee has a training tracking log that includes the key area/topics and training subjects completed with certificates, agendas, and sign-in sheets retained for backup. On the day of review, the Food Service Director was the only employee that had a completed training tracker log for the current school year.

**CAP:** Complete a training tracker log for all food service employees and upload them into MyIdahoCNP for the state agency to review. Complete the NSLP Corrective Action Procedure form to document how the FSD will proceed moving forward regarding tracking all child nutrition employee training.

**Due Date:** February 28, 2025; Completed February 27, 2025

**Response:** The FSD completed and uploaded the NSLP Corrective Action Procedure Form into MyIdahoCNP. This form documents the importance of the training tracker log as well as identifies the FSD as the individual who is responsible for ensuring each child nutrition team member has an updated training tracker log each school year. A training tracker log was also uploaded in MyIdahoCNP for each team member for the current school year.

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## COMMENDATIONS

- The food service director, as well as her team, was hospitable and extremely receptive to any suggestions made by the state agency during their administrative review. Having many necessary documents prepared for the SA team upon arrival was beneficial and allowed the state agency to begin the review immediately after the breakfast service. This was much appreciated!
- The state agency values the interest and knowledge Idaho Arts Charter School's Director of Operations demonstrated in their Child Nutrition Program. His availability for questions assisted the state agency team in terms of their efficiency and his time was appreciated.

## TECHNICAL ASSISTANCE (TA)

### Certification and Benefit Issuance

- In the National School Lunch Program (NSLP), "overt identification" refers to any action that publicly reveals a child's eligibility for free or reduced-price meals, which is considered incredibly important to prevent because it can lead to stigma and embarrassment for the student, potentially discouraging them from participating in the program. The SA recommends a privacy screen for the POS system to ensure students cannot view the account information of other students.

### Meal Components and Quantities – Lunch

- The sponsor was encouraged to provide training on crediting as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews may result in fiscal action.
  - The 1.6 oz. bag of carrots credits at  $\frac{1}{4}$  cup vegetable instead of  $\frac{1}{2}$  cup.
  - The 2 oz. of green peas credit as  $\frac{1}{4}$  cup vegetable instead of  $\frac{1}{2}$  cup
- Production records must indicate meal pattern crediting for all menu items each day, including fruit and vegetables. The submitted production records do not include crediting information for all menu items.

### Smart Snacks

- All 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 exempted fundraisers beyond 10 must be pre-approved by the State agency using the Request form. (7CFR 210.11). Currently, the school has one large fundraiser selling candy bars, but they do not have a fundraiser tracking sheet as documentation. All other food sales at the school are smart snack compliant.

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## FISCAL ACTION

Due to 15 benefit issuance errors, fiscal action results in \$145.76 for NSLP and \$28.10 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,

*Cass Thompson*

Cassandra Thompson, BS  
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Ed Burk, Director of Operations  
Kristen Ludwig, Food Service Director

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