



April 8, 2025

Angie Olson, Principal
Immanuel Lutheran School
2055 Filer Avenue East
Twin Falls, ID 83301

Dear Principal Olson,

On February 28, 2025, Idaho Department of Education Coordinators Jax Dunham, Cambria Steffler, Cassandra Thompson, and Jessica Medrano conducted an Administrative Review (AR) of Immanuel Lutheran School for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- USDA Foods

The site reviewed was Immanuel Lutheran School.

The State agency (SA) would like to commend Pamela DeWitte and the entire staff of Immanuel Lutheran 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 – Meal Counting and Claiming

Upon review of the SFA's January claim, it was noted that the SFA underclaimed 17 free lunches. In the SFA's point of service (POS) software, there is only one site noted as "Immanuel Lutheran School" which includes both the school and daycare sites. As such, the SFA has a process to break down the free, reduced, and paid meal counts by site to claim in MyIdahoCNP. The current system to break down the claim for both sites allows for potential errors which led to the underclaim of 17 lunches for January, 2025. To ensure accuracy of claims by site, the SFA must continue with the current process to break down the claim by site and ensure that the total free, reduced, and paid meal counts for the month are equal to the totals included on the edit check report from the software to certify accurate claims through the end of SY 2024-2025. Once the renewal period for SY 2025-2026 opens, the SFA must work with the assigned NSLP Coordinator to change the SFA to one site in MyIdahoCNP since all students are now enrolled at the school.

CAP: Upload an NSLP Corrective Action Procedure Form detailing how the SFA will proceed to ensure accurate claiming practices going forward. In this form, detail how the SFA will only use the software's edit check report when submitting claims once the SFA is one site in MyIdahoCNP.

Date of Completion: Due April 4, 2025, completed April 4, 2025

Corrective Action Response: The SFA uploaded an NSLP Corrective Action Procedure Form detailing how the SFA will ensure claiming is completed accurately going forward. In this form, the SFA detailed that they would utilize their software's edit check report and the Pre-K customer participation report to ensure accurate claiming for the remainder of the current school year. After using the totals from Pre-K, the SFA will subtract those totals from the edit check report to support the claims for the current year. After the SFA completes the renewal process for the 2025-2026 school year and consolidates to one site in MyIdahoCNP, the SFA will only use the edit check report when collecting numbers for submitting claims.

Finding 2 – Infant and Pre-K Meal Pattern

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. As of the week of the State agency's on-site review, the SFAs lunch schedule has changed in a way that Pre-K students are no longer comingled and are receiving the NSLP meal pattern. Due to

Debbie Critchfield, Superintendent of Public Instruction

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comingling not occurring, four meals are not reimbursable due to students not receiving all components in their full quantities.

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.

Date of Completion: Due April 4, 2025, completed April 4, 2025

Corrective Action Response: The SFA uploaded an NSLP Corrective Action Procedure Form detailing that the SFA retrained foodservice staff on the Pre-K meal pattern via the training portal on April 1, 2025. Additionally, the SFA will prevent the issue from occurring in the future by reviewing production records before service while also making sure that correct serving utensils are available at serving stations to ensure proper serving sizes are provided.

Finding 3 – Local School Wellness Policy

Per the Wellness Policy Final Rule, Local Educational Agencies (LEAs) are required to permit parents, students, school board, physical education teachers, school health professionals, school food service staff, administrators, and community members to participate in the development, implementation, review, and update of the local wellness policy (7 CFR 210.31(d)(1)). The SFA reports that potential stakeholders were not made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy.

CAP: Upload a plan identifying who at the LEA will be responsible for informing potential stakeholders of their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy and how this will be completed.

Date of Completion: Due March 17, 2025, completed March 14, 2025

Corrective Action Response: The SFA uploaded an NSLP Corrective Action Procedure Form detailing that the Principal and Food Service Director (FSD) will be responsible for ensuring that an invitation is sent to inform and permit parents, teachers, school board members, physical education teachers, foodservice staff, and community members to be part of the SFA's wellness committee. This will be sent twice per year via the school's monthly newsletter as well as via the back-to-school information packet. The first invitation will be sent in April, 2025.

Finding 4 – Offer Versus Serve

While reviewing the lunch service on the day of review, the SA noted discrepancies in offer versus serve (OVS) implementation. While going through the serving line, students are offered a vegetable choice which they are allowed to deny, and the kitchen staff notes that the student has received a reimbursable meal. However, the fruit choice is not offered before the staff note that a student has received a reimbursable meal, and there was no staff member to ensure that students take a fruit if they did not take a vegetable. Due to this error, one student was counted for a reimbursable meal without taking a fruit or vegetable.

CAP: Upload an NSLP Corrective Action Procedure Form detailing how the SFA will ensure that a student meal has a fruit or vegetable before being counted as reimbursable going forward.

Date of Completion: Due March 17, 2025, completed March 14, 2025

Corrective Action Response: The SFA uploaded an NSLP Corrective Action Procedure Form detailing that the staff member marking off names from the roster stands after the salad bar to ensure all meals have a fruit or vegetable and are reimbursable.

Finding 5 – Food Safety

The most recent food safety inspection report must be posted in a location visible to the public (7 CFR 210.13(b)). During the onsite portion of the Administrative Review, the most current health inspection was located on a clip board behind the CNP food serving area where the public cannot easily view.

CAP: The most recent food safety inspection must be relocated to a location where it can be easily viewed by the public.

Date of Completion: Due March 17, 2025, completed February 28, 2025

Corrective Action Response: During the Administrative Review, the FSD relocated the most recent health inspection for the current school year next to their "And Justice for All" poster at the beginning of the serving line.

COMMENDATIONS

- The Food Service Director did a great job preparing for the Administrative Review. All requested materials were submitted ahead of time, and the FSD provided well organized documentation for the SA while on-site. The team shows a genuine interest in operating a compliant program while serving nutritious foods.
- The State agency appreciates the responsiveness of the Food Service Director during their Administrative Review. When a finding was discussed, the FSD promptly solved the issue which allowed the State agency to close the discussed finding onsite during their review.
- When the State agency first walked into the kitchen, it felt like being home. The cozy atmosphere is incredibly inviting, and the notes of thanks for the nutritious food offerings written by students were on the wall for all to enjoy.

TECHNICAL ASSISTANCE (TA)

Verification

- 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. 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 results of the process should be marked on the application as well as when the notice letters were sent.

Resource Management

- A maximum of three (3) months operating balance is allowable in the National School Lunch Program. Excess funds should be used to improve the program, either in food costs with the quality of food or procuring safer or more efficient equipment. The balance can exceed the limit if future planned expenditures for equipment, supplies, or program expansions exist; however, a proposal to expend funds must be submitted to the State agency each year the three (3) month operating balance is exceeded.

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - During the Administrative Review, the results of the menu review were provided to the sponsor in a detailed Menu Review Results Report. Recommendations were included 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.
 - 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. Production records with planned numbers for each item should be accessible before each meal service.
 - The salad bar document provided for Thursday of the week of menu review did not contain enough information to accurately determine the amounts offered.

FISCAL ACTION

Due to meal counting and claiming errors, additional reimbursement of \$74.29 is due as a result. However, since this is a result of meal counting and claiming errors in addition to ineligible meals being served during the review, the additional reimbursement will not be disbursed.

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,

Jax Dunham

Jax Dunham, BS, RDN
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Pamela DeWitte, Child Nutrition Director, Immanuel Lutheran School

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