



May 12, 2025

Paul Anselmo, Superintendent
Kamiah Jt. School District
1102 Hill St
Kamiah, ID 83536

Dear Superintendent Anselmo,

On March 3, 2025, Idaho Department of Education Coordinators Cambria Steffler, Jax Dunham, Cassandra Thompson, and Jessica Medrano conducted an Administrative Review (AR) of Kamiah School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- USDA Foods
- Fresh Fruit and Vegetable Program (FFVP)

The site reviewed was the Kamiah Elementary/Middle School.

The State agency (SA) would like to commend Amy Peel and the entire staff of Kamiah 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 – Meal Counting and Claiming - Breakfast

Per 7 CFR 210.7(c) and 7 CFR 220.11, any institution participating in the Federal school meal programs is required to take an accurate count of reimbursable meals served to students at each meal service. Serving lines must be adequately supervised to ensure that all meals claimed for reimbursement meet meal pattern requirements, and that reimbursement is only claimed for one meal per student per meal service.

Breakfast begins at 7:30 am for Kamiah Junior High School (same time as the elementary school). Their breakfast is loaded into three coolers which are then rolled to the middle school which is an approximate 3–5-minute walk across a field. Breakfast was not picked up from the elementary school until 7:45 am and the coolers were in place by 7:50 am outside on the playground. The students did not begin getting their meals until the bell rang at 8:00 am, and there were no staff from the school counting the meals to be claimed for reimbursement. The current practice does not ensure integrity when counting reimbursable meals for claiming, and the current process puts the SFA's Community Eligibility Provision (CEP) status at risk.

During the breakfast meal service, an adult was not present for the first 90% of the meal service. There were no meal counts being documented during the entire service and the state agency (SA) witnessed several students taking second meals. The SA also witnessed one student who came back five times to grab extra meals and/or rummage through bags to only take the juice box from breakfast bags.

The coolers were left outside and unattended after the meal service and the milk cooler was left open and did not contain ice packs, which impacts the safety of the remaining milk. The SA placed ice packs from an empty milk cooler into the cooler with the remaining milk to attempt to keep the milk at a proper temperature. The bell rang at 9:00 am where the SA then witnessed eight students grab a breakfast bag and/or single items out of the bags before going to their next class.

It was also documented that after the breakfast meal service and before the 9:00 am bell, a teacher placed approximately 10 milks into a plastic bag. When questioned about the milks she was taking, she stated the milks were for a detention group that studies during their lunch break. This is also not an acceptable practice as these milks come out of the breakfast meal

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counts versus the lunch meal counts. The SA cannot ensure the milks taken were properly refrigerated immediately after being removed from the breakfast coolers.

At 9:30 am, the coolers were rolled back to the elementary school to temp the food and conduct the meal counts. Their current process of taking meal counts is to count the remaining breakfast bags and subtract that figure from the number of meals prepared for the breakfast service. This is not a method of meal counting and claiming that is acceptable or accurate, as it lacks accountability. A child nutrition team member stated that it is unusual to get bags of food back from the school, as the norm is to only have milk remaining.

In addition to the meal counting and claiming errors, the current location where the meals are being served does not have the required signage informing program participants of their rights. The required signage includes the USDA And Justice For All signage and the Offer versus Serve signage.

The 61 meals from the day of the on-site breakfast service at Kamiah Middle School will be disallowed. If a similar issue is found during the next review, further fiscal action may be taken. **CAP:** Complete the NSLP Corrective Action Procedure form describing the procedure for accurately counting and claiming meals served at the Kamiah Middle School. Indicate the adults who will supervise the meal service to ensure proper meal counts. This plan should also include how those supervising the meal service will ensure food safety is a priority during their meal service. When the NSLP Corrective Action Procedure form is complete, upload the procedure form into MyIdahoCNP.

Due Date: Due March 18, 2025; Completed March 13, 2025

Response: The SFA uploaded a plan for how their breakfast service will be changed. Coolers will be placed outside of teacher's doors and teachers will check off student names as the students take a breakfast. The clipboards and tally sheets will be placed in the cooler and students will take the coolers back to the kitchen.

Finding 2 – Resource Management

The January Fresh Fruit and Vegetable (FFVP) claim of \$2,234.83 could not be found in the Child Nutrition Fund 290 account. While there was an audit adjusting entry of \$74,435 to add money into Child Nutrition at the end of the year, the reason why the entry was made could not be discerned. This caused the Schedule of Expenditures of Federal Awards (SEFA) at the end of the audit on page 44 to be misstated in the FFVP Fund 10.582 by the amount of the January claim. Since the Audit for 2024 has been closed and money was placed in Fund 290, no fiscal adjustment will be required at this time.

CAP: Provide a description of how this type of omission will not occur in future years. Include in this description who will be responsible for ensuring the federal reimbursements have been deposited into the Child Nutrition Fund 290 account and when the deposits will be reviewed for accuracy.

Due Date: Due May 12, 2025; Completed on May 8, 2025

Response: The business manager provided a description of how future claims will be reviewed for accuracy. The business manager will review deposits monthly with an additional review quarterly and a final review yearly before the end of the school year.

Finding 3 – Civil Rights

The district website does not have the USDA non-discrimination statement. 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 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 the [USDA Nondiscrimination Statement](#) webpage. (FNS Instruction 113-1: Civil Rights Compliance and Enforcement).

CAP: Add the full USDA non-discrimination statement or the short statement and a link to the full statement on your website. Provide the link once this has been corrected.

Due Date: Due March 18, 2025; Completed May 8, 2025

Response: The SFA posted the full USDA Non-Discrimination statement on their food service webpage on their district website.

Finding 4 – Professional Standards

School Foodservice Authority staff who interact with program applicants or participants (i.e. Cafeteria staff and Free and Reduced Application approval staff) and their supervisors as well as the Hearing Official must have annual civil rights training.

CAP: Complete the civil rights training and upload a certificate of completion or an agenda and sign in sheet.

Due Date: Due March 18, 2025; Completed March 10, 2025

Response: The hearing official completed the civil rights training, and the FSD uploaded the agenda and sign in sheet.

Finding 5 – Meal Components and Quantities - Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement for the red/orange vegetable subgroup. Red/orange vegetables were offered, but not in large enough quantities to meet the weekly requirement. The 1-1/4 cup weekly red/orange vegetable subgroup requirement was not met for grades 9-12, with only 1 cup offered. Consider the following suggestions to help meet this requirement:

- Substitute one of the starchy vegetables planned for the week (corn or French fries) with a red/orange vegetable. For example, offer carrots or sweet potatoes in place of corn.

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 December 16, 2024; Completed December 10, 2024

Response: Production records and menus submitted show changes were made to reflect the red/orange vegetable subgroup is now met for the week.

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Finding 6 – Meal Components and Quantities - Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement for the dark green vegetable subgroup. The ½ cup weekly dark green vegetable subgroup requirement was not met for grades 9-12, with no dark green vegetables being offered during the week. Consider the following suggestions to help meet this requirement:

- Substitute dark leafy greens for the salad mix that was planned. For example, try romaine, green leaf, red leaf, or raw spinach for the salad.

Keep in mind that raw leafy green vegetables, such as lettuce and spinach, are creditable at half volume. Therefore, a one cup serving of fresh lettuce or spinach is creditable at ½ cup vegetable.

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 December 16, 2024; Completed December 10, 2024

Response: Response including production and menus submitted reflects that changes were made to bring the dark green vegetable subgroup into compliance.

Finding 7 – Meal Components and Quantities - Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirements for vegetables. The federal regulations require a minimum of 1 cup of vegetable to be offered each day for grades 9-12. This requirement was not met on Wednesday the week of the menu review with only ¾ cup offered.

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 December 16, 2024. Completed December 10, 2024

Response: Response and documents submitted are appropriate to bring the vegetable finding into compliance for the week of review.

COMMENDATIONS

- The Food Service Director has good organizational skills and was quick to answer any of the State agency's questions. She shows a genuine interest in operating a compliant and efficient program.
- The foodservice staff at Kamiah Joint School District has great rapport with the students, and they created a warm and welcoming environment.

TECHNICAL ASSISTANCE (TA)

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the meatballs. The spec sheet submitted included a CN number and meal pattern crediting statement but was not an official CN Label or PFS. The CN number was verified as active on the USDA CN Label Verification Report.
 - The Child Nutrition (CN) Label submitted for the chili included a watermark. Please secure for your records the actual CN label from the product packaging, without the watermark. The CN number was verified as active on the USDA CN Label Verification Report.

Food Safety

- Though the SFA has a current HACCP manual available for staff, the manual is missing an employee exclusion standard operating procedure (SOP) that is required by Idaho Food Code. A sample employee exclusion SOP is available in MyIdahoCNP's Download Forms.

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 meal counting and claiming errors, fiscal action results in \$4.01 for NSLP and \$99.74 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,

Debbie Critchfield, Superintendent of Public Instruction
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Cambria Steffler

Cambria Steffler, MS, RD
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Amy Peel, Child Nutrition Director, Kamiah Jt. School District

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