



March 11, 2025

Mrs. Janet Avery, Superintendent
Potlatch School District
510 Elm Street
Potlatch, ID 83855

Dear Superintendent Janet Avery,

On December 4, 2024, Idaho Department of Education contractor CN Resources (CNR) conducted an Administrative Review (AR) of Potlatch 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 Potlatch Elementary School.

The State agency (SA) would like to commend Erica Waters and the entire staff of Potlatch 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

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- 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 – Local School Wellness Policy

The Local Educational Agency (LEA) did not have the required stakeholders involved in the update of the Local School Wellness Policy.

CAP: Parents and guardians, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the public must be permitted to contribute to the development, implementation, periodic review, and update of the local school wellness policy. Contact administration at your school to have your Wellness Policy placed on your next Board meeting agenda.

Due Date: 12/23/2024; Completed 12/18/2024.

Response: Potlatch School District appointed a Policy Review Committee. The School Wellness Policy has been reviewed and will go through the formal “readoption” process at the January 15, 2025, Board meeting.

Finding 2 – Local School 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)(2)).

CAP: Upload a plan identifying who at the LEA will be responsible for completing the triennial assessment, how the assessment will be completed, what steps will be taken to ensure this requirement is met on the triennial basis, and how this assessment will be made available to the public in an easily understood manner.

Due Date: 12/23/2024; Completed 12/18/2024.

Response: The superintendent or wellness committee designee will make sure the triennial assessment is completed and shared with the district stakeholders. The Wellness Policy will be reviewed at the next Board meeting on January 15, 2025.

Finding 3 – School 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-

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342-7744 to see nearby options. Best practice is to include SFSP promotion and ways to locate meals on the SFA's website.

CAP:

1. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
2. Provide a written statement that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program.

Due Date: 12/23/2024; Completed 12/18/2024.

Response:

1. The Food Service Director and Superintendent will oversee this area and ensure future compliance.
2. The sponsor posted a flyer on their website promoting the SFSP. Going forward the sponsor will ensure that at the end of every school year they promote the Summer Food Service Program on social media and their website.

Finding 4 – Meal Components and Quantities-Breakfast

For the week of menu review, the K-6 breakfast menu did not meet the minimum weekly requirements for the fruit subgroup. Fruit subgroup was offered, but not in large enough quantities to meet the weekly requirement. The weekly minimum of five cups was not met for grades K-6, with only four cups offered.

CAP: Provide documentation to demonstrate that the menu findings are now corrected. This documentation may include menus, production records, nutrition fact labels, a written statement, for the week of review, Reference the menu review results report for specific details and suggestions to bring the menu into compliance.

Due Date: 12/23/2024; Completed 12/16/2024.

Response: The uploaded production record showing changes were made and reflect compliance with one full cup of fruit being offered at breakfast.

Finding 5 – Meal Components and Quantities- Lunch

For the week of menu review, the K-6 lunch menu did not meet the minimum weekly requirement for the dark green vegetable subgroup. Dark green vegetables were offered, but not in large enough quantities to meet the weekly requirement. Subgroups of vegetables must be met for each grade group. The ½ cup weekly dark green vegetable subgroup requirement was not met for grades K-6, with only 3/8 cup offered.

CAP: Provide documentation to demonstrate that the menu findings are now correct. 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: 12/23/2024; Completed 12/18/2024.

Response: The updated production record that was uploaded into MyIdahoCNP indicates an additional ½ cup offered of dark green vegetable subgroup requirement.

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Finding 6 – Meal Components and Quantities-Lunch

For the week of menu review, the K-6 lunch menu did not meet the minimum weekly requirements for vegetables subgroup. A vegetable subgroup was offered but not in large enough quantities to meet the weekly requirements. Vegetable subgroup must be met for each grade group K-6, with only ½ cup of green beans being offered.

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. Provide documentation to demonstrate that the menu findings for the week of the 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.
3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: 12/23/2024; Completed 12/18/2024.

Response:

1. The SFA adjusted the production record to increase the vegetable offering from ½ cup to ¾ cup to meet the requirement to be compliant.
2. The updated production record was uploaded into MyIdahoCNP.
3. The Food Service Director is the individual responsible for ensuring compliance with all regulations.

Finding 7 – Meal Components and Quantities-Lunch

For the week of menu review, the K-6 lunch menu did not meet the minimum weekly requirements for meat/meat alternate. The federal regulations require menus to be planned that meet the daily minimum 1-once equivalent meat/meat alternate requirement for grades K-6. This requirement was not met on Wednesday, 10/9/2024 with only 0.25 oz. eq. offered. The (weekly 9 oz. Eq.) was not met for grades K-6. The menu offered a minimum of 8.5 oz. eq. of meat/meat alternate throughout the week.

- A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not available for the diced chicken served in the chicken wrap.
- Ensure the serving size of chicken offers at least 0.75 oz. eq. meat; when combined with the .25 oz. eq. from the cheese, the meat/meat alternate requirements will be met.

CAP:

1. Provide a written statement in the Corrective Action Response box 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. Provide documentation to demonstrate that the menu findings for the week of the menu review are now corrected. This documentation may include menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the

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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: 12/23/2024; Completed 12/18/2024.

Response:

1. This finding was the result of a menu substitution and was not a standard recipe that is normally utilized. Going forward, the sponsor will ensure that a standard recipe is used for any substitutions. The sponsors CNP team has completed the NSLP Lunch Meal Pattern training and have a better understanding about the federal regulation requirements.
2. The updated Product Formulation Statement and sponsor statement indicate the serving size of the Diced Chicken was increased to 1 oz. M/MA for grades K-6.
3. The Food Service Director is the individual responsible for ensuring future compliance.

Finding 8 – Meal Components and Quantities-Lunch

The planned menu was not followed for the week of menu review. The substitutions made were not acceptable to meet program requirements.

CAP: Provide documentation on training in meal pattern requirements and making appropriate menu substitutions, for all staff who participate in menu planning and meal service. Include a copy of the agenda and sign-in sheet.

Due Date: 12/23/2024; Completed 12/18/2024.

Response: The SFA uploaded certificates of completion for the NSLP Lunch and Breakfast Meal Pattern trainings.

COMMENDATIONS

- The food service director demonstrates knowledge and skills to ensure that program regulations are followed.
- The cafeteria was decorated beautifully with nutritional related posters and theme boards.
- Food Safety reminders regarding food handling on the meal service line are posted for staff. The friendly reminders address appearance, serving line attractiveness, and keeping the food safe for meal service.

TECHNICAL ASSISTANCE (TA)

Revenue From Nonprogram Foods

- SFA must ensure that all reimbursements received, including performance base reimbursements, are entered in the Nonprogram Foods Revenue Tool to ensure revenue ratio is accurate.

FISCAL ACTION

There is no fiscal action resulting from this review.

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,

Jessica Medrano

Jessica Medrano

NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Erica Waters, Child Nutrition Director, Potlatch School District

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