



April 30, 2025

Mr. Greg Larson, Superintendent
Rockland School District
321 East Center
Rockland, ID 83271

Dear Superintendent Larson,

On January 29, 2025, Idaho Department of Education contractor CN Resource (CNR) conducted an Administrative Review (AR) of Rockland S.D. for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was the Rockland Public School.

The State agency (SA) would like to commend Kayla Garner and the entire staff of Rockland S.D. 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

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- 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

Per 7 CFR 245.2, applicants are required to include the number of household members in the family, total household income and the last four digits of the parent/guardian's Social Security number (or box checked that the parent/guardian does not have a social security number), for an application to be considered complete. Three students on one application required follow-up as their application was incomplete due to missing social security information.

CAP:

1. Provide a statement the staff approving applications understand the requirement to ensure applications are complete prior to filling out the "For Official Use Only" portion of the application. Describe how all applications will be determined correctly moving forward by completing the NSLP Corrective Action Procedure form.
2. Contact the household to obtain their social security information. Upload the application after ensuring documentation of the conversation with the household is signed and dated.

Due Date: February 13, 2025; Completed February 4, 2025

Response:

1. The Rockland School District Child Nutrition Team provided a statement in MyIdahoCNP stating understand the importance of ensuring applications are fully completed prior to filling out the "For Official Use Only" portion of the application. The FSD completed and uploaded an NSLP Corrective Action Procedure form describing the process to ensure applications are determined correctly moving forward.
2. The FSD made corrections to the applications during the on-site review and uploaded the application into MyIdahoCNP as documentation the application is now complete.

Finding 2 – Verification

If benefits decrease during the verification process, a notice of adverse action must be sent to the household advising of the change in benefits. LEAs are also required to provide 10 days advance notification to households that are to receive a reduction or termination of benefits, prior to the actual reduction or termination [7 CFR 245.6a(j)]. The sponsor mailed the final verification letter; however, the required 10-day notice was not included. The adverse action letter also did not contain the full nondiscrimination statement (NDS) that is required on 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 NDS is available in both English and Spanish on the SA website under [Civil Rights](#).

CAP:

1. Complete the NSLP Corrective Action Procedure Form that describes the process of providing notification to households if adverse action occurs.
2. Provide a copy of the adverse action letter that was sent to the household which includes the NDS and 10-day notice of the change in benefits.

Date: February 13, 2025; Extended February 11, 2025, Completed April 24, 2025

Response: The FSD has uploaded the Corrective Action Procedure Form, as well as the verification notification letter.

Finding 3 – Local School Wellness Policy

Per 7 CFR 210.31(e)(2), 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)).

CAP:

1. Provide the date that the finding was brought into compliance.
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
3. Provide a copy of the completed assessment of the wellness policy.
4. Provide a statement the wellness policy assessment will be posted publicly.

Due Date: February 13, 2025; Completed February 11, 2025

Response:

1. The FSD is the individual responsible for ensuring compliance moving forward.
2. The FSA uploaded a complete Idaho Wellness Policy Progress Report that was completed on February 5, 2025.
3. The Wellness Policy Progress Report was uploaded onto the school's website for public review.
https://rbulldogs.sharepoint.com/:x:/r/sites/Media/_layouts/15/Doc.aspx?sourcedoc=%7B2856DBD9-FB14-492C-9C7A-706788D01990%7D&file=2025%2002%2005%20wellness%20policy%20progress%20report.xlsx&action=default&mobileredirect=true

Finding 4 – Meal Components and Quantities – Breakfast and Lunch

Production records must indicate meal pattern crediting for all menu items each day. The submitted production records for both breakfast and lunch do not include meal pattern crediting for any menu items.

CAP:

1. Provide a statement that the SFA will maintain complete production records for all meal services. The records must be kept on file for a minimum of 3 years plus the current school year.

2. Provide 1 week of updated completed production records for all meal services at the reviewed site(s) for the week of menu review.

Due Date: February 13, 2025; Completed February 4, 2025

Response:

1. The FSD included a statement in MyIdahoCNP that documents the understanding that crediting information must be on all production records. The FSD understands documents need to be saved for three years, plus the current year.
2. One week of fully completed production records for the week of review were uploaded into MyIdahoCNP. These production records document the appropriate changes were made to be in compliance.

COMMENDATIONS

- The lunch director and manager presented off-site documents timely and provided on-site documents/information upon request.
- The lunch director and manager work well together in a supportive manner to adhere to program regulations and maintain program participation.
- Student volunteers did an excellent job keeping the cafeteria clean between meal service periods.
- The students and cafeteria staff demonstrated respect and politeness during their interactions.

TECHNICAL ASSISTANCE (TA)

Meal Components and Quantities – Lunch

- The sponsor was encouraged to provide training as needed to ensure menu compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews may result in fiscal action.
- The CN numbers for the scrambled eggs were verified as current on the CN Label Verification Report.

Meal Components and Quantities - Breakfast

- The CN number for the Breakfast Bagel Pizza was verified as current from the Child Nutrition (CN) statement, not from the CN Label.

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 914-342-7744 to see nearby options. Best practice is to include SFSP promotion and ways to locate meals on the SFA’s website.

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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
Kayla Garner, Child Nutrition Director, Rockland S.D.

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