



March 26, 2025

Dr. Brady Dickinson, Superintendent  
Twin Falls School District  
1775 Eldridge Avenue  
Twin Falls, ID 83301

Dear Superintendent Dickinson,

On February 24, 2025, through February 26, 2025, Idaho Department of Education Coordinators Cassandra Thompson, Cambria Steffler, Jax Dunham and Jessica Medrano conducted an Administrative Review (AR) of Twin Falls School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) Operating CEP
- USDA Foods
- Afterschool Snack Program (ASSP)

The sites reviewed were the Morningside Elementary School, Twin Falls Bridge Academy and Twin Falls Senior High School.

The State agency (SA) would like to commend Crystal Tubbs and the entire staff of Twin Falls 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 – Civil Rights

Procedures for receiving and processing complaints for Child Nutrition Programs is required to be located at each school site. This procedure should be kept in a Civil Rights file that includes complaint forms and tracking logs (7 CFR 210.15(a)(6)). The SFA uploaded all required items in their Civil Rights file into MyIdahoCNP, however, at Morningside Elementary School, their Civil Rights file was missing complaint forms.

**CAP:** Complete the NSLP Corrective Action Procedure form that outlines the Twin Falls School District Civil Rights complaint procedure, as well as the required documents that must be kept on file for each school site. Also include how the food service director will ensure the procedure is being followed at each site. When completed, upload the Corrective Action Procedure form into MyIdahoCNP in the Civil Rights finding.

**Due Date:** March 13, 2025; Completed March 3, 2025

**Response:** The Food Service Director completed and uploaded an NSLP Corrective Action Procedure form that indicates the required documents that must be kept on file for each school site, as well as how the procedure will be followed moving forward.

### Finding 2 – Meal Counting and Claiming - Lunch

The USDA defines overt identification as any action that can identify a child as approved or potentially eligible to receive free, reduced or paid school meals or free milk. A school food authority (SFA) must ensure that it does not disclose a child's eligibility status at any point in the process of providing free, reduced or paid meals. During the on-site meal observation at Twin Falls High School, it was observed that the students were able to see information on the POS monitor while going through the service line. The SA provided suggestions to get a privacy screen for the computer or move the POS so the students must walk in front of the computer where they cannot see student benefits.

**CAP:** Provide documentation that the POS software has been covered or moved to prevent overt identification. This can either be a receipt of purchase for privacy screens or a picture of where the POS will be located where students will not be able to see benefit information or account balances of other students.

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**Due Date:** March 13, 2025; Completed March 11, 2025

**Response:** The Food Service Director purchased three privacy screens for the POS monitors in the cafeteria to ensure student benefits cannot be seen by others. The FSD also uploaded a receipt for the privacy screens into MyIdahoCNP as proof of purchase.

### **Finding 3 – Meal Components and Quantities – Lunch**

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily and weekly 2 oz. eq. requirements for meat/meat alternate (M/MA) with only 1.5 oz. eq. being offered at Twin Falls Senior High School. Consider the following suggestions to bring the menu into compliance:

- The Roast Beef Sandwich offered daily only provides 1.5 oz. eq. M/MA. Consider increasing the amount of roast beef served on the sandwich to 2.75 oz. or the amount of cheese to 1 oz. (2 slices) to help meet the daily requirement.
- The French Dip Sandwich served on Friday, January 31, 2025, only provided 1.5 oz. eq. of M/MA. Consider the same suggestions as the Roast Beef Sandwich.

The federal regulations require weekly minimum amounts of M/MA to be served. The weekly requirement of 10 oz. eq. was not met for grades 9-12. The menu offered a minimum of 7.5 oz. eq. of M/MA throughout the week.

- By following the suggestions outlined to meet the daily M/MA requirement, the weekly requirement will also be met.

#### **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. Submit supporting 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.
3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

**Due Date:** January 30, 2025; Completed January 30, 2025

**Response:** This CAP was approved due to both the recipe and the Product Formulation Statement (PFS) affirming the M/MA requirement is being met. Please note that the PFS from the manufacturer seems incorrect. It would be advisable to contact the manufacturer for clarification on their calculations.

### **Finding 4 – Smart Snacks in School**

Schools must meet the minimum requirement in 7 CFR 210.11 for all foods and beverages sold in school (also known as Smart Snacks in Schools) to increase consumption of healthful foods during the school day and support a healthy school environment. Vending machines, school stores, and fundraising during school hours, need to comply with specific nutrition standards. Currently, there is a vending machine with non-compliant items located in the lunchroom of

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Twin Falls Bridge Academy, which also goes against the Twin Falls District Policy. This policy states that all vending sales shall comply with the standards of the Smart Snacks in Schools regulations, and documentation of compliance shall be retained.

**CAP:** Upload an NSLP Corrective Action Procedure Form detailing how the SFA will ensure that either the vending machine at Twin Falls Bridge Academy is stocked with Smart Snack compliant items or is unplugged during the school day.

**Due Date:** March 13, 2025; Completed March 10, 2025

**Response:** It was discovered this vending machine does not work, as it will not accept money. This vending machine has been unplugged. The Food Service Director uploaded an NSLP Corrective Action Procedure form that documents the principal of Twin Falls Bridge Academy as the individual responsible for ensuring all vending machines are Smart Snack compliant. Additionally, supplemental training will be provided to building administrators.

## COMMENDATIONS

- The Food Service Director (FSD) and the district nutrition staff did an excellent job preparing for the administrative review. All materials were well organized for the State agency upon arrival, and the team displayed a genuine interest in operating a compliant program while feeding students nutritious meals.
- The meal service at Twin Falls Senior High School was extremely fast and efficient, getting the students through the line quickly. There were several options of fresh produce to choose from, and most students had full trays of fruits and vegetables in addition to their main entrees and milk. The students appeared to enjoy their meals and appreciated the opportunity of so many choices.

## TECHNICAL ASSISTANCE (TA)

### Certification and Benefit Issuance

During the Administrative Review, the state agency reviewed the eligibility of 475 students which resulted in zero benefit issuance errors. However, the state agency does have technical assistance regarding four applications:

- Two applications were missing the Determining official's signature, and on the second page, one of the applications was missing the total income, frequency of pay, household size and determined eligibility. There was no change in benefits for either application.
- One application only had one income which was converted to annual income. If there is only one frequency of income, then that frequency must be used. There was no change in benefits.
- One application had zero income for the family. Not contacting the family to verify the zero income is a missed opportunity to assist the family that may be in need of referrals to community assistance. There was no change in benefits.
- One student was on the benefit issuance list as Migrant and was on the DC list as SNAP. There was no change in benefits.

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## Verification

- One of the applications selected for verification included students that were determined as reduced via Medicaid by the direct certification system. However, the household submitted an application that determined the students as free via income. The family was then changed to free. This application was selected for verification. Upon receiving verification documentation (paystubs), the SFA correctly determined that the students would be changed to paid via income. The SFA then acknowledged that due to previously being determined as Medicaid reduced earlier in the school year, they were appropriately switched back to Medicaid reduced. On the final verification determination letter, the SFA mistakenly stated that the students would be changed to paid instead of Medicaid reduced.

## Meal Components and Quantities – Lunch and Breakfast

### Lunch:

- 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.
- A Child Nutrition (CN) Label or Product Formulation Statement (PFS) can be used to determine how processed food items contribute to the meal pattern. Without this documentation it may be difficult to determine if the meal component was satisfied.
  - Secure a CN Label or PFS for the Chicken Fried Steak (served on Monday, January 27, 2025). The manufacturer specification sheet submitted included a meal pattern crediting statement, however, this was not an official CN Label or PFS. The CN number was verified as active on the USDA CN Label Verification Report.
  - The CN Label submitted for the Beef Patty (served on Tuesday, January 28, 2025) showed an issue date of 2012. The CN number was verified as active on the USDA CN Label Verification Report.

### Breakfast:

- The correct menu items must be recorded on production records. Production records state that a homemade toast was prepared on Tuesday, January 28, 2025, and Friday, January 31, 2025, however, a nutrition fact label was submitted for the toast.
- The CN Label submitted for the menu items below included a watermark. Please secure for your records the actual CN label from the product packaging, without the watermark. The CN numbers were verified as active on the USDA CN Label Verification Report.
  - The Scrambled eggs served on Wednesday, January 29, 2025
  - The French Toast Sticks served on Thursday, January 30, 2025

## Civil Rights

- 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 statement printed on the approval/denial letter is the statement used by the SNAP

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program, not FNS. During the time of this administrative review, the civil rights statement is under review per new federal requirements. The SA will not issue a finding at this time as guidance for an updated civil rights statement has not been released. (FNS Instruction 113-1: Civil Rights Compliance and Enforcement).

#### **Offer versus Serve**

- Group staff training must include an agenda and sign-in sheet that specifically identifies that "OVS breakfast" and/or "OVS lunch", as applicable, is included in the training agenda. Training documentation should also be recorded on the Professional Standards tracking log stating OVS training for Breakfast and Lunch was completed. This documentation is required to be maintained on file at the SFA for three years plus the current year.

#### **Food Safety**

- The state agency recommends tabs be placed in the HACCP manual at Morningside Elementary to ensure quick retrieval when a standard operating procedure is needed.

#### **Smart Snacks in School**

- Twin Falls Senior High School has several vending machines which were all Smart Snack compliant, however, the marketing on one of the vending machines was not compliant due to having Coca Cola on the wrapping. The state agency recommends contacting your vendor to request wrapping that has Dasani bottled water (or another Smart Snack compliant item) versus Coca Cola.

### **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,

*Cassandra Thompson*

Cassandra Thompson, BS  
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Crystal Tubbs, Twin Falls School District Food Service Director

## **CIVIL RIGHTS NONDISCRIMINATION STATEMENT**

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