



April 1, 2025

Mr. Ty Jones, Superintendent
Valley School District
882 Valley Rd. South
Hazelton, ID 83335

Dear Superintendent Jones,

On January 14, 2025, Idaho Department of Education contractor CN Resources (CNR) conducted an Administrative Review (AR) of Valley School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) Operating Provision 2 breakfast
- USDA Foods
- Fresh Fruit and Vegetable Program (FFVP)

The site reviewed was Valley School.

The State agency (SA) would like to commend Tina Irish and the entire staff of Valley 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

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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 – Meal Components and Quantities - Breakfast

For the week of menu review, the K-8 and 9-12 breakfast menu did not meet the minimum one cup daily requirements for the fruit subgroup. Fruit was offered, but not in large enough quantities to meet the weekly requirement with only ½ cup 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. Submit supporting documentation to demonstrate that the menu findings listed under step 1 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: February 10, 2025; Completed January 31, 2025

Response:

1. The SFA stated that the proper size fruit servings were correct for each grade group, however, the production records were not completed correctly. The production records have been updated to reflect the proper serving size for both grades K-8 and 9-12.
2. The uploaded production records document changes were made and reflect compliance with one full cup of fruit being offered at breakfast.
3. The Child Nutrition Director is the party responsible for ensuring production records are properly completed to indicate all minimum requirements are being met.

Finding 2 – Meal Components and Quantities – Breakfast

The planned menu was not followed for the week of menu review, as substitutions were necessary; however, the production records were not properly updated to reflect the fruit and vegetable substitutions that were made.

CAP:

1. Provide the date the finding was brought into compliance.
2. Provide a statement that the SFA will ensure all menu substitutions are acceptable to meet meal pattern requirements.
3. Provide the title of the SFA representative that will ensure compliance moving forward.

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Due Date: February 10, 2025; Completed January 31, 2025

Response:

1. On January 31, 2025, the Child Nutrition Director documented all substitutions on the production records to be in compliance with federal regulations.
2. See #1 above.
3. The Child Nutrition Director will ensure the Kitchen Manager properly completes production records moving forward.

Finding 3 – Meal Components and Quantities – Breakfast

Regulations require that a variety of at least two milk types be offered with each meal daily. For the week of menu review, the K-8 and 9-12 breakfast menu did not meet milk requirements, as only one milk type (1% white milk) was 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. 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: February 10, 2025; Completed January 31, 2025

Response:

1. Moving forward, if the school's milk vendor does not deliver the two requested varieties of white milk, the SFA will offer chocolate milk during breakfast. This will ensure students have access to the required two varieties of milk at each meal.
2. The SFA uploaded production records documenting that at least two milk types will be offered with each meal served to be in compliance with the milk requirement.
3. The Child Nutrition Director is the individual responsible for ensuring oversight of the deliveries, as well as making certain the production records reflect what is being served.

Finding 4 – Meal Components and Quantities – Lunch

For the week of menu review, the 6-8 and 9-12 lunch menu did not meet the ½ cup minimum weekly requirement for the starchy vegetable subgroup. There were no starchy vegetables offered this week.

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

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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: February 10, 2025; Completed January 31, 2025

Response:

1. Per the SFA, a starchy vegetable will be added to the menu as documented in the uploaded production records.
2. The updated production records indicate that 3/4 cup of French fries will be offered during the week to meet the starchy vegetables subgroup requirement.
3. The Child Nutrition Director is the individual responsible for ensuring a starchy vegetable is on the menu/production records each week.

Finding 5 – Meal Components and Quantities – Lunch

For the week of menu review, the 6-8 and 9-12 lunch menu did not meet the ½ cup minimum weekly requirement for the beans/peas/lentil's vegetable subgroup, as there were no beans/peas/lentils offered week.

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: February 10, 2025; Completed January 31, 2025

Response:

1. Moving forward, the SFA will ensure 1/2 cup of refried beans are added on to the menu to meet the weekly requirement of bean/peas/lentils vegetable subgroup.
2. The SFA upload revised production records into MyIdahoCNP that document ½ cup of refried beans have been added to the menu.
3. The Child Nutrition Director is the individual responsible for ensuring a starchy vegetable is on the menu/production records each week.

Finding 6 – Meal Components and Quantities – Lunch

On Friday, November 8, 2024, the 9-12 lunch menu did not meet the 2-ounce minimum daily requirements for grain, where only 1.5 oz. eq. Grain was served. (7CFR 210.10)

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: February 10, 2025; Completed January 31, 2025

Response:

1. The SFA increased the serving size of croutons for grades 9-12 to credit as 2 oz. eq. of grain. This addition will bring the menu into compliance.
2. The updated production record for November 8, 2024, reflects the increased croutons for grades 9-12 that credit as 2 oz. eq. grain, which brings the menu into compliance.
3. The Child Nutrition Director is the individual responsible for ensuring a starchy vegetable is on the menu/production records each week.

Finding 7 – Meal Components and Quantities - Lunch

For the week of menu review, the 6-8 lunch menu did not meet the $\frac{3}{4}$ cup minimum weekly requirement for the red/orange vegetable subgroup with only $\frac{3}{8}$ cup being offered and the 1 $\frac{1}{4}$ cups weekly red/orange vegetable subgroup requirement was not met for grades 9-12 with only 1 $\frac{1}{8}$ cups 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. 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: February 10, 2025; Completed January 31, 2025

Response:

1. The carrots on the salad were not properly documented. Moving forward, each type and quantity of red/orange vegetable subgroup will be correctly recorded.
2. The revised production records indicate the serving sizes of $\frac{3}{4}$ cup for grades 6-8 and 1 $\frac{1}{4}$ cup for grades 9-12 red/orange vegetable subgroup are now in compliance for the week of menu review.

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3. The Child Nutrition Director is the individual responsible for ensuring a starchy vegetable is on the menu/production records each week.

Finding 8 – Meal Components and Quantities – Lunch

For the week of menu review, grades 6-8 did not meet the 7 oz. eq. minimum weekly requirement for meat/meat alternate (M/MA) with only 6.75 oz. eq. being offered. For grades 9-12, the daily 2-ounce eq. requirement of M/MA was not met on November 7, 2024, with only 1.25 oz. eq. offered.

CAP:

1. Provide a written statement to describe the specific changes made to the menu for the week of review to correct all the 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: February 10, 2025; Completed January 31, 2025

Response:

1. For grades 6-8, a larger quesadilla will be served where the ham and cheese will be increased by .25 oz. eq. in the recipe to ensure the weekly requirement of 7 oz. equivalence is met. For grades 9-12, the pepperoni and cheese were increased on the pizza to ensure the pizza provides 2-ounce eq. M/MA per serving to meet the daily minimum requirements.
2. The SFA updated production records for both the quesadilla for grades 6-8 and the pizza for grades 9-12 to indicate the servings of meat/meat alternate are met for both grade groups to be in compliance for the week of menu review.
3. The Child Nutrition Director is the individual responsible for ensuring a starchy vegetable is on the menu/production records each week.

Finding 9 – Meal Components and Quantities – Lunch For the week of menu review, the K-5 and 6-8 lunch menu did not meet the minimum daily requirements for vegetables. The federal regulations require a minimum of 3/4 cup of vegetable to be offered each day and only ½ cup was offered on Wednesday, November 6, 2024. For grades 9-12 the regulations require a minimum of one cup of vegetables to be offered daily. This requirement was not met on Wednesday November 6, 2024, and Thursday, November 7, 2024, with only ¾ cup of vegetables 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 the 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: February 10, 2025; Completed January 31, 2025

Response:

1. For grades K-5 and 6-8, an increase to $\frac{3}{4}$ cup of broccoli will be served on the menu for November 6, 2024. On the 9-12 menu, one cup of Romaine lettuce will be served on November 7, 2024, to increase the vegetable subgroups requirement to be in compliance.
2. The SFA updated and uploaded production records indicating the changes made to bring the menus into compliance. The changes made are outlined in #1 above.
3. The Child Nutrition Director is the individual responsible for ensuring a starchy vegetable is on the menu/production records each week.

COMMENDATIONS

- The child nutrition director and her staff work well together in a supportive manner to adhere to program regulations and promote program participation.
- The students and staff demonstrated respect and friendliness.
- The serving line was attractive and well presented for students and staff.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- The sponsor must limit the benefit issuance document access to only required staff and maintain the documentation in a locked location.

Meal Components and Quantities – Lunch

- Standardize the pizza dough recipe so true yields and portion sizes can be determined. To be standardized recipes must include at a minimum the following:
 - All ingredients in the recipe.
 - Correct volume or weighted measure of each ingredient.
 - Serving/portion sizes for each grade group.
 - Clear and complete preparation steps and directions.

- Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for tempura chicken. The spec sheet submitted included a meal pattern crediting statement but was not an official CN Label or PFS.
- The Child Nutrition (CN) Label submitted for the beef patty showed an issue date of 2014. The CN number was verified as active on the USDA CN Label Verification Report.
- Obtain a more current Nutrition Facts Label for the 10" tortilla as it is from 2014.
- Review Tools for Schools, as it offers topic-specific policy and resource materials to assist schools in meeting the nutrition standards.

Meal Components and Quantities - Breakfast

- The Child Nutrition (CN) Label submitted for the scrambled eggs 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.

Revenue From Nonprogram Foods

- The SFA must ensure when completing the Nonprogram Foods Revenue Tool that the correct school year's reimbursement rates are entered, that recipe drop-downs are used, and accurate meal counts and sales numbers are entered.

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.

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
Tina Irish, Child Nutrition Director, Valley S.D.

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