



December 14, 2023

Lani Rembelski, Superintendent
Challis School District #181
1000 E Bluff Avenue
Challis, ID 83226

Dear Superintendent Rembelski,

On October 11, 2023, State Department of Education (SDE) Coordinators Jax Dunham and Cambria Steffler conducted an Administrative Review (AR) of Challis 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 Challis Elementary School.

The State agency (SA) would like to commend Christina Hoyt and the entire staff of Challis 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 – Certification and benefit Issuance

A statistical sample of 116 students resulted in a 19.83% error rate. 13 applications affecting 23 students were incomplete due to missing social security information, total household member information, and signatures.

CAP: The SFA must contact the households to receive the necessary information to complete the incomplete applications. If necessary information is not able to be collected, the household must be changed to a paid benefit after 10 calendar days and an adverse action letter has been sent. Once all required information is gathered, submit the completed applications to the SA.

Date of CAP Completion: Due October 26, 2023; Completed October 26, 2023.

Corrective Action Response: All incomplete applications were completed with notes detailing information gathered for each application.

Based on the administrative error rate over 19.83% associated with certification and benefit issuance, the SFA will be required to conduct a second review of applications beginning school year 2024-2025, and continuing until further notice. A second review of applications requires a re-evaluation by the Confirming Official of the eligibility determination made by the Determining Official, based on the information provided by the household on the application. Depending on the outcomes of this second review, the SFA may be required to complete this process until the next administrative review. A Second Review of Applications Report will need to be filed as well while this requirement is in place. Please reference the Independent Review of Applications section in the Eligibility Manual, a copy of which is available in MyIdahoCNP Download Forms.

Finding 2 – Meal Counting and Claiming

Prior to the submission of a monthly claim for reimbursement, the SFA must review the meal count data for each school to ensure the accuracy of the claim per CFR 210.8(a)(2). While reviewing the meal counts and September claim, it was noted that the edit check report has 549 paid meals, but the claim submitted has 550 paid meals claimed. Additionally, the SFA-wide claim was inaccurate due to underclaiming 1 reduced meal and underclaiming 3 paid meals.

CAP: Develop a plan to edit check claims prior to submission to ensure accurate meal claiming. In this plan, please include what edit check reports will be used, who will be responsible for completing the edit check, and when edit checks will be completed. Upload this plan to MyIdahoCNP for the SA to review.

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Date of CAP Completion: Due October 26, 2023; Completed October 26, 2023.

Corrective Action Response: A plan was uploaded detailing that the director will now utilize the "Meal Count Listing" edit check report. This report will be generated daily to compare with the same report generated each month to ensure accurate claims are submitted.

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

Date of CAP Completion: Due October 26, 2023; returned for corrections; Completed October 30, 2023.

Corrective Action Response: A plan was uploaded detailing that the superintendent will be responsible for ensuring that the triennial assessment is completed every three years. The superintendent will ensure that the triennial assessment occurs by creating a schedule to ensure the policy is reviewed in a timely manner. Once the triennial assessment is complete, it will be posted on the district website for public view.

Finding 4 – Professional Standards

All foodservice staff, determining, confirming, verifying, and hearing officials must watch the full civil rights video training annually. Civil rights training must occur at the beginning of each school year and ongoing as necessary, including within 30 days of hire for any new employees. The district's confirming official does not have documentation of completing the civil rights training for SY23-24.

CAP: The confirming official must complete the civil rights training and upload a certificate of completion or an agenda and sign in sheet.

Date of CAP Completion: Due October 26, 2023; Completed October 19, 2023.

Corrective Action Response: A training agenda showing that the SFA's confirming official completed the civil rights training on October 16, 2023, was provided.

COMMENDATIONS

- The Food Service Director (FSD) has done a fantastic job preparing for the administrative review. Documentation was submitted to the SA swiftly and in a timely manner. The FSD shows dedication in operating a compliant program and engaging students with appealing and nutritious meals.
- The FSD was receptive to all feedback and implemented necessary and recommended changes immediately.

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- Challis School District does a great job implementing the Fresh Fruit and Vegetable Program. There are unique fruits and vegetables offered to students along with engaging learning activities to promote healthy eating habits for students.
- The district's food safety manual was well developed to ensure that all standard operating procedures were specific to the operations of the district.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- When making edits or changes to an application, the best practice is to use a different colored pen. Be sure to always initial and date changes with a note of why change occurred and who in the household provided the new information.
- The director is currently completing and signing both the determining official and confirming official section on free and reduced applications. The determining and confirming official may not be the same person as the confirming official ensures the application eligibility was determined correctly by the determining official. Going forward, the SFA must ensure that only the confirming official signs and completes the according section.
- The SFA's 30-day carryover period ends October 19, 2023. The SFA must ensure that all students which are receiving free and reduced benefits for the current year are switched to paid after meal service on this day if documentation for the current school year is not received by the end of the carryover period.
- The income frequency listed on the application must be used to determine the application. If multiple frequencies are listed, all income must be converted to an annual amount to determine the benefit issued to students in the household.

Verification

- Error prone applications are applications that document a monthly income within \$100 of the Income Eligibility Guidelines. Error prone applications must be a priority when selecting households for verification.
- The confirming official, who must be a different individual than the determining official, must review an application prior to beginning the Verification process. This ensures the application eligibility was determined correctly. Both officials complete the “Official Use Only” box on the free and reduced meal application that has been selected for verification. Once the verification process has been completed and results determined, the verifying official, who can be either the confirming or determining official, must complete the “Official Use Only” box on the meal application. The hearing official is a separate individual with supervisory authority over the other officials that would oversee the hearing process and settle the eligibility if the confirmed original determination is disputed.

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Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus. Production records with planned numbers for each item should be accessible before each meal service. Served numbers and leftover numbers need to be recorded at the end of meal service to ensure accuracy.
 - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the Chicken Nuggets. The specification 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.
 - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the Pancake on a Stick. The specification 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.

SFA On-Site Monitoring

- Though the SFA completed on-site monitoring forms and requirements for SY 22-23 prior to February 1, SFA on-site monitoring documentation was difficult to locate. The SFA should ensure that a proper organizational system is in place for these forms to ensure documentation is retained for three years plus the current year.

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.

School Breakfast and SFSP Outreach

- SFAs must cooperate with 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/meals4kids>), or texting the word "FOOD" or "COMIDA"; to 304-304 to see nearby options. Best practice is to include SFSP promotion and ways to locate meals on the SFA's website.

Smart Snacks

- Schools must meet the minimum requirement in 7 CFR 210.11, for all foods and beverages marketed and sold in school (also known as Smart Snacks in School) to increase consumption of healthful foods during the school day and support a healthy school environment. Vending, school stores, and fundraising need to comply with specific nutrition standards. Refer to *A Guide to Smart Snacks School* available at the

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USDA website. It was noted that the vending machine was turned off during the school day, but was marketing non-compliant beverages.

Resource Management

- Consistent with 7 CFR 210.14(e)(4)(i), SFAs are not required to raise their paid lunch price by more than 10 cents for SY 2023-24 from the last year they charged for paid lunches. SFAs can still choose to raise the price by more than 10 cents. The target weighted average lunch price for SY 2023-2024 is \$3.56. The SA recommends evaluating the current paid lunch prices in preparation for increasing prices for SY 2024-2025.

FISCAL ACTION

Due to meal counting and claiming discrepancies, fiscal action results in \$0.48. 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,

Jax Dunham

Jax Dunham, BS, RDN
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Jennifer Butler, MEd, SNS, NSLP Coordinator, Idaho Child Nutrition Programs
Cambria Steffler, MS, RD, NSLP Coordinator, Idaho Child Nutrition Programs
Christina Hoyt, Child Nutrition Director, Challis School District #181

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Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. **fax:**
(833) 256-1665 or (202) 690-7442; or
3. **email:**
Program.Intake@usda.gov

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