



December 21, 2022

Dr. Scott Woolstenhulme, Superintendent
Bonneville Jt. S.D. #93
2461 E 24 N
Idaho Falls, ID 83401

Dear Superintendent Woolstenhulme,

On November 1st and 2nd, 2022, State Department of Education (SDE) Coordinators Jamie Gibson, Jennifer Butler, Jax Dunham, and Cambria Steffler conducted an Administrative Review of Bonneville Jt. 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 sites reviewed were the Black Canyon Middle School, Hillview Elementary School, Mountain Valley Elementary School, and Tiebreaker Elementary School.

The State agency (SA) would like to commend Heather Plain and the entire staff of Bonneville Jt. 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 Administrative Review 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 Administrative Review a minimum of one time during a three-year cycle, however Idaho has received a waiver to conduct reviews on a five-year 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

As outlined in 7CFR 245.5(a), notification letters including information regarding student eligibility must include the full USDA Non-Discrimination Statement. The notification of approval or denial, and second verification letter only included the short USDA Non-Discrimination Statement (NDS) and requires the full statement.

CAP: Update the template letter in the software system to include the full statement on household notification letters.

CAP Completed: 11/1/2022

Corrective Action Response: All letters have been corrected to include the full Non-Discrimination Statement.

Finding 2 – Meal Components and Quantities

Independent contractor CN Resources (CNR) identified that for the week of menu review, the lunch menu did not meet the minimum daily requirements for grain. The daily minimum of 1 oz. eq. was not met on Tuesday. Only .25 oz. eq. was served this day. As a result of this finding the menu did not meet the weekly grain requirement.

Corrective Action: Increase the grain offering and submit supporting documentation to demonstrate that the menu finding has been corrected.

CAP Completed Date: 09/28/2022

Corrective Action Response: Documentation including production records, recipe, and grain calculator was uploaded to show the grain requirement is now being met.

Commendations

- Heather was very well prepared for the review. All necessary documentation was uploaded well ahead of deadlines in an organized manner.
- The team at the foodservice office was very accommodating and well organized.
- The Buy American documentation and processes for identifying products is organized and displays an understanding for procuring products inside of the country and handling items that need a limited time exception form. All forms had the necessary information and were filed by NSLP or FFVP.
- The receiving stamp used on incoming inventory supports a great practice of ensuring first in and first out.

- Professional standards tracking for the whole district is very organized and includes all required information. It was very easy for the SA to review.
- The staff at Tiebreaker Elementary School were very personable with the students. They were very organized, and their lunch was served quickly. Younger students were provided one on one attention while getting their food through the lunch line. The custodial staff was attentive and prioritized student's safety when spills occurred.
- The FFVP promotion was wonderful to see and students seemed excited to know what would be served. The nutrition education promoting vegetables on the napkin dispenser was great too!
- The Mountain Valley Elementary School kitchen staff did a great job serving through a long meal service and were knowledgeable about requirements.
- The Black Canyon Middle School kitchen and serving area was phenomenal and wonderful to see. Staff kept the kitchen immaculate and students seemed to respect and enjoy the service lines and eating areas.
- The kitchen staff at Black Canyon Middle School demonstrated great rapport with the students, and they were very well organized.
- CNR identified outstanding knowledge of the NSLP program and great job meeting meal pattern requirements and keeping storage units organized with temperature logs.

Technical Assistance (TA)

Certification and Benefit Issuance

- The hearing official must be a separate individual with supervisory authority over the determining, confirming, and verifying officials that would oversee the hearing process and settle the eligibility if the confirmed determination is disputed.
- The SA identified some questions that required follow-up with the on-line application software vendor for clarification. The SFA contacted the vendor while the SA was on-site to address the questions. Some internal process will be refined by the SFA and the software vendor is researching some enhancement options.

Verification

- The verifying official (either the determining or confirming official) must sign and date the bottom portion of the application at the conclusion of verification. The results of the process should be marked on the application as well as when the notice letters were sent.

Meal Components and Quantities

Independent contractor CN Resources completed the menu review and provided the following TA:

- The planned production records were not clear that the minimum 3/4 cup vegetable requirement was offered to all students. The share line vegetable shows 1/2 cup planned serving size, however the sponsor confirmed students are allowed to take two 1/2 cup serving to meet requirements (the production records do indicate 2 servings are

allowed). Ensure the planned production records clearly reflect the minimum of 3/4 cup vegetables are offered to all students in grades K-8.

- A standardized recipe is a recipe that has been carefully adapted and tested to ensure that it will produce a consistent product each time it is prepared. The recipes submitted were not always written in standardized format with complete information. Standardize the recipes so that 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.
 - The true yield made by the recipe.
 - Clear and complete preparation steps and directions.

Local School Wellness Policy

- The SFA opted into *COVID-19: Child Nutrition Response #25 Waiver of Local Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs* waiving statutory and regulatory requirements at 7 CFR 210.31(e) and providing a new first triennial assessment deadline of June 30, 2023.

Resource Management

- The State agency looked at the Nonprogram Food Revenue Tool (NPFRT) uploaded by the SFA and discovered that ala carte entrée prices at the middle school and some of the elementary schools were set at \$2.75, while the high school pricing was \$2.50.
 - The recommendation is to change all ala carte entrée pricing from \$2.50 to \$2.75 and all sides to \$1.00 for all grades. Milk prices can be left at .50 cents.
 - A copy of the "test" NPFRT tool with the recommended changes was sent to the SFA showing that after adjusting the pricing in the tool to the recommended pricing the tool is in compliance.

Paid Lunch Equity

- The SFA's SY22-23 USDA Paid Lunch Equity (PLE) Tool identified a required weighted average price of \$3.31 (rounded to \$3.30) for student paid lunches. The SFA's prices are below equity with an approved \$2.76 weighted average price. The current \$2.50 and \$3.00 prices were approved because the SFA submitted an Attestation of Compliance for SY22-23 showing a positive Fund 290 Balance. Consider an increase greater than 10 cents next year in order to catch up to your weighted average requirement.

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,
Jamie Gibson
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Child Nutrition Programs
Heather Plain, Child Nutrition Director, Bonneville Jt. School District

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2. **fax:**
(833) 256-1665 or (202) 690-7442; or
3. **email:**
program.intake@usda.gov

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