

January 4, 2023

Joel Weaver, Director  
Chief Tahgee Elementary Academy  
34 S Hiline Road  
Pocatello, ID 83202

Dear Joel Weaver,

On November 15<sup>th</sup>, 2022, State Department of Education (SDE) Coordinators Jamie Gibson and Jax Dunham conducted an Administrative Review (AR) of Chief Tahgee Elementary Academy for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was the Chief Tahgee Elementary Academy.

The State agency (SA) would like to commend Lee Griffin and the entire staff of Chief Tahgee Elementary Academy 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 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 – Food Safety

Each SFA must have a written food safety plan for compliance with Hazard Analysis Critical Control Point (HACCP) program criteria found in 7 CFR 210.13(c). SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared or served for the purposes of the NSLP, SBP or other FNS programs. The Food Safety Plan (HACCP) must include bodily fluid clean-up protocols and employee exclusions that are required by Idaho Food Code.

**CAP:** The outdated HACCP manual will be updated with more current SOPs including employee exclusions. Upon updating the HACCP manual, please train staff on the new HACCP manual and SOPs. Please refer to the Institute of Child Nutrition's HACCP manual located at: <https://theicn.org/icn-resources-a-z/standard-operating-procedures>. Please note that the ICN website was updated in 2018, but the manual is still dated 2016. The updated version removed the years and only references “FDA Food Code” without specific dates.

**Date CAP Completed:** 12/12/2022

**Corrective Action Response:** The food service director uploaded an updated copy of the HACCP plan for Chief Tahgee Elementary Academy including all necessary components. The director has trained staff of the new addition and confirmed staff has access to the updated version of the plan.

### Finding 2 – Food Safety

SFAs are required to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories, as applicable [7 CFR 210.21 (d)]. If a product from another country is sourced, then the SFA must have documentation that the domestic product is significantly higher in price or not available in sufficient quantities. Documentation for pineapple tidbits from Indonesia, mandarin oranges from China, and mixed fruit from Thailand were not available during the AR.

**CAP:** The SFA will complete and sign the SA's Buy American Exception Form for the pineapple tidbits from Indonesia, the mandarin oranges from China, and the mixed fruit from Thailand. The SFA will also provide a written procedure detailing how they will implement the required practice for Buy American going forward. Once completed, the SFA will upload the documentation into MyIdahoCNP.

**Date CAP Completed:** 12/12/2022

**Corrective Action Response:** The food service director confirmed via email the process moving forward to work with vendors to complete the exception form when needed and uploaded the completed exception forms for each of the items.

## Commendations

- The new director is implementing good record keeping practices. Training tracking was done in a clear and easily understandable manner.
- The director showcased an understanding for monitoring program operations and implementing training when needed.
- The food service staff demonstrated excellent rapport with the students during breakfast and lunch meal service. As a result, the students were excited to receive their meal and converse with the staff.
- Claim consolidation and review of total meals served is very organized and documented completely.
- Independent contractor CN Resource (CNR) advised of a great job with both meal services. Food was kept warm/cold while transported. Plenty of good food for breakfast and lunch. All requirements were met. They also identified outstanding record keeping, in which all temperature logs were neat and taken daily. Production Records were very neat with meal and milk counts included.

## Technical Assistance (TA)

### Verification

- The State agency completed the verification report with the director while on-site. The report needs to be completed each year by November 15th in MyIdahoCNP even while operating under CEP.

### Meal Components and Quantities

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

- Make sure there is signage for what constitutes a reimbursable breakfast and lunch during meal service. A weekly menu was posted in the meal service room.
- An official manufacturer's Child Nutrition Label or Product Formulation Statement was not submitted for all processed menu items. A sponsor should maintain this documentation on file to document meal pattern requirements as met

### Food Safety

- Per 7 CFR 210.13, schools shall obtain a minimum of two food safety inspections during each school year conducted by a state or local governmental agency responsible for food safety inspections. They shall post in a publicly visible location a report of the most recent inspection conducted and provide a copy of the inspection report to a member of the public upon request.

### Civil Rights

- The SFA's serving area has an outdated "And Justice for All" poster displayed. The office where the current food service director resides has 2 of the most current available "And Justice for All" posters. The food service director replaced the poster in the serving area while SA was on site.

## Reporting and Recordkeeping

- Though current production records are being completed daily, the current production records being used do not include details on temperatures of the items being served. Please use the SA's production letter template found in Download Forms of MyIdahoCNP so that temperatures can be included on production records.

## Local School Wellness Policy (LWP)

- The SFA opted into *COVID-19: Child Nutrition Response #7 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 January 30, 2023.
- The Local School Wellness Policy must be in compliance with the USDA Final Rule established in July 2016 and reflect current district practices. Though the current wellness policy is in compliance, there were statements not necessary to include in the policy and were not reflective of current practices. The Final Rule also included the requirement that report(s) on the progress towards goals stated in the wellness policy be publicly available. Ensure the wellness assessment (e.g., Idaho Wellness Policy Progress Report) is available to the public; posting to the school /district website and/or in a school newsletter would support this requirement.

## Procurement

- A procurement review was previously completed. Please follow the guidance provided by Procurement Specialist Kat Forstie in the closure letter provided at that time.

## 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, Idaho Child Nutrition Programs  
Lee Griffin, Food Service Director, Chief Tahgee Elementary Academy

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U.S. Department of Agriculture  
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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](mailto:Program.Intake@usda.gov)

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