



December 16, 2022

Dr. Becky Meyer, Superintendent
Lake Pend Oreille SD #84
1520 Baldy Mountain Road
Sandpoint, ID 83864

Dear Superintendent Meyer,

On October 19-20, 2022, State Department of Education (SDE) Coordinators Jennifer Butler, Jamie Gibson, Jax Dunham, and Cambria Steffler conducted an Administrative Review (AR) of Lake Pend Oreille 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 Hope ES, Clark Fork Jr-Sr HS, and Kootenai ES.

The State agency (SA) would like to commend Bobbie Coleman and the entire staff of Lake Pend Oreille SD 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 – Civil Rights

The household notification letters must include the full USDA Non-Discrimination Statement (NDS) when advising of approval or denial of benefits (7 CFR 210.23). Five different letters used to communicate eligibility either contained the short NDS or included the former long NDS, which was updated in May 2022.

CAP: Update all household notification template letters in the software system to include the current full NDS.

Completed: October 19, 2022

CAP Response: The SFA updated five separate household notification letters with the current, full NDS.

Finding 2 - Meal Components and Quantities

Independent contractor CN Resource (CNR) identified that for the week of menu review, Clark Fork Jr/SR High School (grades 7-12) served more than the allowable grain-based desserts. Only 2 oz. eq. of creditable grain-based desserts are allowed per week. The menu provided 6 oz. eq. grain-based desserts for the week for grades 7-8. Reduce the number of grain-based desserts served on the menu this week to less than or equal to 2 oz. eq. grain. Replace the s'mores bar offered in the Monday, Wednesday, and Friday meal with another 2 oz. eq. whole grain-rich grain choice or a couple of options such as goldfish crackers (28g for 1 oz. eq.), hard pretzels (28g for 1 oz. eq.), granola (1/4 cup or 1 oz. for 1 oz. eq.). Keep in mind that sweet crackers, such as granola bars, animal and graham crackers, credit as a grain-based dessert.

CAP: Provide a written statement that weekly grain-based dessert requirements are now met and provide documentation demonstrating the correction.

Completed: October 5, 2022.

CAP Response: The SFA explained supply-chain struggles with receiving non-dessert grain items for the alternate meal choice and proceeded with removing the alternative meal choice option from the menu. Revised menus, that removed the items previously subbed into the alternative meal choices for grains, were uploaded.

Finding 3 - Meal Components and Quantities

CNR identified that the minimum weekly grain requirements were not met for the lunch menus at Kootenai and Hope elementary schools for the week of menu review. The weekly requirement of 8 oz. eq. was not met for grades K-6. The menu offered a minimum of 6.25 oz. eq. of grain throughout the week. The yogurt, cracker, cheese meal that is offered on Monday, Wednesday and Friday includes only 1 oz. eq. grain. This only contributed 3 oz. eq. toward the

minimum weekly requirement. The dinner roll offered with the turkey meal only offers 1 oz. eq. toward the minimum weekly requirements. Consider serving an additional grain with the yogurt, cracker, and cheese meal so that there is at least 1.75 oz. eq. per meal. Consider adding whole grain-rich pretzels or crackers or similar grain item. An additional package of crackers may be served as well. Consider serving 1/2 cup whole grain-rich buttered noodles in addition to the dinner roll with the turkey meal. Look for a larger dinner roll to serve that weighs at least 49 grams for 1.75oz. eq.

CAP: Provide a written statement explaining how weekly grain requirements are now met and provide documentation demonstrating the correction.

Completed: October 5, 2022.

CAP Response: The SFA revised the menu to offer yogurt on Tuesday and Thursday so the grain that goes with the yogurt is one day less per week, and made the cheese sandwich alternative meal on Monday, Wednesday, and Friday to increase to minimum of 8 grains.

Commendations

- The director did a remarkable job preparing for the review. All off-site modules were completed in a timely manner and documents uploaded as requested. Paperwork was pulled and organized for reviewers when they arrived onsite.
- The administrative assistant's role in pulling applications and other documentation was greatly appreciated. Her role in managing orders and inventory is very organized and thorough.
- Amazing remodel of the warehouse is an important asset to the program. The warehouse employee does a great job with inventory control and keeping a clean and organized warehouse.
- No benefit issuance errors were identified and the director recorded clear notes to explain questionable situations and information obtained from households.
- Hope Elementary staff did a great job creating a welcoming environment; the cafeteria had fun Halloween decorations and staff knew each student by name. There was a great variety of fruit available for the students to choose from. The apples were sliced fresh when selected, and there were six fruit options in total.
- The kitchen staff at Clark Fork Jr-Sr High School was very friendly and showed great rapport with the students.
- Kootenai Elementary staff did a great job welcoming each student and the cafeteria was decorated with fun Halloween stickers on meal serves line.
- CNR reviewer advised that there was a nice variety of foods offered throughout the week and was complementary on meeting the daily and weekly fruit requirements as well as all the vegetable subgroup requirements. CNR also appreciated such organized menu documentation!

Technical Assistance (TA)

Certification and Benefit Issuance

- According to the eligibility manual, LEAs have an obligation to follow-up when households submit applications with questionable and incomplete information. *SP13-2012 Verification for Cause in School Meal Programs* states, “Verification for cause may be conducted at any time during the school year.”
- The SA identified an excess amount of denied meal applications raising concern that schools are requesting households to complete them. Schools may not require households to complete and submit a meal application; it is the household’s choice to apply for meal benefits. This is an unnecessary use of child nutrition staff time and resources, and is unallowable.
- According to [SP36-2017 Eligibility Manual for School Meals](#), LEAs are prohibited from distributing and processing applications solely to obtain household income information in order to determine the funding or benefits for programs other than the CNPs. For example, LEAs may not distribute school meal applications solely to collect income information for additional education funding from local nonprofits or community donors. Thus, funds in the nonprofit school food service account cannot be used to pay the costs associated with collecting and processing household income information for non-Program purposes. A school or LEA must obtain this information through other means. If the school or LEA collects such information for non-Program purposes through a separate application, the applications must not be labeled as applications for benefits under the CNPs or give any indication CNP benefits are contingent upon a household returning the application.

Meal Components and Quantities

CNR completed the menu review and provided the following TA:

- The original Child Nutrition (CN) Label submitted for the bean burrito was from 2017. Check with the manufacturer for an updated label. Many manufacturers’ change their product formulas. Labels should be maintained for these potential changes.
 - An additional Child Nutrition (CN) Label submitted for the bean burrito included a watermark. Please secure for your records the actual CN label from the product packaging, without the watermark.
- Secure a Child Nutrition (CN) Label for the diced chicken in the Chicken and Broccoli Alfredo and the chicken patty used for the BBQ Chicken Sandwich. The spec sheet submitted included a meal pattern crediting statement but was not an official CN Label or PFS. Reference <https://www.fns.usda.gov/cn/labeling-program> for more 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.
- The recipe for Garden Salad served on Monday has a total of 12.5 cups of carrots. $12.5 \text{ cups} / 100 \text{ servings} = .125$ or $1/8$ cup carrots per 100salads served. The recipe

instructions state to add 1/4 cup carrots. Clarification was provided during the review process to confirm that 1/4cup carrots was to be served. Update the recipe to show the correct portion of carrots served.

- The recipe yield for the yogurt and graham crackers shows 30. In the original packet the total ingredients showed only 18 yogurt and 36 graham crackers. Adjust these totals to better match the yield of the recipe.
- Menu items listed on the production records did not always match the submitted recipes. Update the production records to show that chips are served in place of goldfish crackers, offered with the hoagie sub on Tuesday and Thursday.

Food Safety (HACCP)

- When reviewing the temperature logs at Kootenai Elementary, the temperature for the dry storage has average temperatures above 70°F. The SA recommended exploring keeping the food storage door closed to maintain a cooler temperature or see if a thermometer needs replacing.
- SFAs must have a written food safety plan for compliance with Hazard Analysis Critical Control Point (HACCP) criteria found in 7 CFR 210.13(c). Each site had a plan, but site staff did not readily know the location or fully appreciate the intended purpose of the plan. All employees should have ready access to the HACCP manual to ensure that protocols are followed. An annual review of the plan, including certification of review, should be implemented at each site. Although food safety was covered in training at the beginning of the year, provide refresher training on the purpose and expectations for the HACCP manual.

Offer versus Serve (OVS)

- Although staff was trained on OVS during the Welcome Back meeting, there was no documentation to support the topic was covered. There was a sign-in sheet, but no agenda. Group staff training must include an agenda and sign-in sheet that specifically identifies that "OVS breakfast" and/or "OVS lunch", as applicable, was part of the training agenda. All staff training should include an agenda and sign-in sheet and training documentation should be maintained on file at the SFA for three years plus the current year.

Local School Wellness Policy (LWP)

- The SA completed the Idaho Wellness Progress Report based on the review of 8200 Local School Wellness, 8210 District Nutrition Committee, 8230 District Nutrition Standards, 8240 School Meals, and 8250 Guidelines for Food and Beverage Sales. Some policy wording is repetitive and worded differently in multiple policies causing potential confusion. Additionally, policy 8240 states, "All grains served shall be whole grain", which is more restrictive than current USDA nutrition guidelines.
- 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 following 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)). The SFA opted-in to Waiver #7 and identified an anticipated completion date of 5/31/23 for the triennial assessment. The past two school years, the food service director has completed and uploaded a progress report for the entire district, but individual schools should be monitored by school administration to meet triennial assessment requirements.

- Federal legislation requires school districts to implement a local wellness policy that must include language:
 - Permitting parents, students, school board, PE teachers, school health professionals, school food service staff, administrators, and community members to participate in the development, implementation, review, and update of the local wellness policy.
 - Identifying wellness policy leadership of one or more LEA and/or school official(s) who have the authority and responsibility to ensure each school complies with the wellness policy.
 - Specifying measurable goals for nutrition education, nutrition promotion, physical activity, and other school-based activities to promote student wellness that are written with consideration for evidence-based strategies.
 - Addressing nutrition guidelines for all foods and beverages sold on the school campus during the school day and for providing school meals that adhere to Federal meal pattern requirements.
 - Identifying nutrition standards for non-sold foods and beverages available during classroom and school celebrations.
 - Stating a policy for food and beverage marketing that allows the marketing and advertising of only those foods and beverages that meet Smart Snacks in School nutrition standards.
 - Addressing an evaluation conducted once every three years of the wellness policy and the extent to which schools are in compliance, how the district policy compares to model wellness policies, and the progress made in attaining local wellness policy goals.
 - Identifying a way to share the wellness policy content and implementation with the public.
- For more information on local wellness policy requirements, visit the SA's [School Wellness](#) webpage.

Smart Snacks

- The SA fundraiser tracking template includes an option to check “non-food” for ease in tracking those types of sales along with the “compliant” and “exempted” food fundraiser options. The purpose of tracking all fundraising, including both food and non-food, is because the SA requires at least 50% of fundraising to be exempted or non-food related.

School Breakfast and SFSP Outreach

- SFAs must inform eligible families of the availability of reimbursable breakfasts served under the SBP. In addition to providing all households informational packets with Free

and Reduced Meal Applications, schools must send reminders regarding the availability of the SBP multiple times throughout the school year (7 CFR 210.12 (d)). The foodservice page on the district's website would be a good location to promote the breakfast program. Currently, breakfast menus can be located through the website, but the SFA should include wording to promote the availability of breakfast.

Procurement

- A procurement review was previously completed. Please follow the guidance provided by Procurement Specialist Kat Forstie in a separate closure letter dated October 6, 2022.

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,

Jennifer Butler

Jennifer Butler, MEd, SNS
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Bobbie Coleman, Child Nutrition Director, Lake Pend Oreille SD

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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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