



January 19, 2024

Shon Hocker, Superintendent
Coeur d'Alene School District #271
1242 E. Best Ave.
Coeur d'Alene, ID 83814

Dear Superintendent Hocker,

On November 1 to November 3, 2023, State Department of Education (SDE) Coordinators Jax Dunham, Jennifer Butler, Cambria Steffler, and Cassandra Thompson conducted an Administrative Review (AR) of Coeur d'Alene School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Afterschool Snack Program (ASSP)
- USDA Foods

The sites reviewed were:

- Coeur d'Alene High School
- Woodland Middle School
- Northwest Expedition Academy (NEXA)
 - Operating ASSP

The State agency (SA) would like to commend Desiree Freeman, Shanell Mannel, Jewelz Becraft, and the entire staff of Coeur d'Alene 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 525 students resulted in a 1.90% error rate. Documentation for 20 students was not able to be located while the SA was on-site. Additionally, 5 students must be changed from free to paid as they are not categorically eligible. There are an additional 3 students whose applications require follow-up as they are incomplete due to conflicting household member and income information.

CAP: Upload any benefit documentation for the 20 students that were not able to be located while the SA was on site if found. If the documentation cannot be found by November 7, 2023, send the according households adverse action letters notifying that benefits will be changed to paid after 10 calendar days. Call households with incomplete applications to confirm inconsistent information. Send adverse action letters for the 5 students receiving free benefits without Direct Certification (DC) documentation and change their benefit to paid after 10 calendar days. Once all information has been collected, upload a benefit issuance list showing the correct updates to student eligibility have been made along with any adverse action letters sent to households.

Date of CAP Completion: Due December 1, 2023; completed December 1, 2023.

Corrective Action Response: The SFA uploaded all adverse action letters sent to households and a new benefit issuance list showing the correct eligibility changes have been made. Additionally, missing applications and applications which required follow up were uploaded with applicable notes.

Finding 2 – Certification and Benefit Issuance

There were a large number of households that submitted multiple applications. It was identified that at least two schools sent notifications to households requesting that they complete free and reduced meal applications in order to support the school receiving Title 1 funding. LEAs may not distribute school meal applications solely to collect income information for additional education funding, including Title 1 funding. LEAs may distribute an income

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survey to obtain household income information for purposes outside of Child Nutrition Programs (CNP). The non-profit food service account may not pay for any expense related to the distribution, collection, or calculation of income survey information for purposes outside of CNP. The push for households to complete applications even though a family does not qualify or students have already been determined categorically eligible is not allowable [page 76 of the 2017 Eligibility Guidance for School Meals Manual]. Technical assistance on schools requiring free and reduced applications to be filled out was provided during the previous administrative review. The practice of schools requiring meal application submission for purposes outside of Child Nutrition Programs must stop immediately.

CAP: The district must write a narrative detailing how the district will reduce the amount of unnecessary applications being completed by households. Include in this narrative how the district will incorporate income surveys to report household income for program needs outside of CNP and not use the nonprofit food service account funds to determine applications for purposes unrelated to the National School Lunch Program.

Date of CAP Completion: Due December 1, 2023; completed November 28, 2023.

Corrective Action Response: A communication plan was uploaded for distributing free and reduced applications as it relates to Title 1 funding. In this plan, it was noted that the Operations and Federal Programs Director will work to establish a process to use income surveys that will be included in student registration for the following school years for the purpose of gathering income data to support additional education funding, including Title 1 funding. It was also noted that this will help to isolate free and reduced applications for the sole purpose of identifying student financial support based on qualification for meals provided through the NSLP.

Finding 3 – Civil Rights

The incorrect non-discrimination statement (NDS) is included on household notification letters. All letters notifying families of benefits must include the current full NDS; the current household letters only include the short NDS. Update template letters to include the current full NDS. The full NDS is available on the SA website under [Civil Rights](#). The SA also provides template letters in MyIdahoCNP's Download Forms which can be utilized.

CAP: Update all template letters, including eligibility, DC notification, verification, and adverse action letters, to include the correct NDS. Once complete, upload all template letters in MyIdahoCNP.

Date of CAP Completion: Due December 1, 2023; completed November 27, 2023.

Corrective Action Response: Templates for the aforementioned letters were uploaded by the SFA showing that the full current NDS is now included and will be utilized.

Finding 4 – SFA On-Site Monitoring

According to 7 CFR 210.8 (a)(1) and 7 CFR 220.11 (d)(1), each SFA with two or more feeding sites must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating NSLP and 50% of schools operating SBP under its jurisdiction prior to February 1, each school year. Though the SFA attempted to complete on-site monitoring reviews during

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SY 2022-2023, the forms used do not include all required information for review, and not all forms were completed prior to February 1. The SFA must ensure that this review is conducted for all feeding sites as indicated no later than February 1, and retain the documentation for three years plus the current year.

CAP: Provide a plan detailing how the SFA on-site monitoring requirements will be completed on an annual basis by February 1. In this plan, detail who will be responsible for completing on-site monitoring, what form will be used, and how the district will ensure that this is completed by February 1, each year.

Date of CAP Completion: Due December 1, 2023; completed November 16, 2023.

Corrective Action Response: A plan was uploaded detailing how the SFA will ensure that SFA on-site monitoring is completed by February 1 each school year. The area manager will complete SFA on-site monitoring, and the manager will use the SFA On-Site Monitoring Form found in MyIdahoCNP's download forms. In future years, the SFA will monitor high schools in October, elementary schools in November and December, and Middle Schools in January.

Finding 5 – Local School Wellness Policy

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)). Assessments for schools as well as the district must be completed.

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 December 1, 2023; completed December 1, 2023.

Corrective Action Response: The SFA uploaded a plan to ensure that the triennial assessment of the local wellness policy is completed on a triennial basis. The district has met with administrators from each school within the district, and each school administrator will appoint a "wellness champion and smart snack liaison" to serve on the according committee. The committee will meet every 4 months to share wellness stories and discuss education opportunities. This committee will appoint a Committee Chair, and this person will note the triennial assessment on the calendar to ensure that the triennial assessment is completed on a triennial basis. Once the triennial assessment is completed for each school as well as the district as a whole, the results will be posted on the Coeur d'Alene School District and Nutrition Services website.

Finding 6 – Smart Snacks

Schools must meet the minimum requirement in 7 CFR 210.11, for all foods and beverages 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. Food and beverages sold to students must comply with specific nutrition standards, must be tracked as exempt

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fundraiser(s), or must be inaccessible during the school day (defined as midnight the day before until 30 minutes after the school day ends). During the previous administrative review, a Smart Snacks finding was issued. Per the recently published final rule, *Child Nutrition Program Integrity*, State agencies may impose fines against institutions for failure to correct or continually disregard program requirements due to repeat violations.

CAP: Provide a written plan describing how all Coeur d'Alene schools will comply with Smart Snacks regulations, including a process to track all fundraisers occurring at the schools. In this plan, describe when the changes will be made, how the changes will be implemented, and which designee at each school will be accountable for Smart Snacks compliance.

Date of CAP Completion: Due December 1, 2023; completed November 27, 2023.

Corrective Action Response: A plan detailing the process to track all fundraisers occurring in the district was uploaded. In this plan, it was noted that a Smart Snacks tracking form will be utilized to track all compliant and exempt fundraisers at each school. The SFA further elaborated that fundraisers which do not meet Smart Snacks guidelines will not be allowed in the cafeteria during meal service time. Only approved fundraisers from the district's Nutrition Services office will be allowed to operate. The Director of Operations will discuss the plan at the next administrative staff meeting on November 29, 2023, so that principals from each school can decide who they will designate as the Smart Snacks liaison. The district's Community Relations Director will draft an internal communication and outreach plan to introduce the regulations with staff. This plan will be developed and distributed to each school's administration by December 30, 2023. To ensure future compliance, the Nutrition Services Director will meet with designees annually to review the requirements and procedures to ensure compliance.

Finding 7 – Professional Standards

Per 7 CFR 210.30(b)(1)(v), Food Service Directors (FSD) must have at least eight hours of food safety training at least every five years. A free, online course, *Food Safety in Schools* is available through the [Institute of Child Nutrition \(ICN\)](#) and may be used to meet this requirement.

CAP: Upload a training certificate indicating successful completion of at least eight hours food safety training into MyIdahoCNP once results are issued.

Date of CAP Completion: Due December 20, 2023; extended to January 5, 2024; completed December 27, 2023.

Corrective Action Response: A training certificate from ICN's Food Safety in Schools was uploaded showing that the FSD completed 8 hours of food safety training. Though the FSD had originally intended to take the ServSafe course on December 11, 2023, the training was cancelled. Due to this cancellation, the FSD completed ICN's *Food Safety in Schools* to satisfy the 8-hour food safety training for directors.

Finding 8 – Buy American Provision

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, the SFA must have documentation that the domestic product is significantly higher in price or not available in sufficient quantities.

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Documentation for bananas was not available during the AR. The FSD also noted that she was unsure of how to approach the Buy American Provision as she was recently hired.

CAP: Complete the Buy American Provision training on the CNP digital learning portal. Upload a certificate of completion to MyIdahoCNP.

Date of CAP Completion: Due November 17, 2023; completed November 13, 2023.

Corrective Action Response: A certificate was uploaded showing that the appropriate Buy American training was completed by the Food Service Director.

Finding 9 – Afterschool Snack Program

The Afterschool Snack Program (ASSP) at NEXA was reviewed. For the month of review, it was identified that the claim was accurate for the total free, reduced, and paid counts. However, the school is Attendance Area Eligible using SY19-20 data and qualifies to serve and claim all snacks served to students for free. Claiming snacks by F/R/P resulted in a loss of over \$110 in reimbursement for September. The SA inquired about the differences between operation and enrollment of the CDA 4 Kids (under the 21st Century Grant) and School Plus programs as there was a noted difference of student eligibility within each program's enrollment. It was also discovered that although students are counted by eligibility, they are not charged for the snacks. However, historically, the enrichment programs are invoiced for the snacks. This had not occurred for the month of review, and the newly hired director was not familiar with the process and how the programs were established or charged.

CAP: Review all 11 ASSP sites and determine how many are Area Eligible using data within the past 5 years. Make changes to the site application packet accordingly so free snacks can be claimed going forward at qualifying sites. Contact the individuals overseeing the two separate enrichment programs and inquire about the differences and enrollment charges. Confirm that all students have equal access and opportunity to join either enrichment program option. Explore the historical invoicing process and identify if there is a contract in place or how the prices are established. Evaluate the prices to charge to support the cost of the snack. Develop a procedure of how the monthly invoicing process will be addressed. Upload a narrative addressing all the actions stated above.

Date of CAP Completion: Due December 1, 2023; completed December 1, 2023.

Corrective Action Response: The SFA updated all application packets accurately to ensure that free snacks are claimed at qualifying sites going forward. Additional information was gathered on the two enrichment programs, and it was confirmed that all students have access to both the program offered via the 21st Century Grant (CDA 4 Kids) and School Plus. Upon exploration, the SFA noted that historical invoicing was not consistent. Going forward, the SFA will invoice both programs \$0.58 for a reduced eligibility snack and \$1.17 for a paid eligibility snack if students continue to not be charged for snacks regardless of eligibility.

Finding 10 – Meal Components and Quantities – Lunch

Though there was a variety of adequately portioned vegetables, the carrots offered credited as 1/4 cup of vegetable. The kitchen staff was unsure of crediting information and were not requiring extra vegetables to be taken if only one bag of carrots was taken by a student.

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CAP: Utilize the NSLP Corrective Action Procedure form to detail how the SFA will ensure kitchen staff review crediting information before meal service each day.

Date of CAP Completion: Due November 17, 2023; completed November 15, 2023.

Corrective Action Response: An NSLP Corrective Action Procedure form was uploaded detailing how that SFA will ensure that kitchen staff review and are aware of crediting information. It was noted that training was provided on the topic at the kitchen manager meeting on November 6, 2023. Email was sent to kitchen managers on November 10, 2023 with documents to aid staff in understanding crediting information. It was also recommended that each site performs a "morning huddle" to review the daily menu and crediting information before the meal service.

COMMENDATIONS

- All staff in the child nutrition office were very receptive to feedback and show determination in operating a compliant program. Any necessary changes or suggestions communicated by the SA were quickly noted, documented, and implemented for future practice.
- The SFA's training tracking logs and backup documentation were well organized and formatted showcasing great recordkeeping practices.
- The determining official has an excellent note taking practice. Vital information was easy to track as all notes were made with great detail.
- The staff at NEXA were very welcoming and implemented any recommendations made by the SA right away, and they showcased great food safety practices.
- The kitchen staff at Woodland Middle School are very friendly and are invested in ensuring the School Breakfast Program and National School Lunch Program are correctly implemented. The staff had great rapport with students and created a warm and welcoming environment.
- CNR provided a commendation stating that the staff at Coeur d'Alene High School is very warm and welcoming. The kitchen was very clean and well organized.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- Foster is an Other Source Categorical Eligibility Program designation for a child who is formally placed by a court or a State child welfare agency. In order for a child to be considered categorically eligible for free meals, the State must retain legal custody of the child. This definition does not apply to informal arrangements or permanent guardianship placements that may exist outside of State or court-based systems [7 CFR 245.2]. When a household indicates a child is foster but the child is not included on the State Direct Certification list, follow up is required and documentation from the child welfare agency must be received in order to deem the child categorically eligible.

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- When obtaining the SA Direct Certification (DC) list, be sure to always save it in a format that captures the appropriate heading to validate the date and where the list came from. The SA recommends using the PDF download option to capture the required heading information. Additionally, any time a Single Child Match is completed, the match results from the system must be retained on file.
- The SFA had trouble locating several students' eligibility documentation during the review. Though many of the missing documents and applications were located, the SFA must implement a system of organization which allows for easy access to student eligibility documentation.

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.

Smart Snacks

- Recommendations were provided by the SA to ensure that fundraisers important to schools and extracurriculars can operate under Smart Snack guidelines. It was suggested that DECA stores implore students to utilize the [Smart Snacks Product Calculator](#) as an exercise to introduce students to additional information on a nutrition facts label while still being able to offer nutritious items to raise money for school trips. It was also suggested that staff and students become familiar with *A Guide to Smart Snacks School* to better understand why Smart Snack regulations are in place and whether or not an item is smart snack compliant.

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - A Child Nutrition Label or Product Formulation Statement can be used to determine how processed food items contribute to the meal pattern. Without this documentation it may be difficult to determine if the meal component was satisfied.
 - The Child Nutrition (CN) Label submitted for the Beef Patty showed an expired CN number (issue date 8/2014). The CN number was verified as active on the USDA CN Label Verification Report.
 - The Child Nutrition (CN) Label submitted for the Breakfast Wrap included a watermark and was expired (issue date 9/2017). 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.
 - The Child Nutrition (CN) Label submitted for the Sausage Patty showed an expired CN number (issue date 7/2017). The CN number was verified as active on the USDA CN Label Verification Report.

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- Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the following items. 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.
 - Chicken Nuggets
 - Breaded Chicken Patty
 - Popcorn Chicken
 - Chicken and Cheese Crispito
- Secure an updated Product Formulation Statement (PFS) for the following products. The document submitted has an issue date that is more than 5 years old.
 - Turkey Frank
- Update the crediting for the grains in the Sweet & Sour Popcorn Chicken bowl for grades 6-12 on the recipe and on the production record. The recipe calls for 1 cup of brown rice, which credits as 2 oz. eq. grain. The breading on 18 pieces of popcorn chicken credits as 1.5 oz. eq. grain. The total grain crediting for this recipe is 3.5 oz. eq., not 2.5 oz. eq. grain.

FISCAL ACTION

Due to benefit issuance errors, fiscal action for the SBP results in \$106.40, and fiscal action for the NSLP results in \$684.65. Since the SBP fiscal action falls under the \$600.00 threshold, the SBP fiscal action will be disregarded. However, the NSLP fiscal action of \$684.65 cannot be disregarded, and this adjustment will be withheld from a future claim. Should you wish to appeal this fiscal action, follow the appeal procedures on the [State Agency Appeal Procedures](#) document located on the Idaho Child Nutrition Programs website.

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
Desiree Freeman, Child Nutrition Director, Coeur d'Alene School District

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1. **mail:**
U.S. Department of Agriculture
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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