



December 14, 2023

Janet Williamson, Superintendent
Camas County School District #121
610 Soldier Road
Fairfield, ID 83327

Dear Superintendent Williamson,

On October 3, 2023, State Department of Education (SDE) Coordinators Jax Dunham and Jennifer Butler conducted an Administrative Review (AR) of Camas County School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) (Operating Provision 2 breakfast option)
- USDA Foods

The site reviewed was Camas County Schools.

The State agency (SA) would like to commend Jennifer Brown and the entire staff of Camas County 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

The SFA changed online application and point of service software providers from the previous school year, and the SFA is still learning the new system. Carryover ends on October 5, but benefits as of October 2 were validated while the SA was onsite which included twelve students listed with benefits from the previous school year. Of those students, three students were located on the October 2 direct certification (DC) list and were still appearing with last year's benefit on the eligibility list. One student appearing as reduced from last year's eligibility was actually determined as denied last year (their sibling correctly appears as denied). No benefit determination documentation could be located for two students listed as reduced from last year.

CAP: Work with the software provider on required steps to ensure that accurate and timely updates are reflected on the eligibility list. Upload a new benefit issuance list after carryover ends on October 5, along with any new applications, so the SA can validate the three DC students showing as free and twelve other students receiving benefits from last school year have been switched to paid if no new eligibility determination documentation has been provided. Those students with an incorrect carryover benefit must be changed to paid to reflect the correct carryover benefit.

Date of CAP Completion: Due October 18, 2023; completed October 19, 2023.

Corrective Action Response: The SFA uploaded a benefit issuance list and new benefit documentation showing that correct benefit changes have been issued to the identified students.

Finding 2 – Certification and Benefit Issuance

One student was incorrectly determined as Migrant without acceptable documentation.

CAP: Contact the household to obtain benefit determination documentation. Upload documentation, if provided, and update the benefit issuance list to reflect the determined benefit. If no documentation is provided prior to the end of carryover, change the benefit to paid.

Date of CAP Completion: Due October 6, 2023; Completed October 6, 2023.

Corrective Action Response: Documentation from the SFA's McKinney-Vento Homeless Liaison was uploaded stating that the student should be determined as homeless instead of migrant. A benefit issuance list from the SFA's point of service was uploaded showing that the correct benefit is being issued under the McKinney-Vento determination.

Debbie Critchfield, Superintendent of Public Instruction

(208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov

Based on the administrative error of 11.67% 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 must be filed 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 3 – Local School Wellness Policy

Per 7 CFR 210.31(e)(2), LEAs must assess their local wellness policy (LWP) 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)). There was no record that the SFA completed the triennial assessment.

CAP: Upload a plan identifying who at the LEA will be responsible to complete the triennial assessment(s), how the assessment(s) will be completed, and what steps will be taken to ensure this requirement is met on a triennial basis.

Date of CAP Completion: Due October 18, 2023; Completed October 18, 2023.

Corrective Action Response: A plan was submitted detailing that the full-time kitchen staff member that works with the Food Service Director (FSD) will complete the triennial assessment and notify the superintendent for corrections and approval. Once the triennial assessment has been completed, it will be posted in conjunction with the LWP on the district's website. To ensure this is completed in a timely manner, the district will complete a yearly check of the school foodservice webpage to certify that all items, including the triennial assessment, are completed in a timely manner.

Finding 4 – Local School Wellness Policy

The Local Wellness Policy (LWP) was found out of compliance. During the previous review, a finding was issued for a noncompliant policy, and though it appears that the LEA did address the finding and updated the policy in 2019, they are currently updating all district policies, and an inadequate and incomplete LWP was provided. For more information on local wellness policy requirements, visit the SA's [School Wellness](#) webpage.

CAP: Upload a plan identifying who at the LEA will be responsible to ensure the LWP is compliant with Federal regulations, how the policy will be updated, and when a compliant policy will be available to the public.

Date of CAP Completion: Due October 18, 2023; completed October 19, 2023.

Corrective Action Response: A plan was provided detailing that the school district will ensure that the LWP is compliant by utilizing ISBA standard language and policies. The policy is set to be approved and made available to the public in January, 2024. Once the wellness policy is compliant, the full-time kitchen staff member that works with the FSD will be responsible for

Debbie Critchfield, Superintendent of Public Instruction

(208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov

ensuring that the LWP continues to be in compliance by evaluating the policy at the beginning of each school year.

Finding 5 – School Breakfast and SFSP Outreach

SFAs must inform families about the availability of breakfasts for students. Information about the School Breakfast Program (SBP) must be distributed just prior to or at the beginning of the school year. Additionally, schools are encouraged to send reminders regarding the availability of the SBP multiple times throughout the school year [7 CFR 210.12(d)(1)]. Technical assistance on this requirement was provided during the last two administrative reviews with recommendation of adding a breakfast menu to the website. As the SFA is operating Provision 2 breakfast, the availability of free breakfast for all students should be widely promoted to all households.

CAP: Upload a plan identifying who will be responsible to distribute SBP information, how it will be distributed at the beginning of the year as well as reminders throughout the year, and what steps will be taken to ensure this requirement is met annually.

Date of CAP Completion: Due October 18, 2023; Completed October 18, 2023.

Corrective Action Response: The SFA provided a plan detailing how the district will ensure that breakfast outreach occurs going forward by advertising menus monthly, creating flyers to post on social media and send via email, and supplying breakfast information to the newspaper.

Finding 6 – Meal Components and Quantities - Lunch

For the week of menu review, the K-5 & 6-8 lunch menus did not meet the minimum weekly requirement for the starchy vegetable subgroup. Starchy vegetables were offered, but not in large enough quantities to meet the weekly requirement. The 1/2 cup weekly starchy vegetable subgroup requirement was not met for grades K-5 & 6-8, with only 3/8 cup offered.

CAP: Provide a written statement that the starchy vegetable subgroup requirements are now met. Include a detailed statement to describe what specific changes were made to the menu, for the week of review to correct all menu review findings and bring the menu into compliance. Submit supporting documentation to demonstrate that the menu findings are now corrected. This documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.

Date of CAP Completion: Due October 2, 2023; Completed October 2, 2023.

Corrective Action Response: The SFA added green peas to the salad bar on Wednesday and Thursday to satisfy the starchy requirement for the week. The FSD attached the production record and documentation for the frozen peas that were used. The FSD also added the needed items to the production logs and made sure they were implemented.

COMMENDATIONS

- Though SFA on-site monitoring is not required for SFAs with only one site, the director completed this practice to ensure that the program is functioning in line with federal regulation to certify that reimbursable meals are accurately tracked.

Debbie Critchfield, Superintendent of Public Instruction

(208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov

- The Food Service Director was very well organized and showed dedication in operating a compliant program. Responses to questions were swift, and thorough documentation was uploaded prior to the SA arriving on site.
- The SFA's Buy American Provision documentation was well presented and filed showing compliance and great recordkeeping practices.
- The SFA installed a monitor in the cafeteria with funds from the Technology Innovation Grant. This monitor was utilized in a creative way to market food and additional scholastic information in the cafeteria.
- The SFA provided well organized documentation for all foods sold at school during the school day to ensure Smart Snack compliance and promote student wellness throughout the school.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- The LEA's designated homeless liaison is responsible for determining if a student meets the requirements of the McKinney-Vento Act. In order for the SFA to identify a student as eligible for free meals, the student's name must be included on a list signed and dated by the homeless liaison. This information must be provided to the SFA in a valid format (date and validating signature) in a timely manner so that students can receive free meals as soon as that information is determined. Retain all lists to support the date of eligibility. Migrant students are included on the State agency's DC list, which is the only allowable method for determining a student as Migrant as those students are added to the DC list after validation of the submission of qualification by the appropriate liaison.
- The income frequency listed on the application must be used to determine the application. Income should not be converted to an annual amount unless various income frequencies are reported. Make use of the Income Eligibility Guidelines chart to determine eligibility at the reported frequency.
- The benefit issuance list should reflect the date of the direct certification list to indicate the student's eligibility date for free meals.
- The SFA's application software determines applications by annual income regardless of listed income frequency. As this may result in a determination error, it is recommended that the SFA investigate if this can be modified in the software. If not, the determining official must validate the eligibility using the reported income.
- Never discard any of the applications received from households. If a determination method such as Direct Certification or Migrant overrides the benefit determined on an application, make a notation on the application of the new benefit, and file the applications in groupings with the method determined.

Debbie Critchfield, Superintendent of Public Instruction

(208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - During the Administrative Review, the results of the menu review were provided to the sponsor in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served must meet all daily and weekly meal pattern requirements for the specific grade group. The sponsor was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews may result in fiscal action.
 - Subgroups of vegetables must be met for each grade group. The 1/2 cup weekly starchy vegetable subgroup requirement was not met for grades K-5, with only 3/8 cup offered.
 - Consider serving 1 cup (1 full portion) of potato soup instead of 3/4 cup (.75 portion) or adding 1/8 cup corn to the menu this week.
 - The Product Formulation Statement submitted for the Mozzarella Filled Breadsticks was not complete as the grain crediting and signature were submitted separately. The complete PFS was secured in order to confirm meal pattern crediting. This documentation was uploaded to CNR's website where the files may be accessed. SFAs should maintain this documentation on file to document meal pattern requirements as met.
 - 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.

Resource Management

- The SFA must enter a Capital Expenditure Request in MyIdahoCNP (this was done on 12/5/2023 and approved by the SA). In the future, all single piece equipment purchases over the \$5,000 threshold must be submitted through a capital expenditure request for approval by the State agency before purchase is made as also noted in Camas County School District's procurement review of school meal programs. [SP39-2016]

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 the Download Forms section of MyIdahoCNP, and the SFA utilized and implemented this SOP while the SA was on site.

Professional Standards

- Consider implementing a process that ensures the required trainings - food safety, OVS, and civil rights - are conducted at the beginning of each school year and adequately documented. When new employees are hired ensure necessary training is received within the first 30 days.

Debbie Critchfield, Superintendent of Public Instruction

(208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov

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 on the SFA’s website.

FISCAL ACTION

Due to benefit issuance errors, fiscal action for the National School Lunch Program totals \$258.70. 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
Jennifer Brown, Child Nutrition Director, Camas County School District #121

CIVIL RIGHTS NONDISCRIMINATION STATEMENT

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible

state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

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

This institution is an equal opportunity provider.