



Idaho Department of Education

June 14, 2024

Tina Strong, Superintendent
Coeur d'Alene Tribal School
30 Moctleme, PO Box 338
Desmet, ID 83824

Dear Superintendent Strong,

On March 19, 2024, Idaho Department of Education Child Nutrition employees, Lynda Westphal, Cassandra Thompson and Kat Forstie conducted an Administrative Review (AR) of Coeur D'Alene Tribal School for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP) Operating Community Eligibility Provision (CEP)
- School Breakfast Program (SBP) Operating CEP
- Fresh Fruit and Vegetable Program (FFVP)

The site reviewed was the Coeur d'Alene Tribal School.

The State agency (SA) would like to commend Christopher Luke and Ana Matheson and the entire staff of Coeur d'Alene Tribal School 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

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- 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 – Meal Pattern - Breakfast - Fruit

For the week of menu review, the K-8 breakfast menu did not meet the minimum daily and weekly requirements for fruit. The federal regulations require minimum daily amounts of fruit for breakfast. The daily minimum of 1 cup was not met Tuesday through Friday for grades K-8, with only 1/2 cup offered. · Consider serving ½ cup fresh, frozen, or canned fruit daily along with ½ cup 100% full-strength juice to meet fruit requirements. The federal regulations require minimum weekly amounts for fruit. The weekly minimum of 5 cups was not met for grades K-8, with only 3.25 cups offered. · By following the suggestions outlined to meet the daily fruit requirement, the weekly fruit requirement will also be met.

CAP: 1. Provide a written statement that the fruit 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. **2.** Submit supporting documentation to demonstrate that the menu findings listed under step 1 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. **3.** Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: February 7, 2024

Response: For the week of review the Head Cook added an extra half cup of fruit in the morning breakfast meals for the week. On the 12th, Anastasia added an extra half cup of Applesauce. On the 13th, she added an extra half cup of Bananas, on the 14th she added an extra half cup of diced mangos. On the 15th she added an extra box of juice to meet the meal requirements. She will attach revised breakfast production records for that week with the correction. She also attached the CN labels. Anastasia is the Head Cook and is responsible for producing menus and ordering for the school.

Finding 1 – Meal Pattern - Breakfast – Grain

For the week of menu review, the K-8 breakfast menu did not meet the minimum daily 1 ounce equivalent requirement for grain. The federal regulations require daily minimum amounts of grains to be served. The daily minimum of 1 oz. eq. was not met on Thursday for grades K-8, with only 0.25 oz. eq. offered. · The breakfast combo bar served on Thursday credited at only 0.25 oz. eq. grain per the Product Formulation Statement submitted. Consider serving a 1 oz. slice of toast or 1 oz. cereal bowl with the combo bar to meet the daily grain requirements. · After the daily 1 oz. eq. grain minimum is met, the weekly minimum can be met with additional

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grains or meat/meat alternates. Schools may substitute 1 oz. eq. of meat/meat alternate for 1 oz. eq. of grains after the minimum daily grain requirement is met.

CAP: 1. Provide a written statement that the daily grains 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. 2. Submit supporting documentation to demonstrate that the menu findings listed under step 1 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. 3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance

Due Date: February 7, 2024

Response: Corrective Action Response: The Head Cook added cereal to the breakfast for February 15th. We've revised the breakfast menu. We will be more thorough on what counts and what doesn't in the future.

Finding 3 – Meal Pattern – Lunch - Vegetable Subgroups

For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement for the Beans/Legumes and dark green vegetable subgroup. There were no dark green vegetables offered this week. There were no beans/legumes offered this week. Subgroups of vegetables must be met for each grade group. The ½ cup weekly bean/legumes vegetable subgroup requirement was not met for grades K-8, with no beans/legume offered. Subgroups of vegetables must be met for each grade group. The ½ cup weekly dark green vegetable subgroup requirement was not met for grades K-8, with no dark green vegetables offered.

CAP: 1. Provide a written statement that the dark green 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. 2. Submit supporting documentation to demonstrate that the menu findings listed under step 1 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. 3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: February 7, 2024

Response:

Corrective Action Response: The Head Cook added Bean and Cheese Burritos to the 12th Lunch, which will meet the weekly requirements of the bean/legumes vegetable subgroup. The iceberg lettuce was replaced with Romaine lettuce to satisfy the dark green subgroup requirement.

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Finding 4– Meal Pattern – Lunch - Vegetables

For the week of menu review, the K-8 lunch menu did not meet the minimum daily and weekly requirements for vegetables. The federal regulations require a minimum of 3/4 cup of vegetable to be offered each day for grades K-8. This requirement was not met on Tuesday, Thursday, and Friday, with only ¼ - ½ cup creditable vegetables offered. The federal regulations require minimum weekly amounts for vegetables. The weekly minimum of 3- 3/4 cups was not met for grades K-8, with only 3 cups offered.

- Tuesday- only ½ cup carrots were served. Consider adding ½ cup baked beans or pinto beans to the menu this day to also meet the weekly beans/legumes vegetable subgroup requirement.
- Thursday- the 1 cup serving of iceberg lettuce in the salad was creditable at only ½ cup vegetable. Consider adding ¼ cup of vegetable toppings to the salad, such as cherry tomatoes, cucumber slices, or pepper slices. Keep in mind that raw leafy green vegetables, such as lettuce and spinach, are creditable at half volume. Therefore, a one cup serving of fresh lettuce or spinach is creditable at ½ cup vegetable.
- Friday- the corn cobette credited at only ¼ cup vegetable per the food buying guide. Consider adding ½ cup broccoli or other dark green vegetable to the menu this day to also help meet the weekly dark green vegetable requirements.

The weekly requirements will be met with meeting the daily ¾ cup creditable vegetable requirements.

CAP: 1. Provide a written statement that the daily and weekly vegetables 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. 2. Submit supporting documentation to demonstrate that the menu findings listed under step 1 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. 3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance

Due Date: February 7, 2024

Response: The Head Cook went back through and revised the amount of vegetables served for Tuesday, Thursday, and Friday as advised. Please see attachments.

Finding 5 – Meal Pattern – Lunch - Meat/Meat Alternative

For the week of menu review, the K-8 lunch menu did not meet the minimum daily requirements for meat/meat alternate. The federal regulations require menus to be planned that meet the daily minimum 1 oz. eq. meat/meat alternate requirement for grades K-8. This requirement was not met on Tuesday. A Child Nutrition Label or Product Formulation Statement was not submitted for the hot dog product served on Tuesday; therefore meat/meat alternate crediting could not be determined as met. Choose a hot dog product with this documentation to confirm meal pattern crediting.

CAP: 1. Provide a written statement that the daily meat/meat alternate requirements are now met. Include a detailed statement to describe what specific changes were made to the menu,

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for the week of review, to correct all menu review findings and bring the menu into compliance. 2. Submit supporting documentation to demonstrate that the menu findings listed under step 1 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. 3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: February 7, 2024

Response: The school switched to an alternative on the 13th Lunch Menu to meet the credible meat/meat alternative. We will continue to ensure that the products we choose are counting for what they need to count for.

Finding 6 – Meal Counting and Claiming

While the prior corrective action has been implemented by using a clicker, the claim spreadsheet recorded an inaccurate number of meals on two days of the February 2024 claim. This resulted in an underclaim of 41 breakfasts and lunches (7 CFR 210.18)

CAP: Upload a procedure to have a double check of the spreadsheet prior to claim submission to avoid claiming errors in the future.

Due Date: April 9, 2024; extended, completed, May 24, 2024

Response: Will return paperwork to Food Service manager for any inconsistencies and revise my tracking spreadsheet to ensure all excel formulas are correct.

Finding 7 – Local School Wellness Policy

LEAs must assess their wellness policy at least once every three years on the extent to which the schools are in compliance with district policy, the extent to which the local wellness policy compares to model school wellness policies, and a description of the progress made in attaining these goals of the local wellness policy (7 CFR 210.31(e)(2)).

CAP: Complete and upload a Wellness Policy Progress Report (available on the SA's website or in Download Forms). Also, 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.

Due Date: April 9, 2024, extended to June 13, 2024

Response: The completed Wellness Policy Progress Report was sent to the SA on June 13, 2024.

Finding 8 – Professional Standards

The U.S. Department of Agriculture (USDA) requires that any program receiving federal financial assistance provide annual training to its staff on civil rights. Specifically, USDA states that all frontline staff who work with or assist program applicants or participants are required to receive civil rights training as well as those persons who supervise frontline staff. Currently, the school staff who oversee the children during meals have not received the one-page handout training and there is no log for said training.

CAP: Have all frontline staff who work or assist with the meal program:

1. Review the one-page Civil Rights handout

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2. Sign and date the sign-in sheet (agenda should be on sign-in sheet) and upload into MyIdahoCNP.

Due Date: April 9, 2024, extended and completed May 24, 2024

Response: The Head Cook completed the Civil Rights training on May 24, 2024. The teachers were also trained using the one-page Civil Rights training and signed the sign-in sheet.

Finding 9 – Professional Standards

The United States Department of Agriculture has established minimum Professional Standards for school nutrition professionals who manage and operate the National School Lunch and School Breakfast Programs (7 CFR 210.30). The standards provide annual training requirements for all school nutrition professionals. It is required that some form of documentation be kept on file to show Professional Standards compliance. The Idaho Child Nutrition Programs digital learning portal contains multiple courses that could be used to meet training requirements.

CAP: Complete the NSLP Corrective Action Procedure Form to create a process to ensure training for the director and all kitchen staff occurs annually. A procedure also needs to be created for new employees (within 30 days of hire). Both items can be placed on one corrective action form. Upload the NSLP Corrective Action Procedure Form into MyIdahoCNP when completed.

Due Date: April 9, 2024 extended and uploaded April 25, 2024

Response: All food service staff will be required to complete all annual training in the Training portal.

Finding 11 – Food Safety – Buy American

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 mandarin oranges and diced pears from Mexico, tuna from Thailand, tomatoes and sugar snap peas from Mexico were not available during the AR.

CAP: Complete and retain the SA's "Buy American Exemption Form" for all for products requiring documentation. Upload Buy American Exemption Forms into MyIdahoCNP.

Due Date: April 2, 2024, Extended and completed May 24, 2024

Response: The Head Cook completed the Buy American training on April 30, 2024. The requirement to complete forms was waived due to new USDA Guidance on the Nonavailable Articles List at FAR 25.104, which specifies several products that are not produced in the United States. While some of the above products must have a Buy American Form, the USDA has not released their prototype as of this printing.

Finding 12 – Food Safety – HACCP Plan

The Food Safety plan (HACCP) must have bodily fluid clean-up and employee exclusion procedures that are required by Idaho Food Code. Please update your plan to make it compliant. These SOP's can be found in Download forms in MyIdahoCNP.

CAP: Please update your plan to make it compliant. These SOP's can be found in Download forms in MyIdahoCNP. Please notify Lead Reviewer when completed.

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Due Date: April 2, 2024, Extended and completed April 29, 2024

Response: The Head Cook is using the Federal Guidelines to adopt a Food Safety Plan for Coeur d'Alene Tribal School (in process). She also completed the Online Food Safety Training on April 29, 2024.

Finding 13 – Offer Versus Serve training

The premise of Offer versus Serve (OVS) is that it allows students to decline some of the food offered. The goals of the OVS program are to reduce food waste in the school meals programs while permitting students to decline foods they do not intend to eat. Currently, OVS is not being served properly, as the students are being served all meal components, versus the students choosing what they want to eat. [SP 41-2015].

For more information, go to: https://fns-prod.azureedge.us/sites/default/files/cn/SP41_2015os.pdf.

CAP: The director and kitchen staff are to complete both the OVS-Breakfast and the OVS-Lunch trainings in the portal. The training will include a sign-in sheet and agenda that is to be uploaded into MyIdahoCNP once completed.

Due Date: April 2, 2024, Extended and completed April 24, 2024

Response: The Head cook completed the Offer versus Serve training for Breakfast on April 30, 2024, and the OVS for Lunch on April 24, 2024.

Finding 14 – Smart Snacks in School

Currently, fundraisers are not being tracked as required. All fundraisers, including exempted and compliant, must be tracked. Per state policy, a maximum of 10 exempted fundraisers per school site per year may be approved by the school administrator. A fundraiser can be for a maximum of four consecutive school days. All exempted fundraisers beyond 10 must be pre-approved by the State agency using the Request form. (7CFR 210.11) Details available at the [SDE CNP Smart Snacks website](#).

CAP: Complete the NSLP Corrective Action Procedure Form to create a tracking method for all school fundraisers. A sample tracking form is available in MyIdahoCNP. Upload the NSLP Corrective Action Procedure Form into MyIdahoCNP.

Due Date: April 2, 2024, Extended and completed April 25, 2024

Response: All food and non-food fundraisers are being tracked via spreadsheet which was available in Download forms section of MyIdahoCNP. The Head Cook completed the training.

COMMENDATIONS

- Meal service was amazing and very organized.
- The staff was very friendly and welcoming to the students
- Ana shows a desire to learn all aspects of the program and wants to have everything right. The initiative is appreciated.

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TECHNICAL ASSISTANCE (TA)

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.
 - A sponsor must maintain current product documentation and nutrition facts labels from the manufacturer for commercially prepared foods. The labels and menu documentation submitted were outdated, more than 5 years old.
 - Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus. The submitted production records did not provide adequate information. It is a requirement of the federal regulations to maintain complete and accurate production records. See below for a description of problem areas noted in completing production records.
 - The production records documented only one milk type planned daily (1% white milk). The sponsor submitted labels for fat free chocolate milk and 1% white milk as served. Update production records to document fat free chocolate milk was also planned daily.
 - Condiments were not recorded as planned on the production records.
 - A Child Nutrition Label (CN) or Product Formulation Statement (PFS) 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.

Offer versus Serve

- Offer versus serve can be implemented in upper grades and not lower to avoid food waste. In this school OVS is an option, however, implementation may result in less food waste. If there is leftover food, it may be donated to a non-profit organization (501 (c) 3) per USDA memo SP11-2012 dated Feb 3, 2012.

School Breakfast and Summer Food 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-

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304 to see nearby options. Best practice is to include SFSP promotion on the SFA's website.

Seamless Summer Option (SSO)

- The Seamless Summer Option (SSO) program will be reviewed on July 2, 2024, and a separate report will be issued after that review is completed.

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,



Lynda Westphal, MHS, SNS,
Director, Idaho Child Nutrition Programs

cc: Ana Morrison, Child Nutrition Head Cook, Coeur d'Alene Tribal School

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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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