



Idaho Department of Education

April 16, 2024

Christie Jorgenson, Administrator
Falcon Ridge Public Charter School
278 South Ten Mile Road
Kuna, ID 83634

Dear Superintendent Jorgenson,

On February 15, 2024, Idaho Department of Education Coordinators Cambria Steffler and Cassandra Thompson conducted an Administrative Review (AR) of Falcon Ridge Public Charter School for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- USDA Foods

The site reviewed was Falcon Ridge Public Charter School

The State agency (SA) would like to commend Sonia Lopez and the entire staff of Falcon Ridge Public Charter 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 – Verification

One application was verified using PayPal, stripe, bank statements, and a budget Excel sheet for a self-employed household. The bank statement is dated for the month of September, and the PayPal and stripe statements are for the year of 2023 up to October. The bank statement shows several transfers that are not included in the reported income. The bank statement income would move the household from a free benefit to a reduced benefit. The SA was unable to make a definitive decision on if the income documentation was sufficient for verification purposes.

CAP: Contact the household to ask for clarifying documentation or a collateral contact. If the household is unable to provide further documentation, send an adverse action letter and change the household benefit to reduced. Upload a copy of the documentation and any applicable changes to the benefit issuance list or a copy of the adverse action letter and updated benefit issuance list.

Date: Due March 8, 2024; Due Date Extended to March 22, 2024; Completed April 1, 2024

Response: The FSD uploaded an adverse action letter and updated benefit issuance list showing the benefits have been changed to reduced.

Finding 2 – Civil Rights

The nondiscrimination statement (NDS) must accompany any printed and web-based materials referencing FNS programs. The SFA has an outdated version of the USDA FNS nondiscrimination statement on their website. Web pages associated with program operation should list the full USDA NDS with details on participants' right to file a complaint. The full statement is available on the SA website under Civil Rights.

CAP: Post the full USDA NDS on the school food service webpage. Notify the SA when the website has been updated.

Date: Due March 8, 2024; Due Date Extended to March 22, 2024; Completed March 21, 2024

Response: The non-discrimination statement has been updated on the website.

Finding 3 – Local School Wellness Policy

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 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)).

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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, when the triennial assessment 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: Due March 8, 2024; Due Date Extended to March 22, 2024; Completed March 21, 2024

Response: The FSD uploaded an NSLP corrective action procedure form for the local school wellness policy. The triennial assessment for this policy will be reviewed once every three years. This process will be overseen by the administrator and nutrition director, and the results will be posted in the school newsletter and on the website.

Finding 4 – Professional Standards

All food service line staff must receive annual civil rights, food safety, and OVS training when OVS is implemented. The staff members have completed the civil rights training but have not completed the food safety or OVS training. All staff training must include an agenda and sign-in sheet and training documentation must be maintained on file at the SFA for three years plus the current year.

CAP: Complete the food safety and OVS training for all applicable staff members. Upload certificates of completion or a sign in sheet and agenda. Upload copies of the training logs with documented training for all employees.

Date: Due March 8, 2024; Due Date Extended to March 22, 2024; Completed March 22, 2024

Response: The FSD uploaded agendas and sign in sheets for the OVS Lunch training and the HACCP food safety training. The FSD uploaded training logs for all employees.

Finding 5 – Professional Standards

School Foodservice Authority staff who interact with program applicants or participants (i.e. Cafeteria staff, Free and Reduced Application approval staff) and their supervisors as well as the Hearing Official must have annual civil rights training. The Hearing Official has not completed the Civil Rights training.

CAP: Complete the civil rights training and upload a certificate of completion or an agenda and sign in sheet.

Date: Due March 8, 2024; Due Date Extended to March 22, 2024; Completed March 15, 2024

Response: The FSD uploaded an agenda and sign in sheet showing the hearing official completed the full civil rights training.

Finding 6 – Professional Standards

Food Service Directors 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 can be used to meet this requirement.

CAP: Upload a training certificate indicating successful completion of at least eight hours food safety training into MyIdahoCNP (MICNP) Review Attachments.

Date: Due March 8, 2024; Due Date Extended to March 22, 2024; Completed March 15, 2024

Response: The FSD completed 8 hours of food safety training through the ServSafe Certification.

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Finding 7 – 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 have bodily fluid clean-up and employee exclusion that are required by Idaho Food Code. Both Bodily fluid clean-up and employee exclusion standard operating procedures (SOPs) are not included in their HACCP manual. Please update your plan to come into compliance.

CAP: The Food Safety plan (HACCP) must have bodily fluid clean-up and employee exclusion that are required by Idaho Food Code. Please update your plan to come into compliance.

Date: Due March 8, 2024; Due Date Extended to March 22, 2024; Due Date Extended; Completed March 21, 2024

Response: The FSD uploaded a copy of the bodily fluid clean up SOP and employee exclusion policy that has been added to the HACCP binder at the school.

Finding 8 – Food Safety

The most recent food safety inspection report must be posted in a location visible to the public (7 CFR 210.13(b)). The food safety inspection is hanging in the kitchen and is not visible to the public.

CAP: Move the food safety inspection plan to a publicly visible location.

Date: Completed February 15, 2024

Response: The FSD moved the food safety inspection report to the bulletin board near the service line while the SA was on-site.

Finding 9 – 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 Jalapenos from Mexico and Mandarin Oranges from China were not available during the AR. Complete and retain the SA's "Buy American Exception Form" for all food products requiring documentation. The SA reviewed documentation and noted bananas and pineapples were on one form. Each non-domestic food item purchased will need their own exemption form.

CAP: Complete the Buy American Provision training in the training portal and upload a certificate of completion. Additionally, complete the Buy American Exception Form for each non-domestic commodity.

Date: Due March 8, 2024; Due Date Extended to March 22, 2024; Completed March 21, 2024

Response: The FSD uploaded Buy American exception forms and back up documentation for all the out of compliance food items. A certificate of completion for the Buy American training was uploaded.

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Finding 10 – Reporting and Recordkeeping

Food service records (7 CFR 210.15) must be maintained for three years plus the current year to document compliance with program regulations and the service of reimbursable meals. A plan for record retention needs to be incorporated. During the review, the SFA could not locate production records prior to SY22-23.

CAP: Complete the NSLP Corrective Action Procedure Form to develop a plan regarding how records will be maintained for three years plus the current year.

Date: Due March 8, 2024; Due Date Extended to March 22, 2024; Completed March 21, 2024

Response: The FSD uploaded a NSLP corrective action procedure form stating that all records will be maintained by the FSD for the required time period in the school kitchen.

Finding 11 – Offer versus Serve

During the on-site review conducted by Child Nutrition Resources, there was no signage identifying what constitutes a reimbursable meal. 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what foods constitute unit priced reimbursable meals. Schools operating OVS must also identify what a student must select in order to have a reimbursable meal under OVS.

CAP: Secure signage explaining what constitutes a reimbursable lunch to students, post it in a visible area near the start of meal service so the students can see it before they go through the line. Provide a picture of posted signage.

Date: Due January 16, 2024; Completed January 22, 2024

Response: A photo of the signage has been posted hanging on a bulletin board near the serving line.

Finding 12 – Meal Components and Quantities - Lunch

For the week of menu review, the 1-8 lunch menu did not meet the minimum 1/2 cup weekly requirement for the beans/legumes vegetable subgroup. There were no beans/legumes offered this week.

CAP: Provide 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: Due December 15, 2023; Returned for Correction; Completed January 31, 2024

Response: The updated production record and label show 1/2 cup pinto beans added to 12/13/23. The production record is signed by Sonia Lopez.

Finding 13 – Meal Components and Quantities - Lunch

For the week of menu review, the 1-8 lunch menu did not meet the whole grain-rich requirements. At least 80% of the grains offered weekly must be whole grain-rich to meet requirements. The menu met 78.05% whole grains for the week of review for grades 1-8.

CAP: Provide 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.

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Date: Due December 15, 2024; Returned for Correction; Completed January 25, 2024

Response: The SFA statement indicates WG croutons and a WG breadstick will be served with the Caesar salad. The 80% whole grain-rich requirement is now met.

Finding 14 – Meal Components and Quantities - Lunch

For the week of menu review, the 1-8 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 Wednesday, December 13, 2023, with only .5 oz. eq. offered.

CAP: Provide 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: Due December 15, 2024; Completed January 26, 2024

Response: The updated production record shows 2 oz diced chicken added to 12/13/23. The daily meat/meat alternate requirement is now met. The production record is signed by the food service director.

COMMENDATIONS

- It is lovely to see the positive relationship the Food Service Director has with both her team and students. The team works together like a well-oiled machine and the variety of colors on their service line was impressive. It is also appreciated that the Food Service Director was willing to listen to advice to promote professional growth.
- The SA appreciates the welcome each student receives when they arrive at school. Many adults with various positions were in the hallway where students enter the school to offer smiles as well as wish them a great day! Prior to entering the school, the Vice Principal was outside saying good morning to each student as they arrived. This was refreshing to see, and the SA appreciates the friendly, optimistic environment Falcon Ridge offers to all students.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- When obtaining the SA Direct Certification (DC) list, be sure to 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. When the SA was on-site, the SFA tried to print the DC list and it was not printing correctly. The SA did note that the SFA can pull the correct list on the DC platform.

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Verification

- Hard copies of all notification letters sent to households as part of the verification process must be kept with the application and supporting verification documentation for a complete record. Copies of the original notification of verification letters along with copies of the second attempt letter and final notice letters were not on file.

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - 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 Wednesday, December 13, 2023, with only .5 oz. eq. offered. Develop a standardized recipe for each menu option and ensure that crediting supports the desired meat/meat alternate amount.
 - The nacho cheese sauce is not creditable. A Product Formulation Sheet (PFS) or Child Nutrition (CN) label was not provided. Consider choosing a Nacho cheese product with either a CN label or PFS to determine meal pattern crediting.
 - The Chili Sauce with Meat is not creditable for the 1 oz portion. The Product Formulation Statement states that ¼ cup (2 oz) would provide .25 oz meat/meat alternate. The response given was that 1/8 cup (1 oz) was served. Consider using homemade chili made using a standardized recipe calculated to provide the needed meat/meat alternate credit or finding a processed product that provides more meat/meat alternate credit. Consider using a larger portion of the Chili Sauce with Meat.
 - The 1/8 cup (1 oz) of beans served credits as .5 oz meat/meat alternate.
 - At least 80% of grains offered must be whole grain-rich to meet requirements. The menu met 78.05% whole grains for the week of review for grades K-8. The pizza offered on 12/15/2023 is not whole grain rich. Increase the amount of whole grain-rich products offered to at least 80% of the weekly grain offerings. To be considered whole grain-rich, the product must be comprised of at least 50% whole grain ingredients, with the remaining grain ingredients enriched. An easy way to determine this is by looking at the ingredient list. The product would be considered whole grain-rich if the primary ingredient is a whole grain, such as: whole wheat flour, graham flour, whole corn, or oatmeal.
 - 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/legumes offered. Consider the following suggestions to help meet this requirement:
 - Review all weekly menus to ensure that ½ cup of beans/legumes are served at least once during the week. Note that if beans/legumes are used to meet the meat/meat alternate requirement as was the case for

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- the Nachos, they cannot be used to meet the vegetable subgroup requirement.
 - In order for the beans/legumes to count toward the vegetable subgroup requirement, a ½ cup portion must be served.
- The menu was not followed for the week of menu review, however the substitutions made were documented and acceptable to meet meal pattern requirements.
 - American cheese was substituted for the Swiss cheese menued.
 - The Fruit snack was menued on December 13, 2023, but was planned for December 15, 2023.
 - The cookie on the menu for December 15, 2023, was not planned on the production record.
- A standardized recipe is a recipe that has been carefully adapted and tested to ensure that it will produce a consistent product each time it is prepared. The recipes submitted were not always written in standardized format with complete information. Items on the menu that need standardized recipes include the following:
 - Chicken Ceasar Salad- review this recipe for accuracy. The recipe provided stated 15-20 heads of romaine was used for 100 servings. At 15 heads this comes out to 81 creditable cups (.75 cup creditable per serving). However, the portion size is listed as ½ cup.
 - Ham and Cheese Sandwich
 - Nachos
- 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 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 Planned/Served Number of Milk by Type was not completed.

Reporting and Recordkeeping

- The SA recommends the SFA review/organize the previous records of the NSLP program. This will allow for easy retrieval in the future.

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 and ways to locate meals on the SFA’s website.

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,

Cambria Steffler

Cambria Steffler, MS, RD
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Sonia Lopez, Child Nutrition Director, Falcon Ridge Public Charter School

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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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