



May 8, 2024

Angie Lakey-Campbell, Superintendent  
Hansen School District  
550 Main Street South  
Hansen, ID 83334

Dear Superintendent Lakey-Campbell,

On February 13, 2024, Idaho Department of Education contractor CN Resource (CNR) conducted an Administrative Review (AR) of Hansen 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
- Fresh Fruit and Vegetable Program (FFVP)
- USDA Foods

The site reviewed was Hansen Schools.

The State agency (SA) would like to commend the staff of Hansen 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

When a household submits an incomplete application or their application is missing required information, the household cannot be approved for benefits [7 CFR 245.6(c)(7)]. One application was missing an adult signature. The missing information must be obtained before an eligibility determination can be made [Eligibility Manual, page 63].

**CAP:** Obtain the missing adult signature and upload the completed application.

**Date:** Due February 13; Completed February 7, 2024

**Response:** The completed application was uploaded for review and no change in benefit was required.

### Finding 2 – Meal Counting and Claiming

An unallowable practice for counting meals was identified. The High School Provision 2 breakfast is served at two different times. The first breakfast was served before the bell in the cafeteria on the service line. The second breakfast was served grab-and-go style with 50 bags left out that included 3 of the 4 items with milk on the side for selection. The count of bags left at the end of service was deducted from 50 to obtain a meal count. Although the director states she knows all students by name and monitors their participation, there is no assurance in place to keep students from obtaining a meal from both services. Additionally, using bag counts is an unallowable way to count reimbursable meals. A total of 49 meals were disallowed on the day of review due to an insufficient POS.

**CAP:** Identify a system that ensures that meal counts comply with requirements of a reimbursable meal being counted as taken. At the same time, identify a way to prevent those students who ate at first breakfast from taking a second breakfast.

**Date:** Due April 8; Completed April 24, 2024.

**Response:** The SFA identified the high school will now have one breakfast meal service. Students ID cards will be scanned at the POS to help reduce any meal counting errors.

### Finding 3 – Local 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 1. Who at the LEA will be responsible to complete the triennial assessments for the district policy and each school's implementation; 2. How the assessments will be completed; and 3. What steps will be taken to ensure this requirement is met on a triennial basis, including notifying the public in a timely manner.

**Date:** Due March 6; Completed March 5, 2024

**Response:** The superintendent uploaded a plan advising that a committee will be formed to complete the triennial assessment of the district policy. The committee will consist of an administrator, a representative from the National School Lunch Program, a teacher, and a parent. The committee will use the Idaho Wellness Policy Progress Report to assess their policy. The completed assessment will be posted on the district's website with the policy.

#### **Finding 4– Meal Components and Quantities**

No more than 2-ounce equivalents of grain-based desserts may be offered weekly. For the week of menu review, the weekly grain-based dessert limit was exceeded in the K-6, 7-8, and 9-12 lunch menus. The menu resulted in 2.50 oz. eq. grain-based desserts for the week for grades K-12.

**CAP:** Provide a written statement identifying how grain-based dessert limit is now met.

**Date:** Due March 6; Completed March 13, 2024

**Response:** The sugar cookie was removed from the menu and will no longer be served.

## **COMMENDATIONS**

- Upon receiving input, the director immediately came up with ideas on how to improve the program. She listened well, engaged in the conversation, and made suggestions that showed a solid understanding of the SBP, NSLP, and FFVP.
- The foodservice team does a very nice job of serving healthy meals with tremendous variety. On the day of review, there were eight different fruits and vegetables to choose from. There was a wonderful variety of colors, textures, and flavors, especially at lunch.

## **TECHNICAL ASSISTANCE (TA)**

### **Certification and Benefit Issuance**

- The income frequency listed on the application must be used to determine the application. If multiple frequencies are listed, then all income must be converted to an annual amount per USDA regulations.

### **Verification**

- The confirming official, who must be a different individual than the determining official, must review an application prior to beginning the Verification process. This ensures the application eligibility was determined correctly. Both officials complete the "Official Use Only" box on the free and reduced meal application that has been selected for verification. Once the verification process has been completed and results determined,

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the verifying official, who can be either the confirming or determining official, must complete the “Official Use Only” box on the meal application.

- The hearing official is a separate individual with supervisory authority over the other officials that would oversee the hearing process and settle the eligibility if the confirmed original determination is disputed.

### **Meal Components and Quantities**

- 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. 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.
- All menus served must meet all daily and weekly meal pattern requirements for the specific grade group. Grades were combined into grade groups that were not appropriate for menu planning. Grades 7-12 were combined for one serving size on the production record, but grades 9-12 have higher meal pattern requirements. To meet requirements, use K-8 and 9-12 grade groups or K-5, 6-8, and 9-12 grade groups for menu planning.
- Secure the actual CN label from the product packaging, without the watermark. The Child Nutrition (CN) Label submitted for the Breakfast Pizza on Wednesday included a watermark.
- Product Formulation Statement (PFS) must be on signed letterhead that demonstrates how the processed product contributes to the meal pattern requirements. The PFS submitted for the donut was missing an official signature and issue date. Accurate documentation was secured to confirm meal pattern crediting and must be maintained on file to document meal pattern requirements as met.
- Child Nutrition (CN) Labels are valid for five years or until product formulation changes. Current documentation must be retained. The Hamburger Patties showed an issue date of 05/11. The CN number was verified as active on the USDA CN Label Verification Report.
- Secure manufacturer labels for all menu items served and keep on file. Manufacturer labels may be located on the product packaging or on the manufacturer’s website.
- Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus.
- Be sure to record the specific milk types served and the number of each type on the production record.
- Sweet crackers, such as animal and graham crackers, are creditable as a grain-based dessert.

### **Offer vs. Serve (OVS)**

- All food service line staff must receive annual OVS training when OVS is implemented. 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. OVS training

for both breakfast and lunch is available through the [Idaho CNP training portal](#) and a training log is available in MyIdahoCNP Download Forms.

- During the day of review, a misunderstanding in OVS was observed. Staff prepped fruits and vegetables into 1 cup containers. When questioned about the large portion size, staff advised they thought one cup was required under OVS. Regulations were discussed and fruits and vegetables were divided into ½ cup containers.
- Prior to meal service, staff should discuss the crediting amount of food items and what is required for a reimbursable meal under OVS. The crediting amount listed on the production record will guide this conversation.
- The minimum portion of fruits and vegetables identified in the meal pattern for each grade group must be made available, but under OVS, a special provision is allowed for students to select a reduced portion (1/2 cup) of fruit or vegetable. More information can be found in the [OVS Guidance Manual](#) (SP41-2015).
- Pay close attention to full 1 cup portion sizes for either the fruit or vegetable when only fruit, vegetable, and one other component are selected as part of a HS meal. Additionally, keep in mind that leafy greens credit as 1/2 the volume, so a full cup of leafy greens is required to meet the reduced 1/2 cup portion size for a reimbursable meal under OVS for the vegetable component.

### Local School Wellness Policy

- For more information on Local Wellness Policy requirements, visit the following webpages:
  - Local School Wellness Policies at <https://www.fns.usda.gov/tn/local-school-wellness-policy>
  - Local School Wellness Policy Implementation Tools and Resources at <https://www.fns.usda.gov/tn/local-school-wellness-policy-implementation-tools-resources>
  - Local School Wellness Policy Outreach Toolkit at <https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit>
  - Local School Wellness Policy: Guidance and Q&As at <https://www.fns.usda.gov/cn/local-school-wellness-policy-guidance-and-qas>

### Resource Management

- Per 2 CFR 200.403(a), allowable costs must be necessary and reasonable for the performance of the Federal award. Please review the Idaho School Nutrition Reference Guide [Financial Requirements and Resource Management](#) for a list of common allowable and unallowable expenses.
- It is highly recommended that the SFA separately track nonprogram food revenues from program food revenues (student meal payments) in the accounting ledger. The SFA could establish separate food service revenue codes for adult meals and extra milk. It is also highly recommended that the SFA use its electronic point of sale system to track extra milk sales.

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- It is highly recommended that the SFA develop policies for ensuring that bad/delinquent debt is not paid for with food service funds. Please refer to the following guidance for additional information:
  - [SP 29-2017: 2017 Edition of Overcoming the Unpaid Meal Challenge](#)
  - [SP 23-2017: Unpaid Meal Charges Q&A](#)
  - [SP 46-2016: Unpaid Meal Charges: Local Charge Policy](#)
  - [SP 47-2016: Unpaid Meal Charges: Clarification on Collection of Delinquent Meal Payments](#)
- 7 CFR 210.14(b) requires SFAs to limit their net cash resources in its nonprofit school food service account to no more than three months' average expenditures. Net cash resources are defined under 7 CFR 210.2 as consisting of all monies, as determined in accordance with the State agency's accounting system, that are available to or have accrued to an SFA's nonprofit school food service at any given time, less cash payable. If a sponsor has net excess cash (over 3 months' average expenditures) the department will require the Sponsor to reduce the price children are charged for lunches, improve food quality, or take other action designed to improve the school food service; such as upgrading food service equipment, developing nutrition education materials and curricula, or training of food service personnel, and any other use in accordance with 2 CFR 200.

#### Special Provision Options

- The current Provision 2 cycle expires at the end of SY 23-24, and the district must qualify to continue operation of this special provision cycle (Base Year 2013). If the district wishes to continue with Provision 2 breakfast, contact the SA prior to the expiration date to see if the district qualifies for an extension.

#### FISCAL ACTION

Due to an inadequate point of service, fiscal action results in \$107.27. 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,

*Jennifer Butler*

Jennifer Butler, MEd, SNS  
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Cassandra Rose, Child Nutrition Director, Hansen School District

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Washington, D.C. 20250-9410; or
2. **fax:**  
(833) 256-1665 or (202) 690-7442; or
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