



April 19, 2024

Trevor Sparrow, Director
Idaho Youth Challenge Academy
117 Timberline Dr.
Pierce, ID 83546

Dear Director Sparrow,

On March 18, 2024, Idaho Department of Education staff Lynda Westphal, Cassandra Thompson, and Kat Forstie conducted an Administrative Review (AR) of Idaho Youth Challenge Academy 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 site reviewed was Idaho Youth Challenge Academy.

The State agency (SA) would like to commend Sarah Larsen and the entire staff of Idaho Youth Challenge Academy 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 – Civil Rights

Per [FNS instruction 113-1](#), the USDA nondiscrimination statement must accompany any new printed materials referencing FNS programs. The full statement must be included in outreach material when notifying potentially eligible participants how to apply for benefits or when informing participants about their right to file a complaint. The full NDS is available in both English and Spanish on the SA website under [Civil Rights](#).

CAP: Upload a copy of the parent letter with the full nondiscrimination statement included.

Due Date: April 1, 2024; Completed March 12, 2024

Response: The Food Service Director uploaded a new parent letter with the full nondiscrimination statement.

Finding 2 – Professional Standards

The USDA 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 documentation, such as certificates or sign-in sheets 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. The SA spoke with the FSD who confirmed OVS breakfast and OVS lunch training has yet to occur for SY23-24.

CAP: Complete the NSLP Corrective Action Procedure Form to create a process that ensures the required training in 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 their first 30 days. (7 CFR 210.30).

Due Date: April 1, 2024; Completed April 1, 2024

Response: A procedure was developed to train staff in July before the first academy of the year.

Finding 3 – Food Safety

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. This documentation is required to be updated annually. If items are considered seasonal or a one-time exception the forms must be completed when non-domestic products arrive.

CAP: Complete and retain the SA's "Buy American Exception Form" for all food products requiring documentation.

Due Date: April 1, 2024; due date extended, Completed April 3, 2024

Response: The Food Service Director uploaded Buy American Exception Forms for Mandarin Oranges, Bananas, and Pineapple Chunks as directed. The NSLP Corrective Action Procedure Form was also uploaded into MyIdahoCNP to indicate how non-domestic items will be handled moving forward.

Finding 4 – Verification

All letters must be sent to the families in a timely manner per 7 CFR 245.6a(f). A colorful piece of paper at the top of the letter could suffice to bring their attention to the fact that all meals are free regardless of the determination of an application. This must also be done with Verification letters. Also - all letters explaining the USDA meal benefits must have a full USDA Nondiscrimination statement in the same sized font used on each letter. This information can be found in the [Eligibility Manual for School Meals](#).

CAP: Upload letters with the correct nondiscrimination statement included in the same font size.

Due Date: April 1, 2024; Completed March 25, 2024

Response: The Food Service Director uploaded a new Verification letter to be sent to families that is fully compliant and includes the full nondiscrimination statement.

Finding 5– Certification and Benefit Issuance

As outlined in 7 CFR 245.5(a), the information letters sent to families must include the full USDA Nondiscrimination Statement when advising of approval or denial of benefits.

CAP: Upload letters with the correct nondiscrimination statement in the same font size and a procedure to send out the letters at the beginning of the Youth Challenge Academy cohort.

Due Date: April 1, 2024; deadline extended, Completed April 3, 2024

Response: The Food Service Director uploaded a new approval letter to be sent to families that is fully compliant and includes the full nondiscrimination statement.

Finding 6 – Meal Components and Quantities – Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirements for fruit or vegetables per 7 CFR 210.10. The federal regulations require a minimum of one cup of fruit and vegetables to be offered each day for grades 9-12. This requirement was not met on Sunday February 4: Two Kiwis are offered. According to the USDA Food Buying Guide, $\frac{3}{4}$ kiwi = $\frac{1}{4}$ cup. Based on this calculation, two kiwis contribute $\frac{5}{8}$ cups of fruit to the menu. Consider cutting the kiwis up into one cup portions or offer another fruit choice when kiwis are served. Also, on Sunday February 4, only $\frac{7}{8}$ cup of vegetables were offered.

CAP: Provide a written statement that the daily fruit and vegetable 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 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: April 1, 2024; Completed January 2, 2024

Response: The Food Service Director added a sidekick fruit juice to the meal which is 1/2 cup of fruit. The broccoli was increased to one cup. A production record was uploaded to include the new amounts with a label for the sidekick juice. A new menu for the week of Feb 4-10 was uploaded.

Finding 7 – Offer versus Serve

All food service line staff must receive annual OVS training when OVS is implemented ([SP-41-2015](#)). 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 is available through the Idaho CNP training portal and a training log is available in MyIdahoCNP Download Forms.

CAP: Food service breakfast and lunch line staff must complete the separate breakfast and lunch OVS online trainings in the CNP training portal. Upload certificates of completion for all line staff.

Due Date: April 1, 2024; CAP extended, Completed April 15, 2024

Response: All Food Service personnel were trained in OVS and certificates were uploaded into the review module.

Finding 8 – Meal counting and Claiming - Breakfast

Even though OVS is not required at breakfast, food service staff members at the point-of-service must be trained and accurately recognize a reimbursable meal, including appropriate quantities, and counting each cadet as they receive a reimbursable meal at Point of Service.

CAP: Food service breakfast and lunch line staff must complete the separate breakfast and lunch online trainings in the CNP training portal. Upload certificates of completion for all line staff.

Due Date: April 1, 2024; CAP extended and completed April 15, 2024

Response: All Food Service personnel were trained in Breakfast and Lunch meal patterns and certificates were uploaded into the review module.

COMMENDATIONS

- Sarah was well prepared for the review and open to suggestions from reviewers. This made the review go smoothly and was much appreciated by the reviewers.
- Idaho Youth Challenge Academy (IDYCA) has a robust Wellness Policy that is easily found on the website and regularly reviewed. Wellness is a high priority for IDYCA that is reflected in their attention to this section of the Administrative Review. Good job!

TECHNICAL ASSISTANCE (TA)

Meal Components and Quantities - Breakfast

Independent contractor CNResource 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.
 - Tools for Schools offers topic-specific policy and resource materials to assist schools in meeting the nutrition standards.
 - The Food Buying Guide for Child Nutrition Programs has all the current information in one manual to help determine the specific contribution each food makes toward the meal pattern requirements and purchase the right amount of food and the appropriate type for school meals.

Civil Rights

- All Foodservice staff training, including Civil Rights, provided by the Director should include a sign-in sheet and a dated agenda documenting the length of time and topics covered. These hours can contribute to the Professional Standards requirements. Proof of training documentation must be kept on file at the SFA for three years plus the current year.
- The USDA Nondiscrimination statement (NDS) shall be in print size no smaller than the text used in the document. This is to show equal importance between the document and the NDS Statement. Verify the NDS statement in all template letters, including eligibility, DC notifications, verification, and adverse action letters, are in a font size no smaller than the font size in the original documents.

Food Safety

- Each SFA is 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)). (LIST PRODUCTS) If a product from another country is sourced, then the food service must have proof that the domestic product is significantly higher in price or not available in sufficient quantities. Include the Buy American Provision in SFA solicitation documents for the purchase of commercial foods. Products must be checked upon receipt and not accepted if the products do not comply with the Buy American Provision, unless there is documentation to justify the exception (exorbitant pricing or product shortages).
- The Food Safety plan (HACCP) must have bodily fluid clean-up and employee exclusion that are required by Idaho Food Code. The Employee Exclusion SOP was missing from their HACCP manual. While the SA was onsite, the Employee Exclusion SOP was printed

and placed in their HACCP manual. The SA advised the FSD to explain the Employee Exclusion plan to all kitchen staff.

Professional Standards

- The FSD conducts monthly training for the food service staff. These trainings each have their own agenda/sign-in sheet. However, training courses are not transferred to each staff member's individual training logs on a regular basis. It is recommended the individual training logs are updated regularly.
- The Professional Standards tracking is only for National School Breakfast/Lunch training topics. Some of the trainings specific to IDYCA do not count. Fire Extinguishers, Confidentiality and Ethics could count, but social media, IDYCA Core Values would not count as National School Lunch Training.

Afterschool Snack

- If a site is Area Eligible (over 50 percent F&R) within the last 5 years, all snacks can be claimed at the free rate.

Offer versus Serve

- For both males and females, the students are taking enough components, however, there is no method to ensure a fruit is being selected. The SA recommends a staff member to be located at the end of the POS line to ensure three components (including 1/2 cup of fruit) are being selected by each student. At the female breakfast service, the SA recommends an organized method to serve the food components. This could include a table with the appropriate components, as well as a staff member located at the end of the POS line to ensure three components (including 1/2 cup of fruit) are being selected by each student.

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,



Lynda Westphal, MHS, SNS
Child Nutrition Programs Director

cc: Sarah Larsen, Child Nutrition Director

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Office of the Assistant Secretary for Civil Rights
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Washington, D.C. 20250-9410; or
2. **fax:**
(833) 256-1665 or (202) 690-7442; or
3. **email:**
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