



January 8, 2024

Lisa Arnold, Superintendent
Lakeland School District
15506 North Washington St.
Rathdrum, ID 83858

Dear Superintendent Arnold,

On October 30-31, 2023, State Department of Education (SDE) Coordinators Cambria Steffler, Jax Dunham, Cassandra Thompson, and Jennifer Butler conducted an Administrative Review (AR) of Lakeland School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- USDA Foods
- Fresh Fruit and Vegetable Program (FFVP)

The sites reviewed were Spirit Lake Elementary School, Twin Lakes Elementary School, and Timberlake High School.

The State agency (SA) would like to commend Jessica Grantham, Kevin Doyle, and the entire staff of Lakeland 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 application indicating an Assistance Program, the determining official should compare the applications with case numbers to the direct certification list to determine if any children listed on the application are on that list. When a match is not found, the LEA should contact the household for further clarification; or verify the application for cause. [Eligibility Manual for School Meals (July 2017)]. Three applications were submitted with case numbers and no income and determined to be categorically eligible with no follow up by the determining official although it was identified that the student names were not listed on the State DC list. While the SA was onsite, the determining official ran single child matches in the DC system and contacted the households.

CAP: One student from one application was identified as directly certified through a single child match. The other two households advised the case numbers were Medicaid and would resubmit applications with income. Update student benefits as required based on new applications and send adverse action letters accordingly.

Due Date: Due November 7, 2023; Completed November 9, 2023

Response: The SFA uploaded the new applications and the updated benefit issuance list reflecting their benefit from their income.

Finding 2 – SFA On Site Monitoring

The SFA on-site review checklist requires two signatures. One for the SFA reviewer conducting the review and another for the school representative that was either monitored or program requirements outlined on the checklist were discussed. None of the monitoring forms included a signature from the school representative and were only signed by the director conducting the reviews.

CAP: As there is a new foodservice director, complete the 2023 Online SFA On-Site Monitoring training located in the CNP Training Portal to ensure all SY24 on-site monitoring forms are completed as required prior to the February 1 due date.

Due Date: November 15, 2023; November 2, 2023

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Response: The FSD completed the SFA on-site monitoring training on the CNP learning portal.

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)). The Wellness Committee assessed their policy in March 2022. However, no documentation for each school's assessment was provided nor were they available on the website as reported. While on site at Timberlake High School, the SA observed marketing of non-compliant beverage items which is in violation of the district's wellness policy.

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 including notifying the public in a timely manner.

Due Date: November 15, 2023; November 6, 2023

Response: The FSD developed a procedure and rotating timeline for the wellness committee to complete the local wellness policies triennial assessments for all sites in the district.

Finding 4 – Professional Standards

Per SP05-2020, the SFA maintains oversight and responsibility for planning, administering, implementing, monitoring, and evaluating the school meal programs, therefore, the FSD for a district must be within the SFA. Per 7 CFR 210.30(b)(1)(v), 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.

Due Date: November 15, 2023; November 1, 2023

Response: The FSD uploaded a certificate of completion for the 8-hour food safety training provided by ICN.

COMMENDATIONS

- The determining official provided detailed determination information and notes on applications. The notes were easy to understand and included vital information important to determining student meal benefits.
- It is evident that the SFA has implemented a quality offer versus serve training for all kitchen staff. Offer versus serve was implemented very well at all sites reviewed by the SA, and the staff was actively teaching young students how to take a nutritious and reimbursable meal.

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- The administrative assistant was very organized and responsive to SA staff. She was extremely proactive with implementing suggestions and following up on requests.
- The food service staff at all the schools had a great rapport with the students. They created a warm and welcoming environment, and the students were excited to eat in the cafeteria. The signage in the schools reviewed by the SA clearly identified a reimbursable meal and showed many options the students have to choose from. The menus for both breakfast and lunches were also impressive. The students have an incredible variety of food items/components available to them.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- Income sources include earnings, wages, welfare, pensions, support payments, unemployment compensation, social security, and other cash income. Other cash income includes cash amounts received or withdrawn from any source, including savings, investments, trust accounts, and other resources which are available to pay for a child's meals or milk [7 CFR 245.6(a)(5)(ii)]. The Eligibility Manual for School Meals (July 2017) includes a list of income sources on page 26. Multiple applications did not include income amounts and were determined to be free. Although no indicated income is considered to be a complete application, many of those applications also included an indication of Medicaid. Since Medicaid does not automatically qualify students for free meals, the SFA was asked to follow-up with household to inquire about income. During the phone calls, household income was documented, and applications were redetermined based on the additional information.

Verification

- All currently certified households for whom benefits are to be reduced or terminated must be given 10 calendar days' written notice of the change prior to the date the change will go into effect [7 CFR 245.6a(j)]. The first day of the advance notice period is the day the notice is sent. The notice of adverse action must advise the household of:
 - Change in benefits;
 - Reasons for the change;
 - An appeal must be filed within the 10 calendar days advance notice period to ensure continued benefits while awaiting a hearing and decision;
 - Instructions on how to appeal; and
 - The household may reapply for benefits at any time during the school year

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - A Child Nutrition (CN) Label or Product Formulation Statement (PFS) can be used to determine how processed food items contribute to the meal pattern. Without

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this documentation it may be difficult to determine if the meal component was satisfied.

- The manufacturer CN label submitted for the Cheese & Bean Burrito showed an expired CN number, issued 4/2018. The CN number is not active on the USDA CN Verification report. Please contact the manufacturer to secure a current CN label or PFS.
- Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the Breakfast Turkey Sausage Pizza. The spec sheet submitted included an expired CN number (5/2017) and meal pattern crediting statement but was not an official CN Label or PFS. The CN number was verified as active on the USDA CN Label Verification Report.
- A whole fresh Orange was planned every day of the week. The Food Buying Guide indicates, a whole fresh orange (4 wedges) is creditable at only ½ cup fruit. Per the Production Records an orange is being credited as 5/8 cup. Consider making the change to the Production Records to reflect the appropriate creditable amount.

Civil Rights

- Per FNS 113-1, all “And Justice for All” posters must be displayed in a specific size of 11” width by 17” height. It is recommended that the SFA dispose of all posters that do not meet the required display size.

Food Safety

- Daily food storage temperatures logs are required to ensure food is stored within recommended temperature ranges for food safety and to maintain food quality [CFR 210.13(d)]. Dry storage should be between 50-70 degrees. The room used to store dry food at the elementary school was recorded at 66-74 degrees. Action should be taken to meet recommended temperatures to ensure integrity and safety of food in the dry storage area.

Professional Standards

- For more information on the responsibilities of the LEA when contracting with an FSMC, refer to USDA policy memos SP13-2023: Best Practices for Contracting with Food Service Management Companies and SP 05-2020: Questions & Answers Regarding Professional Standards for State and Local School Nutrition Program Personnel (Q/A #53-55).

Smart Snacks

- Schools must meet the minimum requirement in 7 CFR 210.11, for all foods and beverages sold in school (also known as Smart Snacks in School) to increase consumption of healthful foods during the school day and support a healthy school environment. Vending, school stores, and fundraising need to comply with specific nutrition standards. Refer to A Guide to Smart Snacks School available at the USDA website. The school office shared that soda machines will not operate until 30 minutes

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after the school day ends. However, per two groups of students, it was claimed that they can purchase soda if paid for in cash during the school day.

Buy American

- Per SP 38-2017, there are limited exceptions to the Buy American provision which allow for the purchase of foods not meeting the “domestic” standard as described above (i.e., “non-domestic”) in circumstances when use of domestic foods is truly not practicable. These exceptions, as determined by the SFA, are if the product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product. The SFA's Buy American Exception forms include a section for "other reasons" which details the reason for purchasing as the processor sourcing the items from a different country than the United States. If this note is included for any item, including produce, backup documentation describing that the product is costly or not grown in sufficient quantities must be included with the form. Additionally, if the seasonality box is checked on this form, information on when and why this product is not available must be included.

FISCAL ACTION

Due to benefit issuance errors, fiscal action results in \$56.05 for NSLP and \$16.20 for SBP. 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,

Cambria Steffler

Cambria Stegler, MS, RD
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Jennifer Butler, MEd, SNS, NSLP Coordinator, Idaho Child Nutrition Programs
Jessica Grantham, Child Nutrition Director, Lakeland School District

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Washington, D.C. 20250-9410; or
2. **fax:**
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