



April 30, 2024

Lance Hansen, Superintendent  
Lewiston School District  
3317 12<sup>th</sup> Street  
Lewiston, ID 83501

Dear Superintendent Hansen,

On March 21, 2024, Idaho Department of Education Coordinators Cassandra Thompson, Kathrine Forstie, and Director of Child Nutrition Programs Lynda Westphal, conducted an Administrative Review (AR) of Lewiston School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- USDA Foods

The sites reviewed were Camelot, Orchards, and Whitman Elementary Schools.

The State agency (SA) would like to commend Jodi Hoff and the entire staff of Lewiston 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 – Local Wellness Policy

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. 7 CFR 210.31(e)(2). LEAs must make this assessment available to the public in an easily understood manner (7 CFR 210.31(d)(3).

**CAP:** Complete and upload a Wellness Policy Progress Report (available on the SA’s website) for the schools on review assessing the extent to which they are in compliance with the district policy. 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/these assessment(s) will be made available to the public in an easily understood manner.

**Due Date:** March 29, 2024; completed April 10, 2024

**Response:** The SFA uploaded the requested Wellness Progress Reports for Camelot, Orchard, and Whitman for SY2022. All progress reports document they are in compliance. The FSD indicated in their plan that Triennial wellness policy assessments will be completed in collaboration by Building Administration and the FSD. The FSD tracks when triennial assessments are scheduled and coordinates with building administrators. Their next Triennial Assessment is scheduled for SY2025.

### Finding 2 – Smart Snacks

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 and address who is responsible for tracking fundraisers, including both exempted and compliant. Once the NSLP Corrective Action Procedure Form is complete, upload the form into MyIdahoCNP for SA review.

**Due Date:** March 29, 2024, completed April 26, 2024

**Response:** The SFA completed and uploaded both an NSLP Corrective Action Procedure Form as well as a Procedure for Smart Snacks in Schools. The procedure states that the FSD will report any Smart Snack concerns to the Operations Director. Both the Operations Director and the FSD

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will provide training to building principals on April 25, 2024, and will repeat the training at the start of the school year.

### **Finding 3 – 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.

**CAP:** Complete the NSLP Corrective Action Procedure Form to devise a process that ensures exempt fundraisers are not sold during the school day (from midnight until 30 minutes after the end of school). The Procedure Form must also state who is responsible for ensuring fundraisers are in compliance. Once completed, upload into MyIdahoCNP for SA review.

**Due Date:** March 29, 2024; completed April 26, 2024

**Response:** The SFA completed and uploaded both an NSLP Corrective Action Procedure Form as well as a Procedure for Smart Snacks in Schools. The procedure will be maintained by the Food Service Director who will share the procedure with building principals, for their review, at the start of each school year. Both the Operations Director and the FSD will ensure any concerns are handled immediately.

### **Finding 4 – Smart Snacks**

Both Camelot and Orchards Elementary schools were missing the bodily fluids clean up SOP. The Food Safety plan (HACCP) must contain the bodily fluid clean-up procedure that is required by Idaho Food Code. Please update your plan to come into compliance. This SOP can be found in Download Forms in MyIdahoCNP.

**CAP:** Please ensure all schools in the Lewiston SD have a HACCP manual that includes the SOP for Cleaning & Disinfecting Body Fluid Spills. This SOP can be found in Download Forms in MyIdahoCNP. Please notify the lead reviewer when the bodily fluids SOP is added to your HACCP manual.

**Due Date:** March 29, 2024; completed April 10, 2024

**Response:** The SFA has updated all district HACCP manuals to include the Bodily Fluids SOP. The SOP for Cleaning & Disinfecting Body Fluid Spills was uploaded to MyIdahoCNP.

### **Finding 5 – Food Safety**

The most recent food safety inspection report must be posted in a location visible to the public (7 CFR 210.13(b)). At Camelot and Orchards Elementary schools, the most recent food safety inspection report was posted in the kitchens.

**CAP:** Relocate the most recent food safety inspection report to a location visible to the public.

**Due Date:** March 29, 2024; completed March 19, 2024

**Response:** While the SA was onsite at Camelot and Orchards Elementary, the kitchen staff relocated the food inspection near the service line.

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## COMMENDATIONS

- The kitchens at all three schools monitored were clean, efficient and had incredibly friendly staff. It was wonderful to see the lively conversations between the students and the staff. Great work and it was a pleasure to be in your kitchens this week!
- The Food Service Director was incredibly prepared for her Administrative Review. Her excellent organizational skills and knowledge of the programs she runs makes her an invaluable asset to the Lewiston School District. It is greatly appreciated that the Food Service Director is currently training her replacement as she prepares to retire at the end of this school year. It is rare that such training takes place to ease the path of new directors. It has been a pleasure working with you.
- At Camelot Elementary School, it was a pleasure to see the student helpers in action. They were efficient and performed their duties well. Kudos to them! It was also great to see the students themselves scrape their own plates, put silverware where it belonged, empty any liquid in their milk cartons prior to disposing of them and placing their trays at the window to be washed. Many hands make light work!
- The staff had a good grasp on Offer versus Serve and it showed in the number of students that were told to select more fruits and vegetables. Not one tray left the line without a reimbursable meal.

## TECHNICAL ASSISTANCE (TA)

### Civil Rights

- Ensure the point of service screen is hidden from view to ensure all children's eligibility status remain confidential.

### Verification

- There is a good process for verification, however the letters have multiple due dates on them giving the families too much time for verification. The process should be conducted over a shorter timeframe. The SA has a sample verification timeline in Download Forms.

### Food Safety

- A recent purchase of Romaine Lettuce was missing the Buy American Exception Form and supporting documentation. All other Buy American Forms for non-domestic products were very organized and included all the required supporting documentation. While the state was onsite, the Food Service Director obtained the Buy American Exception form for the Romaine, including all supporting documentation to be in compliance.
- The number of adults allowed in the kitchen to receive their food should be reduced to those who belong in the kitchen for food safety reasons.

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## Professional Standards

- All Foodservice staff training provided by the Director should include a sign-in sheet and a dated agenda documenting the topics and the length of time each topic is discussed. 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. It is important to be specific on the agenda to easily view what was covered in your training courses.

## 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,

*C. Thompson*

Cassandra Thompson, BS  
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Jodi Hoff, Food Service Director, Lewiston School District

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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](mailto:Program.Intake@usda.gov)

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