



April 30, 2024

Sara Beggs, Executive Director  
Palouse Prairie School  
406 Powers Avenue  
Moscow, ID 83843

Dear Director Beggs,

On March 28, 2024, Idaho Department of Education Coordinators Jax Dunham and Cambria Steffler conducted an Administrative Review (AR) of Palouse Prairie School for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was Palouse Prairie School.

The State agency (SA) would like to commend Debbie Berkana, Celeste Woodland, and the entire staff of Palouse Prairie 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 – Civil Rights**

The nondiscrimination statement (NDS) must accompany any printed and web-based materials referencing FNS programs. Web pages associated with program operation should list the full USDA NDS with details on participants' right to file a complaint. Though the SFA has a link to the current full NDS, the short statement that accompanies the link is incorrect and includes conflicting language.

**CAP:** Update the short statement accompanying the link to the current full NDS on the school nutrition webpage to state "This institution is an equal opportunity provider." Once updated, notify the SA that the change has been made.

**Date of CAP Completion:** Due April 12, 2024; completed April 5, 2024.

**Corrective Action Response:** The SFA's website is now updated to include the correct short NDS along with a link to the current full NDS through USDA's website.

### **Finding 2 – Civil Rights**

The SFA's notice of verification letter and verification results letter contains an outdated version of the nondiscrimination statement (NDS). The correct USDA NDS can be found on [USDA's website](#).

**CAP:** Update and upload the Notice of Verification letter and Verification Results letter to include the current full NDS.

**Date of CAP Completion:** Due April 12, 2024; completed April 5, 2024.

**Corrective Action Response:** The SFA uploaded the Notice of Verification and Verification Results template letters showing that they now include the current full NDS.

### **Finding 3 – Professional Standards**

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 \(ICN\)](#) which can be used to meet the requirement.

**CAP:** Upload a training certificate indicating successful completion of at least eight hours food safety training into MyIdahoCNP.

**Date of CAP Completion:** Due April 12, 2024; completed April 5, 2024.

**Corrective Action Response:** A certificate for ICN's Food Safety in Schools training was uploaded showing successful completion of 8 hours of food safety training by the Food Service Director (FSD).

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#### **Finding 4 – 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. The SFA has a vended meal contract and does not store agricultural commodities or products on site as a result. However, per question 2 in the Q&A section of SP38-2017, any entity that purchases food or food products on behalf of the SFA must follow the same Buy American provisions and exceptions. The SFA does not have documentation for products sourced from outside the United States on file from the entity that they received vended meals. The SFA must ensure that this information is retained on file as applicable.

**CAP:** Upload an NSLP Corrective Action Procedure Form detailing how the SFA will ensure that Buy American documentation will be retained on file. In this form, be sure to describe how the SFA will receive the appropriate Buy American documentation from the entity that they receive meals from.

**Date of CAP Completion:** Due April 12, 2024; completed April 5, 2024.

**Corrective Action Response:** An NSLP Corrective Action Procedure form was uploaded detailing that the SFA will contact the meal vendor to request any Buy American documentation for their files. The documents for SY 2023-2024 were received on March 19, 2024, and the SFA will continue to utilize and retain this procedure in their food service program records. The FSD will ensure that the procedure is followed, and the Lunch Program Assistant will file and maintain the documents for three years plus the current year.

#### **Finding 5 – Meal Components and Quantities – Breakfast**

For the week of menu review, the K-8 breakfast menu did not meet the minimum daily and weekly requirements for fruit. Federal regulation requires minimum daily amounts of fruit for breakfast. The daily minimum of 1 cup was not met on Tuesday and Thursday for grades K-8. Additionally, the weekly minimum of 5 cups was not met for grades K-8 with only 4 ¼ cups offered.

**CAP:** Provide a written statement that the daily and weekly fruit 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 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 of CAP Completion:** Due January 17, 2024; returned for corrections January 10, 2024; completed January 21, 2024.

**Corrective Action Response:** The SFA submitted and updated production records, menus, and an explanation on how they met the fruit requirement for grades K-8 to a total of 1 cup per day. With the addition of a 1/2 cup of 100% fruit juice on 2/13 & 2/15 the requirements for breakfast are now compliant.

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## COMMENDATIONS

- The staff involved with the school meal programs show initiative in operating a compliant program. The notes included with free and reduced applications and the verification file were well documented and easy to understand, and all documents were neatly organized and submitted prior to the on-site review. Questions were asked to help ensure better practices at the school, and any changes or suggestions were quickly noted and implemented.
- Palouse Prairie Charter School has a robust Wellness Policy and webpage dedicated to the subject. The policy and assessments are easily found and accessed, and there are additional resources available to promote wellness. Their commitment to wellness is apparent and appreciated.
- The staff at Palouse Prairie Charter School have great rapport with the students. Their actions show that they are committed to establishing a healthy school environment.

## TECHNICAL ASSISTANCE (TA)

### Food Safety

- Though the SFA has a current HACCP manual available for staff, the manual is missing an employee exclusion standard operating procedure (SOP) that is required by Idaho Food Code. A sample employee exclusion SOP is available in the Download Forms section of MyIdahoCNP.
- The most recent food safety inspection report must be posted in a location visible to the public (7 CFR 210.13(b)). Though the inspection was located in a public location, the SA recommended moving the inspection to an easier to locate area.

### Meal Components and Quantities – Breakfast

- Crediting information is vital to ensure that reimbursable meals are being served. Upon checking production records from the current year, it appears that crediting information was omitted from breakfast production records sporadically at the beginning of the school year, but has since been corrected. The SFA must ensure that the production record is filled out with crediting information each day from the vendor of the meals as they have access to the crediting information. The SFA noted that this information has been included since, and they will continue to ensure that this information is included going forward.
- Independent contractor CN Resource completed the menu review and provided the following TA:
  - During the day of review, it was observed that the posted/planned menu did not align with what was being served. The SFA did follow the menu pattern and serve the appropriate portion sizes. The SFA must have the posted menu be the same as what is being served. The SFA stated they will obtain correct posted menu from the meal vendor.
  - Per the Food Buying Guide, the largest orange listed credits as 5/8 cup of fruit.

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- Consider cutting up the oranges and measuring out 1 cup of wedges, pairing the fresh orange with another fruit option such as 100% juice, or ½ cup canned fruit.
- A yield study can also be performed to demonstrate the cup equivalents of the oranges purchased if they are larger than the count sizes listed in the Food Buying Guide.
- Tools for Schools offers topic-specific policy and resource materials to assist schools in meeting the nutrition standards.

### Meal Components and Quantities – Lunch

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - On the day of menu review, it was observed that the SFA was offering 2% milk at lunch. TA was provided regarding the NSLP menu pattern requirement that all milk served must be fat-free (skim) or low-fat (1%). Per 7 CFR 210.10(d)(1)(i), all milk must be fat-free (skim) or low-fat (1 percent fat or less). Milk with higher fat content is not allowed.
  - The Child Nutrition (CN) Label submitted for the chicken nuggets, beef patty, and hot dog showed an expired CN number that was older than five years. The CN numbers were verified as active on the USDA CN Label Verification Report.
  - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the fish sticks and pizza rippers. The specification sheet submitted included a meal pattern crediting statement but was not an official CN Label or PFS.
  - Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus.

### 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,

*Jax Dunham*

Jax Dunham, BS, RDN  
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Debbie Berkana, Food Service Director/Business Manager, Palouse Prairie School  
Celeste Woodland, Lunch Program Assistant/Title I Teacher, Palouse Prairie School

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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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