

March 15, 2024

Chris Born, Interim Superintendent Salmon School District 1501 Bean Lane Salmon, ID 83467

Dear Superintendent Born,

On October 10, 2023, State Department of Education (SDE) Coordinators Cambria Steffler and Jax Dunham conducted an Administrative Review (AR) of Salmon 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
- USDA Foods

The site reviewed was Salmon Jr-Sr High School.

The State agency (SA) would like to commend Florence Smartt and the entire staff of Salmon 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

Debbie Critchfield, Superintendent of Public Instruction (208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov • 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 List

A statistical sample of 179 applications resulted in a 3.35% error rate. Three applications, affecting three students, required changes in benefits. Two applications were miscalculated and resulted in changes of reduced to free and reduced to denied. One application was missing a signature and is therefore considered incomplete. Additionally, the benefit issuance list included three students who had carryover benefits from several years ago and should be changed to paid.

CAP: Send the affected households a notice of adverse action and change benefit status after the required timeframe. The increase in benefits for the application changing from reduced to free was applied immediately. The three students using incorrect carryover were changed to denied immediately. Upload status change documentation showing that the required benefit changes took effect.

Date of CAP Completion: Due October 25, 2023; Returned for Correction; Completed November 15, 2023

Response: The Food Service Director (FSD) uploaded corrected applications, adverse action letters, and the updated benefit issuance list with all applicable changes.

Finding 2 – Meal Counting and Claiming

Federal requirements under 2 CFR 200.303 require SFAs to establish and maintain effective internal control over the Federal funds they receive that provides reasonable assurance that they are in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. Internal controls should include processes that help ensure that financial transactions are properly recorded and accounted for. The SFA did not realize they did not receive reimbursement for breakfast meals from the previous school year until it was brought to their attention from the State agency while conducting the Resource Management section of the Administrative Review. The SFA is not demonstrating compliance with maintaining accountability over assets and monitoring the deposit of program reimbursements.

CAP: Upload a completed NSLP Procedure Corrective Action form addressing the procedure to be implemented to support the requirement to maintain effective internal controls that involve monitoring of claims for reimbursement to ensure that claims are paid, deposits are recorded in the non-profit food service account, and the amount is the expected amount based on current reimbursement rates for meals served.

Date of CAP Completion: Due November 29, 2023; Due Date Extended; Completed December 11, 2023

Response: The FSD completed the NSLP Corrective Action Procedure form, and the FSD and the business manager will check the claim reimbursement for accuracy.

Finding 3 – Civil Rights

Some of the SFA's kitchen staff did not complete the annual civil rights training. Staff who interact with program applicants or participants (i.e. cafeteria staff, free and reduced application approval staff), their supervisors and the Hearing Official must have the full annual civil rights training (7 CFR 210.30(c)) (FNS Instruction 113-1: Civil Rights Compliance and Enforcement).

CAP: Upload an NSLP Corrective Action Procedure form documenting how the SFA will ensure that civil rights training is completed annually for all applicable staff. The plan must include information on how training will be tracked, when training will be completed, and who will be responsible for ensuring that all civil rights training is completed. Upload certificates of completion for applicable staff members.

Date of CAP Completion: Due October 25, 2023; Returned for Correction; Completed November 24, 2023

Response: The FSD uploaded the certificates of completion for applicable staff members and completed the NSLP CAP Procedure form outlining the procedure for making sure all applicable staff are trained in civil rights at the beginning of the school year.

Finding 4 – Civil Rights

Procedures for receiving and processing complaints must include that the State agency will be advised of the complaint within 3 working days. Though there was a written procedure, it did not include the correct information (7 CFR 210.15(a)(6)). Additionally, the SFA was utilizing an outdated civil rights complaint form. The current civil rights complaint form (in both English and Spanish) and a sample procedure can be found in MyIdahoCNP's download forms. The procedure and forms should be kept with the Civil Rights binder along with the tracking logs at each site.

CAP: Upload the updated civil rights complaint form and procedure now included in the SFA's civil rights binders.

Date of CAP Completion: Due October 25, 2023; Completed October 30, 2023 **Response:** The FSD uploaded a copy of the civil rights compliant procedure and log that will be used at each site in the district.

Finding 5 – 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. The SFA does not have the current full NDS on the foodservice website. The full NDS is available in both English and Spanish on the SA website under Civil Rights (FNS Instruction 113-1: Civil Rights Compliance and Enforcement).

CAP: Update the school food service webpage to include the current full NDS and notify the SA once this change has been made.

Date of CAP Completion: Due October 25, 2023; Completed October 30, 2023 **Response:** The full USDA NDS statement is on the district's food service webpage.

Finding 6 – SFA On-Site Monitoring

According to 7 CFR 210.8 (a)(1) and 7 CFR 220.11 (d)(1), each SFA with two or more feeding sites must perform no less than one on-site review of the meal counting and claiming system and the readily-observable general areas of review, identified under 7 CFR 210.18(h), in each school operating NSLP and 50% of schools operating SBP under its jurisdiction prior to February 1, each school year. There is no record that this review occurred in the past. Ensure that this review is conducted for all feeding sites as indicated no later than February 1, and retain documentation for three years plus the current year.

CAP: Upload a NSLP Corrective Action Procedure form detailing how the SFA will ensure that SFA on-site monitoring is completed annually before February 1, and how the accompanying SFA on-site monitoring forms will be filed and retained properly.

Date of CAP Completion: Due October 25, 2023; Returned for Correction; Completed November 24, 2023

Response: The FSD completed the NSLP CAP Procedure form outlining the procedure for how the SFA on-site monitoring will be completed each year.

Finding 7 – Local School 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 the progress made in attaining the goals of the local wellness policy. LEAs must make this assessment available to the public. (7 CFR 210.31)

CAP: 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 assessment will be made available to the public in an easily understood manner.

Date of CAP Completion: Due October 25, 2023; Returned for Correction; Completed November 24, 2023

Response: The FSD has completed a CAP procedure form outlining their procedure for ensuring the triennial assessment is completed. The superintendent will be responsible for completing and maintaining the triennial assessment of the local wellness policy.

Finding 8 – Professional Standards

It is required that all staff be trained on food safety annually, including procedures included in the HACCP manual. The food service staff was not trained on food safety for the current school year. All staff training should include an agenda and sign-in sheet, and training documentation should be maintained on file at the SFA for three years plus the current year. The ICN has free food safety trainings available on their website, and the SA has a sample training agenda MyldahoCNP's download forms. (7 CFR 210.30(c))

CAP: Complete a food safety training on the HACCP manual and upload a certificate of completion or training agenda and sign in sheet.

Date of CAP Completion: Due October 14, 2023, Completed November 1, 2023 **Response:** The FSD has uploaded certificates of completion for food safety training for all applicable food service staff.

Finding 9 – Food Safety

Each SFA must have a written food safety plan for compliance with Hazard Analysis Critical Control Point (HACCP) program criteria found in 7 CFR 210.13(c). SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared or served. The SFA has a HACCP manual, but it is an outdated version that references outdated food codes. The outdated HACCP manual (2005 NFSMI) should be updated with more current standard operating procedures (SOPs). Additionally, the SFA must include an employee exclusion SOP in accordance with Idaho food code. Ensure all kitchen and cafeteria staff are trained on these food safety elements each year. A template for a HACCP procedure can be found at <u>The Institute of Child Nutrition</u>be located in MyIdahoCNP's download forms. **CAP:** Update the HACCP manual to include updated SOPs and food codes. Ensure customization of the SOPs to fit the SFAs food service needs and include the implementation date for each SOP. Once completed, upload the new HACCP manual and employee exclusion SOP for review. **Date of CAP Completion:** Due October 25, 2023; Returned for Correction; Completed December 14, 2023

Response: The FSD uploaded copies of the reviewed HACCP plan to be used at all schools.

Finding 10 – Buy American Provision

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)). If a product from another country is sourced, then the SFA must have proof that the domestic product is significantly higher in price or not available in sufficient quantities. The SFA had backup documentation for several products sourced outside of the United States but did not have the Buy American exception form for these products. The SFA must keep documentation justifying the limited exception(s); make use of the document available in Download Forms. The out of compliance products observed were mandarin oranges from China and jalapenos from Mexico.

CAP: Provide a written procedure outlining the process of completing the Buy American documentation, including the Buy American exception form, backup documentation, and reasoning for using the exception.

Date of CAP Completion: Due October 25, 2023; Returned for correction; Completed November 24, 2023

Response: The FSD uploaded a NSLP corrective action procedure form outlining the procedure to complete Buy American documentation if products outside of the US are purchased.

Finding 11 – Offer versus Serve (OVS)

All food service line staff must receive annual Offer versus Serve (OVS) training when OVS is implemented. All staff training must include a training certificate or 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. (7 CFR 210.30(c)

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 each kitchen staff member or upload an agenda and sign in sheet for all kitchen staff along with the training certificate for the director.

Date of CAP Completion: Due October 25, 2023, Completed November 1, 2023 **Response:** The FSD has uploaded certificates of completion for OVS Breakfast and OVS Lunch trainings for herself and kitchen staff members.

Finding 12 – Meal Components and Quantities – Breakfast

For the week of menu review, the 6-12 breakfast menu did not meet the whole grain-rich requirement. At least 80% of the grains offered weekly must be whole grain-rich to meet requirements. The menu met 75% whole grains for the week of review for grades 6-12. Whole grain-rich crediting could not be determined due to lack of documentation received from the SFA for the waffles served on Tuesday 9/26. (7 CFR 220.8)

CAP: Provide documentation demonstrating that the whole grain rich requirements are now met. 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 October 26, 2023; Returned for correction; Completed November 16, 2023

Response: The FSD uploaded the nutrition facts label for the waffle reflecting a whole grain rich product. The USDA menu compliance worksheets were updated and reflect menu compliance.

Finding 13 – Meal Components and Quantities - Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirements for grain. The federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent grain requirement for grades 9-12. This requirement was not met on Wednesday 9/27/23, with only 1.25 oz. eq. offered. (7 CFR 210.10)

CAP: Provide documentation demonstrating that the grain requirement is now met. 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 October 26, 2023; Returned for correction; Completed December 21, 2023

Response: The FSD increased the serving size of the grain and updated the production record to reflect this change. The USDA menu compliance worksheet was updated and reflects menu compliance.

Finding 14 – Meal Components and Quantities - Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirements for meat/meat alternate. The federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent meat/meat alternate requirement for grades 9-12. This requirement was not met on Thursday, 9/28/23 with only 1 oz. eq. offered. **CAP:** Provide documentation demonstrating that the meat/meat alternate requirement is now met. 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. (7 CFR 210.10)

Date of CAP Completion: Due October 26, 2023; Returned for correction; Completed December 20, 2023

Response: The serving size for the grilled cheese was increased to bring the meat/meat alternate into compliance. The USDA menu compliance worksheet was updated and reflects menu compliance.

Finding 15 – Meal Components and Quantities - Lunch

For the week of menu review, the 6-8 and 9-12 lunch menu did not meet the minimum weekly requirement for the beans/legume's vegetable subgroup. There were no beans/legumes offered this week. Subgroups of vegetables must be met for each grade group. The ½ cup weekly bean/legumes vegetable subgroup requirement was not met for grades 6-8 and 9-12, with none being offered. (7 CFR 210.10)

CAP: Provide documentation demonstrating that the beans/legumes vegetable subgroup requirement is now met. 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 October 26, 2023; Returned for Correction; Completed December 21, 2023

Response: An additional ½ cup of refried beans was added to the beef and bean burrito recipe. The USDA menu compliance worksheet was updated and reflects menu compliance.

Finding 16 – Meal Components and Quantities - Lunch

For the week of menu review, the 6-8 and 9-12 lunch menu did not meet the minimum weekly requirement for the dark green vegetable subgroup. Dark green vegetables were offered, but not in large enough quantities to meet the weekly requirement. Subgroups of vegetables must be met for each grade group. The ½ cup weekly dark green vegetable subgroup requirement was not met for grades 6-8 and 9-12, with only 1/8 cup offered. (7 CFR 210.10)

CAP: Provide documentation demonstrating that the dark green vegetable subgroup requirement is now met. 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 October 26, 2023; Returned for Correction; Completed December 21, 2023

Response: The serving size for the romaine lettuce in the salad recipe has been increased. The USDA menu compliance worksheet has been updated and reflects menu compliance.

Finding 17– Meal Components and Quantities - Lunch

For the week of menu review, the 6-8 and 9-12 lunch menu did not meet the minimum daily requirements for vegetables. The federal regulations require a minimum of 3/4 cup of vegetable to be offered each day for grades 6-8 and 9-12. This requirement was not met on Monday 9/25, with only 5/8 cup offered. (7 CFR 210.10)

CAP: Provide documentation demonstrating that the daily vegetable requirement is now met. 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 October 26, 2023; Returned for Correction; Completed December 21, 2023

Response: The updated recipes showing increased serving sizes for vegetable subgroups bring the daily vegetable requirements into compliance. The USDA menu compliance worksheet has been updated and reflects menu compliance.

COMMENDATIONS

- The school nutrition staff have a great rapport with the students. They seemed excited to come to breakfast and lunch. Both the breakfast and lunch meals looked delicious, and several students came back for seconds.
- The director was very receptive to all feedback provided during the review and helped to create a friendly environment for both students and staff.
- Both breakfast and lunch offered a variety of fruit options. It was apparent that the students are offered multiple choices frequently as many had 2 or 3 fruits on their trays.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

• The SFA's 30th day of the carryover period is October 18, 2023. The SFA must ensure that all 35 students who are receiving free or reduced benefits for the current year are switched to paid after meal service on this day if documentation for the current school year is not received by the end of the carryover period. The SFA must upload a benefit

issuance list showing that these students have been changed to paid at the end of this date in MyIdahoCNP for the SA to review.

• There were a large number of applications submitted that were denied or from households that have been directly certified. Based on the excess amount of applications submitted, there may be an unnecessary push for households to complete applications even though a family does not qualify. Besides being an unnecessary use of resources and time for the approver, it is not allowable (page 76 of the Eligibility Guidance for School Meals Manual 2017). The practice of schools requiring meal applications must stop, or this may lead to an escalation of a finding in future reviews.

Verification

- Since the AR was during verification for SY23-24, the SA reviewed SY22-23 verification documents. The sponsor completed verification for the required number of applications, however, all the required documentation was not kept together for review. The verification documents provided for review did not contain the final "outcome of verification" letter. It is recommended that all correspondence and documentation should be kept on file together. The best practice for verification documentation includes a copy of the selected application(s), a copy of the initial letter sent to the household(s), a copy of the second request letter(s) (if required), a copy of all submitted documentation, a copy of the final determination letter(s) advising households of the results of verification, and all correspondence with the households in the verification folder.
- Error prone applications are applications that document a monthly income within \$100 of the Income Eligibility Guidelines. Error prone applications must be a priority when selecting households for verification.

Meal Components and Quantities

- Independent contractor CN Resource 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.
 - To fulfill the daily vegetable requirements for grades 6-8:
 - Consider adding 1/4 cup broccoli to be served on the side with the broccoli casserole or add ¼ cup of carrots on the side to go with the salad.
 - Consider offering ½ cup broccoli to all students on one day of the week to meet requirements. Another option would be to serve 1 cup Romaine

lettuce for the salad on Monday in place of the lettuce mixture for the salad.

- Offer ½ cup of pinto beans on the side with the Beef or Pork Burrito served on Tuesday or offering ½ cup black beans with the Salisbury steak on Wednesday.
- To fulfill the menu requirements for grades 9-12:
 - The American cheese slices used for the Grilled Cheese are only 0.5 oz each. Consider serving two 1 oz slices of cheddar cheese for the grilled cheese sandwiches instead.
 - Consider serving one 2 oz whole grain roll on Wednesday in place of the 1 oz garlic bread or consider serving two slices of the 1 oz garlic bread, to satisfy this requirement.
 - Consider adding 1/2 cup broccoli to be served on the side with the broccoli casserole or add 1/2 cup of carrots on the side to go with the salad to fulfill the daily vegetable requirements.
 - Consider offering ½ cup broccoli to all students on one day of the week to meet requirements. Another option would be to serve 1 cup Romaine lettuce for the salad on Monday in place of the lettuce mixture.
 - Offer ½ cup of pinto beans on the side with the Beef or Pork Burrito served on Tuesday or consider offering ½ cup black beans with the Salisbury steak on Wednesday.
- Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus. The submitted production records did not provide adequate information. It is a requirement of the federal regulations to maintain complete and accurate production records. See below for a description of problem areas noted in completing production records.
 - Production records with planned numbers for each item should be accessible before each meal service. Served numbers and leftover numbers need to be recorded at the end of meal service to ensure accuracy.
 - Serving sizes did not always match what was actually offered for lunch, per communication with the sponsor. Ensure from this point forward, production records accurately reflect the menu served.
 - Production records state 1 cup fruit is served to 6–8-year-olds and 9-12-year-olds. It was verified by talking to sponsor, and viewing onsite, 3 or more ½ cup fruit items are served daily for lunch.
 - Planned milks were not noted as planned on productions records for breakfast or lunch. Always include milk counts to show milk what was planned/served.
 - Menu items and serving sizes were not always documented on production records. Garlic Bread was left off the menu and

production records on Wednesday, but was served, and added later to production records. Crackers were on production records on Thursday, but the portion size was not on production records.

- Serving sizes did not always match what was actually offered for breakfast, per communication with the sponsor. Ensure from this point forward, production records accurately reflect the menu served.
 - Production records state ½ cup fruit is served to 6-8 and 1 cup to 9-12. It was verified by talking to sponsor, and viewing onsite, three or more 1 cup to ½ cup fruit items are served daily for breakfast. All fruit should be separated by type and quantity on production records to reflect what was offered/served.
 - Planned numbers were not noted on the production records for individual items.
 - Meal type (Breakfast or Lunch) was not selected at the top of the production to reflect meal service.
- The meal pattern crediting for the grains and meat/meat alternate components could not be determined due to lack of documentation received from the sponsor however there was another choice on the menu fulfilling the meal pattern requirement. Ensure you have documentation for the following:
 - Egg bowl
 - Oatmeal Bar
- A standardized recipe is a recipe that has been carefully adapted and tested to ensure that it will produce a consistent product each time it is prepared. The recipes submitted were not always written in standardized format with complete information. It is acceptable to use USDA recipes, however any changes made to the recipe need to be clearly noted.
 - Refried beans were added to the Beef or Pork Burrito on Tuesday, but the amount was not included in the recipe.
 - Grilled cheese sandwich recipe lists one slice of bread in the ingredients, per instructions 2 slices of bread is used.

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. During the last AR, Smart Snacks TA was provided. Food and beverages sold to students (even through the PTA) must comply with specific nutrition standards, must be tracked as exempt fundraiser(s), or must be inaccessible during the school day (defined as midnight the day before until 30 minutes after the school day ends). The vending machines located in the cafeteria had beverages that did not meet smart snack standards, and they were accessible to students during the school day. As per 7 CFR 210.11, the school should have knowledge of and keep a written record of food sales that occur within the school day, but outside of food service. Only foods sold in school and intended for consumption during the school day (from midnight until 30 minutes after the end of school) fall under Smart Snacks regulations. Smart Snacks information and resources, including a sample site tracking form, can be found at the Idaho SDE Child Nutrition Programs Smart Snacks website.

Food Safety

• All food items in storage must be dated with month, day and year.

Professional Standards

- The FSD was tracking training on a piece of paper. Best practice is training documentation should be recorded on the Professional Standards tracking log and maintained on file at the SFA for three years plus the current year. The SFA was shown the professional standards tracking log available in MyldahoCNP's download forms; the SFA will utilize and implement this training log going forward.
- Consider implementing a process that ensures the required trainings 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 the first 30 days.

Local School Wellness Policy

- Federal legislation requires school districts to implement a local wellness policy that must include language permitting parents, students, school board, PE teachers, school health professionals, school food service staff, administrators, and community members to participate in the development, implementation, review, and update of the local wellness policy. Identifying wellness policy leadership of one or more LEA and/or school official(s) who have the authority and responsibility to ensure each school complies with the wellness policy. Specifying measurable goals for nutrition education, nutrition promotion, physical activity, and other school-based activities to promote student wellness that are written with consideration for evidence-based strategies. Addressing nutrition guidelines for all foods and beverages sold on the school campus during the school day and for providing school meals that adhere to Federal meal pattern requirements. Identifying nutrition standards for non-sold foods and beverages available during classroom and school celebrations. Stating a policy for food and beverage marketing that allows the marketing and advertising of only those foods and beverages that meet Smart Snacks in School nutrition standards. 7 CFR 210.31(d)(3)-LEAs must inform the public about progress toward meeting the goals for the local school wellness policy and compliance with the local school wellness policy by making the triennial assessment available to the public in an accessible and easily understood manner.
- 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 the progress made in attaining the goals of the local wellness policy. LEAs must make this assessment available to the public.

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.

Resource Management

 Consistent with 7 CFR 210.14(e)(4)(i), SFAs are not required to raise their paid lunch price by more than 10 cents for SY 2023-24 from the last year they charged for paid lunches. SFAs can still choose to raise the price by more than 10 cents. The target weighted average lunch price for SY2023-2024 is \$3.56. The SA recommends evaluating the current paid lunch prices in preparation for increasing prices for SY2024-2025.

FISCAL ACTION

Due to benefit issuance errors, fiscal action results in \$442.35 for NSLP and \$119.35 for SBP. However, since each amount falls under the \$600 threshold, the fiscal action will be disregarded, and no financial adjustment will occur.

A procurement review is currently being completed. Kat Forstie, Procurement Specialist is waiting for some answers in order to complete the 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,

Cambria Steffler Cambria Steffler, MS, RD NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs Jennifer Butler, MEd, SNS, NSLP Coordinator, Idaho Child Nutrition Programs Florence Smartt, Child Nutrition Director, Salmon 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
- email: <u>Program.Intake@usda.gov</u>

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