



April 30, 2024

Rob Waite, Superintendent
Shoshone School District
61 E. Hwy 24
Shoshone, ID 83352

Dear Superintendent Waite,

On November 28, 2023, Idaho Department of Education contractor CN Resource (CNR) conducted an Administrative Review (AR) of Shoshone School District for the following United States Department of Agriculture (USDA) programs:

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

The sites reviewed were High Desert High School and Shoshone Elementary School for FFVP only.

The State agency (SA) would like to commend Ciara Naylor and the entire staff of Shoshone 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 findings determined by CNR and the SFA response to the findings:

FINDINGS AND CORRECTIVE ACTION PLAN (CAP)

Finding 1 – Local Wellness Policy

The current wellness policy (dated 2021) does not include all required elements as identified in 7 CFR 210.31. During the previous review, technical assistance was issued advising of language requirements.

CAP: Upload a plan on district letterhead identifying 1) Who at the LEA will be responsible to ensure the LWP is compliant with Federal regulations 2) How the policy will be updated 3) When a compliant policy with all required elements will be available to the public.

Date: Due April 11, 2024; completed April 3, 2024

Response: The SFA uploaded a plan identifying the child nutrition program director to be the person in charge of the local wellness policy. The LEA has decided to start anew with its wellness policy and is using a sample policy as a starting point. A committee meeting was scheduled for April 17, 2024. The updated policy will be made available to the public on the school's website by May 1, 2024.

Finding 2 – Meal Components and Quantities

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily and weekly requirements for fruit. The federal regulations require a minimum of 1 cup of fruit to be offered each day for grades 9-12. This requirement was not met on Thursday 10/5 with only 1/2 cup offered. Per the Food Buying Guide, 1 whole fresh plum credits as 1/2 cup of fruit. Because the daily minimum was not met, the weekly minimum requirement was not met.

CAP: Provide a written statement identifying how the daily and weekly fruit requirements are now met along with documentation demonstrating the correction.

Date: Due January 12, 2024; completed December 13, 2023

Response: The 1 cup minimum fruit to be offered each day for grades 9-12 has now been met. An applesauce cup was added to the menu when fresh plums were served. Training will be provided to staff regarding a plum only crediting for one half a cup because of its pit. The nutrition director will oversee and ensure future compliance.

Finding 3 – Meal Components and Quantities

For the week of menu review, the 6-8 & 9-12 lunch menus did not meet the minimum 1/2 cup weekly requirement for the beans/legumes vegetable subgroup. There were no beans/legumes offered this week.

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CAP: Provide a written statement identifying how the weekly beans/legumes vegetable subgroup requirements are now met along with documentation demonstrating the correction.

Date: Due January 12, 2024; completed December 13, 2023

Response: The beans and legumes subgroup requirement is now met. A half cup of refried beans was added to the menu. Training will be provided to staff to inform them that the peas that were served for the beans/legumes subgroup requirement do not qualify as a legume for child nutrition purposes. The nutrition director will oversee and ensure future compliance.

COMMENDATIONS

- The hospitality and cooperation during the on-site portion of the Administrative Review process was appreciated. The director was very cooperative and responsive in providing any documentation in a prompt and efficient manner. Her passion for the Child Nutrition Program is evident in the menu offerings and choices available to the students. The fresh fruits and vegetables offered to the students were excellent in the presentation and variety. She is doing an excellent job with the program and serving the students.
- The Child Nutrition kitchen staff are doing an excellent job in providing the meals for the students. The kitchen is spotless as reflected in the last Health Inspection with Zero Deficiencies. They interacted well with the students while in the serving areas. They ensured the food serving area was clean and the menu items well stocked for service. They are a cohesive team in the kitchen and are following the guidelines of the program and are open to technical assistance.

TECHNICAL ASSISTANCE (TA)

Verification

- The SFA completed verification by the November 15 deadline, however the FNS 742 was not completed accurately. Any CEP site needs to be reflected accurately in the allocated location on FNS 742. In addition, check box #5-6 should be marked properly if verification was completed.

Meal Counting and Claiming

- It was suggested, for consistency, the cashier use a clicker at the point of service (POS) for lunch service at the High Desert High School. Only this site had the cashier counting meals. All other sites were using a clicker at the POS.

Meal Components and Quantities

- 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.

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- 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.

Resource Management

- Per 2 CFR 200.403(a), allowable costs must be necessary and reasonable for the performance of the Federal award. Please review the Idaho School Nutrition Reference Guide Financial Requirements and Resource Management for a list of common allowable and unallowable expenses.
- For SY23-24, the SFAs weighted average price requirement was \$3.56. Although there was a positive fund balance, paid lunch prices were increased by .40 and .45 cents resulting in a \$3.13 weighted average. Continue to make strides to increase prices to align with USDA's targeted paid lunch price [7 CFR 210.14(e)].

Local School Wellness Policy

- Goals listed in the assessment such as nutrition education, physical activity, and nutrition promotion are not currently in the wellness policy but were assessed. Be sure to include the required measurable goals when updating the policy.
- For more information on Local Wellness Policy requirements, visit the following webpages:
 - Local School Wellness Policies at <https://www.fns.usda.gov/tn/local-school-wellness-policy>
 - Local School Wellness Policy Implementation Tools and Resources at <https://www.fns.usda.gov/tn/local-school-wellness-policy-implementation-tools-resources>
 - Local School Wellness Policy Outreach Toolkit at <https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit>
 - Local School Wellness Policy: Guidance and Q&As at <https://www.fns.usda.gov/cn/local-school-wellness-policy-guidance-and-qas>

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,

Jennifer Butler

Jennifer Butler, MEd, SNS
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Ciara Naylor, Child Nutrition Director, Shoshone School District

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(833) 256-1665 or (202) 690-7442; or
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