



December 20, 2023

Kevin Ramsey, Superintendent
South Lemhi School District #292
111 South 3rd Street
Leadore, ID 83464

Dear Superintendent Ramsey,

On October 9, 2023, State Department of Education (SDE) Coordinators Jax Dunham and Cambria Steffler conducted an Administrative Review (AR) of South Lemhi 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 the Leadore School.

The State agency (SA) would like to commend Julia Matson and the entire staff of South Lemhi 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

All 64 free and reduced eligible students' documentation was validated by the SA, resulting in a 1.56% error rate. One application affecting one student was incorrectly determined as free and must be changed to reduced-price eligibility on the benefit issuance list. An adverse action letter was sent to the household on the day of review notifying that the student's eligibility will be decreased to reduced-price after 10 calendar days.

CAP: Upload a benefit issuance list indicating the student was changed to reduced-price eligibility. Additionally, upload the adverse action letter that was sent to the family.

Date of CAP Completion: Due October 26, 2023; completed October 19, 2023.

Corrective Action Response: The adverse action letter sent to the household was uploaded, and a new benefit issuance list was uploaded showing that the student's benefit was changed to reduced-price after 10 calendar days.

Finding 2 – 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 has the incorrect NDS on their website. The full NDS is available in both English and Spanish on the SA website under [Civil Rights](#).

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

Date of CAP Completion: Due October 26, 2023; completed October 20, 2023.

Corrective Action Response: The school nutrition webpage now includes the correct full NDS.

Finding 3 – Local School Wellness Policy

7 CFR 210.31(e)(2) states that LEAs must assess their Local Wellness Policy (LWP) 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. There is no record that the triennial assessment has occurred in the past

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

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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 26, 2023; returned for corrections; completed November 15, 2023.

Corrective Action Response: A district wellness policy plan was uploaded. In this plan, it was detailed that the LEA's administration will be responsible for ensuring that the triennial assessment is completed on a triennial basis. The LEA will evaluate compliance with the policy and the programs offered in the school, compare the policy to model policies, and measure progress toward wellness policy goals. To ensure this is completed on time, the Wellness Chairperson will keep minutes of LWP meetings to ensure that wellness policy necessities are implemented. Once completed, the triennial assessment will be made public on the district website.

Finding 4 – Local School Wellness Policy

The Local Wellness Policy must contain the required language outlined in 7 CFR 210.31(c)(3)(iii). The SFA's LWP does not contain the required language about marketing materials meeting smart snack regulations for foods during the school day.

CAP: Upload a plan identifying who at the LEA will be responsible to ensure the LWP is compliant with Federal regulations, how the policy will be updated, and when a compliant policy will be available to the public.

Date of CAP Completion: Due October 26, 2023; returned for corrections; completed November 16, 2023.

Corrective Action Response: A plan was uploaded detailing that the administration of South Lemhi School District will be responsible to ensure that the LWP is compliant. To ensure that the wellness policy remains compliant, the wellness committee will meet annually before the first day of the third month of the school year to ensure that the policy is still compliant. The wellness chairperson will keep minutes of wellness committee meetings to ensure that the necessary changes are completed and implemented. Additionally, the SFA indicated that a compliant policy will be made available to the public by November 16, 2023.

Finding 5 – Offer Versus Serve

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.

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 26, 2023; returned for corrections; completed November 15, 2023.

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Corrective Action Response: Training certificates for both OVS breakfast and lunch were uploaded for the food service director along with a training agenda and sign in sheet detailing that the additional kitchen staff received OVS breakfast and lunch training.

Finding 6 – Professional Standards

It is required that all staff be trained on food safety annually, including training on procedures included in the HACCP manual. The food service staff have not been 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 Institute of Child Nutrition (ICN) has free food safety trainings available on their website, and the SA has a sample training agenda MyIdahoCNP's download forms.

CAP: Complete food safety training, ensuring that information from the HACCP manual is included, and upload a certificate of completion or training agenda and sign in sheet.

Date of CAP Completion: Due October 26, 2023; returned for corrections; completed November 15, 2023.

Corrective Action Response: A training agenda was uploaded detailing that food safety training has occurred for both the food service director and kitchen staff since the beginning of SY 2023-2024.

Finding 7 – Professional Standards

The SFA has no record that the Food Service Director (FSD) has 8 hours of food safety training. FSDs 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 of food safety training into MyIdahoCNP.

Date of CAP Completion: Due October 26, 2023; returned for corrections; completed November 17, 2023.

Corrective Action Response: A certificate was uploaded showing that the Food Service Director has completed 8 hours of food safety training via the *Food Safety in Schools* training provided by ICN.

Finding 8 – 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 sources 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 pineapple tidbits and mandarin oranges.

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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 26, 2023; returned for corrections; completed November 8, 2023.

Corrective Action Response: A procedure was uploaded detailing how the SFA will complete Buy American exception forms and retain backup documentation to support the reasoning for utilizing the exception.

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). 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 the Institute of Child Nutrition (<https://theicn.org/icn-resources-a-z/standard-operating-resources/>).

CAP: Update the HACCP manual using the template found at the ICN website. Ensure to customize the SOPs to fit the SFAs food service needs and include the implementation date for each SOP.

Date of CAP Completion: Due October 26, 2023; returned for corrections; completed November 15, 2023.

Corrective Action Response: The SFA uploaded documentation showing that the ICN HACCP plan was utilized to ensure compliance. Additionally, an SOP from the new HACCP plan was uploaded to show that the plan has been implemented as of October 28, 2023.

Finding 10 – Meal Components and Quantities – Lunch

For the week of menu review, the 6-8 & 9-12 lunch menus did not meet the grain-based dessert requirement. Only 2 ounce equivalents of creditable grain-based desserts are allowed for lunch per week. The menu met 2.25 ounce equivalents of grain-based desserts for the week for grades 6-8 and 2.5 ounce equivalents of grain-based desserts for the week for grades 9-12.

CAP: Provide a written statement that the grain-based dessert 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 grain-based dessert finding is 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 October 20, 2023; completed October 20, 2023.

Corrective Action Response: The SFA provided updated production records to reflect the change to the menu on September 25, 2023. A cookie was taken off the production records,

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and baked Cheetos were added to correct the grain-based dessert finding. The baked Cheetos PFS was secured and uploaded, and an updated menu compliance worksheet was additionally uploaded.

Finding 11 – Meal Components and Quantities – Lunch

For the week of menu review, the K-5, 6-8, and 9-12 lunch menus did not meet the minimum weekly requirement for the starchy vegetable subgroup as there were no starchy vegetables offered during the week. Subgroups of vegetables must be met for each grade group. The ½ cup weekly starchy vegetable subgroup requirement was not met for grades K-5, 6-8, and 9-12 since no starchy vegetables were offered for the week.

CAP: Provide a written statement noting that the starchy vegetable 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 starchy vegetable finding is 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 October 20, 2023; completed October 20, 2023.

Corrective Action Response: The SFA noted that a ½ cup portion of french fries would be added to the menu. With the addition of the ½ cup of french fries for grades K-12, the starchy vegetable subgroup requirements have been met for all grade levels for the week of 9/25/2023-9/28/2023.

Finding 12 – Meal Components and Quantities – Lunch

For the week of menu review, the K-5, 6-8, and 9-12 lunch menus did not meet the minimum weekly requirement for the beans/legumes vegetable subgroup. Beans/legumes 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 bean/legumes vegetable subgroup requirement was not met for grades K-5, 6-8, and 9-12 with only a 1/8 cup portion being offered for the week.

CAP: Provide a written statement that the beans/legumes finding 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 beans/legumes finding is 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 October 20, 2023; completed October 20, 2023.

Corrective Action Response: The SFA noted an addition of ½ cups of black beans added to the September 26, 2023, menu for all grade groupings showing that the bean/legume weekly requirement is now fulfilled.

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COMMENDATIONS

- Based upon the received date noted on free and reduced applications, the FSD is quick in determining benefits once documentation is received which helps to grant student access to meals in an adequate timeframe.
- The SFA has done a great job implementing smart snack regulations throughout their school, including stocking the vending machine with compliant items and making sure marketing materials meet smart snack regulations.
- The FSD showed a positive attitude in providing documentation while the SA was on site. Responses to questions were swift, and the director showed a genuine interest in ensuring that Child Nutrition Programs are operated compliantly.
- The director and staff have excellent rapport with the students at Leadore School, helping to create a positive environment.
- The SFA hosts creative non-food fundraisers that promote school spirit and the local wellness policy. Some notable fundraisers include inflatable "bull" racing, selling cutting boards from shop class, and basketball camps.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- Though most applications with varying income frequencies were converted to annual, one application was converted to monthly income with varying frequencies. If multiple frequencies are listed, all income must be converted to an annual amount to avoid discrepancies when determining eligibility.

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 original application, the notification letter to the household, or the final outcome of verification letter. Previous years verification folders did contain these documents, so it is unknown why SY22-23 verification did not. 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, and a copy of the final determination letter(s) advising households of the results of verification.
- 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.

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Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - The original submitted production records reflected a milk variety but did not show what type of milk was being served. Always list the different types of milk separately.
 - The number of planned servings was not listed at the top of the production record to reflect the amounts planned per grade grouping.
 - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the Chicken Patty served on September 25, and the pepperoni served on September 28. The specification sheets submitted included a CN number 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.
 - Serving sizes did not always match what was actually offered per communication with the SFA. Documentation of vegetables offered was not clear on the amounts, and communication with the sponsor was necessary.
 - Menu items listed on the production records did not always match the submitted recipes. Egg noodles are on the recipe for chicken noodle soup, but a rotini pasta label was sent in for the recipe.
 - Menu items and serving sizes were not always documented and clear for each grade group. Carrots and cheese sticks were on the production records for only some age groups, but served to all grade groups as per on site observation.
 - 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. Standardize the recipes so that true yields and portion sizes can be determined. To be standardized recipes must include at a minimum the following:
 - All ingredients in the recipe.
 - Correct volume or weighted measure of each ingredient.
 - Serving/portion sizes for each grade group.
 - The true yield made by the recipe.
 - Clear and complete preparation steps and directions.
 - Most labels submitted were generated by the distributor, vendor or online nutrition calculator. Obtain labels directly from the manufacturer of the product or from the product packaging and keep on file so they can easily be referenced when determining menu compliance.

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

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weighted average lunch price for SY 2023-2024 is \$3.56. The SA recommends evaluating the current paid lunch prices in preparation for increasing prices for SY 2024-2025.

Food Safety

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - The most recent food safety inspection was not posted on the wall, and the SFA should post the most recent food safety inspection when it is received.

Professional Standards

- 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.
- 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 MyIdahoCNP's download forms; the SFA will utilize and implement this training log going forward.

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.
- When operating free Provision 2 breakfast/CEP, additional promotion should support that breakfast is available everyday free of charge. The monthly breakfast menu would also be a good place to remind participants and their families that breakfast is available at no cost.

FISCAL ACTION

Due to benefit issuance errors, fiscal action results in \$4.80. 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,

Jax Dunham

Jax Dunham, BS, RDN
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Jennifer Butler, MEd, SNS, NSLP Coordinator, Idaho Child Nutrition Programs
Cambria Steffler, MS, RD, NSLP Coordinator, Idaho Child Nutrition Programs
Julia Matson, Food Service Director, South Lemhi School District #292

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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

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