



May 16, 2024

Angela Hild, Principal  
St. Edward's School  
139 6<sup>th</sup> Avenue East  
Twin Falls, ID 83301

Dear Principal Hild,

On February 24, 2024, Idaho Department of Education contractor Child Nutrition Resource (CNR) conducted an Administrative Review (AR) of St. Edward's 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 St. Edward's School.

The State agency (SA) would like to commend Sabrina Naranjo and the entire staff of St. Edward's 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

- 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 determined findings and the SFA response to the findings:

## FINDINGS AND CORRECTIVE ACTION PLAN (CAP)

### Finding 1 – Verification

Prior to any other verification activity, a determining official must review each approved application selected for verification to ensure the initial determination was accurate. Any LEA that conducts a confirmation review of all applications at the time of certification is not required to conduct confirmation reviews prior to verification. The confirmation review must be done by an individual other than the individual who made the initial eligibility determination [7 CFR 245.6a(e)(1)]. The SFA did not provide proof that a confirmation review took place.

**CAP:** Submit the verification application selected with the confirmation conducted by having the confirming official review, sign, and date. Additionally, submit a plan detailing who will conduct the confirmation review, when the confirmation review will be conducted, and how the confirmation review will be conducted going forward.

**Date of CAP Completion:** Due April 26, 2024; completed April 30, 2024.

**CAP Response:** The SFA provided a plan describing that the confirming official will confirm all applications submitted and sign and date the applications within 10 days of receiving the application to ensure accuracy and correct the practice for verification.

### Finding 2 – Meal Components and Quantities – Lunch

For the week of menu review, the Pre-K through 8<sup>th</sup> grade lunch menu did not meet the minimum daily requirements for meat/meat alternate. Additionally, the weekly requirement of 9 oz. eq. was not met for Pre-K through 8<sup>th</sup> grade. The menu offered a minimum of 7.25 oz. eq. of meat/meat alternate throughout the week.

**CAP:** Provide a written statement that the weekly meat/meat alternate requirements are now met. Include a detailed statement to describe what specific changes were made to the menu for the week of review to bring the menu into compliance.

**Date of CAP Completion:** Due April 8, 2024; returned for corrections; completed April 22, 2024.

**CAP Response:** The SFA added a cheese stick to the menu in addition to increasing the portion sizes of the orange chicken and ham offered during the week to meet the meat/meat alternate requirements.

### Finding 3 – Local School Wellness Policy

Per 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 a description of the progress made in attaining the goals of the local wellness policy. LEAs must make this

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assessment available to the public in an easily understood manner (7 CFR 210.31(d)(3)). There is no documentation noting that the triennial assessment of the wellness policy took place.

**CAP:** Upload a plan identifying who at the LEA will be responsible to complete the triennial assessments for the district policy and each school's implementation, how the assessments will be completed, and what steps will be taken to ensure this requirement is met on a triennial basis including notifying the public in a timely manner.

**Date of CAP Completion:** Due April 4, 2024; returned for corrections; completed April 21, 2024.

**CAP Response:** The SFA uploaded a plan noting that the principal will be responsible for completing the triennial assessment along with the Food Service Director (FSD). To ensure that this is completed on a triennial basis, the SFA will assess the wellness policy annually and note when the triennial assessment needs to be completed during this annual review. When completing the triennial assessment, the SFA will utilize the assessment resource available via the SA. Following the completion of the triennial assessment, the assessment will be shared via the SFA's newsletter and school website.

## COMMENDATIONS

- The FSD and administration did an amazing job with gathering all the needed documents. They are doing a great job of implementing the NSLP and SBP.
- The administration provides excellent support to the foodservice program. There is a community effort to ensure operations run smoothly and that kids are fed nutritional meals in a timely matter.
- The FSD and the foodservice team do a great job of preparing and serving breakfast and lunch to the students. They know every student by name and they make it a pleasant experience to come through the line.

## TECHNICAL ASSISTANCE (TA)

### Offer Versus Serve

- St. Edward's School operates under serve only in grades PreK - 8. It was noted that there was a substantial amount of food waste. It was discussed with the FSD that offer versus serve may help to prevent the amount of food waste.

### Meal Counting and Claiming – Breakfast and Lunch

- 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.

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- 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.
  - Milk types were not recorded on the production records with planned and served numbers for each type.
  - Serving sizes did not always match what was offered.
  - Cereal types were not recorded on the production records.
  - Juice types were not recorded on the production records.
  - Serving sizes documented were not always clear and complete.
- A sponsor must maintain current product documentation and nutrition facts labels from the manufacturer for commercially prepared foods. Secure manufacturer labels for all menu items served. Manufacturer labels may be located on the product packaging or on the manufacturer’s website. Some of the submitted labels were generated from the vendor and not the manufacturer.

### Resource Management

- Internal control documentation should identify segregation of financial duties and establish a strong internal control environment to mitigate the risk of errors, fraud, and noncompliance. Written financial procedures are integral to a strong internal control environment. Examples of documented internal controls include:
  1. Written financial management standard operating procedures outlining purchasing and accounting processes, segregation of duties, fiscal responsibilities, etc.
  2. Maintaining a list of common allowed/unallowed costs for federal awards and/or the child nutrition programs.
  3. An internal control policy that shows the SFA has assessed risk and has a system in place to prevent, detect, and correct errors and fraud.

The business department and food service department should work together to develop written financial and accounting procedures for cafeteria cash collection, purchasing, and financial reporting. The food service department should receive monthly financial reports, and the FSD should be trained to review these financial reports.

- The SFA should establish separate food service revenue codes for all food service revenue categories, including adult meal revenues and extra milk revenues. Nonprogram food revenues should be tracked separately from program food revenues in the accounting ledger.

### 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  
Sabrina Naranjo, Child Nutrition Director, St. Edward's School

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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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