



February 21, 2025

Michelle Ball, Executive Director
Alturas Academy
151 North Ridge Ave.
Idaho Falls, ID 83404

Dear Director Ball,

On November 7, 2024, Idaho Department of Education Coordinators Jax Dunham, Cambria Steffler, Cassandra Thompson, and Jessica Medrano conducted an Administrative Review (AR) of Alturas Academy for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- USDA Foods

The site reviewed was Alturas Preparatory Academy.

The State agency (SA) would like to commend Megan Mallard, Bryanna Coulter, and the entire staff of Alturas Academy 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

A statistical sample of 181 student benefits resulted in a 0.53% error rate. One student was noted as reduced via Medicaid direct certification (DC), but the student could not be found on a DC list or had their benefits extended via another student. Upon running a single match in the State DC system, the student was noted as free via direct certification of Medicaid.

CAP: Change the students benefit from reduced to free via direct certification in the point of service software. Once this has been completed, upload a new benefit issuance list showing that the student's benefit is now correct.

Date of Completion: Due November 22, 2024; completed November 18, 2024

CAP Response: The SFA uploaded a benefit issuance list showing the student is now receiving the correct benefit.

Finding 2 – Certification and Benefit Issuance

The first direct certification report was not generated until September 23, 2024 which was about 30 days after the first day of school. Student names (i.e. a current enrollment list) should be run through Direct Certification every week or more frequently at the beginning of the school year so that all the new students as well as any new matches that may be available can be identified. Once the students are identified, this documentation must be printed and saved for three years plus the current year (the DC system does not save information).

CAP: Complete the NSLP Corrective Action Procedure Form to outline the process for running the DC list at the beginning of the school year. In this form, please identify who will be responsible for running the DC list, when the DC list will be ran for the first time each school year, and the frequency of which these lists will be obtained.

Date of Completion: Due November 22, 2024; completed November 18, 2024

CAP Response: The SFA uploaded an NSLP Corrective Action Procedure Form detailing that the Administrative Manager will ensure that the first DC list is generated at the beginning of the school year within the first week of school. To ensure this occurs in the appropriate timeframes, the SFA has included a reminder on the office calendar.

Finding 3 – Verification

Verification requirements were not met for SY2024-2025. The details of the requirements not met are listed below:

- The SFA over-selected the number of applications for verification. The total number of applications required to be selected for verification was two. The SFA selected two applications per site for a total of four applications for verification.

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- The application pulled for Verification included a student that was included on the State Direct Certification (DC) list. This list was obtained by the LEA on September 23, 2024, before Verification began, so the application should not have been included in the verification pool.
- When reviewing the verification documents, it was noted that all of the documents were not readily available. The original application, second notice (if applicable), and results of verification letter were not available to review. Per 7 CFR 245.6a (h), all verified applications must be readily retrievable. All documents submitted by the household for the purpose of confirming eligibility, reproductions of those documents, or annotations made by the determining official indicating which documents were submitted by the household and the date of submission also must be retained, along with all relevant correspondence between the households selected for verification and the school or LEA. This documentation, including documentation concerning any appeals, must be kept by the LEA to demonstrate compliance with the verification requirements when LEAs are reviewed by State or Federal officials. The documentation must be kept for a minimum of three years, after the date of the fiscal year to which it pertains.
- A second attempt to contact the household when the household does not respond to the original request for verification must be completed [7 CFR 245.6a(f)(6)]. Documentation that a second attempt was made to contact the households selected for verification was not readily available on the day of the administrative review. The documentation that was provided did not reflect the day the actual letter was sent. The SA recommends following the sample timeline provided in the download forms section of MyIdahoCNP for verification notification letters
- A confirmation review must take place prior to notifying the household of the request for verification. The confirming official, who must be a different individual than the determining official, must review an application prior to beginning the verification process. This ensures the application eligibility was determined correctly. The confirming official completes the "Official Use Only" box on the free and reduced meal application that has been selected for verification. Once the verification process has been completed and results determined, the verifying official (which may be either the determining or confirming official) must sign and date the "For Official Use Only" portion of the application at the conclusion of verification. The results of the process should be marked on the application as well as when the notice letters were sent.

CAP: Complete and upload the NSLP Procedure Corrective Action form detailing how the SFA will complete the verification process in the future while ensuring that all verification requirements are met. In this form, detail how the students that are directly certified will not be selected for verification, how verification files will be retained in order to be readily accessible, how a confirmation review will take place, how a second notice will be sent as applicable, and how the SFA will not over-select for verification.

Date of Completion: Due November 22, 2024; returned for corrections; completed December 11, 2024

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CAP Response: An NSLP Corrective Action Procedure Form was uploaded detailing that the SFA's Administrative Manager will be responsible for ensuring that the verification process is completed correctly. The SFA will ensure that students which have been determined as DC will not be included in the verification sample, and the SFA will complete a confirmation review before the verification process begins. The SFA will compile a list of beneficiaries between both sites to conduct the verification process in order to ensure that over-verification does not occur. The SFA will also keep a binder with all verification documentation including a sample list, applications, letters (including all notices as applicable), paystubs, and summary so that information is readily accessible and in one place.

Finding 4 – Civil Rights

Web pages associated with program operation should list the full USDA Non-discrimination Statement (NDS) with details on participants' right to file a complaint. The SFA's foodservice webpage does not reference the NDS or contain a link to it

CAP: Post the full USDA NDS or the short statement with a link to the full NDS on the school food service webpage. Notify the SA when the website has been updated.

Date of Completion: Due November 22, 2024; completed November 18, 2024

CAP Response: The SFA updated both foodservice webpages to now include the full USDA NDS.

Finding 5 – Meal Components and Quantities – Lunch

Crediting information is vital to ensure that reimbursable meals are being served. When reviewing the production record from the day of review, it was noted that crediting information was omitted. Upon checking production records from the current year, it appears that crediting information is omitted from the production record on a semi-consistent basis. The SFA must ensure that the production record is filled out with crediting information each day. If it is discovered that crediting information is omitted from production records during the following Administrative Review, fiscal action may be taken.

CAP: Complete and upload the NSLP Corrective Action Procedure Form detailing how the SFA will ensure that production records are filled out adequately with crediting information each day before meal service.

Date of Completion: Due November 22, 2024; completed November 18, 2024

CAP Response: The SFA uploaded an NSLP Corrective Action Procedure Forms detailing that the FSD and Assistant FSD will ensure production records are printed with all crediting information from the SFA's software before the meal service.

Finding 6 – Meal Components and Quantities – Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily and weekly requirements for meat/meat alternate. The minimum daily 2-ounce equivalent meat/meat alternate requirement for grades 9-12 was not met on Wednesday (9/25) with only 1.75 oz. eq. offered with the Cobb Salad. Additionally, the weekly requirement of 8 oz. eq. was not met for grades 9-12 as the menu offered a minimum of 7.75 oz. eq. of meat/meat alternate throughout the week.

CAP: Provide a written statement describing the specific changes made to the menu for the week of review to correct the menu finding and bring the menu into compliance.

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Additionally, submit supporting documentation to demonstrate that the menu finding is now corrected. This documentation may include: menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes

Date of Completion: Due October 11, 2024; completed October 10, 2024

CAP Response: The SFA updated the recipe for the Cobb Salad by including a whole egg to meet the minimum 2 oz. eq. of meat/meat alternate for Wednesday of the week of review. This change also allowed for the SFA to meet the 8 oz. eq. meat/meat alternate requirement for the week of menu review.

Finding 7 – Food Safety

The most recent food safety inspection report must be posted in a location visible to the public (7 CFR 210.13(b)). At Alturas Preparatory Academy, the most recent food safety inspection was not posted.

CAP: Post the most recent food safety inspection in a location visible to the public.

Date of Completion: Due November 22, 2024; completed November 7, 2024

CAP Response: The SFA posted the most recent food safety inspection in a publicly visible location prior to the lunch service while the SA was on-site.

Finding 8 – 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 for the purposes of the NSLP, SBP or other FNS programs. The HACCP manual was not available at Alturas Preparatory Academy.

CAP: Provide the site with a copy of the Alturas HACCP manual and upload the new manual to the State agency once completed. Ensure the Food Safety plan (HACCP) has the bodily fluid clean-up and employee exclusion SOP's that are required by Idaho Food Code.

Date of Completion: Due November 22, 2024; completed November 18, 2024

CAP Response: The SFA uploaded the HACCP plan that has now been implemented on-site at Alturas Preparatory Academy.

COMMENDATIONS

- The Food Service Director (FSD) and Administrative Manager were very proactive in providing documents for the State agency's review. Documentation was well organized, and any suggestions were met with quick implementation.
- The SA appreciates the proactive attitudes of the team at Alturas Preparatory Academy. When they were advised that a current copy of their most recent health inspection is a requirement, they obtained a copy within 15 minutes and had it posted prior to the lunch service.
- The kitchen staff at Alturas Preparatory Academy were very efficient in their meal service during lunch. Additionally, they had positive attitudes and were quick to note any suggestions.

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- The satellite meal operation at Alturas Preparatory Academy is effective as they utilize a new freezer, coolers, and warmers for keeping food at a safe temperature.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- When obtaining the SA Direct Certification (DC) list, be sure to save it in a format that captures the appropriate heading to validate the date and where the list came from. The SA recommends using the PDF download option to capture the required heading information.

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. The SFA on-site monitoring was completed for SY2023-2024, but the form was not signed by the school representative or the SFA reviewer. Ensure that this review is conducted no later than February 1. The review form should be signed and retained for three years plus the current year.

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - The recipes for the Kale Caesar Salad and Cobb Salad show fresh, raw chicken. Update the recipes to show the pre-cooked, diced chicken used in the recipes instead of the raw chicken.
 - The Child Nutrition Labels provided for the peanut butter and jelly sandwiches were out of date. Current documentation was secured for the peanut butter and jelly sandwiches to confirm meal pattern crediting. The SFA must maintain this documentation on file to document meal pattern requirements are met.
 - Ensure the serving sizes are listed for all items on the production records.
 - Marinara sauce should show 1 (2 oz.) cup
 - Entrees and milk should have serving sizes daily
 - Secure current Child Nutrition (CN) Labels or Product Formulation Statements (PFS) for the chicken patty and pizza. The specification sheets submitted included a meal pattern crediting statement but was not an official CN Label or PFS.
 - Secure a current Product Formulation Statement (PFS) or Nutrition Facts Label with ingredient list for the tortilla. The PFS submitted was dated more than 5 years ago.

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Food Safety

- The temperature log in the dry storage area has been maintained inconsistently. Ensure all temperature logs are maintained daily.

Buy American Provision

- The Buy American Provision's final rule codified in regulations 7 CFR 210.21 (d)(5)(iii) and 7 CFR 220.16 (d)(5)(iii) dated 7-1-2024, requires school food authorities to maintain documentation to demonstrate the use of exceptions. An optional template was provided by the on-site reviewer to the district to help organize documentation and keep track of costs related to non-domestic food purchases. The SFA has the required documentation necessary for Buy American Provision's final rule. However, the Buy American Provision Exception Documentation Worksheet for each item has the nondomestic item listed as N/A. The name of the product being purchased should be written in this location.

Professional Standards

- All staff who work in food service or with recipients of the NSLP program must complete annual trainings, including civil rights training. All trainings should include proof of training (i.e. a certificate of training from an on-line course or a sign-in sheet) and a dated agenda documenting the length of time and topics covered. These hours can contribute to the Professional Standards requirements. This documentation must be kept on file at the SFA for three years plus the current year.

School Breakfast and SFSP Outreach

- SFAs must cooperate with the 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/summer/sitefinder>) or by texting the word "Food" or "SFSP" to 914-342-7744 to see nearby options. Best practice is to include SFSP promotion and ways to locate meals on the SFA's website.

Resource Management

- While reviewing the nonprofit foodservice account ledger from the 2023-2024 school year, it was noted that the SFA spent a total of \$87,216 on consulting services. Though the SFA had a general fund transfer of \$224,591 to cover a negative balance for the school year, the SFA must ensure that they use documented procedures for procurement transactions and receive prior approval, as applicable, for such services [2 CFR 200.318].

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FISCAL ACTION

Due to one benefit issuance error, an additional reimbursement of \$3.60 is due as a result. However, since this is due to a benefit issuance error from the review, the additional reimbursement will not be disbursed.

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
Megan Mallard, Child Nutrition Director, Alturas Academy
Bryanna Coulter, Administrative Manager, Alturas Academy

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Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

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