

April 7, 2025

Lisa Roberts, Superintendent Boise School District #001 6625 S. Elite Dr. Boise, ID 83716

Dear Superintendent Roberts,

On February 3-6, 2025, Idaho Department of Education Coordinators Jax Dunham, Cambria Steffler, Cassandra Thompson and Jessica Medrano conducted an Administrative Review (AR) of Boise School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Fresh Fruit and Vegetable Program (FFVP)

The sites reviewed were:

- Fairmont Junior High School (implementing the Community Eligibility Provision)
- Timberline High School
- Adams Elementary School
- East Junior High School
- Morley Nelson Elementary School (implementing the Community Eligibility Provision and FFVP)
- Horizon Elementary School (implementing the Community Eligibility Provision)

The State agency (SA) would like to commend Christy Smith and the entire staff of Boise 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

A review of 590 student benefits resulted in a 0.17% error rate on the selected benefit sample. One application, which affected one student on the benefit issuance list sample and three students not in the sample, was incorrectly determined as free and must be changed to paid. **CAP:** Send the household an adverse action letter notifying them of their reduction in benefit in 10 calendar days. Once the 10 calendar days have passed, upload the adverse action letter and a new benefit issuance list showing that the students' benefits are now reflecting the correct benefit.

Due Date: Due February 24, 2025; completed February 19, 2025

Corrective Action Response: The SFA uploaded the adverse action letter and a new benefit issuance list showing that the correct benefit is now being issued.

Finding 2 – Verification

While reviewing the verification documents for SY24-25, one application was verified incorrectly due to an error in the software system. When the application was submitted, there were four household members. When the application was selected for verification, the household size had reduced to three members. The SFA put "3" in the household verification section in their software system, but the software pulled the "4" household members from the original application. This caused the application to be incorrectly verified as "reduced" instead of "paid." This does not seem to be a systemic error as all other applications were verified correctly.

CAP: Upload a copy of the adverse action letter sent to the household and a copy of the benefit issuance list showing the benefit has been changed to paid.

Due Date: Due February 24, 2025; completed February 19, 2025

Response: The SFA uploaded the adverse action letter and a new benefit issuance list showing that the correct benefit is now being issued.

COMMENDATIONS

- The district foodservice staff in Boise School District are extremely organized and have excellent procedures to ensure compliance in Child Nutrition Programs. The staff show genuine interest in feeding the students of Boise School District in the most effective way while ensuring that all students have as much access to the programs as possible.
- It is rare to see a fundraising approval procedure that functions so well. If a student, staff member, sports team or club desires to have a fundraiser, they are required to complete a form that requests specific information regarding said fundraiser, including whether the fundraiser is Smart Snack compliant. This form goes directly to the principal who approves or denies the fundraiser. The principal then takes the initiative to log the approved fundraiser in the required tracking form. This is a great process, and the State agency appreciates the principal's accountability regarding Smart Snack standards.
- The staff at Adams Elementary School were very organized and had great rapport with the students. The kitchen was very organized and made great use of the small space and were able to serve the students quickly and efficiently.
- The food service team at Horizon Elementary had lovely interactions with the students, which was a pleasure to witness. The comradery and teamwork the nutrition team displayed was incredible as they all efficiently cleaned and prepared for the next round of meals. It's clear that the team takes pride in what they do, and it makes a significant difference to each and every student.
- The staff at East Junior High School were very warm and welcoming, and they kept the kitchen very organized. The meal service was efficient, and the staff showed excellent rapport amongst themselves and with the students.
- The staff at Fairmont Junior High School provided outstanding service. The staff showed attention to detail, and scratch cooking was implemented in a way to reduce food waste while also providing students with delicious food.
- The staff at Timberline High School maintained a very organized and clean kitchen. They had great rapport with the students, and it was great to see the increased participation for breakfast with the use of the new carts bringing the breakfast to the students. The students were very respectful, and the meal services were quick and efficient.
- The food service staff at Morley Nelson Elementary did an excellent job of serving students during breakfast with the use of the new carts in a quick, efficient, and friendly manner.

TECHNICAL ASSISTANCE (TA)

Professional Standards

Employee training tracking logs must include the key area/topics and training subjects
completed with certificates, agendas, and sign-in sheets retained for backup. Regarding
Offer Versus Serve (OVS), the training tracking log does not specify that OVS training
occurred for both breakfast and lunch. If operating both OVS-breakfast and OVS-lunch,

it is a requirement to log both OVS trainings as documentation that both training occurred. The state agency did view the OVS training that was uploaded into MyldahoCNP and it contained training information for both breakfast and lunch.

Food Safety

While on-site, the State agency noted a product in the dry storage area at one school
which had a best by date that had already passed. The SFA was able to provide product
information showing that the product was still within a date range to ensure safety and
freshness. The SFA should continue to retain this information for products going
forward to ensure food safe practices.

Offer Versus Serve

• Per SP41-2015, it is required that SFAs identify, near or at the beginning of the serving line, the food items that constitute a reimbursable meal with information that the total of any fruit or vegetable item selected under OVS must equal at least 1/2 cup. The SFA does have their monthly meal calendar posted near the serving area (that does state the fruit/vegetable requirement), but this signage is very small. When observing meals, the state agency did not witness any students looking at the 8 1/2" x 11" monthly menu. The State agency discussed the matter with the SFA, and the SFA noted that they have been working on creating their own resource to satisfy the requirement in an effective manner.

FISCAL ACTION

Due to a benefit issuance error, fiscal action results in \$52.13 for NSLP and \$29.70 for SBP. However, since these amounts fall under the \$600.00 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 Christy Smith, Child Nutrition Director, Boise School District #001

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