



# Idaho Department of Education

February 14, 2025

Joe Steele, Superintendent  
Butte County School District #111  
250 S. Water Street  
Arco, ID 83213

Dear Superintendent Steele,

On October 22, 2024, Idaho Department of Education Coordinators Jax Dunham, Kathrine Forstie, and Jessica Medrano conducted an Administrative Review (AR) of Butte County School District 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 the Butte County Middle-High School.

The State agency (SA) would like to commend Carolyn Blattner and the entire staff of Butte County 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

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- 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**

One student was determined as reduced though they are in the same household as a student that is directly certified under Medicaid Free, resulting in a 0.82% benefit issuance error rate.

**CAP:** Change the student's benefit from reduced to free to show that the DC benefit has been extended. Once the benefit has been changed, upload an updated benefit issuance list showing that the benefit has been changed.

**Date of Completion:** Due November 13, 2024; completed October 29, 2024

**CAP Response:** The SFA uploaded a benefit issuance list showing that the correct benefits are now being issued.

### **Finding 2 – Certification and Benefit Issuance**

The SFA has only been notifying households of DC eligibility approval, approval of free and reduced applications, and denial of free and reduced applications via phone. The SFA must send written notification as the notification must include necessary wording as noted in the Eligibility Manual for School Meals [7 CFR 245.6(e) and Eligibility Manual page 56].

**CAP:** Upload an NSLP Corrective Action Procedure Form detailing how the SFA will provide written notification to households for notification of DC eligibility, approval for free and reduced applications, and denial of free and reduced applications. Additionally, upload the template letters that the SFA will use for notification going forward. The SA has sample templates for these letters available in MyIdahoCNP's Download Forms.

**Date of Completion:** Due November 13, 2024; completed December 17, 2024

**CAP Response:** The SFA uploaded the SA template letters for approval and denial of benefits in addition to a DC approval letter with all required elements indicating that these letters will be used going forward. Additionally, an NSLP Corrective Action Procedure Form was uploaded detailing that the FSD will ensure that benefit determination letters will be issued as determinations are made.

### **Finding 3 – Civil Rights**

SFAs must ensure that current complaint logs, complaint procedures, and complaint forms are available. The SFA does not have a current civil rights complaint log for the current year on file.

**CAP:** The SFA printed and added a complaint log dated for SY 2024-2025 into the civil rights binder while the SA was on-site.

**Date of Completion:** Due November 6, 2024; completed October 22, 2024

**CAP Response:** The SFA printed and added a complaint log dated for SY 2024-2025 into the civil rights binder while the SA was on-site.

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#### **Finding 4 – Civil Rights**

After reviewing the SFA's civil rights training documentation, it was noted that the confirming official has no documentation that civil rights training was completed for the current school year.

**CAP:** Upload documentation (either a training certificate or an agenda with a date and signature) showing that the confirming official has now completed the Child Nutrition Civil Rights Training for the current year.

**Date of Completion:** Due November 13, 2024; completed October 29, 2024

**CAP Response:** A training certificate was uploaded showing that the SFA's Confirming Official completed the 2024 Civil Rights Training.

#### **Finding 5 – 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's foodservice webpage does not have the full NDS.

**CAP:** Add the full USDA NDS or the short statement with a link to the full statement on the school foodservice webpage.

**Date of Completion:** Due November 13, 2024; completed October 29, 2024

**CAP Response:** The SFA updated the foodservice webpage to include the short NDS along with a link to the current full NDS.

#### **Finding 6 – 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. Though the SFA completed SFA on-site monitoring for NSLP prior to February 1st during SY 2023-2024, there is no record that monitoring occurred for SBP.

**CAP:** Upload an NSLP Corrective Action Procedure Form that details how the SFA will ensure that SFA on-site monitoring is completed for both breakfast and lunch each school year prior to February 1st.

**Date of Completion:** Due November 13, 2024; completed October 29, 2024

**CAP Response:** The SFA uploaded an NSLP Corrective Action Procedure Form detailing that the FSD will be responsible for ensuring that the SFA on-site monitoring requirement is met each year for SBP and NSLP before February 1st.

#### **Finding 7 – Local Wellness Policy**

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 assessment available to the public in an easily understood manner (7 CFR 210.31(d)(3). Per 7 CFR 210.31(e)(2).

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**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 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 Completion:** Due November 13, 2024; completed December 9, 2024

**CAP Response:** The SFA uploaded an NSLP Corrective Action Procedure Form detailing that the Superintendent and school board will be responsible for completing the triennial assessment. The SFA uploaded the State agency's wellness progress report document, indicating that they will be using this form going forward. The FSD has made a note in the SFA's file and bulletin board stating when the following triennial assessment must be completed. Upon completion, the SFA will post the assessment on the district webpage.

### **Finding 8 – Buy American Provision**

SFAs are 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 documentation that the domestic product is significantly higher in price or not available in sufficient quantities. Documentation for jalapeno slices from Mexico was not available during the AR. Please also note that beginning SY 2025-2026, SFAs will be required to have less than 10% of commercial purchases come from non-domestic sources.

**CAP:** Upload the NSLP Corrective Action Procedure Form detailing how the SFA will complete the Buy American Exception Form for items not noted on the Federal Acquisition Regulation (FAR) list going forward.

**Date of Completion:** Due November 13, 2024; completed November 11, 2024

**CAP Response:** An NSLP Corrective Action Procedure Form was uploaded detailing that the SFA will retain the Buy American Exception Form for appropriate items sourced from outside the United States. This documentation will be completed by the FSD and retained as a file on the FSD's computer.

### **Finding 9 – Food Safety**

The SFA's Hazard Analysis and Critical Control Points (HACCP) manual is missing the required bodily fluid cleanup standard operating procedure (SOP).

**CAP:** Upload a copy of the SOP for Bodily Fluid Cleanup that the SFA will utilize and implement going forward. Ensure that the SOP is signed and dated to show that the procedure is now being implemented. A sample SOP is available through the Institute of Child Nutrition (ICN) at <https://theicn.org/icn-resources-a-z/standard-operating-procedures/>.

**Date of Completion:** Due November 13, 2024; completed November 5, 2024

**CAP Response:** The SFA uploaded a Bodily Fluid Cleanup SOP showing that the new SOP has now been implemented.

### **Finding 10 – 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

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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 an NSLP Corrective Action Procedure Form detailing how the SFA will ensure that production records are filled out adequately each day before meal service.

**Date of Completion:** Due November 13, 2024; completed November 5, 2024

**CAP Response:** An NSLP Corrective Action Procedure Form was uploaded detailing that the FSD and Menu Planner will ensure that production records are filled out adequately each day before meal service to ensure that kitchen staff have information available. The procedure will be retained in the files along with production records.

### **Finding 11 – Meal Components and Quantities – Lunch**

For the week of menu review, the 7-8 and 9-12 lunch menus did not meet the minimum weekly requirement for the starchy vegetable subgroup. Starchy vegetables 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 starchy vegetable subgroup requirement was not met for grades 7-12, with only ¼ cup offered throughout the week.

**CAP:** Provide a written statement describing the specific changes made to the menu for the week of review to correct all menu review findings and bring the menu into compliance. Additionally, submit supporting documentation to demonstrate that the menu findings are now corrected. This documentation may include menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes.

**Date of Completion:** Due October 3, 2024; completed October 1, 2024

**CAP Response:** The updated production record and September menu show 1/2 cup corn added on 9/26/24 bringing the starchy vegetable subgroup in compliance for the week on menu review.

### **Finding 12 – Meal Components and Quantities – Breakfast**

For the week of menu review, the 7-12 breakfast menu did not meet the minimum weekly requirements for the combined grain and meat/meat alternate component. The federal regulations require weekly minimum amounts of the combined grain and meat/meat alternate component to be served. The weekly requirement of 7 oz. eq. was not met for grades 7-12. The menu offered a minimum of 6.5 oz. eq. of grain throughout the week.

**CAP:** Provide a written statement describing the specific changes made to the menu for the week of review to correct all menu review findings and bring the menu into compliance. Additionally, submit supporting documentation to demonstrate that the menu findings are now corrected. This documentation may include menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes.

**Date of Completion:** Due October 3, 2024; completed October 1, 2024

**CAP Response:** The updated production record and September menu show a cheese stick was added to the WG donuts meal on 9/24/24 bringing the grain ounce equivalents for the week of menu review into compliance.

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## COMMENDATIONS

- The Food Service Director (FSD) has a great attitude. Any suggestions that were provided to her were met with a positive can-do attitude.
- The planned and served menu for lunch on the day of review was nutritious, colorful and provided various textures.
- The SFA's Smart Snacks documentation was very thorough. The vending machine stocked by the SFA is heavily utilized, and the documentation shows the SFA's dedication to providing a healthy school environment.
- The kitchen staff at Butte County School District have a great rapport with the students and help to create a welcoming environment.
- During the on-site review, it was observed that the serving line area hosts a soap/disinfectant dispenser. This practice enhances good personal hygiene.
- The cafeteria/dining room holds "murphy type" bench table placements. The tables serve as excellent space savers for the limited room size.

## TECHNICAL ASSISTANCE (TA)

### Meal Components and Quantities – Breakfast

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - Consider the following suggestions to help meet grain/meat/meat alternate requirements.
    - The donuts (4 each) only credited as 1.25 oz. eq. grain per manufacturer's documentation.
    - Offer a 1 oz. eq. cheese stick or yogurt with the donuts to meet requirement.
    - Schools may offer grains, meat/meat alternates, or a combination of both to meet the minimum ounce equivalent in this combined meal component requirement.
  - Secure an updated Product Formulation Statement (PFS) for the chocolate chip scone. The document submitted had an issue date that was more than 5 years old.

### Meal Components and Quantities – Lunch

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - Consider the following suggestions to help meet starchy vegetable requirements.
    - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the menu items listed below.

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- Egg Patty: the specification sheet included a CN statement; the CN number was secured and verified active on the USDA CN Label Verification Report.
- Sausage Patty: secure a CN label or PFS to confirm crediting.
- Chicken Patty: the specification sheet included a CN statement, and the CN number was verified active on the USDA CN Label Verification Report.
- Pizza Calzones: secure a CN label or PFS to confirm crediting.
- Cookie: secure a PFS to confirm crediting.
- Review the green salad recipe for accuracy to ensure the amount of romaine and spinach totals the planned 200 1 cup servings.

### 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.

### Offer Versus Serve (OVS)

- Though the SFA has signage explaining what constitutes a reimbursable meal to students, including the requirement to select at least 1/2 cup fruit or vegetable, it appears that the signage is only used intermittently for the day's menu. The SFA should ensure that this signage has the menu items for both breakfast and lunch listed daily so that students can see what constitutes a reimbursable meal under OVS for the day.

### 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

- 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 weighted average lunch price for SY 2024-2025 is \$3.85. The SA recommends evaluating the current paid lunch prices in preparation for increasing prices for SY 2025-2026.

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## **FISCAL ACTION**

Due to one benefit issuance error, an additional reimbursement of \$4.20 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  
Carolyn Blattner, Child Nutrition Director, Butte County School District #111

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