



February 20, 2025

Craig Woods, Superintendent  
Emmett School District #221  
722 S. Wardwell Ave.  
Emmett, ID 83617

Dear Superintendent Woods,

On November 18-19, 2025, Idaho Department of Education Coordinators Jax Dunham, Cassandra Thompson, Jessica Medrano, and Cambria Steffler conducted an Administrative Review (AR) of Emmett School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- USDA Foods
- Fresh Fruit and Vegetable Program (FFVP)
- Afterschool Snack Program (ASSP)

The sites reviewed were Butte View Elementary School and Emmett High School.

The State agency (SA) would like to commend Tyree White, Sherri Olson, and the entire staff of Emmett 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 statistical sample of 420 student benefits resulted in a 4.52% error rate. Three applications, affecting five students, were incomplete due to not having the total household member number listed and required follow-up. One application, affecting three students, was determined using a Medicaid number for a student that was not included on the State Direct Certification (DC) list. However, Medicaid can only directly certify a student if they are included on the State DC list, and the student must be changed to paid due to the free and reduced application on file. Additionally, the SFA's software system inaccurately extended DC benefits to students based upon historical home address data. As a result, there are nine students that must change from free to paid and six students that must change from free to reduced via DC Medicaid.

**CAP:** Send adverse action letters to the students that are reducing in benefit, and upload all adverse action letters into MyIdahoCNP. Upload the incomplete applications showing that household member number has been gathered. Once ten calendar days have passed, upload a new benefit issuance list showing that all appropriate benefit changes have been made. Additionally, upload an NSLP Corrective Action Procedure Form detailing how the SFA will ensure that the correct DC benefit extensions are made in the POS software going forward.

**Date of Completion:** Due December 11, 2024; completed December 9, 2024

**CAP Response:** The SFA uploaded a new benefit issuance list in addition to benefit documentation showing that all benefits are now issued correctly. Additionally, all previously incomplete applications were uploaded showing that the applications are now complete. All adverse action letters were uploaded, and an NSLP Corrective Action Procedure Form was uploaded detailing that the SFA will verify eligibility extension via DC in the software system before issuing extensions going forward.

### **Finding 2 – Afterschool Snack Program (ASSP)**

While reviewing the Afterschool Snack Program (ASSP), it was noted that there were errors in the operation of the program. The ASSP is only being offered to the preschool students during their school day. The preschool is being operated under the 21st Century Grant, and guidance was provided by someone in the district involved with the 21st Century Grant program that, due to the preschool being an "out of school" program, they can claim the meals under the ASSP. The ASSP is required to be offered to all students after the school day ends. The SA

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discussed some options to change the operations of the program to bring it into compliance. The options are listed below:

1. The SFA can move the snack to after the end of the Pre-K school day. This would allow them to claim both the morning and afternoon sessions. However, with this option, the SFA would need to offer an afterschool snack program to the additional grades at the school.
2. The SFA can include the preschoolers in the meal service for the other grades. The preschoolers can attend the breakfast and lunch services with the older grades and these meals can be claimed for reimbursement under the NSLP and SBP programs.

If neither of these options work for the SFA, the SA encourages the SFA to work with the 21st Century Grant coordinators to see if the snack can be provided to the students through that grant.

**CAP:** Upload documentation on how the SFA will move forward to bring this program into compliance. The FSD must update their application packet to reflect the changes made to this program. There may be potential fiscal action tied to this finding at the closure of this review.

**Date of Completion:** Due December 11, 2024; completed December 6, 2024

**CAP Response:** The SFA uploaded documentation stating that the ASSP will not be claimed at Butte View Elementary for the 21st Century Grant Program going forward. Additionally, the SFA made the change to their application packet in MyIdahoCNP noting that they are ceasing the operation of ASSP at Butte View Elementary School at the time of corrective action.

### **Finding 3 – 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)).

**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 December 11, 2024; completed December 11, 2024

**CAP Response:** The SFA uploaded a Triennial Assessment Plan noting that the Assistant Superintendent will be responsible for ensuring that the triennial assessment is completed and posted on the district website every three years. The SFA will utilize the Idaho Wellness Policy Progress Report document when completing the assessment. The triennial assessment will be completed through a collaborative approach involving building-level administrators. Each building-level administrator will be responsible for collecting and reviewing data specific to their building, ensuring the wellness policies are being followed and identifying areas for improvement. A calendar entry and quarterly reminders will be set to stay on track.

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#### **Finding 4 – 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 jalapenos from Mexico (at Emmett High School) was not available during the AR.

**CAP:** Complete and retain the SA’s “Buy American Exemption Form” for the sliced jalapenos. Once completed, upload the Buy American documentation into MyIdahoCNP.

**Date of Completion:** Due December 11, 2024; completed December 4, 2024

**CAP Response:** The SFA uploaded a Buy American Exception Form along with backup documentation showing that the sliced jalapenos cost significantly more for those produced domestically when compared to those sourced outside the United States.

#### **Finding 5 – Meal Components and Quantities – Breakfast**

For the week of menu review, the K-4 breakfast menu did not meet milk requirements. It is required that a variety of at least two milk types are offered with each meal daily. Only 1% white milk was offered at breakfast.

**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 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 8, 2024; completed October 2, 2024

**CAP Response:** The SFA updated the menu to offer both fat-free white milk and 1% white milk at breakfast daily.

### **COMMENDATIONS**

- The Food Service Director (FSD) and Foodservice Administrative Assistant are very receptive and show a genuine interest in operating a compliant program. All suggestions and recommendations were met with positive reception and implemented swiftly. The FSD also plans menus that are creative and nutritious, offering numerous choices for children.
- The SFA did an excellent job in preparing for the NSLP Administrative Review. All documentation was neatly organized and readily retrievable, leading to smooth review of documentation.
- The cafeteria staff demonstrated respect and kindness towards their fellow co-workers and the students they serve. Additionally, the school cafeteria is spacious and well maintained. The cafeteria dedicates time to enhance the area by theme decorating and lighting effects. There are multiple nutritional posters on display, and it is a pleasant and inviting area for promoting healthy eating experiences.

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## **TECHNICAL ASSISTANCE (TA)**

### **Meal Counting and Claiming**

- The SFA should continue to retain meal count backup for claims submitted on the day of submission since the SFA's POS software system makes updates to meal counts if reports are generated at a later date due to changes in student eligibility after the claim is submitted.

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

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - The Child Nutrition (CN) Label submitted for breakfast pizza included a watermark. Please secure for your records the actual CN label from the product packaging without the watermark. The CN number was verified as active on the USDA CN Label Verification Report.
  - Ensure the menu planning grade groups and site name are documented on the production records daily.

### **Offer Versus Serve**

- The FSD has documentation regarding who completed the back-to-school training at the beginning of the 2024-2025 school year that consisted of both an agenda and sign-in sheet. The agenda indicated Offer Versus Serve (OVS) training was completed on 08/14/2024; however, the agenda did not specifically state OVS Breakfast and OVS Lunch. The FSD shared both OVS Breakfast and Lunch were reviewed at the back-to-school training. Ensure that training agendas specify that both OVS lunch and OVS breakfast trainings are included in future trainings.

### **Food Safety**

- The dry storage areas should be below 70 degrees. The dry storage area at Emmett High School was 72 degrees on the day of the Administrative Review. Temperatures above 70 degrees can lead to decreased quality of food, and sometimes even leading to the growth of bacteria. It's important that foodservice professionals enforce proper food storage procedures and guidelines at all times in order to avoid spoiled and degraded dry food items.

### **Professional Standards**

- The SFA has individual training tracking logs for each team member; however, each team member enters their own training, and trainings are not tracked consistently. It is recommended that staff note trainings that have been completed on the tracking logs consistently to ensure all trainings are accurately logged.

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### Fresh Fruit and Vegetable Program

- The Fresh Fruit and Vegetable Program (FFVP) provides an opportunity to incorporate bite size nutrition lessons along with the service of the produce. It is recommended the FFVP includes an enrichment activity with each produce item offered.

### FISCAL ACTION

Due to benefit issuance errors and incorrect claiming under the Afterschool Snack Program, fiscal action results in \$2,105.85 for the NSLP, \$868.78 for the ASSP, and \$547.35 for SBP, totaling \$3,521.98. This adjustment will be withheld from a future claim. Should you wish to appeal this fiscal action, follow the appeal procedures attached in the closure email.

### 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  
Tyree White, Child Nutrition Director, Emmett School District #221

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