



# Idaho Department of Education

November 26, 2024

Ms. Hannah Spafford, Superintendent  
Garden Valley SD #017  
1053 Banks Lowman Rd.  
Garden Valley, ID 83622

Dear Superintendent Spafford,

On October 16, 2024, Idaho Department of Education Child Nutrition Director Lynda Westphal and Shawn Charters, Financial Specialist, Sr. conducted an Administrative Review (AR) of Garden Valley SD for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) - Operating Provision 2 breakfast option at Garden Valley School (Lowman School operated both Breakfast and Lunch on Provision 2, however no students are enrolled currently)
- USDA Foods

The site reviewed was the Garden Valley School.

The State agency (SA) would like to commend Debbie Updike and the entire staff of Garden Valley 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

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- 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 – Local School Wellness Policy

The Local School Wellness Policy must comply with the USDA Final Rule established in July 2016, including the requirement that report(s) on the progress towards goals stated in the wellness policy be publicly available. The final rule requires LEAs to fully comply with the requirements of the final rule by June 30, 2017.

**CAP:** Corrective Action: Please provide a plan for how and when the wellness policy language will be brought into compliance with Federal requirements. Ensure the wellness assessment (e.g., Idaho Wellness Policy Progress Report) is available to the public; posting to the school /district website and/or in a school newsletter would support this requirement.

**Due Date:** October 30, 2024 – Submitted October 16, 2024

**Response:** The SFA will update our Wellness Policy by the end of 2024 to include corrections as noted in the review. A policy committee will meet in November and the policy will be on the school board agenda for review at their December meeting. The wellness policy is currently under review and will be posted as updated on the school district website under the Child Nutrition/Menus page.

### Finding 2 – Meal Counting and Claiming

The daily meal count report's numbers from the SFA's Point of Service (POS) software did not match the software's consolidated monthly meal count report, leading to an inaccuracy in the SFA's claim from the month of review. As such, the conflicting numbers led to the SA being unable to validate the claim on the day of review. Upon further investigation, the daily meal counts kept as backup to the claim were completed prior to adjustments made due to duplicate entries. When another set of daily meal count reports were printed, the numbers were closer to matching that on the claim. However, these counts were still off by one meal for Garden Valley School. The Lowman school numbers were hand entered and totaled twenty meals; however, the count was accidentally entered as two into MyIdahoCNP which caused a discrepancy of eighteen meals. Additionally, it was noted on the day of review that teachers were not counting meals using the approved POS counting method required by USDA.

**CAP:** Provide a procedure to ensure meal counts match both daily and monthly printouts when the claim is being entered to validate what the report shows accurate claim numbers in MyIdahoCNP.

**Due Date:** October 30, 2024 – extended and Submitted November 22, 2024

**Response:** The SFA noted that there are occasional adjustments that have taken place after the report has been generated to correct sales that were entered twice. Also, new benefit

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determinations that have been processed since the processed since the claim was entered lead to discrepancies if a new report has been generated since the claim was submitted. Additionally, the daily meal count report includes non-reimbursable meals in the count which leads to a discrepancy between this report and the monthly edit check report/claim. The FSD uploaded the daily report and claim edit check which more closely matches the claim. Additionally, the teachers were sent an email on accurate POS counting and a sign-in sheet was provided acknowledging they received, read, and understood how to count breakfast in the classroom correctly.

## **COMMENDATIONS**

- The Food Service Director had the paperwork ready for the review, making it go smoothly.
- CNR provided the following: The salad bar looked colorful and appetizing with a lot of fresh produce and a wide variety.

## **TECHNICAL ASSISTANCE (TA)**

### **Certification and Benefit Issuance**

- The SFA should check the selected verification application against the list of homeless and DC students before sending out verification letter. Once selected, if the application is directly certified, the district is done with verification process for that application.

### **Meal Counting and Claiming**

- The SFA should communicate the importance of point of service meal counting with the teachers. Having the children raise a hand of who ate after the fact is not appropriate point of service counting.
  - See above finding – teachers were sent an e-mail about how to properly count at POS and acknowledged on a sign-in sheet that they read and understood the memo.

### **Meal Components and Quantities**

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - During the Administrative Review, the menu review results were given to the sponsor in a detailed Menu Review Results Report.
  - 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. It is a requirement of the federal regulations to maintain complete and accurate production records.
  - See below for a description of problem areas noted in completing production records.
    - All milk types offered were not recorded on the production records.

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- Juice type(s) were not recorded on the production records.
- Cereal types were not recorded on the production records for grades 6-12.
- Applesauce types were not recorded on the production records.
- Serving sizes documented were not always clear and complete.
- No serving size was documented for the macaroni and cheese.
- The Child Nutrition (CN) Label submitted for the cheese and pepperoni pizza included a watermark. Please secure for your records the actual CN label from the product packaging, without the watermark. The CN numbers were verified as active on the USDA CN Label Verification Report.
- 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. It is a requirement of the federal regulations to maintain complete and accurate production records.
- Alternative milk substitutes must align with all nutrient profiles of milk. This includes Calcium, Protein, Vitamin A, Vitamin D, Magnesium, Phosphorus, Potassium, Riboflavin, and Vitamin B-12. More information can be found here: [Z CFR 210.10\(d\) fluid Milk Substitution requirements.](#)

### Resource Management

- Provision 2 Base Year (SY22-23) benefit issuance was previously validated by the SA on October 31, 2022. The retention of all required Provision 2 documentation was confirmed during the administrative review. The current Provision 2 cycle expires at the end of SY25-26. If the district wishes to continue with Provision 2 breakfast and/or lunch, you must contact the SA prior to the expiration date (May 2026) to see if they qualify for an extension.

### FISCAL ACTION

Due to the claiming errors mentioned, fiscal action results in (\$33.74). However, since this amount falls under the \$600 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) 332-6825.

Thank you for your continued support of the Child Nutrition Programs.

Sincerely,

*Lynda Westphal*

Lynda Westphal, MHS, SNS  
Child Nutrition Director

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cc: File

Debbie Updike, Child Nutrition Director, Garden Valley School District

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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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