



March 26, 2025

Ms. Wendy Moore, Superintendent
Genesee Joint School District
330 West Ash Street
Genesee, ID 83832

Dear Superintendent Moore,

On December 6, 2024, Idaho Department of Education contractor CN Resource (CNR) conducted an Administrative Review (AR) of Genesee Joint 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 Genesee School.

The State agency (SA) would like to commend April Baumgartner and the entire staff of Genesee Joint 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

Last school year's eligibility status can carry over *thirty operating days* into the new school year, allowing households to complete a current school year application to reapply without interruption of benefits. Student eligibility changes must be applied when a new determination for the school year has been made even if the determination is made within the carryover period. As soon as the carry-over period is over, students lose the previous year's eligibility and must be changed to paid benefit for the current school year if a new determination has yet to be made. An Adverse Action Letter is not required, as eligibility was not established for the current school year (7CFR 245.6). Carry-over-ended on October 11, 2024, and eligibility changes were not updated for one student in the benefit issuance/point of service software as required.

CAP: Upload a benefit issuance list for all students demonstrating that any student without out benefit issuance documentation is changed to paid. Also, upload a statement describing a plan to ensure that the benefit issuance/point of service software accurately reflects benefits and eligibility dates.

Due Date: December 23, 2024; Completed December 19,2024

Response: The FSD uploaded a benefit issuance showing the benefits have been corrected. The FSD uploaded an NSLP Corrective Action Procedure Form to ensure the thirty-operating day carryover occurs in the appropriate timeframe. The FSD will change student status to reflect a 30-day carryover for the new school year.

Finding 2 – Meal Components and Quantities – Lunch

For the week of the menu review, the PreK-5 & 6-8 lunch menus did not meet the minimum $\frac{3}{4}$ cup oz. eq. daily requirement for vegetables, with only $\frac{1}{2}$ cup oz. eq. being offered.

CAP:

1. Provide a written statement to describe the specific changes made to the menu, for the week of review, to correct all menu review findings and bring the menu into compliance.
2. Submit supporting documentation to demonstrate that the menu findings for the week of menu review are now corrected. This documentation may include menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.
3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: December 23, 2024; Completed December 19, 2024

Response: The updated production record and sponsor statement indicate 1/4 cup carrot sticks added for PreK-5 and 1/2 cup carrot sticks added to 6-8 on October 7, 2024, to meet the red/orange vegetable subgroup.

Finding 3– Meal Components and Quantities – Lunch

For the week of menu review, the 9-12 lunch menu did not meet the 2 oz. eq. minimum daily requirements for grain with only 1.75 oz. eq. offered.

CAP:

1. Provide a written statement in the Corrective Action Response box to describe the specific changes made to the menu, for the week of review, to correct all menu review findings and bring the menu into compliance.
2. Submit supporting documentation to demonstrate that the menu findings for the week of menu review are now corrected. This documentation may include menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.
3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: December 23, 2024; Completed December 19, 2024

Response: The updated production record for October 10, 2024, and sponsor statement indicates the serving size of tortilla chips and goldfish crackers was increased for grades 9-12 to credit as 2 oz. eq. grain.

COMMENDATIONS

- The Food Service Director is new to her position and demonstrates a willingness to increase her knowledge and program adherence.
- The school principal assists the cafeteria routinely by helping to serve at the lunch service. This practice recognizes the efforts of the cafeteria staff and principal to engage in conversations with students. The students clearly enjoyed seeing their principal in another type of school role and were polite and respectful in their interactions. It was a pleasure to witness the lively conversations.
- The dining room area is beautifully decorated with local art and colorful posters creating a healthy and positive eating experience.

TECHNICAL ASSISTANCE (TA)

Verification

- The sponsor did not have the confirming official to sign the verification application when verification was completed. Please review this process in the Verification Timeline that is in Download Forms.

Meal Components and Quantities - Breakfast

Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus. See below for a description of problem areas noted in completing production records:

- The number of meals served is required to be recorded at the end of meal service to ensure accuracy.
- The SFA did not add the ounce equivalent of apple slices that were served on Tuesday.
- Production records must indicate meal pattern crediting for all menu items each day. The submitted production records do not include meal pattern crediting for all menu items each day. Reference the link below to access the Production Records section of the Idaho School Nutrition Reference Guide. This reference guide provides information related to production record requirements.
<https://www.sde.idaho.gov/cnp/sch-mp/files/reference/production-records/Production-Records.pdf>
- On October 10, 2024, the crediting information for the applesauce was not documented on the production record.

Meal Components and Quantities - Lunch

A standardized recipe is a recipe that has been carefully adapted and assessed to ensure that it will produce a consistent product each time it is prepared. The recipes submitted were not always written in standardized format with complete information. Items on the menu that need standardized recipes include the following:

- Chef Salad- is missing tablespoon measurement under garbanzo.
- Taco Salad:
 - The dehydrated onion is used every time, please update the recipe.
 - The recipe needs to be updated to reflect the 85% lean 15% fat ground beef being used.
- Nachos: The recipe should specify the serving number of tortillas per grade group.
- Garden Salad- change ¼ bag for measurement to weight or cups. The amount of creditable lettuce and spinach in this recipe came out to be larger than 1 cup per serving.
- Secure an updated Product Formulation Statement (PFS) or CN label for the following items to confirm meal pattern crediting. The document submitted has an issue date that is more than 5 years old.
 - Goldfish crackers
 - The Child Nutrition (CN) Label submitted for the hamburger patty showed an issue date of 2014. The CN number was verified as active on the USDA CN Label Verification Report.
 - The Child Nutrition (CN) Label submitted for the Chicken Fajitas showed an issue date of 2017. The CN number was verified as active on the USDA CN Label Verification Report.
 - Hot Dog Franks
 - Chicken Patty- image submitted was blurry.
 - Pepperoni Pizza Rippers- documentation was missing crediting for vegetables.

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- Flavored milk.

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.

Revenue From Nonprogram Foods

- If the SFA is going to provide adult meals free of charge to employees who help with Lunch meals, the SFA must ensure that documentation to support the direct benefit to the meal service is maintained such as duty schedules or task assignment records. A Program Adult is defined as those who work directly with the meal service at the site as either a food service volunteer only or a paid food service employee. Non-programmed adult meals such as those who do not work in any direct way with the meal service, such as a teacher or school staff, must be charged the minimum adult meal price per USDA regulations or non-Federal funding must be used to cover the cost of the meal as USDA funds cannot be used to subsidize adult meals. See guidance from the State Agency found here: <https://www.sde.idaho.gov/cnp/sch-mp/files/reference/pos/Point-of-Service-and-Meal-Counting.pdf>.
- SFA must ensure that all Program and Nonprogram Revenues are listed on each menu tab of the Nonprogram Foods Revenue Tool including adult meal sales.

FISCAL ACTION

Due to benefit issuance errors, fiscal action results in \$116.29 for school lunch and \$29.70 for school breakfast. However, since these amounts fall 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) 332-6820.

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

Sincerely,

Jessica Medrano
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs

April Baumgartner, Child Nutrition Director, Genesee JT. S.D.

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