



February 18, 2025

Randy Lords, Superintendent  
Madison School District  
290 N. 1<sup>st</sup> E.  
Rexburg, ID 83440

Dear Superintendent Lords,

On November 4, 2024, Idaho Department of Education Coordinators Cambria Steffler, Cassandra Thompson, Jax Dunham, and Jessica Medrano conducted an Administrative Review (AR) of Madison School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- USDA Foods

The sites reviewed for the Administrative Review were Adams Elementary School and Central High School. The site reviewed for the Seamless Summer Review was Madison Middle School.

The State agency (SA) would like to commend Jordyn Bybee and the entire staff of Madison 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 525 applications resulted in a 0.19% error rate. One student was directly certified for Medicaid Reduced but is not on the DC lists and could not be matched using a single child match.

**CAP:** Upload a copy of the adverse action letter sent to the household notifying them that their benefit will be changed. Upload a copy of the benefit issuance list showing the benefit has been changed to paid after the required waiting period.

**Due Date:** Due November 20, 2024; Completed November 19, 2024

**Response:** The FSD uploaded a copy of the adverse action letter and the benefit issuance list showing the student has been changed to paid.

### **Finding 2 – Resource Management**

While reviewing the Non-Profit Food Service Account for SY23-24, it was noted that a purchase for a liftgate was made totaling \$7,950.44 without prior approval from the SA. At the time of this purchase, a capital expenditure request needed to be submitted for a single piece of equipment over the \$5,000 threshold, and the purchase should not have been made until the SA has approved the request. During the SY15-16 review, the SFA was given TA about submitting a capital expenditure prior to purchasing equipment meeting the cost threshold regarding a liftgate that was purchased. If subsequent reviews result in a finding regarding not receiving prior SA approval before purchasing equipment meeting the cost threshold, the SA will require the school district's general funds to cover the cost of the item purchased using non-federal funds. (2 CFR 200.439)

**CAP:** Complete the Capital Expenditure Request CAP form outlining the procedure for completing capital expenditure requests prior to making a purchase above the cost threshold.

**Due Date:** Due February 6, 2025; Completed January 31, 2025

**Response:** The FSD uploaded a Capital Expenditure Request Correction Action Plan document. A capital expenditure request will be submitted and approved before making a purchase over \$10,000, which is the new threshold that went into effect October 1, 2024.

### **Finding 3 – Civil Rights**

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 reference the NDS or contain a link to it. (FNS Instruction 113-1: Civil Rights Compliance and Enforcement)

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**CAP:** Post the full USDA NDS or the short statement with a link to the full NDS on the school food service webpage. Notify the SA when the website has been updated.

**Due Date:** Due November 20, 2024; Returned for Correction; Completed December 5, 2024

**Response:** The website has the short statement with a link to the full NDS posted.

#### **Finding 4 – Civil Rights**

It is required that the hearing official and confirming official receive civil rights training on an annual basis. There is no documentation showing that the SFA's hearing official and confirming official have taken the civil rights training for the current school year.

**CAP:** Upload a certificate or agenda and sign-in sheet showing that the hearing and confirming officials have completed civil rights training for the current school year. (FNS Instruction 113-1: Civil Rights Compliance and Enforcement)

**Due Date:** Due November 20, 2024; Completed November 18, 2024

**Response:** The FSD has uploaded a sign in sheet and an agenda showing the hearing official and confirming official have completed the CNP Civil Rights training for the school year.

#### **Finding 5 – Civil Rights**

Central High School did not have a Civil Rights folder located on-site. A folder was brought to Central High School from Madison Middle School (where food is prepared for the HS) that did not contain complaint forms or Spanish versions of documents. Ensure all Civil Rights binders/folders are up to date to include current documents. Binders/folders should include a complaint procedure, complaint forms, and log.

**CAP:** Complete the NSLP Procedure Corrective Action Form and ensure the What, How, Who, Where and When sections are all fully completed. Update the procedure form into MyIdahoCNP for the state agency's review. Ensure staff are made aware of where the Civil Rights information is located to ensure a smooth process if a complaint is made.

**Due Date:** Due November 20, 2024; Completed November 11, 2024

**Response:** The FSD completed the NSLP Corrective Action Procedure Form outlining that all staff have been trained and will continue to be trained annually on where to find the civil rights binder with all the required documentation in it.

#### **Finding 6 – Civil Rights**

The "And Justice for All" poster, also referred to as "AD-475A," is required to be posted at all school locations where NSLP and SBP meals are served. At Central High School, breakfast is served in the main office, and lunch is served in the cafeteria. Neither location had the proper "And Justice for All" poster posted as required.

**CAP:** Post the "And Justice for All" poster in both the cafeteria and front office where breakfast and lunch is served. Take a picture of signage in both locations and upload them into MyIdahoCNP for the state agency to review.

**Due Date:** Due November 20, 2024; Completed November 11, 2024

**Response:** The FSD has posted the AJFA poster on the kitchen door near the service line and in the front office.

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### **Finding 7 – Smart Snacks in Schools**

Schools must meet the minimum requirement in 7 CFR 210.11, for all foods and beverages sold in school (also known as Smart Snacks in School) to increase consumption of healthful foods during the school day and support a healthy school environment. Vending, school stores, and fundraising need to comply with specific nutrition standards. Refer to A Guide to Smart Snacks in School available at the USDA website. At Central High School, the school store is open several times during the school day. The school store stocks full sugar soda (example: Mountain Dew), a variety of candy bars, donuts and chips which are not smart snack compliant.

**CAP:** Create a policy for school stores to ensure they are Smart Snack compliant. Complete the NSLP Procedure Corrective Action form and upload it into MyIdahoCNP for the state agency to review.

**Due Date:** Due November 20, 2024; Returned for Correction; Completed December 11, 2024

**Response:** The FSD uploaded an NSLP corrective action plan outlining how their district will come into compliance. The district will create a smart snack committee to decide on what smart snack compliant options will be sold to students and where the items will be procured.

### **Finding 8 – Local School Wellness Policy**

In July 2016, the regulations on wellness policies (§210.31) were finalized and required LEAs to be in compliance by June 30, 2017. The LEA's current LWP is missing required elements, making it noncompliant. Specifically, the policy does not address:

- Specifying measurable goals for nutrition education, nutrition promotion, physical activity, and other school-based activities to promote student wellness that are written with consideration for evidence-based strategies.
- Addressing nutrition guidelines for all foods and beverages sold on the school campus during the school day and for providing school meals that adhere to Federal meal pattern requirements.
- The wellness policy must include specific/measurable goals for physical activity using evidence-based strategies.

The wellness policy committee must work to get the LWP compliant with the final rule requirements. In addition to the policy uploaded, here are additional ISBA Policy Sections to include:

Policy 2305- Nutrition Services  
Policy 2310- Nutrition Education  
Policy 2315- Physical Activity Opportunities and Education  
Policy 7310- Advertising in Schools/Revenue Enhancements  
Policy 8210- District Nutrition Committee  
Policy 8230- Nutrition Standards  
Policy 8235- Water Consumption/Water Bottle Policy  
Policy 8240- School Meals  
Policy 8250- Guidelines for Food and Beverage Sales

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The State Agency has located and uploaded Policy 8210 and 8250. Policy 2310 is not called Nutrition Education but Health Enhancement Education. Therefore, Nutrition Education is still required.

**CAP:** Upload a plan identifying who at the LEA will be responsible to ensure the LWP is compliant with Federal regulations, how the policy will be updated, and when a compliant policy will be available to the public.

**Due Date:** Due November 20, 2024; Returned for Correction; Completed January 31, 2025

**Response:** The FSD uploaded an NSLP Corrective Action Procedure Plan outlining the procedure for keeping the LWP in compliance. The Superintendent will be responsible for making sure the LWP is in compliance and the committee will review the policy annually to make sure it remains in compliance.

### **Finding 9 – Local School 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)(2)).

**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.

**Due Date:** Due November 20, 2024; Returned for Correction; Completed January 31, 2025

**Response:** The FSD uploaded an NSLP Corrective Action Procedure Form outlining how the NSLP triennial assessment will be completed. The superintendent or wellness committee designee will make sure the triennial assessment is completed and shared with district stakeholders.

### **Finding 10 – Professional Standards**

Teachers, secretaries, custodians, and volunteers that assist during meal services, yet food service is not their position within the school district, must complete the Civil Rights Training using the Frontline Staff handout. This is a requirement that must be completed annually. (FNS Instruction 113-1: Civil Rights Compliance and Enforcement)

**CAP:** Ensure teachers, secretaries, custodians and volunteers that assist during meal services receive their required Civil Rights Training by reviewing the one-page Frontline Staff handout. Upload an agenda and sign-in sheet that documents those who have reviewed the Civil Rights handout.

**Due Date:** Due November 20, 2024; Completed November 14, 2024

**Response:** The FSD has uploaded a sign in sheet and an agenda with signatures of all employees required to take the CNP Civil Rights Training.

### **Finding 11 – Professional Standards**

All food service line staff must receive annual OVS training when OVS is implemented. All staff training must include an agenda and sign-in sheet, and training documentation must be kept on

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file at the SFA for three years plus the current year. OVS training is available through the Idaho CNP training portal and a training log is available in MyIdahoCNP Download Forms. Staff in Madison School District have not received Offer Versus Serve training for SY24-25. It is a requirement that staff receive this training annually.

**CAP:** Food service breakfast and lunch line staff must complete the separate breakfast and lunch OVS online trainings in the CNP training portal. Upload certificates of completion for all line staff into MyIdahoCNP.

**Due Date:** Due November 20, 2024; Returned for Correction; Completed November 26, 2024

**Response:** The FSD has uploaded an agenda and sign in sheet for the OVS breakfast and OVS lunch trainings for all required staff members.

### **Finding 12 – Professional Standards**

Food Service Directors must have at least eight hours of food safety training at least every five years. A free, online course, Food Safety in Schools is available through the Institute of Child Nutrition (ICN) and can be used to meet this requirement. The current Food Service Director has not received the eight hours of food safety training.

**CAP:** Upload a training certificate indicating successful completion of at least eight hours food safety training into MICNP Review Attachments.

**Due Date:** Due November 20, 2024; Returned for Correction; Completed January 29, 2025

**Response:** The FSD completed an 8-hour food safety training and uploaded a certificate of completion.

### **Finding 13 – Meal Counting and Claiming - Lunch**

During the on-site meal observation at Adams Elementary School, it was observed that the students were able to see other students account balances while going through the service line. While the software did not state "free" or "reduced," it is easy to infer which students were receiving free or reduced meals based on their account balances. During the meal service, the kitchen manager was holding the computer screen up to the students and allowing them to click on their picture in the software bringing up their account information. The students were lined up behind the POS computer and were able to see the other student's information. Additionally, the kitchen manager would walk away from the POS without locking the system while students were in line. Several students would click on the screen while the kitchen manager was away.

**CAP:** Complete an NSLP corrective action plan outlining the procedure form outlining the procedure for the POS that ensures PII confidentiality. Include in this procedure what actions will be taken to train staff annually on the requirements for the POS software and how the POS screen will be blocked from students' view and access.

**Due Date:** Due November 20, 2024; Completed November 11, 2024

**Response:** The FSD has conducted training with the kitchen staff at Adams Elementary. The POS will be kept facing the wall so the screen will not be visible to the students effective immediately.

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### **Finding 14 – Food Safety**

Each SFA must have a written food safety plan for compliance with Hazard Analysis Critical Control Point (HACCP) program criteria found in 7 CFR 210.13(c). SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared or served for the purposes of the NSLP, SBP or other FNS programs. The Food Safety plan (HACCP) must have bodily fluid clean-up and employee exclusion that are required by Idaho Food Code. A food safety manual (HACCP) was located in the Adam's Elementary School kitchen but is outdated and not customized to reflect the actual needs of the kitchen. There was not a HACCP manual at Central High School.

**CAP:** Upload a copy of the HACCP plans that will be available at both Adams Elementary School and Central High School.

**Due Date:** Due November 20, 2024; Completed November 11, 2024

**Response:** The FSD uploaded a copy of the HACCP manual that will be used at both schools. The manual has been printed and delivered to both sites.

### **Finding 15 – Food Safety**

The most recent food safety inspection report must be posted in a location visible to the public (7 CFR 210.13(b)). The most recent food safety inspection report was not posted at Adams Elementary School.

**CAP:** Post the food safety inspection in a publicly visible location. Upload a picture of where the inspection is located.

**Due Date:** Due November 20, 2024; Completed November 11, 2024

**Response:** The FSD posted a picture of the food safety inspection report posted in the school cafeteria.

### **Finding 16– Meal Counting and Claiming - Lunch**

While the SA was reviewing the meal counts for the day of review, it was noted that there was a discrepancy in the meal counts for the day of review. When the FSD contacted the kitchen manager for the site, it was discovered that Central High School has a junior high school attached and the additional meals came from those students. This is not being reflected in the SFA's application packet, and subsequently, the SA was not aware of these grades being a part of this site review. Additionally, Burton Elementary School does not have breakfast checked in the application packet even though breakfast is being served at this site. The breakfast claim for Burton Elementary School is being claimed under Kennedy Elementary School.

**CAP:** The SFA must add the 6-8 grade levels to the site application or create a new site for these grades. The SFA must add breakfast to Burton Elementary School's site application.

**Due Date:** Due November 20, 2024; Completed November 8, 2024

**Response:** The grades 6-8 have been added to the Central High School's application packet. The breakfast program has been added to Burton Elementary School's application packet.

### **Finding 17 – Meal Components and Quantities - Lunch**

Per SP 39-2019 and [7 CFR 210.10\(d\)\(4\)](#), water cannot compete with milk in the meal pattern and cannot be served on the service line. During the lunch meal service at both Adams

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Elementary School and Central High School, water bottles were next to the milk cooler with a sign above stating that students had a choice between water or milk with their meal.

**CAP:** Complete the NSLP Corrective Action Procedure form outlining the procedure for ensuring that water does not compete with milk during the meal service. In this form, please include how staff will be trained on the meal pattern requirements and how this change will be enforced at the schools.

**Due Date:** Due November 20, 2024; Completed November 11, 2024

**Response:** The FSD has removed the water option for sale on the meal service line effective immediately. Students have access to water at the water fountain.

### **Finding 18 – Meal Components and Quantities - Lunch**

For the week of menu review, the K-4 lunch menu did not meet the whole grain-rich requirements. At least 80% of the grains offered weekly must be whole grain-rich to meet requirements. The menu met 72.09% whole grains for the week of review for grades K-4. The pepperoni pizza and penne pasta in chicken tetrazzini products were not whole grain-rich. To be considered whole grain-rich, the product must be comprised of at least 50% whole grain ingredients, with the remaining grain ingredients enriched. An easy way to determine this is by looking at the ingredient list. The product would be considered whole grain-rich if the primary ingredient is a whole grain, such as whole wheat flour, graham flour, whole corn, or oatmeal.

**CAP:** Provide 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. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.

**Due Date:** Due November 15, 2024; Completed November 14, 2024

**Response:** The updated production record for the cycle week shows the serving size of whole grain-rich pancakes increased to two each. The weekly whole grain-rich percentage is now 80.85% and meets requirements.

### **Finding 19 – Meal Components and Quantities - Lunch**

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily and weekly requirements for vegetables. The federal regulations require a minimum of 1 cup of vegetables to be offered each day for grades 9-12. This requirement was not met on Monday 10/7/2024, Tuesday 10/8/2024, Wednesday 10/9/2024, and Friday 10/11/2024 with less than 1 cup offered. Consider the following suggestions to help meet requirements.

- Monday - the submitted production record for the sandwich line did not plan to serve the broccoli as planned on the menu. This resulted in several meals to be short of vegetables.
- Tuesday - the submitted production record for the sandwich line did not plan to serve the carrots or broccoli as planned on the menu. This resulted in several meals to be short on vegetables.
- Wednesday - the submitted production record for the sandwich line did not plan to serve the celery and pork & bean as planned on the menu. This resulted in several meals to be short on vegetables.

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- Friday - the submitted production record for the sandwich line did not plan to serve the romaine salad as planned on the menu. This resulted in several meals to be short on vegetables.

The federal regulations require minimum weekly amounts for vegetables. The weekly minimum of 5 cups was not met for grades 9-12, with a minimum of only 2 ½ cups offered. By following the suggestions outlined to meet the daily vegetable requirement, the weekly vegetable requirement will also be met.

**CAP:** Provide documentation to demonstrate that the menu findings listed under step 1 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.

**Due Date:** Due November 15, 2024; Completed November 12, 2024

**Response:** The Deli to Go line menu is in compliance. The sponsor response states the kitchen manager will follow the menu exactly moving forward.

### Finding 20 – Meal Components and Quantities - Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily and weekly requirements for meat/meat alternate. The federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent meat/meat alternate (weekly 10 oz. Eq.) requirement for grades 9-12. This daily requirement was not met on Friday 10/11/24 with only 1.25 oz. eq. offered. Consider the following suggestions to help meet requirements:

- The USDA Fact Sheet submitted indicated a 1.7 oz. serving of fajita chicken meat credits at 1 oz. eq. meat/meat alternate. Increase to 3.4 oz. of fajita chicken to meet 2 oz. eq. meat/meat alternate or consider adding at least .75 oz. cheese to the salad to meet requirements.

The menu offered a minimum of 9.25 oz. eq. of meat/meat alternate throughout the week. By following the suggestions outlined to meet the daily meat/meat alternate requirement, the weekly requirement will also be met.

**CAP:** Provide documentation to demonstrate that the menu findings listed under step 1 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.

**Due Date:** Due November 15, 2024; Completed November 12, 2024

**Response:** The addition of 4 oz yogurt (1 oz. eq. meat/meat alternate) to the chicken fajita strips on Friday increased the meat/meat alternate total for that meal to 2.25 oz. eq. to meet daily and weekly requirements.

### Finding 21 – Meal Components and Quantities - Lunch

The planned menu was not followed for the week of menu review. The substitutions made were not acceptable to meet program requirements.

- Monday - SFA did not plan to serve the broccoli, Rib B Que Sandwich, and onion slices. For the Deli menu, broccoli will not be served and only one type of chip will be offered. For the pizza menu, broccoli will not be offered.

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- Tuesday - SFA did not plan to serve the Rib B Que Sandwich and onion slices. For the deli menu, carrots and broccoli will not be offered, and only one type of chip will be offered.
- Wednesday - SFA did not plan to serve the Rib B Que Sandwich and onion slices for the Bobcat menu. Celery sticks and pork & beans will not be offered for the deli menu and only one type of chip will be offered.
- Thursday - SFA did not plan to serve the Rib B Que Sandwich and onion slices for the Bobcat menu. Only one type of chip will be offered for the deli menu.
- Friday - SFA did not plan to serve the Rib B Que Sandwich and onion slices for the Bobcat menu. Romaine Salad will not be offered on the deli menu.

**CAP:** Provide documentation of training on meal pattern requirements and making appropriate menu substitutions, for all staff who participate in menu planning and meal service. Include a copy of the agenda and sign-in sheet.

**Due Date:** Due November 15, 2024; Completed November 15, 2024

**Response:** SFA submitted completed training certificates.

### **Finding 22 – Offer versus Serve**

OVS at both breakfast and lunch services for Central High School was not done correctly. For the breakfast meal service, the application packet stated that they operated a “serve only” breakfast, and the breakfast meal was prebagged for the students to grab with a milk and juice. When observing the breakfast meal service, it was observed that students were not taking all the components of the breakfast meal pattern. Additionally, a variety of milk was not offered during the meal services at Central High School. During breakfast at Ventral High School, only 1% white milk was offered. During lunch, only fat free chocolate milk was offered. If the SFA would like to operate under serve only, students are required to take all the breakfast components in their full quantities. If the SFA would like to operate under OVS, the students will need to be able to select 3 out of 4 items offered to them, including a minimum of ½ cup of fruit and/or vegetables. For the lunch meal service, OVS is required for grades 9-12. Currently, students preorder only their main entree for lunch and the entire meal comes boxed up with their name on it for pick up. Under OVS, students are required to take a minimum of 3 out of the 5 components with one of those choices being at least ½ cup of fruit or vegetable. With the meals coming pre-plated, the students do not have the option to decline any of the components which is a requirement under OVS.

**CAP:** Complete an offer versus serve training for both breakfast and lunch for all food service staff. Upload an agenda and a sign in sheet. Additionally, complete the NSLP Corrective Action Procedure form outlining the process for how OVS will be implemented at the satellite schools that have the meals pre-plated for the students.

**Due Date:** Due November 20, 2024; Returned for Correction; Completed December 6, 2024

**Response:** The FSD uploaded the NSLP Corrective Action Procedure form outlining the procedure for satellite schools operating OVS. The FSD has implemented a new ordering form for the students that allows them to select all the meal components instead of the meal being pre-plated.

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### **Finding 23 – Offer versus Serve**

The NSLP regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what foods constitute unit priced reimbursable meals. Schools using OVS must also identify what a student must select in order to have a reimbursable meal under OVS. Central High School and Adams Elementary School do not have proper signage where both breakfast and lunch are served.

**CAP:** Post the appropriate signage where breakfast and lunch are served (Breakfast-Front Office/Lunch - Cafeteria). Once signage is posted, take a picture and upload it into MyIdahoCNP.

**Due Date:** Due November 20, 2024; Completed November 11, 2024

**Response:** The FSD has posted a sign for OVS at both schools.

### **COMMENDATIONS**

- The Food Service Director has an incredibly positive attitude and is a joy to work with. The state agency appreciates her willingness to listen to suggestions and implement procedures to ensure integrity in the food service program.
- The kitchen manager is doing a great job of organizing the off-site meal service process in the most efficient manner while still providing all of the menu choices that the other schools have. All of the students at Central High seemed to be very pleased when they were receiving their lunches.

### **TECHNICAL ASSISTANCE (TA)**

#### **Certification and Benefit Issuance**

- During the review of applications, it was noted that one application had zero income, and one application had an income listed that looked like an hourly wage. While these applications are able to be approved as is, it is best practice to contact the household to confirm that this is accurate. If needed, questionable applications may be selected for verification for cause.

#### **Verification**

- The SFA's online free and reduced application software only flags an error-prone application if the application is at risk of changing to a lower benefit (free to reduced and reduced to paid). The SFA should contact their application software provider to ensure that those that are error-prone for changing to a greater benefit (reduced to free) are flagged as well. Enabling this function will ensure that all applications within \$100 per month of the applicable Income Eligibility Guidelines are correctly identified as error prone.

#### **Meal Components and Quantities**

- During the lunch meal service at Adams Elementary School, the milk cooler was after the meal service line. The SA would recommend switching the milk cooler and the POS

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to ensure that all components are able to be observed by an adult at the end. This will also ensure that the milk cooler can be observed by adults to catch students returning to the milk cooler without purchasing a milk.

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - The menu was not followed for the week of menu review, however, the substitutions made were documented and acceptable to meet meal pattern requirements. Ensure menus are followed as planned, and if substitutions are made, they continue to meet meal pattern requirements. All kitchen staff should be trained on making menu substitutions to ensure meal pattern requirements remain met.
    - Daily: Not all cereal and juice types were offered as stated in the weekly menu.
    - Thursday: Cornbread Poppers were replaced with Pop-Tarts.
    - The strawberries were not planned on Monday and only one type of pizza was planned on Tuesday comparing the planned production records to the weekly menu.
  - A standardized recipe is a recipe that has been carefully adapted and tested 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:
    - Romaine Salad Recipe - weight or measure should be added to romaine lettuce in recipe.
  - A Child Nutrition Label or Product Formulation Statement can be used to determine how processed food items contribute to the meal pattern. Without this documentation, it may be difficult to determine if the meal component was satisfied. A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not submitted for all processed menu items. A sponsor should maintain this documentation on file to document meal pattern requirements as met.
  - This documentation was secured for the menu items listed below, to confirm meal pattern crediting. Chicken Nuggets
    - Hamburger Beef Patty
    - Sausage Patty
    - Chicken Patty
    - Spicy Chicken Patty
    - Beef Burger
    - Ham
    - Grape Peanut Butter and Jelly Sandwich
    - Strawberry Peanut Butter and Jelly Sandwich
    - Garden Salsa Chips
    - Original Sun Chips
    - Stuffed Mac and Cheese

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- Chicken Strips
- Chicken Chunks
- Scooby Doo Snacks
- Apple Cinnamon Muffins
- Strawberry Pop-Tart
- Blueberry Pop-Tart
- Cinnamon Pop-Tart

### **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. Ensure that this review is conducted for all feeding sites as indicated no later than February 1 and retain documentation for three years plus the current year. Ideally, separate forms will be utilized for each of these separate breakfast and lunch reviews, but the SA has allowed the same form to be used for both meal observations if different colored pens are used to document and separate the responses for each review. The line asking for the date of the last breakfast review is to help guide the SFA to identify the requirement to review at least 50% of the sites for breakfast every other year, with a site being reviewed at least every two years. The SA has made available an online course in the digital learning portal that covers the requirements and form completion for this annual monitoring.

### **SUMMER 2024 SEAMLESS SUMMER OPTION (SSO) REVIEW RESULTS**

There were no findings resulting from the SSO review.

### **FISCAL ACTION**

Due to benefit issuance errors, fiscal action results in \$21.66. 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) 332-6820.

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

Sincerely,

*Cambria Steffler*

Cambria Steffler, MS, RD  
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Jordyn Bybee, Child Nutrition Director, Madison School District

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1. **mail:**  
U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
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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