



Idaho Department of Education

January 22, 2025

Kylee Morris, Superintendent
Midvale School District
56 School Rd
Midvale, ID 83645

Dear Superintendent Morris

On October 9, 2024, Idaho Department of Education Coordinators Cambria Steffler and Jax Dunham conducted an Administrative Review (AR) of Midvale 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 Midvale School.

The State agency (SA) would like to commend Sandarah Cornwell and the entire staff of Midvale 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 – Civil Rights

The nondiscrimination statement (NDS) must accompany any printed and web-based materials referencing FNS programs. The notification letters to households who applied for meal benefits contained only the short statement. The full statement is available on the SA website under Civil Rights. It is recommended that a link to the full statement in a variety of languages be included. The recommended link to use is the [USDA Nondiscrimination Statement](#) webpage. (FNS Instruction 113-1: Civil Rights Compliance and Enforcement).

CAP: Add the full USDA nondiscrimination statement to the notification letters and upload a copy of the letter.

Due Date: Due October 24, 2024; Completed October 9, 2024

Response: The FSD uploaded the letter with the full NDS statement on it.

Finding 2 – 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 (7 CFR 210.31(e)(2)). LEAs must make this assessment available to the public in an easily understood manner (7 CFR 210.31(d)(3)).

While it is appreciated that the Board reviews the policy annually, an assessment was not provided.

CAP: Upload an NSLP Corrective Action Procedure form 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 October 24, 2024; Completed October 23, 2024

Response: The FSD uploaded an NSLP Corrective Action Procedure Form outlining the process for completing the triennial assessment. The triennial assessment will be completed by the superintendent or designee.

Finding 3 – Professional Standards

Per 7 CFR 210.30(e), it is required to train staff annually on Food Safety, including procedures included in the HACCP manual. All staff training should include an agenda and sign-in sheet, and training documentation should be kept on file at the SFA for three years plus the current year.

CAP: Complete food safety training for all employees. Upload either a certificate of completion or an agenda and sign in sheet.

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Due Date: Due October 24, 2024; Completed October 24, 2024

Response: The FSD uploaded an agenda and sign in sheet for the food safety training.

Finding 4 – Meal Components and Quantities – Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirements for fruit. The federal regulations require a minimum of 1 cup of fruit to be offered each day for grades 9-12. This requirement was not met on Thursday with only ½ cup offered because 1 whole banana credits as ½ cup fruit according to the USDA Food Buying Guide. (7 CFR 210.10)

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 September 19, 2024; Completed September 13, 2024

Response: The updated production records and attached statement show 2 whole fruits (apple and banana) now served on 9/12/24 to meet the 1 cup daily fruit requirement for grades 9-12.

Finding 5 – Meal Components and Quantities – Lunch

For the week of menu review, the K-5 lunch menu 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 K-5, with only 1/4 cup offered. (7CFR210.10)

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 September 19, 2024; Completed September 13, 2024

Response: The updated production record and sponsor statement indicate 1/2 cup fries offered on 9/12/24 to meet the starchy vegetable subgroup requirement.

Finding 6 – Meal Components and Quantities – Lunch

For the week of menu review, the K-5 lunch menu did not meet the minimum weekly requirement for the beans/peas/lentils vegetable subgroup. Beans/peas/lentils 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 beans/peas/lentils vegetable subgroup requirement was not met for grades K-5, with only 3/8 cup offered. (7 CFR 210.10)

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 September 19, 2024; Completed September 13, 2024

Response: The updated production records and sponsor statement indicate 1/2 cup refried beans added to 9/11/24 to meet the beans/peas/lentils subgroup requirement.

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Finding 7 – Meal Components and Quantities - Lunch

For the week of menu review, the K-5 lunch menu did not meet the minimum weekly requirement for the dark green vegetable subgroup. Dark green 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 dark green vegetable subgroup requirement was not met for grades K-5, with only 1/4 cup offered. (7 CFR 210.10)

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

Due Date: Due September 19, 2024; Completed September 13, 2024

Response: The updated production records and sponsor statement indicate 1 cup Romaine added to 9/11/24 to credit as 1/2 cup dark green vegetable to meet the subgroup requirement.

Finding 8 – Meal Components and Quantities - Lunch

For the week of menu review, the K-5 lunch menu did not meet the minimum daily and weekly requirements for vegetables. The federal regulations require a minimum of 3/4 cup of vegetable to be offered each day for grades K-5. This requirement was not met on Tuesday and Wednesday with only 3/8 cup offered on Tuesday and ½ cup offered on Wednesday. The federal regulations require minimum weekly amounts for vegetables. The weekly minimum of 3 cups was not met for grades K-5, with only 2 5/8 cups offered. (7 CFR 210.10)

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 September 19, 2024; Completed September 13, 2024

Response: The updated production records submitted show at least 3/4 cup vegetables offered each day to meet the daily and weekly vegetable requirements.

Finding 9 – Meal Components and Quantities - Lunch

For the week of menu review, the K-5 lunch menu did not meet the minimum daily requirements for grain. The federal regulations require menus to be planned that meet the daily minimum 1 oz. eq. grain requirement for grades K-5. This requirement was not met on Monday with only 1/2 oz. eq. offered. The serving size of 3 chicken nuggets only credits as 1/2 oz. eq. Grain. (7 CFR 210.10)

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: September 19, 2024; Completed September 13, 2024

Response: The updated production record for 9/9/24 and sponsor statement indicate the serving size of chicken nuggets was increased to 5 for grades K-5 to credit as 1 oz. eq. grain.

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COMMENDATIONS

- The food service staff demonstrate excellent rapport with the students. They do a great job ensuring that the meal service is an enjoyable experience.
- The food service director was exceptionally organized for the review. She provided all the information needed in folders and binders which made completing the review quick. She exemplifies integrity and shows a strong desire to run a compliant program.
- Students were respectful and demonstrated good manners towards the cafeteria staff and faculty members.
- The dining and serving line areas were attractively decorated and provided a positive environment for fellowship and healthy meal opportunities.

TECHNICAL ASSISTANCE (TA)6

Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - Consider adding the alternate entrée choices to the printed calendar menu.
 - The spec sheet submitted included a meal pattern crediting statement but was not an official CN Label or PFS for the sausage. The reviewer obtained and uploaded a Product Formulation Statement (PFS) for this item.
 - The Child Nutrition (CN) Label submitted for the egg patty 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.
 - The recipe and the production record do not match for the sausage, egg, and cheese biscuit. Update the production record to show ½ oz. cheese (1 slice) per sandwich, not 1 oz. cheese per sandwich.
 - The amount of cheese in the breakfast burrito does not credit as 0.5 oz. per serving, but credits at 0.18 oz. per serving only. Increase the amount of cheese in the recipe to 22.5 oz. to credit as 0.5 oz. cheese per serving.
 - The menu was not followed for the week of menu review, however the substitutions made were documented and acceptable to meet meal pattern requirements.
 - For the fruit choices, consider indicating the serving size of each item, such as 1 whole apple, 1 whole banana instead of in cups.
 - The beef taco bar recipe needs to be standardized and needs more information. 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. Ensure that recipes submitted are always written in standardized format with complete information. Items on the menu that need standardized recipes include the following:
 - There was no yield.

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- Many of the ingredients were missing complete volume/weighted measurements. For example, what size of cans of all of the beans are used?
- There was no serving size listed. Standardize the recipe so that true yields and portion sizes can be determined.

To be standardized recipes must include at a minimum the following:

- All ingredients in the recipe.
- Correct volume or weighted measure of each ingredient.
- Serving/portion sizes for each grade group.
- The true yield made by the recipe.
- Clear and complete preparation steps and directions.
- The 6-8 and 9-12 production record does not show salsa being offered on Wednesday, but the SFA stated it was served without indicating a serving size. Ensure this item is added to the production records.

School Breakfast and SFSP Outreach

- SFAs must cooperate with 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/meals4kids>) or texting the word “FOOD” or “COMIDA” to 304-304 to see nearby options. Best practice is to include SFSP promotion and ways to locate meals on the SFA’s website.

FISCAL ACTION

There is no fiscal action resulting from this review.

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
 Sandarah Cornwell, Child Nutrition Director, Midvale 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

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