



February 20, 2025

Mr. Douglas Howell, Superintendent
Pocatello School District #025
3115 Pole Line Road
Pocatello, ID 83201

Dear Superintendent Howell,

On October 21 through October 23, 2024, Idaho Department of Education Coordinators Cassandra Thompson and Cambria Steffler conducted an Administrative Review (AR) of Pocatello 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)
- After school Snack Program (ASSP)

The sites reviewed were Claude A. Wilcox Elementary School, Edahow Elementary School, Hawthorne Middle School, and New Horizon Center.

The State agency (SA) would like to commend Heather Canfield and the entire staff of Pocatello 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 – Civil Rights

The nondiscrimination statement (NDS) must accompany any printed and web-based materials referencing FNS programs. The notification letter for directly certified households did not contain the full non-discrimination statement. (FNS Instruction 113-1: Civil Rights Compliance and Enforcement).

CAP: Upload a copy of the household notification letters with the full non-discrimination statement.

Due Date: November 7, 2024; Completed November 7, 2024

Response: The SFA uploaded a corrected Direct Certification Notification letter that includes the full non-discrimination statement. This letter will be utilized moving forward.

Finding 2 – Certification and Benefit Issuance

A statistical sample of 590 applications resulted in a 3.39% error rate:

- The income of nine applications was converted to annual by Infinite Campus. The income should have remained the same since there were not two different frequencies (weekly, bi-weekly, twice a month or monthly). There was no change in benefits due to these errors.
- Five applications had income calculated incorrectly. These errors resulted in two applications changing from free to reduced and three applications with no change in benefits.
- Five applications were missing information and should not have been processed due to being incomplete. This resulted in these five applications changing from free to paid.
- One application was missing the benefit determination. This error did not impact the students benefit issuance.

CAP: Change student benefits as required and send household notifications of said changes. Upload status change documentation showing that the required benefit changes are now in effect.

Due Date: November 7, 2024; Extended to December 13, 2024; Completed December 20, 2024

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Response: The SFA uploaded a current copy of their benefit issuance list that documents the changes made and the new effective dates.

Finding 3 – Meal Counting and Claiming

During the lunch service, thirty-three students (Hawthorne Middle School - 6 students / Claude A Wilcox Elementary - 24 students / New Horizon Center - 3 students) walked away from the serving line without the minimum 1/2 cup of fruit and/or vegetable.

CAP: Provide additional OVS (breakfast and lunch) training for CNP staff. Upload a completed NSLP Procedure Corrective Action form addressing the procedure to be implemented to ensure OVS is operating properly to ensure students are receiving a reimbursable meal. Upload your training agenda and sign-in sheet as documentation indicating all staff have received additional training.

Due Date: November 7, 2024; Extended to December 13, 2024; Completed January 8, 2025

Response: The SFA uploaded a completed NSLP Corrective Action Procedure form addressing the procedure to be implemented to ensure OVS is operating properly to ensure students are receiving a reimbursable meal. OVS breakfast and lunch trainings were completed, and the appropriate training documentation was uploaded to MyIdahoCNP.

Finding 4 – Meal Counting and Claiming

Before submitting a monthly reimbursement claim, the SFA must review the meal count data for each school to ensure the accuracy of the claim per CFR 210.8(a)(2). The SFA has been using the Daily Transaction Summary Report to check their claim prior to submission. While the SA was on-site, it was noted that this report did not have the same meal counts as the edit check report generated from the software. While reviewing the claim, the SA noted discrepancies between the claim submitted and the edit check report generated from the POS.

For the entire district, the meal count discrepancies are as follows:

- Underclaim of 20 free lunches
- Underclaim of 265 reduced lunches
- Overclaim of forty-four paid lunches
- Overclaim of twenty-three free breakfasts
- Overclaim of twelve reduced breakfasts
- Overclaim of twenty paid breakfasts

CAP: Complete the NSLP Corrective Action Procedure form outlining the process for completing an edit check before submitting the claim. In this form, please include what reports will be utilized and who will be responsible for completing this edit check.

Due Date: November 7, 2024; Extended to December 13, 2024; Completed December 18, 2024

Response: The SFA uploaded an NSLP Corrective Action Procedure form that clearly outlines the process for completing an edit check prior to the submission of their monthly claim to ensure accuracy. The NSLP Corrective Action Procedure form also identifies the individual responsible for completing this task.

Finding 5– Meal Counting and Claiming – Lunch (Claude A. Wilcox and Hawthorne Middle)

During the on-site meal observation at Claude A. Wilcox Elementary School and Hawthorne Middle School, the state agency observed that the students were able to see other students'

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account balances while going through the service line. While the software did not state "free" or "reduced," it would be easier to infer which students were receiving free or reduced meals based on the amount charged for free and reduced meals. During the meal service, the students would put their numbers in and then look at the screen. They would also line up behind the POS and were able to see the information for the students entering their number at the POS. The SA provided suggestions to provide a privacy screen for the computer monitor or move the POS so the students must walk in front of the computer where they cannot see the benefit.

CAP: Provide documentation that the POS software has been covered or moved to prevent overt identification at both sites. This can either be a receipt of purchase for monitor privacy screens or a picture of where the POS will be located where students will not be able to see the account balances of other students.

Due Date: November 7, 2024; Completed November 7, 2024

Response: The sponsor purchased privacy screens for seven laptops in their district to prevent overt identification during meal services. A receipt for the privacy screens was uploaded into MyIdahoCNP as documentation that satisfies this finding.

Finding 6 – Local Wellness Policy

LEAs must assess their wellness policy at least once every three years to 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 per (7 CFR 210.31(d)(3) and (7 CFR 210.31(e)(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. The Idaho Wellness Policy Progress Report is one tool available for completing the Triennial Assessment. You can find it on the SDE website: <https://www.sde.idaho.gov/cnp/sch-mp/wellness.html> or in MyIdahoCNP under download forms.

Due Date: November 7, 2024; Extended to December 13, 2024; Completed December 18, 2024

Response: The School Food Authority uploaded an NSLP Corrective Action Procedure form into MyIdahoCNP that identifies their plan to ensure their wellness policy is assessed at least once every three years. The plan included being on the April 24, 2025, agenda for the next Wellness Sub-Committee meeting where they will complete the Idaho Wellness Policy Progress Report. The Food Service Director, Director of Curriculum and the Director of Business Operations are the individuals responsible for ensuring completion of the triennial assessment.

Finding 7 – Food Safety

The Food Safety plan (HACCP) must have a bodily fluid clean-up Standard Operating Procedure (SOP), which is required by the Idaho Food Code. The bodily fluid clean-up plan was not available at Edahow Elementary School or Wilcox Elementary School.

CAP: Upload a copy of the bodily fluid clean-up plan to be implemented at each school.

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Due Date: November 7, 2024; Completed November 7, 2024

Response: The SFA uploaded a Standard Operating Procedure (SOP) for Cleaning and Disinfecting Body Fluid Spills into MyIdahoCNP. This SOP was sent to all district locations with instructions to ensure a copy of this SOP is in their respective HACCP manuals.

Finding 8 – Food Safety

Daily food storage temperature logs are required to ensure food is stored within recommended temperature ranges for food safety and to maintain food quality [7 CFR 210.13(d)]. Dry storage should be between 50-70 degrees Fahrenheit. The SA noted there was not a temperature log for dry storage at New Horizon Center, Edahow Elementary School, Hawthorne Middle School, and Claude A. Wilcox Elementary School.

CAP: Upload a completed NSLP Procedure Corrective Action form addressing the procedure to be implemented to support the requirement of posting and entering temperatures daily in the dry storage room at New Horizon Center, Edahow Elementary School, Hawthorne Middle School, and Claude A. Wilcox Elementary School.

Due Date: November 7, 2024; Completed November 7, 2024

Response: The SFA uploaded a receipt into MyIdahoCNP for twenty-three dry storage thermometers that measure both temperature and humidity. These thermometers were sent to all school locations to ensure dry storage goods are stored within the recommended temperature ranges for food safety and quality. The SFA also uploaded a picture of the new thermometer at one of their locations as documentation that their corrective action plan has been completed. A clipboard with a temperature log is now in the dry storage area of all locations.

Finding 9 – Food Safety (Hawthorne)

The most recent food safety inspection report must be posted in a location visible to the public (7 CFR 210.13(b)). The SFA did not have the most recent food safety inspection report posted.

CAP: Post the most recent food safety inspection report in a location visible to the public.

Due Date: Completed October 22, 2024, on the day of review.

Response: The most recent food safety inspection report was posted in the cafeteria near the POS system immediately on the day of review.

Finding 10 – Verification

While reviewing the SY23-24 verification documents, the state agency noted that the notification letters sent to the households were not available for review, including the initial notification letter, any follow up correspondence, and the results of verification notification letter. Per 7 CFR 245.6a(h), all verified applications must be readily retrievable. All documents submitted by the household for the purpose of confirming eligibility, reproductions of those documents, or annotations made by the determining official indicating which documents were submitted by the household and the date of submission also must be retained, along with all relevant correspondence between the households selected for verification and the school or LEA. This documentation, including documentation concerning any appeals, must be kept by the LEA to demonstrate compliance with the verification requirements when reviewed by State

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or Federal officials. The documentation must be saved for at least three years, after the fiscal year to which it pertains.

CAP: Complete the NSLP Correction Action Procedure Form outlining the procedure for completing the verification process, including who will complete the verification process, when verification will be completed, how and where all documentation will be maintained.

Due Date: November 7, 2024, Completed November 7, 2024

Response: The Food Service Director uploaded an NSLP Corrective Action Procedure form that outlines their Verification process moving forward to ensure all documentation (including letters or any correspondence between the family and LEA, the individual responsible for completing this process and where the documentation will be stored) is kept on file for three years plus the current year to which they pertain.

Finding 11 – Offer versus Serve (Hawthorne)

Per 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 to have a reimbursable meal under OVS. The SFA had signage for what constitutes a meal at only one of the POS stations. The other station did not have the required signage.

CAP: Post signage for what constitutes a reimbursable meal and upload a picture of the signage posted.

Due Date: November 7, 2024; Completed November 7, 2024

Response: The SFA requested current signage for the day's meal choices from the state agency to post near all POS stations. Pictures were uploaded into MyIdahoCNP as documentation signage was posted which identifies what constitutes a reimbursable meal.

Finding 12 – Meal Components and Quantities – Lunch (Edahow and Claude A. Wilcox)

For the week of menu review, the K-5 lunch menu did not meet the minimum daily requirements for vegetables. The federal regulations require at least 3/4 cups of vegetables each day for grades K-5. This requirement was not met on Friday, September 27, 2024, with only 1/2 cup minimum offered.

- The Pizza Rippers meal provided 1/8 cup pizza sauce and the 1/2 cup broccoli totaled 5/8 cup vegetable.
- The turkey and cheese sandwich meal provided 1/2 cup broccoli to total 1/2 cup vegetable.

Consider the following suggestions to help meet requirements.

- Offer 3/4 cup of broccoli or 1/4 cup of another vegetable with the 1/2 cup broccoli.

CAP: 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. Submit supporting documentation to demonstrate that the menu findings listed have been corrected. Reference the menu review results report for specific details and suggestions to bring the menu into compliance. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: October 15, 2024; Completed October 15, 2024.

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Response: The sponsor statement, menu, and updated production record document an update to the menu where the sliced pears were replaced by three mini peppers which are credited as 1/4 cup vegetable. The ½ cup of broccoli remained on the menu to satisfy the ¾ cup vegetable requirement.

Finding 13 – Meal Components and Quantities – Lunch (Claude A. Wilcox and Edahow)

For the week of menu review, the K-5 lunch menu did not meet the minimum weekly requirements for grain. The federal regulations require weekly minimum amounts of grains to be served. The weekly requirement of 8 oz. eq. was not met for grades K-5. The menu offered 7.5 oz. eq. of grain throughout the week.

- The 2.6 oz. PBJ offered on Tuesday, 9/24/2024 only credited as 1 oz. eq. grain.
- A recipe for Peanut Butter and Jelly Sandwich was not submitted.

Consider the following suggestions to help meet requirements.

- Offer a 1 oz. eq. grain such as Goldfish crackers or tortilla chips with the PBJ.

CAP: 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.

Submit supporting documentation to demonstrate that the menu findings listed have been corrected. Reference the menu review results report for specific details and suggestions to bring the menu into compliance. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: October 15, 2024; Completed October 15, 2024

Response: The recipe for the peanut butter and jelly sandwich has been uploaded into MyIdahoCNP documenting two slices of bread that are credited as 2 oz. eq. grain. The weekly grain total is now 8.5 oz. eq.

COMMENDATIONS

- The SFA keeps excellent Smart Snacks documentation on file. This shows the SFA's commitment to providing nutritious food in the school environment.
- The food service team at New Horizon Center works well together to produce exceptional service, and they have an excellent rapport with their students.
- The staff at Claude A. Wilcox Elementary had a great rapport with their students. They implemented all suggestions made by the state immediately which demonstrates their desire to run a compliant program.
- The meal service at Hawthorne Middle School was extremely fast and efficient. The healthy choice options were beautifully displayed and there were several fresh fruit and vegetable options to choose from.
- The staff at Edahow Elementary School did a fantastic job at ensuring all students took the required amounts of fruit and/or vegetables. They had a great rapport with students and ran a highly organized and efficient meal service.
- The dining area at Edahow Elementary was decorated beautifully, which provides a positive environment for healthy eating.

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TECHNICAL ASSISTANCE (TA)

Certificate and Benefit Issuance

- When making edits or changes to an application, the best practice is to use a different colored pen. Initial and date changes with a note of why the change occurred and who in the household provided the added information.
- One application documented both a case number and income of \$14.00. The application was processed via income instead of being considered categorically eligible. An application with a case number could be determined as free based on the case number alone. If the application has questionable information, the SFA should contact the household for any necessary clarifications and if deemed necessary, the SFA can verify the application for cause. For more information on verification for cause, please refer to page 99 in the eligibility manual.
- During the review of applications, it was noted that one application had zero income. While the application can be approved with no income listed, it is best practice to contact the household to confirm that this is accurate.

Meal Counting and Claiming

The paid, reduced and free meals on the District Edit Check Summary totals for the month of review (09/01/2024 - 09/30/2024) do not equal the paid, reduced and free totals when the Site Edit Check Summary's for each school are added together. The state agency recommends the sponsor rectify this discrepancy, as well as maintain all documentation utilized in processing your claim as back-up to assist in resolving potential issues moving forward.

Resource Management

- During the onsite review, the state agency obtained documentation that the SFA transferred funds (other than approved indirect costs) out of the food service account to support general school district expenses or non-food related activities. This practice is not allowed and may result in a finding if this scenario is repeated moving forward.

Food Safety

- The SFA's Hazard Analysis and Critical Control Points (HACCP) manuals are missing an employee exclusion standard operating procedure (SOP) required by Idaho Food Code. A sample SOP for employee exclusion can be found in MyIdahoCNP's download forms.

SFA On Site Monitoring

- Though the SFA has records showing that all required SFA on-site monitoring was completed for both SBP and NSLP by February 1, the monitoring forms did not contain signatures from the school representative/SFA reviewer or note whether the school was reviewed for NSLP or SBP. The SFA should ensure that there is consistent practice when completing the SFA on-site monitoring forms.

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Meal Components and Quantities – Breakfast and Lunch

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - 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 consistently provide adequate information. It is a requirement of the federal regulations to maintain complete and accurate production records. This includes the planned numbers for each day and clear descriptions for each item.
 - All menus served must meet all daily and weekly meal pattern requirements for the specific grade group. The sponsor was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews may result in fiscal action.
 - Ensure product Formulation Statements (PFS) and/or Child Nutrition (CN) labels without a watermark are provided for each item on the menu.

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,

C. Thompson

Cassandra Thompson, BS
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Heather Canfield, Food Service Director

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