



April 29, 2025

Teresa Rensch, Superintendent
St. Maries Jt. School District #041
240 S. 11th Street
St. Maries, ID 83861

Dear Superintendent Rensch,

On March 5, 2025, Idaho Department of Education Coordinators Jax Dunham, Cambria Steffler, Cassandra Thompson, and Jessica Medrano conducted an Administrative Review (AR) of District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) - operating Provision 2 breakfast option
- USDA Foods
- Fresh Fruit and Vegetable Program (FFVP)
- Afterschool Snack Program (ASSP)

The site reviewed was the Heyburn Elementary School.

The State agency (SA) would like to commend Cheri Chaffey and the entire staff of St. Maries Jt. 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 review of 280 student benefits resulted in a 2.50% error rate. One application affecting three students was incorrectly determined as reduced, and the students must be changed to paid. Three students were incorrectly noted as free via direct certification instead of reduced via Medicaid. One student was determined as reduced and should have been extended free eligibility via a household member receiving free Medicaid benefits.

CAP: Send adverse action letters to the households that are reducing in benefits notifying them that their benefits will change in 10 calendar days. Once all benefits have been changed, upload adverse action letters and a new benefit issuance list showing that the correct benefits are now being issued.

Date of Completion: Due March 20, 2025; submitted March 18, 2025; completed March 27, 2025.

CAP Response: The SFA uploaded adverse action letters, a new free and reduced application, and a new benefit issuance list showing that the correct benefits are now being issued.

Finding 2 – Verification

One application selected for verification was verified using documents that were insufficient in showing the household income. The document submitted was a direct deposit voucher, not a paystub. Acceptable written evidence for verification must include the name of the household member, the amount of income received, the frequency received, and the date the income was received (page 107 of the Eligibility Manual for School Meals).

CAP: Contact the household for additional information about their income to verify the aforementioned information. Notify the household of the outcome of verification using the State agency notice of verification. Upload a copy of the documentation received by the household and the notice of verification outcome for review. If the household's benefits changed, upload a copy of the benefit issuance list showing the correct benefit. Additionally, complete the NSLP Corrective Action Procedure Form outlining detailing what steps will be taken to ensure income documentation submitted for verification meets the requirements. Include in this procedure who will be responsible for reviewing the income documentation and what resources will be used if questions arise.

Date of Completion: Due March 20, 2025; completed March 12, 2025.

CAP Response: The SFA uploaded a valid paystub showing that the students selected for verification do not change in benefit along with results letter noting such. Additionally, an NSLP Corrective Action Procedure Form was uploaded detailing that the Food Service Director (FSD) will receive correct proof of income and contact the State agency if assistance is needed for a specific case related to verification.

Finding 3 – 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)(3)).

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 by the end of the school year.

Date of Completion: Due March 20, 2025; completed March 12, 2025.

CAP Response: The SFA uploaded an NSLP Corrective Action Procedure Form detailing how the triennial assessment will be completed and uploaded to the SFA's Foodservice Website by June 5, 2025. In this form, it was detailed that the Superintendent will oversee the compilation of the committee and meetings. Additionally, the FSD will compile, invite, and submit the committee for board approval, and schedule and plan committee meetings while submitting triennial assessments. The committee will determine if the wellness policy aligns with model policies, plan and complete goals to implement the policy, and determine if the SFA is in compliance with their policy in addition to completing the triennial assessment.

Finding 4 – Afterschool Snack Program

The Afterschool Snack Program must maintain records including production records (documenting changes or substitutions as applicable) to show component compliance and note number of portions prepared, served, and leftover for every day the ASSP operates. The menu and required portion sizes listed on the production record should be completed by foodservice employees as food is provided for program operation. The production records did not contain the serving sizes for the foods served.

CAP: Complete the NSLP Corrective Action Procedure Form outlining the procedure for adding the serving sizes to the snack production records. In this procedure, include who will be responsible for adding the serving sizes to the production records and how menu changes will be handled to ensure a compliant snack is served.

Date of Completion: Due March 20, 2025; completed March 6, 2025.

CAP Response: The SFA uploaded an NSLP Corrective Action Procedure Form detailing that the corrected production records will be emailed by the Food Service Director to the staff member which prepares the snack for the ASSP and to the ASSP Director, who hands out the snack and completes the production records. The Food Service Director will review the next 5 days of production records to verify that the correct production records are being used. The FSD will be

responsible for ensuring that the procedure is followed, and the procedure will go into effect on March 10, 2025.

Finding 5 – Pre-K Meal Pattern

The Child and Adult Care Food Program (CACFP) meal pattern must be followed when claiming Pre-K students under the SBP. However, per SP37-2017, Pre-K students may be served the SBP meal pattern and claimed under the SBP if they are comingled with other K-5 grades as it may be challenging to determine during a meal service if a child is in preschool or K-5. In the current operation, Pre-K students are not currently comingled and are receiving the SBP meal pattern.

CAP: Upload an NSLP Corrective Action Procedure Form detailing how the SFA will ensure that the Pre-K students are properly counted and claimed under an appropriate meal pattern.

Date of Completion: Due March 20, 2025; completed March 13, 2025.

CAP Response: The SFA uploaded an NSLP Corrective Action Procedure Form detailing that the FSD will be responsible for ensuring that breakfast served to pre-k students will align with the CACFP meal pattern. Since the district is not completely in line with CACFP yogurt and grain-based dessert requirements under NSLP for the current school year, the FSD will create a separate menu for the remainder of SY 2024-2025. During SY 2025-2026, the SFA will use the same menu with the exception of not serving flavored mil to the pre-k students. For the current year and going forward, the FSD will provide a separate production record to staff to ensure compliance with the CACFP meal pattern. Using the CACFP meal pattern, the SFA will claim the Pre-K students under SBP.

Finding 6 – Food Safety

The most recent food safety inspection report must be posted in a location visible to the public (7 CFR 210.13(b)). On the day of the Administrative Review, the most recent food safety inspection was posted inside of the kitchen where it was not visible to the public.

CAP: Post the most recent food safety inspection on or near the meal service line where it is visible to the public.

Date of Completion: Due March 20, 2025; completed March 5, 2025.

CAP Response: The SFA moved the food safety inspection to a publicly visible area while the SA was on-site.

COMMENDATIONS

- The FSD did a great job preparing for the Administrative Review. All requested records were neatly organized and available when the SA arrived on-site.
- The FSD shows a genuine interest in operating a compliant program while providing students with nutritious meals. All feedback was noted immediately, and the FSD asked great questions throughout the review.
- The State agency appreciates the ice packs that were located in the share/return box to help ensure items like milk remain at a proper temperature. This practice helps to prevent waste as it increases the probability of an item like milk to be safely placed in the refrigerator for re-use after sanitizing the item.

Debbie Critchfield, Superintendent of Public Instruction

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- We greatly appreciate the food service staff for their time while we conducted on the on-site review of their kitchen. We appreciate the hard work it takes to provide healthy meals to students. The hard work is evident and much appreciated.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- The SFA's application software determines applications by annual income regardless of listed income frequency. As this may result in a determination error, it is recommended that the SFA investigate if this can be modified in the software. Please make use of the Income Eligibility Guidelines chart to determine applications by listed income.

Verification

- The nondiscrimination statement (NDS) must accompany any printed and web-based materials referencing FNS programs. Web pages associated with program operation should list the full USDA NDS with details on participants' right to file a complaint. The statement printed on the verification letter was not correct for the time of verification. During the time of this review in March 2025, the civil rights statement is under review per new federal requirements. The SA will not issue a finding at this time as guidance for an updated civil rights statement has not been released (FNS Instruction 113-1: Civil Rights Compliance and Enforcement).

Meal Counting and Claiming

- The USDA defines overt identification as any action that can identify a child as approved or potentially eligible to receive free, reduced or paid school meals or free milk. A school food authority must ensure that it does not disclose a child's eligibility status at any point in the process of providing free, reduced or paid meals. During the on-site meal observation at Heyburn Elementary School, it was observed that the students were able to see information the POS monitor while going through the service line, even though there was a privacy screen. The SA provided suggestions to move the POS so students cannot approach from behind the POS where they can see student information, including meal balances. The State agency also recommends the POS be locked when not attended.

Meal Components and Quantities – Breakfast and Lunch

- Independent contractor CN Resource completed the menu review and provided the following TA:
 - A Child Nutrition Label or Product Formulation Statement (PFS) was not available for the pancake on a stick. Sponsors should maintain this documentation on file to document meal pattern requirements are met.
 - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the chicken nuggets. The specification sheet submitted included a meal pattern crediting statement but was not an official CN Label or PFS.

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Food Safety

- The HACCP manual at Heyburn Elementary School had all of the required elements. The State agency recommends inserting 'tabs' in the HACCP manual to ensure easy retrieval when needed. At the beginning of the HACCP manual, the last date reviewed was documented as 2018. The State agency recommends the revised date is updated each year to ensure standard operating procedures are current.

Summer Food Service Program 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.

Resource Management

- The SFA must ensure that all non-reimbursable foods sold by school food service, including, but not limited to, a la carte food items, adult meals, and vended meals, generate at least the same proportion of school food authority revenues as they contribute to school food authority food costs, as required in 7 CFR §210.14(f).

FISCAL ACTION

Due to benefit issuance errors, fiscal action results in \$876.73 for NSLP. Additionally, fiscal action results in \$17.13 for SBP due to Pre-K meal counting errors, but this amount will be disregarded due to falling under \$600.00 threshold. The adjustment for NSLP will be withheld from a future claim. Should you wish to appeal this fiscal action, follow the appeal procedures on the [State Agency Appeal Procedures](#) document located on the Idaho Child Nutrition Programs website.

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,

Jax Dunham

Jax Dunham, BS, RDN
NSLP Coordinator

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

Cheri Chaffey, Child Nutrition Director, St. Maries Jt. School District #041

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