



April 21, 2025

Todd Howard, Superintendent  
Wallace School District  
501 Western Avenue  
Silverton, Idaho 83867

Dear Superintendent Howard,

On March 7, 2025, Idaho Department of Education Coordinators Cassandra Thompson, Jax Dunham, Cambria Steffler and Jessica Medrano conducted an Administrative Review (AR) of Wallace School 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
- Fresh Fruit and Vegetable Program (FFVP)
- USDA Foods

The site reviewed was the Silver Hills Elementary School.

The State agency (SA) would like to commend Bea Conley, Bonnie Slater, and the entire staff of Wallace 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

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- 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 152 applications resulted in a 1.32% error rate. One application affecting two students required a change in benefits. This was due to the students not being changed to "Paid" after carryover. Last school year's eligibility status can carry over 30 operating days into the new school year, allowing time for households to reapply without interruption of benefits. Failure to reapply during the carryover period is not a denial of benefits for the current school year. LEAs are not required to notify families or send reminders. A notice of adverse action is not required as eligibility was not established for the current school year. (7CFR 245.6) The students' benefits should have ended on October 1, 2024, but as of the review date they were still receiving benefits from the previous school year.

#### **CAP:**

1. Upload a benefit issuance list for all students demonstrating that any student without current school year benefit issuance documentation is changed to paid.
2. Complete and upload the NSLP Corrective Action Procedure Form describing a plan to ensure that the benefit issuance/point of service software accurately reflects benefits and eligibility dates. Additional information can be found in the Eligibility Manual for School Meals.

**Due Date:** March 24, 2025; Completed March 13, 2025

#### **Response:**

1. The Business Manager uploaded a corrected benefit issuance list where the student was appropriately changed to paid.
2. The NSLP Corrective Action Procedure Form was uploaded and described a plan to ensure the benefit issuance list accurately reflects the student benefit and eligibility dates.

### **Finding 2 – Verification**

The application selected for verification was verified incorrectly as the household did not submit income documentation. The SFA received a phone call from the employer of a member of the household confirming the amount and frequency of payment. There is no documentation of this phone call, and no paper documentation was provided to the SFA. Per 7 CFR 245.6a (h), 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 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 LEAs are reviewed by State or Federal officials. The documentation must be kept for a minimum of three years, after the date of the fiscal year to which they pertain.

**CAP:**

1. Contact the household to retrieve the income documentation. If the income results in the same benefits, no further action is needed. If the income documentation results in a change in benefit, resend the final letter with the correct benefit and upload a copy of that letter and a copy of the benefit issuance list showing the corrected benefit.
2. Complete the NSLP Corrective Action Procedure form outlining the process for completing verification. Include in this form who will be completing verification, the timeframe in which verification will be completed, and what documents will be utilized to complete verification.

**Due Date:** March 24, 2025; Completed March 13, 2025

**Response:**

1. The Business Manager contacted the household to retrieve income documentation. The income documentation did result in a change in benefits from being reduced to free. A final letter was uploaded to MyIdahoCNP informing the household of the change in benefits.
2. A Corrective Action Procedure Plan was uploaded into MyIdahoCNP that outlines the important timelines for the necessary steps to successfully complete the verification process. The corrective action plan specifically states income documentation is necessary to complete this process.

**Finding 3 – Meal Counting and Claiming - Breakfast**

While reviewing the February 2025 claim for Silver Hills Elementary, a discrepancy between the AccuClaim report and the claim submitted to the SA was observed for the breakfast meal counts. There was an overclaim of 10 free breakfasts. This appears to be a result of a data entry error, so the SA does not believe this is a systemic error.

**CAP:** Complete the NSLP Corrective Action Procedure Form outlining the process for checking the claim for accuracy prior to submission to the SA. Include in this procedure who will be responsible for submitting the claim.

**Due Date:** March 24, 2025; Completed March 13, 2025

**Response:** The Business Manager completed and uploaded the NSLP Corrective Action Procedure Form that states the claim will be triple checked for accuracy prior to submission for reimbursement.

#### **Finding 4 – Professional Standards**

Per 7 CFR 210.30(b)(1)(v), 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.

**CAP:** Complete the Institute of Child Nutrition's (ICN) free online course, "Food Safety in Schools" by March 24, 2025. Once completed, upload your certificate of completion into MyIdahoCNP for the state agency to review.

**Due Date:** March 24, 2025; Completed March 13, 2025

**Response:** The Business Manager completed ICN's Food Safety in Schools training and uploaded her certificate of completion into MyIdahoCNP.

#### **Finding 5 – Food Safety**

The SFA's current Food Safety Manual (HACCP Manual) is outdated and does not include current standard operating procedures (SOPs). The current manual is dated 2002 and must be updated. SFAs must ensure that the Food Safety Manual contains current and correct SOPs and that all kitchen and cafeteria staff are trained in these SOPs each year. A sample HACCP Manual and SOPs can be found at: <https://theicn.org/icn-resources-a-z/standard-operating-resources/>. Additionally, the SFA's Food Safety Manual requires an Employee Exclusion SOP per Idaho Food Code. This information is also located in MyIdahoCNP's Download Forms.

**CAP:** Upload an updated Food Safety Manual showing the SOPs have been updated and implemented.

**Due Date:** March 24, 2025; Completed March 13, 2025

**Response:** The Business Manager updated their HACCP manual by customizing the ICN sample HACCP manual to reflect their school district. The updated version was uploaded into MyIdahoCNP and is dated SY 24-25 and includes the Employee Exclusion standard operating procedure.

#### **Finding 6 – Meal Components and Quantities – Breakfast**

For the week of menu review, the K-6 breakfast menu did not meet the minimum daily one cup fruit requirement with only ½ cup being offered or the weekly minimum 5 cup requirement for fruit with only 2.5 cups offered:

- Consider serving ½ cup fresh, frozen, or canned fruit along with ½ cup 100% full-strength juice daily to meet fruit requirements.
- By following the suggestions outlined to meet the daily fruit requirement, the weekly fruit requirement will also be met.

**CAP:**

1. Provide a written statement to describe the specific changes made to the menu for the week of review to correct all menu review findings and bring the menu into compliance.
2. Submit supporting documentation to demonstrate that the menu findings for the week of menu review are now corrected. This documentation may include menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into

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compliance.

3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

**Due Date:** March 10, 2025; Completed March 10, 2025

**Response:**

1. The SFA updated the menus and production records that document 1/2 cup of 100% full-strength juice will be served with ½ cup fresh, frozen, or canned fruit daily. This correction will also bring our weekly requirement of 5 cups into compliance.
2. The Business Manager uploaded both the corrected menus and production records as documentation that the appropriate changes have been made to serve compliant meals.
3. The Food Service Director is the individual responsible for ensuring compliant meals are served daily.

**Finding 7 – Meal Components and Quantities – Breakfast**

On February 24, 2025, the K-6 breakfast menu did not meet the federal daily requirement of 1 oz. eq. of the combined grain and meat/meat alternate component with only .75 oz. eq. being offered or the weekly requirement of 8 oz. eq. was not met for grades K-6. The menu offered a minimum of 5.75 oz. eq. of grain throughout the week.

- The Nutri-grain bars planned weighed 37 grams and credits as .75 oz. eq. grains. Consider serving a 1 oz. cheese stick or 4 oz. yogurt cup with the Nutri-grain bar to meet the requirement or serve a larger 1 oz. eq. Nutri-grain bar variety.
- The variety cereal meal planned Monday through Thursday only credits as 1 oz. eq. of grains. If a student selects the cereal daily, the requirements will not be met. Serve a package of graham crackers, 1 oz. cheese stick, or 4 oz. yogurt with the cereal meal daily to help meet the weekly requirement.

**CAP:**

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

**Due Date:** March 10, 2025; Completed March 12, 2025

**Response:**

1. The SFA updated their production records to show a ½ oz. eq. of graham crackers will be offered with the Nutri-grain bar to fulfill the daily requirement of grains. The addition of graham crackers will ensure the weekly minimum requirement of 8 oz. eq. is also met.
2. The SFA uploaded a production record for February 24, 2025, that documents the addition of the graham crackers to meet both the daily and weekly requirements.

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3. The Food Service Director is the individual responsible for ensuring compliant meals are served daily.

### **Finding 8 – Meal Components and Quantities – Lunch**

For the week of menu review, the K-6 lunch menu did not meet the minimum 1/2 cup weekly requirement for the beans/peas/lentil's vegetable subgroup. There were no beans/peas/lentils offered this week.

- Consider offering ½ cup baked beans with Wednesday's corn dog.

#### **CAP:**

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

**Due Date:** March 10, 2025; Completed March 10, 2025

#### **Response:**

1. The SFA added ¾ cup of baked beans to the corn dog menu and updated the production record as documentation the appropriate adjustment was made to be in compliance with regulations.
2. The updated production record was uploaded into MyIdahoCNP as documentation that the menu is now in compliance.
3. The Food Service Director is the individual responsible for ensuring compliant meals are served daily.

### **Finding 9 – Meal Components and Quantities – Lunch**

For the week of menu review, the K-6 lunch menu did not meet the 1/2 cup minimum weekly requirement for the dark green vegetable subgroup. There were no dark green vegetables offered this week.

- Consider replacing Thursday's potatoes with ¾ cup broccoli to meet the requirement.

#### **CAP:**

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

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**Due Date:** March 10, 2025; Completed March 3, 2025

**Response:**

1. The SFA added  $\frac{3}{4}$  cups of broccoli to the February 27, 2025, menu to meet the dark green vegetable subgroup requirement for the week of review.
2. The updated production record was uploaded into MyIdahoCNP as documentation that the menu is now in compliance.
3. The Food Service Director is the individual responsible for ensuring compliant meals are served daily.

**Finding 10 – Meal Components and Quantities – Lunch**

The federal regulations require a minimum of  $\frac{3}{4}$  cup vegetables to be offered each day for grades K-6. This requirement was not met on Tuesday, February 25, 2025, through Friday, February 28, 2025, with only  $\frac{1}{2}$  cup offered. This resulted in the weekly minimum of  $3\frac{3}{4}$  cups of vegetables not being met for grades K-6, with only  $2\frac{3}{4}$  cups offered:

- Consider increasing the serving size of vegetables to  $\frac{3}{4}$  cup daily to meet the federal requirements.
- By following the suggestions outlined to meet the daily vegetable requirement, the weekly vegetable requirement will also be met.

**CAP:**

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

**Due Date:** March 10, 2025; Completed March 3, 2025

**Response:**

1. The updated production records document  $\frac{3}{4}$  cups of vegetables are being offered daily. This results in 4 cups of vegetable being offered for the week which exceeds the weekly requirement of  $3\frac{3}{4}$  cups.
2. The updated production record was uploaded into MyIdahoCNP as documentation that the menu is now in compliance.
3. The Food Service Director is the individual responsible for ensuring compliant meals are served daily.

**Finding 11 – Meal Components and Quantities – Lunch**

Federal regulations require a minimum of  $\frac{1}{2}$  cup of fruit to be offered each day for grades K-6. This requirement was not met on Friday, February 28, 2025, with only  $\frac{3}{8}$  cup offered. A whole fresh clementine was served on this day. The Food Buying Guide indicates, a whole fresh clementine is creditable at only  $\frac{3}{8}$  cup fruit. The federal regulations require a weekly

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minimum of 2 ½ cups fruit to be served. This requirement was not met for grades K-6, with only 2 3/8 cups offered.

- Consider offering 2 clementines with this meal, to meet the ½ cup daily fruit requirement.
- By following the suggestions outlined to meet the daily fruit requirement, the weekly fruit requirement will also be met.

**CAP:**

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

**Due Date:** March 10, 2025; Completed March 11, 2025

**Response:**

1. The updated production record for February 28, 2025, now documents two clementines will be served to meet the federal requirements.
2. The updated production record was uploaded into MyIdahoCNP as documentation that the menu is now in compliance.
3. The Food Service Director is the individual responsible for ensuring compliant meals are served daily.

### **Finding 12 – 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 food safety inspection at Silver Hills Elementary School was posted behind the serving line in an area not visible to the public.

**CAP:** Move the most recent food safety inspection to a location where it can easily be viewed by the public.

**Due Date:** March 24, 2025; Completed March 7, 2025

**Response:** The most recent food safety inspection was moved to the cafeteria where it can be easily viewed by the public. This was completed on the day of review while the state agency was onsite.

### **Finding 13 – Afterschool Snack**

Though the SFA has noted in their application packet that they operate the Afterschool Snack Program (ASSP), both Silver Hills Elementary School and Wallace Jr/Sr High School have not operated or claimed under the ASSP for the current school year. If the SFA does not intend to operate or claim under the ASSP, they must inform the SA and update their application packet in MyIdahoCNP.



**CAP:** Update the site applications for both Silver Hills Elementary School and Wallace Jr/Sr High School in MyIdahoCNP to unselect the ASSP operation and submit the updates for acceptance.

**Due Date:** March 24, 2025; Completed March 13, 2025

**Response:** The SFA updated the site applications for both Silver Hills Elementary School and Wallace Jr./Sr. High School in MyIdahoCNP where they unselected ASSP operation and submitted for state approval.

## COMMENDATIONS

- The SFA's Buy American documentation is very well maintained and organized showing that the SFA puts care into their attention to detail.
- The foodservice staff at Silver Hills Elementary School have a great rapport with the students. This along with the warm and inviting lunchroom creates a warm and welcoming environment for the students.

## TECHNICAL ASSISTANCE (TA)

### Offer Versus Serve

- In the National School Lunch Program (NSLP), Offer Versus Serve (OVS) training should occur before the start date of any school food authority implementing OVS. OVS training for both breakfast and lunch did not occur until December 30, 2024. This training is a requirement and should occur prior to or at the beginning of the school year.

### Fresh Fruit and Vegetable Program

- Schools must widely publicize the FFVP. This can be done through posting the grant award on the school website, creating a bulletin board, or writing a short statement for the school newsletter.

### School Breakfast and SFSP Outreach

- SFAs must cooperate with the Summer Food Service Program (SFSP) sponsors to distribute materials to inform families of the availability and location of free SFSP meals for students when school is not in session [7 CFR 210.12(d)(2)]. SFAs should promote locating summer meal locations by advertising the Summer Meal Site Finder (<https://www.fns.usda.gov/summer/sitefinder>) or by texting the word "Food" or "SFSP" to 914-342-7744 to see nearby options. Best practice is to include SFSP promotion and ways to locate meals on the SFA's website.

### Meal Components and Quantities – Breakfast and Lunch

- Ensure signage is posted so students understand how to select a reimbursable meal. Schools are required to identify reimbursable meals to students; this aims to reduce the unintended purchase of a la carte items and help students make healthy food choices. Consider using the State of Idaho's "What's for Breakfast" poster.

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- A Child Nutrition (CN) Label or Product Formulation Statement (PFS) 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.

Breakfast:

- A CN Label was not provided for the Strawberry Nutri-Grain Bar
- A CN Label was not provided for the Blueberry Nutri-Grain Bar
- The CN Label submitted for the egg & cheese wrap included a watermark and showed an issue date of 09-17. 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.

Lunch:

- The documentation submitted for the cheese breadsticks was not an official CN Label. The manufacturer was contacted, and a CN Label was obtained which included a watermark. The original CN Label from the product packaging (without the watermark) should be secured and kept on file. The CN number was verified as active on the USDA CN Label Verification Report.
- The spec sheet obtained from the manufacturer included a meal pattern crediting statement but was not an official PFS. Secure a PFS for the following items:
  - ✓ Tomato Soup
  - ✓ Bean and Cheese Burrito
  - ✓ Corn Dog
  - ✓ Uncrustable

## **FISCAL ACTION**

Based on the benefit issuance error, there is a withholding of \$76.19 for Lunch and \$55.35 for breakfast. These amounts are both under the \$600 threshold and will be disregarded.

Therefore, 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,

*Cassandra Thompson*

Cassandra Thompson, BS  
NSLP Coordinator

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

Bonnie Slater, Child Nutrition Director  
Bea Conley, Business Manager

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