



April 14, 2025

Derek Bub, Superintendent
West Ada School District
1303 East Central Drive
Meridian, ID 83642

Dear Superintendent Bub

On January 13-17, 2025, Idaho Department of Education Coordinators Cambria Steffler, Jax Dunham, Cassandra Thompson, and Jessica Medrano conducted an Administrative Review (AR) of West Ada 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)
- Afterschool Snack Program (ASSP)

The sites reviewed were:

- Chief Joseph School of the Arts
- Crossroads Middle School
- Eagle Elementary School of the Arts
- Idaho Fine Arts Academy
- Owyhee High School
- Sawtooth Middle School

The State agency (SA) would like to commend Anne Brock, Kristen Homer, and the entire staff of West Ada 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 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 (SFA) 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 Chief Joseph School of the Arts, it was observed that the students were able to see information on the POS monitor while going through the service line. The SA provided suggestions to get a privacy screen for the computer 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 sites. This can either be a receipt of purchase for 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: Due February 3, 2025, Completed January 30, 2025

Response: The FSD has created an SOP for preventing overt identification at the POS and all staff have been trained. The account balance has been covered temporarily, and the POS has been moved so students cannot see the account balance. The district will be purchasing privacy screens for the POS computers. The district has also reached out to the POS software to ask if this can be removed from the screen. The POS software responded stating this feature is in the works but is not available yet.

Finding 2 – Resource Management

Per 7 CFR 210.14, SFAs must observe the restrictions on the use of nonprofit food service revenue so that all revenue is used for operating the meal service and/or improving its quality and efficiency. Revenue may be used for food, supplies, equipment and personnel to operate

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the meal service. The SFA used child nutrition funds to pay a total of \$3,095.12 for staff members to attend a staff recognition event that was put on through a donor. These funds were listed as a catering expense in the fund 290. Per 2 CFR 200.430(f) such incentives (such as staff appreciation gifts or incentive compensation bonuses) must be agreed to before services are rendered and should be a part of the SFA's normal compensation policy. The SFA would need to have a clearly documented compensation practice prior to distributing any gifts using the NPSFA funds. So, the compensation (to include any staff gifts) needs to be built into the budget in advance as part of the operational cost and not decided on an ad hoc basis.

CAP: Upload a copy of the fund 290 showing the \$3,095.12 has been reimbursed.

Due Date: Due April 11, 2025; Completed April 11, 2025

Response: The FSD uploaded documentation showing a total of \$3095.12 has been credited to the fund 290 for child nutrition.

COMMENDATIONS

- The state agency acknowledges the efforts the West Ada School District has made to ensure a successful and compliant program. The Food and Safety Supervisor is constantly on the road visiting all 58 schools to ensure the food quality and service is top notch. The state agency witnessed the excellent relationship the Food and Safety Supervisor has with the child nutrition team members she encounters. She is professional, approachable, and willing to jump in and assist where needed. The Food and Safety Supervisor is obviously respected and appreciated by her food service teams in the district.
- The food and nutrition staff were extremely organized and prepared for this review, which allowed the SA to be quick in our review. We really appreciate the prompt responses to our questions and the meticulous attention to detail with all of the documents.
- Eagle Elementary staff has a very nice inviting atmosphere in the cafeteria. Lunch was served in a nice timely manner serving a colorful nutritious meal. The Kitchen is also kept very nicely organized and clean.
- The camaraderie between the child nutrition team at Chief Joseph School of the Arts was amazing. It was lovely to see how well the team worked together while enjoying each other's company. The team truly adores interacting with the students, as each student is made to feel like family while in the cafeteria. Your students will remember you for years to come!
- The kitchen staff at Sawtooth Middle School was very friendly and showed great rapport with the students. The kitchen was very organized, and the team showed great efficiency at meal services.
- The staff at Idaho Fine Arts Academy were very warm and welcoming. They spoke highly of the students and provided them with high quality service.
- The Child Nutrition team at Owyhee High School was extremely impressive. The staff are detail oriented, and the SA appreciates the 'Gluten Free Preparation Area' at this

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location. Food safety is obviously a priority for this team that sincerely cares about their students, as well as working together to provide exceptional customer service.

TECHNICAL ASSISTANCE (TA)

Certification and Benefit Issuance

- During the review of applications, it was noted that a few applications had zero income. While the application is able to be approved with no income listed, it is best practice to contact the household to confirm that this is accurate.

Meal Counting and Claiming

- While observing the lunch meal service at Sawtooth Middle School, it was observed that one meal did not have a fruit or vegetable and was counted as reimbursable. As this was the only non-reimbursable meal noted during all the on-site reviews, this occurrence was noted as a non-systemic issue. The SFA should continue to train on the importance of identifying reimbursable meals under OVS to ensure that only reimbursable meals are being counted on the claim.

Offer Versus Serve

- Training logs for the child nutrition team are located at the district office. The training logs only listed "OVS Training" and did not specify "OVS Breakfast and OVS Lunch" were both part of the training agenda. The SA confirmed that both OVS breakfast and lunch trainings were completed. Future tracking logs and agendas should specify "OVS Breakfast" and "OVS Lunch" as there are different requirements for each of these. Training documentation should be recorded on the Professional Standards tracking log and maintained on file at the SFA for three years plus the current year. (7 CFR 210.10(e))

Meal Components and Quantities

- 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 provide adequate information. It is a requirement of the federal regulations to maintain complete and accurate production records.
 - Fruit types were not recorded on the production records.
 - Serving sizes did not always match what was actually offered. Per communication with sponsor, 1 cup of carrots is offered; however, production records indicate students may take 2 selections which would be 2 cup portion. Other vegetables such as green beans are served in 1/2 cup portions, but the students may take 2 servings for a 1 cup portion.

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- Grades 6-8 are included on the production records with grades 9-12; however, the production records only document grade group 9-12. Production records should document grades 6-12.

Food Safety

- The school district houses all of the food safety policies on their school's internal file share system. All staff at the school district have access to the food safety procedure documents. The food service director should ensure that all staff know how to access these files. The staff should consider having printed copies of procedures that are referenced often or would be needed quickly in case of emergency, such as the bodily fluid clean up procedure.
- In NSLP, if a product is past its "best if used by" date, it should not be served to students and should be discarded. Two products were found in the dry storage area that had outdated "best if used by" dates. Both Malt O Meal oatmeal and Mrs. Butterworth syrup had expiration dates of December 2024.

Professional Standards

- Upon inquiring about the hearing official civil rights training, it was noted that the SFA's application packet in MyIdahoCNP included outdated hearing official information. The SFA should ensure that information in MyIdahoCNP is updated in a timely manner.

Smart Snacks

- 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. Food and beverages sold to students must comply with specific nutrition standards, must be tracked as exempt fundraiser(s), or must be inaccessible during the school day (defined as midnight the day before until 30 minutes after the school day ends). The SA would like to acknowledge that the district has made conscious efforts to ensure all school stores and vending machines are smart snack compliant. The SA discussed fundraising and Smart Snacks with the West Ada District's Health and Safety Supervisor and identified that Owyhee High School has surpassed their 10 exempt fundraisers for the current school year. Jamba Juice is sold every Friday and quarterly, the high school has a fundraiser called "Storm the Quad," where hot dogs, chips and soda are cooked and served by school staff for \$3.00. The state agency recommends a fundraising procedure be created that includes communication to the Owyhee Food Service Director to enable her to accurately log fundraising efforts. During future reviews, if non-compliant fundraisers exceed the maximum amount allowed, this may escalate to a finding.

Resource Management

- Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure that all revenue from the sale of non-program foods supports the production of reimbursable school meals does not subsidize the sale

of non-program foods. All foods purchased by the food service department to be used as non-program food sales must be marked up to account for the cost of the food, labor, storage, and delivery of the products. All grade level menus should be completed on one NPFRT tool so calculations for food costs are kept in the same Excel workbook.

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
Anne Brock, Child Nutrition Director, West Ada School District
Kristen Homer, Assistant Child Nutrition Director, West Ada School District

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