



November 26, 2024

Ron Cote, Superintendent  
White Pine Charter School  
2959 John Adams Parkway  
Ammon, ID 83406

Dear Superintendent Cote,

On October 24, 2024, Idaho Department of Education Coordinators Cambria Steffler and Cassandra Thompson conducted an Administrative Review (AR) of White Pine Charter School 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 White Pine Stem Academy.

The State agency (SA) would like to commend Daretta Georgeson and the entire staff of White Pine Charter School 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

**Debbie Critchfield, Superintendent of Public Instruction**

**(208) 332-6800 | 650 W. State St., Boise, ID 83702 | [sde.idaho.gov](https://sde.idaho.gov)**

- 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 – 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). Per 7 CFR 210.31(e)(2).

**CAP:** Complete the Triennial Assessment and make the assessment available to the public. If the triennial assessment cannot be completed by the due date, 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.

**Due Date:** Due November 8, 2024; Completed November 8, 2024

**Response:** The LEA has completed the triennial assessment and has it posted on the website.

### Finding 2 – Food Safety – Buy American Provision

SFAs are required to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories, as applicable [7 CFR 210.21 (d)]. If a product from another country is sourced, then the SFA must have documentation that the domestic product is significantly higher in price or not available in sufficient quantities. Documentation for Fruit Cocktail with ingredients from Indonesia, Malaysia, Thailand and the Philippines was not available during the AR.

**CAP:** Upload a completed copy of the exemption form for Fruit Cocktail.

**Due Date:** Due November 8, 2024; Completed November 4, 2024

**Response:** The FSD uploaded a buy American exception form for the Fruit Cocktail with back up documentation from her vendor stating that it is not produced in enough quantity in the US. This will count in the new 10% cap on Buy American starting in SY25-26.

## COMMENDATIONS

- The Food Service Director was very organized and well prepared for the review. The FSD and all the kitchen staff had a great rapport with the students and made sure their mealtime was an enjoyable experience.

**Debbie Critchfield, Superintendent of Public Instruction**

**(208) 332-6800 | 650 W. State St., Boise, ID 83702 | [sde.idaho.gov](http://sde.idaho.gov)**

- Great job in trying to use more homemade items like the chili and lasagna. I am sure the students can taste the difference!

## TECHNICAL ASSISTANCE (TA)

### Certification and Benefit Issuance

- During the review of applications, it was noted that some 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.
- When obtaining the SA Direct Certification (DC) list, be sure to save it in a format that captures the appropriate heading to validate the date and where the list came from. The SFA recommends using the PDF download option to capture the required heading information.

### Offer versus Serve

- On training agendas, the SA recommends the SFA be specific when documenting what topics are covered during training. For your Offer Versus Serve training, the agenda states OVS. It is important to document that OVS Breakfast and Lunch trainings were both on the agenda.

### Meal Components and Quantities - Breakfast

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - A Child Nutrition Label or Product Formulation Statement 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. A Child Nutrition Label or Product Formulation Statement was not submitted for two processed menu items. A CN number was secured, and the CN numbers were verified as active on the USDA CN Verification Report for the menu items listed below to confirm meal pattern crediting. A sponsor should maintain this documentation on file to document meal pattern requirements as met.
    - Thursday 9/19/24
      - Egg Patty
      - Pork Sausage
    - The Child Nutrition (CN) Label submitted for the Egg and Cheese Omelet served on Friday 9/20/24 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.
      - Per new USDA Guidance SP05-2025 issued November 7, 2024 a CN label copied with a watermark displaying the product name

**Debbie Critchfield, Superintendent of Public Instruction**

**(208) 332-6800 | 650 W. State St., Boise, ID 83702 | [sde.idaho.gov](https://sde.idaho.gov)**

and CN number provided by the vendor and the Bill of Lading (invoice) can be used to demonstrate meal compliance.

- Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus. See below for a description of problem areas noted in completing production records.
  - Wednesday 9/18/24 - the production record was missing the number of servings per student for Mini Cinnis. The SFA confirmed that the production record will be updated to show such information.
  - Thursday 9/19/24 and Friday 9/20/24 - the type of fresh fruit planned was not documented. If fresh fruit is served, document the serving size as “whole” or “half”, unless the fruit is cut and measured in a volume cup.

### Meal Components and Quantities - Lunch

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - 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. The recipes submitted were not always written in standardized format with complete information. Items on the menu that need standardized recipes include the following:
    - Chili served on Monday 9/16/24
      - Add the recipe title.
      - Specify the fat content on the ground meat fat content.
      - Add the true yield made by the recipe.
      - Add the serving size per grade group.
    - Nachos served on Tuesday 9/17/24
      - Add the recipe title.
      - Change the ground meat content to 81/19 fat.
      - As dry onions are mentioned in the instructions, add dry onions as an ingredient with volume or weight measurement.
      - Add the true yield made by the recipe.
  - A Child Nutrition Label or Product Formulation Statement 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. A Child Nutrition (CN) Label or Product Formulation Statement was not submitted for some processed menu items. This documentation was secured for the menu items listed below to confirm meal pattern crediting. A sponsor should maintain this documentation on file to document meal pattern requirements as met.
    - Wednesday 9/18/24
      - Egg Patty - a CN number was secured and verified active.
    - Thursday 9/19/24

**Debbie Critchfield, Superintendent of Public Instruction**

**(208) 332-6800 | 650 W. State St., Boise, ID 83702 | [sde.idaho.gov](http://sde.idaho.gov)**

- Popcorn Chicken - a CN number was secured and verified active.
- Friday 9/20/24
  - Dick & Jane Crackers - the documentation submitted was issued in 2017. Current manufacturer documentation was secured to confirm crediting.
- Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the hot dog and cheese pizza breadsticks. The spec sheet submitted included a meal pattern crediting statement but was not an official CN Label or PFS.
- 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. See below for a description of problem areas noted in completing production records.
  - Tuesday 9/17/24 - production records should match the fat content of the ground beef to the one used for that day.

### Civil Rights

- 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 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. It is a requirement that the full NDS statement is the same size font as the rest of the document

### Food Safety

- The FDA Food Code requires that food be stored six inches off the floor, that food be protected during storage, and that there be no pests in the facility to contaminate food. In the dry storage area, the bottom shelves are less than six inches from the ground.
- The HACCP manual contained all of the required elements. To ensure the SOPs can be located quickly and efficiently, it is recommended that the SFA number the SOPs in the index or consider utilizing tabs for each SOP for easy retrieval.

### 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/summer/sitefinder>) 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.

**Debbie Critchfield, Superintendent of Public Instruction**

**(208) 332-6800 | 650 W. State St., Boise, ID 83702 | [sde.idaho.gov](http://sde.idaho.gov)**

## **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  
Dareta Georgeson, Child Nutrition Director, White Pine Charter School

## **CIVIL RIGHTS NONDISCRIMINATION STATEMENT**

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

**Debbie Critchfield, Superintendent of Public Instruction**

**(208) 332-6800 | 650 W. State St., Boise, ID 83702 | [sde.idaho.gov](http://sde.idaho.gov)**

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](mailto:Program.Intake@usda.gov)

This institution is an equal opportunity provider.