



January 2, 2024

Christine Ivie, Superintendent  
Mackay School District  
400 E Spruce  
Mackay, ID 83251

Dear Superintendent Ivie,

On October 12, 2023, State Department of Education (SDE) Coordinators Cambria Steffler and Jax Dunham conducted an Administrative Review (AR) of Mackay 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
- USDA Foods

The site reviewed was Mackay Schools.

The State agency (SA) would like to commend Mary Sacher and the entire staff of Mackay 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 statistical sample of 69 students resulted in an 11.59% error rate. Three applications, affecting eight students, were determined correctly, but were missing the required social security number information.

**CAP:** Contact households to update the social security number on the application. If the SFA is unable to get a social security number from the household, the benefit will need to be changed to paid after an adverse action letter is sent. Upload corrected applications to MyIdahoCNP.

**Date of CAP Completion:** Due October 27, 2023; Completed October 24, 2023

**Response:** The FSD uploaded all corrected applications.

*Based on the administrative error rate of 11.59% associated with certification and benefit issuance, the SFA will be required to conduct a second review of applications beginning school year 2024-2025, and continuing until further notice. A second review of applications requires a re-evaluation by the Confirming Official of the eligibility determination made by the Determining Official, based on the information provided by the household on the application. Depending on the outcomes of this second review, the SFA may be required to complete this process until the next administrative review. A Second Review of Applications Report will need to be filed as well while this requirement is in place. Please reference the Independent Review of Applications section in the Eligibility Manual, a copy of which is available in MyIdahoCNP Download Forms.*

### Finding 2 – Verification

Per 7 CFR 245.6a (h), all verified applications must be readily retrievable. The verification documents for SY22-23 were unable to be produced during the review. 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 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:** Develop a plan for completing verification. In this plan, include who will complete verification, when verification will be completed annually, and where documents will be stored for three years plus the current year.

**Debbie Critchfield, Superintendent of Public Instruction**

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**Date of CAP Completion:** Due October 27, 2023; Completed October 24, 2023

**Response:** The Food Service Director (FSD) uploaded a procedure with a timeline for when verification will be completed by the kitchen manager.

### **Finding 3 – Civil Rights**

All foodservice staff, determining, confirming, verifying, and hearing officials, and their supervisors must watch the full civil rights video training annually. Civil rights training must occur at the beginning of each school year and ongoing as necessary, including within 30 days of hire for any new employees. The district's confirming official and hearing official do not have documentation of completing the civil rights training for SY23-24.

**CAP:** The confirming and hearing officials must complete the civil rights training. Upload a certificate of completion or an agenda and sign in sheet documenting that these officials have completed the civil rights training.

**Date of CAP Completion:** Due October 27, 2023; Completed October 24, 2023

**Response:** The FSD uploaded an agenda and sign in sheet showing the district's confirming official and hearing official completed the civil rights training.

### **Finding 4 – 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 SFA's webpage does not contain the current full NDS. The full NDS is available in both English and Spanish on the SA website under [Civil Rights](#).

**CAP:** Post the current full USDA NDS on the school food service webpage. Notify the SA when the website has been updated.

**Date of CAP Completion:** Due October 27, 2023; Completed October 24, 2023

**Response:** The short statement and a link to the full USDA NDS has been posted to website.

### **Finding 5 – Local School Wellness Policy**

Per 7 CFR 210.31(e)(2), 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.

**Date of CAP Completion:** October 27, 2023; Returned for correction; Completed November 14, 2023

**Response:** The FSD has uploaded a procedure outlining that the triennial assessment for the Local Wellness Policy will be completed in the required timeframe by the principal and kitchen manager.

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### **Finding 6 – Food Safety**

Each SFA must have a written food safety plan for compliance with Hazard Analysis Critical Control Point (HACCP) program criteria found in 7 CFR 210.13(c). SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared or served. The SFA has a HACCP manual, but it is an outdated version that references outdated food codes. The outdated HACCP manual (2005 NFSMI) should be updated with more current standard operating procedures (SOPs). Additionally, the SFA must include an employee exclusion SOP in accordance with Idaho food code. Ensure all kitchen and cafeteria staff are trained on these food safety elements each year. A template for a HACCP procedure can be found at [The Institute of Child Nutrition](#) (ICN), and a sample employee exclusion SOP can be located in MyIdahoCNP's download forms.

**CAP:** Update the HACCP manual to include updated SOPs and food codes. Ensure to customize the SOPs to fit the SFAs food service needs and include the implementation date for each SOP. Once completed, upload the new HACCP manual and employee exclusion SOP for review.

**Date of CAP Completion:** Due October 27, 2023; Completed October 12, 2023

**Response:** The HACCP manual has been updated using the ICN HACCP template. The FSD has reviewed and signed each SOP in the new HACCP manual.

### **Finding 7 – 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 current food safety inspection is hanging in the kitchen which is not a publicly assessable location.

**CAP:** Move the health inspection documentation to a publicly visible location.

**Date of CAP Completion:** Due October 27, 2023; Completed October 12, 2023

**Response:** The food safety inspection was moved to cafeteria near the service line while the SA was on-site.

### **Finding 8 – Offer versus Serve**

All food service line staff must receive annual Offer versus Serve (OVS) training when OVS is implemented. The FSD took the Summer Foods Service Program OVS training instead of the NSLP OVS training. Training must include a certificate of completion, or an agenda and sign-in sheet and training documentation must be maintained on file at the SFA for three years plus the current year. OVS training is available through the [Idaho CNP training portal](#) and a training log is available in MyIdahoCNP Download Forms.

**CAP:** Complete the NSLP Breakfast and NSLP Lunch OVS trainings in the training portal. Upload your certificate of completion to MyIdahoCNP.

**Date of CAP Completion:** Due October 27, 2023; Completed October 17, 2023

**Response:** The FSD has uploaded certificates of completion for the OVS Breakfast and OVS Lunch trainings.

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## COMMENDATIONS

- The FSD is well organized and was prepared for the administrative review. All documents were provided in a timely and organized manner.
- The food service staff have a great rapport with the students. They have created a fun and inviting environment for the students to have breakfast and lunch.
- The FSD has a positive attitude and is open to feedback provided by the State Agency. She is quick to implement the changes required from the review.

## TECHNICAL ASSISTANCE (TA)

### Certification and Benefit Issuance

- An application from SY22-23 was determined for SY23-24. The application was dated within the 2023-2024 school year, and it is unsure of where the household received this application from. The application was determined correctly. Ensure that the correct SY application is obtained for distribution sometime after July 1 each school year.
- The SFA's 30th day of the carryover period is October 18, 2023. The SFA must ensure that all 5 students which are receiving free benefits for the current year are switched to paid after meal service on this day if documentation for the current school year is not received by the end of the carryover period. The SFA must upload a benefit issuance list showing that these students have been changed to paid at the end of this date in MyIdahoCNP for the SA to review.

### Meal Components and Quantities

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - If milk delivery does not have required milk due to shortage, call the state agency as soon as possible for guidance. Do not accept, or serve, any milk other than fat free or 1% unless permission is given from the state agency. Get the required milk as soon as possible before meals are served.
  - 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.
  - Portion size for banana shows  $\frac{1}{2}$  for grades K-8, please indicate if this is 1 each or  $\frac{1}{2}$  of a Banana. Portion size for banana shows 1 for grades 9-12, please indicate if this is 1 banana or 1 full cup meal contribution which would be 2 bananas.
  - The apple planned for Thursday 9/28 indicated the serving size of 1/2c. One apple is equal to 1 cup of fruit per the Food Buying Guide, please adjust production record accordingly.
  - Meal contributions did not always match the contributions provided by product formulations statements or CN label provided.

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- Milk types were not recorded on the production records for the planned meals. Make sure to fill in the planned milk types as you are filling out the production records.

### Professional Standards

- Consider implementing a process that ensures the required training – food safety, OVS, and civil rights- are conducted at the beginning of each school year and adequately documented. When new employees are hired, ensure necessary training is received within the first 30 days.

### 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. Vending, school stores, and fundraising need to comply with specific nutrition standards. Refer to A Guide to Smart Snacks School available at the USDA website.

### School Breakfast and SFSP Outreach

- SFAs must inform eligible families of the availability of reimbursable breakfasts served under the SBP. In addition to providing all households informational packets with Free and Reduced Meal Applications, schools must send reminders regarding the availability of the SBP multiple times throughout the school year (7 CFR 210.12 (d)). The foodservice page on the district’s website would be a good location to promote the breakfast program.
- 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/meals4kids>) 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.

## 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  
Jennifer Butler, MEd, SNS, NSLP Coordinator, Idaho Child Nutrition Programs  
Jax Dunham, BS, RDN, NSLP Coordinator, Idaho Child Nutrition Programs  
Mary Sacher, Child Nutrition Director, Mackay School District

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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)

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