



April 29, 2024

Sue Styren, Principal  
Holy Family Catholic School  
3005 W Kathleen Ave  
Coeur d'Alene, ID 83815

Dear Principal Styren,

On January 22, 2024, Idaho Department of Education contractor CN Resource (CNR) conducted an Administrative Review (AR) of Holy Family Catholic School for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)

The site reviewed was Holy Family Catholic School.

The State agency (SA) would like to commend Alicia Linscott and the entire staff of Holy Family Catholic 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

- 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 findings determined by CNR and the SFA response to the findings:

## FINDINGS AND CORRECTIVE ACTION PLAN (CAP)

### Finding 1 – Meal Components and Quantities

For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirements for grain. The federal regulations require weekly minimum amounts of grains to be served. The weekly requirement of 8 oz. eq. was not met for grades K-8. The menu offered a minimum of 7.5 oz. eq. of grain throughout the week. Consider increasing one of the meals to at least 1.5 oz. eq. grain to meet weekly requirements.

**CAP:** Provide a written statement identifying how the weekly grain requirements are now met along with documentation demonstrating the correction.

**Date:** Due February 27; completed March 14, 2024

**Response:** The SFA added granola as an option to the smoothie meal and uploaded the recipe. The addition of granola has fulfilled the grain requirement for the week of review.

### Finding 2 – Professional Standards

USDA has established annual training requirements for all school professionals [7 CFR 210.30]. It is required that some form of documentation that tracks training be kept on file to show annual Professional Standards compliance. The SFA did not submit proof that training hours are being tracked.

**CAP:** Complete and uploaded a tracking tool used to track professional standard hours.

**Date:** Due February 27; completed February 20, 2024

**Response:** A completed log was uploaded for the director showing 19 hours of training completed for SY23-24. Certificates of Completion supporting the recorded trainings were also uploaded.

## COMMENDATIONS

- The staff was great to work with and the meals offered a great variety for students.
- All the documents and information the director and school uploaded to the system was greatly appreciated.

## TECHNICAL ASSISTANCE (TA)

### Meal Counting and Claiming

- Prior to the submission of a monthly claim for reimbursement, the SFA must review the meal count data for each school to ensure the accuracy of the claim per CFR 210.8(a)(2).

### Dietary Specifications and Nutrient Analysis

- During the Administrative Review the results of the menu review were provided to the sponsor in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance.
- All menus served must meet all daily and weekly meal pattern requirements for the specific grade group. The sponsor was encouraged to provide training as needed to ensure compliance.
- Please note that per USDA guidance any repeat menu findings in future Administrative Reviews may result in fiscal action.

### Verification

- The household verification notification letter requires elements that can be found in the Eligibility Manual for School Meals which also outlines the verification process. The SA provides template letters available in Download Forms of MyIdahoCNP.

### Professional Standards

- Employee training tracking Logs must include the key area/topics and training subjects completed. The SA has made available a template tracking log prompting this information available in Download Forms of MyIdahoCNP. Information on Professional Standards Learning Objectives and Topics with Codes which can be found on the [USDA Professional Standards Website](#)
- 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.

### 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/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.

### Resource Management

- Any positive balance remaining in the nonprofit food service account at the end of the school year must be carried over to the next school year as the beginning balance in the nonprofit food service account. Any negative balance in the account at the end of the year must be cleared by funds from non-federal sources, such as the general fund. The

food service fund cannot begin a fiscal year with a negative fund balance. It was discovered that the SFA's "Cafeteria - NSLP Program Funds" tracker, which is used to track the accumulation of food service funds, showed that the SFA was rolling forward negative fund balances in the nonprofit school food service account and this is not allowed.

## **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,

*Jennifer Butler*

Jennifer Butler, MEd, SNS  
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Alicia Linscott, Child Nutrition Director, Holy Family Catholic School

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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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