



April 18, 2019

Bridgit Arkoosh, Principal  
Holy Family Catholic School  
3005 W. Kathleen Ave.  
Coeur d'Alene, ID 83815

Dear Principal Arkoosh,

On March 12, 2019, State Department of Education (SDE) Coordinators Jennifer Butler and Lynda Westphal conducted an Administrative Review of Holy Family Catholic School for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- USDA Foods
- Special Milk Program (SMP)

The State agency (SA) would like to commend Sharon Kavanaugh 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 Administrative Review 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 Administrative Review a minimum of one time during a three-year cycle 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 – Benefit Issuance

Two meal applications, missing Social Security Number (SSN) information, were determined for benefits and should have been denied for being incomplete. One of the incomplete applications was determined incorrectly resulting in a change from free to reduced price benefits.

**Corrective Action:** Obtain missing SSN information to complete the applications and upload the two completed applications into MyIdahoCNP. Send an adverse action notification letter to the household for the application that was incorrectly determined and update the benefit issuance list following the 10-day period. Upload a copy of the adverse action notification and the updated benefit issuance list into MyIdahoCNP.

**Due Date for CAP completion:** March 27, 2019; completed March 18, 2019

**Corrective Action Response:** Copies of the applications completed with the missing SSNs were uploaded, along with the adverse action notice sent to the family and an updated benefit issuance list. Fiscal action was calculated on the benefit issuance error.

### Finding 2 – Meal Counting and Claiming

A systemic claiming error was discovered; the review month claim was inaccurate due to the claim being filed prior to updating student eligibility resulting in an under claim of \$163.80.

**Corrective Action:** The Business Manager will develop a plan to edit check claims prior to submission to ensure accurate meal claiming. Upload the plan into MyIdahoCNP.

**Due Date for CAP completion:** March 27, 2019; completed March 25, 2019

**Corrective Action Response:** The provided plan states, “A Benefit Issuance verification field has been added to the Claim section of the monthly lunch count spreadsheet used at Holy Family Catholic School. This field asks for the “updated date” of the Benefits Issuance list used for verification. Until the date is entered an adjacent field shows *Verify Benefits*. Once the date is entered the claim for that month is ready to be filed.”

### Finding 3 – Special Milk Program (SMP)

Only students who do not have access to lunch service may participate in the Special Milk Program (SMP). The SFA has previously advised that pre-kindergarten and pre-school students did not have access, however the SA observed some of these students purchase lunch or milk during the lunch service. The SMP will need to be discontinued as these students are able to participate in lunch. Additionally, the SFA was approved to operate SMP as "pricing with free option", however all students are being claimed as free and required to pay a participation fee at the beginning of the year. Claiming all milks as free resulted in over claiming.

**Corrective Action:** The SA will disallow the unallowable SMP claims and apply fiscal action. The SFA will need to update their application packet to remove the SMP and will not be able to submit SMP claims for January or February. If, the LEA wishes to continue to provide milk to these students, they may opt to sell these milks a la carte.

**Due Date for CAP completion:** March 27, 2019; completed March 12, 2019

**Corrective Action Response:** The sponsor application packet was approved to no longer participate in the SMP and the SA calculated fiscal action by disallowing \$146.86 of unallowable SMP claims.

#### **Finding 4 – Meal Components and Quantities - Lunch**

Contractor CN Resources (CNR) conducted the menu review and identified the following for the week of review: 1) A meat/meat alternate was offered daily, however the minimum weekly requirement was not met; 2) A grain was offered daily, however the minimum daily and weekly requirements were not met.

**Corrective Action:** Provide a written statement identifying how the daily and weekly grain and daily meat/meat alternate requirements will be met and provide supporting documentation of corrections.

**Due Date for CAP completion:** Completed February 22, 2019

**Corrective Action Response:** Meat/meat alternate portion sizes were increased by adding additional meat and cheese to the deli sandwich and chef salad. Grain servings were also increased.

### **Commendations**

- Staff displayed good food safety practices and were friendly.
- The SFA significantly lowered their application error rate and will no longer be required to conduct a second review of applications.
- During the menu review, the CN Resource contractor provided the following commendations:
  - The school posts really nice pictures of each meal that is being offered that day. This gives the students a clear idea of what each choice looks like (and probably increases the chance that they will choose to eat school lunch). What a great idea!

### **Technical Assistance (TA)**

#### **Verification**

- Consider starting the Verification process earlier so that the benefits are changed by November 15. A reminder notification should be sent prior to the deadline for submission and it is recommended that the check stubs be date stamped when received. The "Verifying Official's Signature" on the back of the application must be completed when the verification results are determined.

#### **Meal Counting and Claiming**

- Since the LEA will no longer be participating in the SMP, they may elect to have enrolled pre-kindergarten and pre-school students participate in the NSLP and submit a monthly claim for reimbursement beginning in March 2019.

## Meal Components and Quantities

CN Resource completed the menu review and provided the following TA:

- During the Administrative Review, the results of the menu review were provided to the SFA in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served within the SFA must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA 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.
- The federal regulations require menus to be planned that meet the minimum weekly 9 oz. eq. meat/meat alternate requirements. The reviewed menu only met a minimum of 7.75 oz. eq. for the week.
- The federal regulations require menus to be planned that meet the minimum 1 oz. eq. daily grain requirement for grades K-8, as well as the minimum weekly 8 oz. eq. requirement for grains.
- Production Records must be completed throughout meal service and maintained every day. At a minimum the production records should include the name of the item, the recipe or item number, the portion size, the number of planned portions, the component contribution amount and the number of actual servings. All kitchen staff should be trained on completing productions records so that everyone can complete the records.

## Offer versus Serve (OVS)

- Students must be presented with all food components in the proper quantities and be able to decline some components to make a reimbursable meal; pre-plating is not an option when implementing OVS. This was observed for the PK to 1<sup>st</sup> grade students, but not the older grades.

## Food Safety and 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 baby corn from Thailand and tomatoes from Mexico was not available during the AR. The SA has a “Buy American Exemption Form” that can be used for documentation. This form is available in the Download Forms section of MyIdahoCNP. Include the Buy American Provision in SFA solicitation documents for the purchase of commercial foods. Products must be checked upon receipt and not accepted if the products do not comply with the Buy American Provision, unless there is documentation to justify the exception (exorbitant pricing or insufficient availability).

## Civil Rights

- Update your non-discrimination statement on the posted menus to the correct USDA non-discrimination statement available at the [State Agency Civil Rights webpage](#). The

short non-discrimination statement reads, "This institution is an equal opportunity provider."

### **Local School Wellness Policy (LWP)**

- The LEA adopted the Diocese of Boise Catholic Schools Wellness Policy, but did not update the attached *Appendix A: School Level Contacts* to include the correct school, employee names, titles, and contact information. Update *Appendix A* and repost on the website so the public can contact the appropriate personnel.
- 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 the progress made in attaining the goals of the local wellness policy. LEAs must make this assessment available to the public.

### **Procurement**

- A separate procurement review will be completed in 2019-2020 with a State Agency closure letter sent following completion of corrective action (if needed); please follow the guidance provided.

### **Fiscal Action**

Fiscal action was calculated on benefit issuance errors, the December 2018 under claim error, and September – December 2018 unallowable SMP claims. However, since this amount falls under the \$600 threshold, the fiscal action will be disregarded and no financial adjustment will occur.

### **Your review is now closed.**

There is no fiscal action resulting from this review. Should you wish to appeal any of these findings please follow the appeal procedures on the State Agency Appeal Procedures document located on [the SDE web page](#).

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, MEd, SNS  
NSLP Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs  
Sharon Kavanaugh, Child Nutrition Director, Holy Family Catholic School

## Civil Rights

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To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at [the USDA website](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.