



September 12, 2017

Mister Skip Greene, Superintendent
Idaho Juvenile Corrections Center – St. Anthony
2200 E 600 North
St. Anthony, ID 83445

Dear Mr. Greene,

On September 6, 2017, State Department of Education (SDE) Coordinator Lynda Westphal conducted an Administrative Review of St. Anthony Juvenile Corrections Center 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 the St. Anthony Juvenile Corrections Center main campus.

The State agency (SA) would like to commend Robin Klein and the entire staff of the St. Anthony Juvenile Corrections Center 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 (HHFKA), 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 – Civil Rights Training

While it was reported that all the main staff has had the required annual Civil Rights training, there was no sign-in sheet to support the training. Please have all trained individuals who watched the Civil Rights training sign the sign-in sheet and develop a plan to ensure all staff takes Civil Rights training annually, whether by watching the video or reading the one page handout for front-line staff.

Timeframe for CAP completion: September 20, 2017

Sponsor Response to CAP: The IT director talked with the reviewer during the review and he will make annual civil rights training an annual requirement with links in their on-line system. The completed sign-in sheet for the current year was e-mailed to the State agency (SA) on September 11, 2017 to close this finding.

Commendations

- Robin and her staff do an excellent job with the paperwork and vegetable subgroups. All staff I interacted with were professional and wanted to make sure all requirements were met. This is appreciated by the reviewer.
- The Wellness policy is well written and some TA is listed below to improve one area. The staff prepared a wonderful meal and showed pride in serving all the children in a quick and friendly manner.

Technical Assistance (TA)

Meal Counting and Claiming

- Gave technical assistance (TA) that the meal count sheet should word the need for a gallon of milk at the intake cabin differently (it appeared to the reviewer that milk was not served by the indication on the meal count sheet that “No Milk” was needed – change the wording to Milk still available at intake).

Dietary Specifications and Nutrient Analysis

- Kerry McKaig, RD, LD, contractor, reviewed the NutriKids K-8 Breakfast and Lunch Certification tools for grades 9-12 and provided TA to Robin Klein, food service manager, on the following topics:
- Technical assistance was given on how to complete reports using NutriKids software and how to enter the contribution components for cycle 3. Ladd from IT was able to update the software from version 14 to 17.6.
- The breakfast menu for the week of review met all of the specifications.
- The lunch menu weighted average for sodium is 1957 mg, which is over the target of 1420 mg according to the NutriKids Portion Values spreadsheet.



- Lunch for each day of the review week is high in sodium for lunch and 2 days are high for breakfast.
- The sodium was corrected to 1898 mg after clarifying labels and recipes for the potato pearls, chicken taco, twice-baked potato and stir-fry sauce. Technical assistance was given to switch to low sodium potato pearls. Technical assistance was given to use low sodium soy sauce in the stir-fry sauce recipe and look for lower sodium twice baked potato or change the menu. The chicken taco sodium level was incorrectly entered into NK but was corrected.
- To reduce the sodium for this lunch menu week, technical assistance was provided to switch to low sodium products available from their suppliers including:
- Potato pearls, pork gravy mix and all other gravy mixes, fajita seasoning, tomato salsa, tomato juice, sliced cheese, bacon bits, raspberry vinaigrette, stir-fry sauce, wild rice mix, black beans and turkey hot dog.
- In recipes that call for both table salt and garlic salt, try using just one or cut the amount in half. Experiment using different herbs and spices and salt free mixtures like *Mrs. Dash* and *Butter Buds*.
- Recommend serving low fat or fat free sour cream and salad dressings instead of full fat versions.

Meal Components and Quantities

- Kerry McKaig reviewed the NutriKids and USDA K-12 Breakfast and 9-12 Lunch Certification tools for grades 9-12 for the review week of July 9-15. The reviewer compared the recipes, CN labels, manufacturer formulation statements and production records for the review week.

Tuesday Breakfast

- According to the Exhibit A grain chart, 1 cup oatmeal = 2 oz. grain and ¼ cup granola = 1 oz. grain equivalent for a total of 3 oz. instead of 2 oz.

Wednesday breakfast

- 5.5 oz. tomato juice + 4 oz. apples + 2 oz. fresh orange half = 11.5 oz. = 1 3/8 cup
- WG tortilla served is 1.5 oz. grain equivalent according to the label instead of 1 oz.
- A breakfast skillet was substituted for the planned breakfast burritos. This was noted by the cook on the production record. All of the ingredients were written on the production record except for the eggs and salt. A recipe was created with the ingredients used to determine crediting.

Sunday lunch

- Pork chop is 4 oz. Meat/Meat Alternative (M/MA) according to the label instead of 2 oz. M/MA listed on the production record.

Monday lunch

- Production record lists portion of tortilla chips as 7 chips = .5 grain oz. equivalent but NK spreadsheet lists the planned portion as 14 chips = 1.0 grain oz. equivalent.



Production Records

- Discussed reviewing and updating the information on the production records with NutriKids and with any new products.
- Recommend adding to the production record the weight portion of the food in the portion size column to eliminate any confusion in preparing and serving the proper portions.

Food Safety and Buy American Provision

- Starting July 1, 2018, a person in charge needs to have an approved Food Safety training with a proctored exam, such as ServSafe, Prometric, etc. A list of approved courses can be found at this [Department of Health and Welfare Site](#).

Local School Wellness Policy

- Gave TA on one area of improvement for the wellness policy; however, this will need to be revised if the Café is allowed to sell food to children during the school day.

Smart Snacks

- If the Café is selling snack to students, then the food products sold have to be Smart Snack compliant during the school day. If it is ONLY being sold to staff, then the food products do not have to follow the Smart Snack Rules.
- If the JCC plans to use tickets as a reward program to students and they can purchase the products from the Café, then the tickets count as “money” and the snacks have to follow Smart Snack regulations.

Procurement

- Two products, water chestnuts from China and tuna from Thailand, are products from out of the country. You may use these products; however, documentation is required to show the product from USA is higher in cost or does not exist.
- The Procurement Review (first round) is giving a baseline on where purchasing procedures need to improve. It is all considered technical assistance unless there is egregious non-compliance. Being a JCC, you should be following the IDAPA rules regarding purchasing, which includes a Code of Conduct and Procedures. This review is to identify areas of improvement, not to mandate a move to a single vendor. Some of the considerations in purchasing food are the sodium content of the food and some vendors may not be able to fulfill this need. The SA also recommended joining the Snake River Co-Op purchasing group to receive the food that the schools do for the best possible price.



GENERAL PROCUREMENT REVIEW completed by Keddington & Christensen, LLC.

- a. **Comment:** The SFA does not prohibit the acquisition of unnecessary or duplicative items in their procurement policy as required in 2 CFR 200.318(d).
 - i. **Technical Assistance:** The SFA should update their procurement policy to include a prohibition of the acquisition of unnecessary or duplicative items.

- b. **Comment:** The SFA's procurement policy does not include affirmative steps required by 2 CFR 200.321 to assure that small, minority, and women's businesses enterprises and labor surplus firms are used when possible.
 - i. **Technical Assistance:** The SFA should update their procurement policy to include the following:
 - 1. The SFA takes affirmative steps as in 2 CFR 200.321 to assure that small, minority and women's businesses enterprises and labor surplus firms are used when possible. These steps include:
 - 2. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
 - 3. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
 - 4. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
 - 5. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
 - 6. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development of Commerce; and requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed above.

SMALL PURCHASES (INFORMAL PROCUREMENT)

- c. **Comment:** The SFA did not obtain informal (verbal or otherwise) bids from 2 or more qualified sources as required by 2 CFR 200.320(b)/7 CFR 3016.36(d)(1). In one instance, the SFA did not consider it necessary since the purchase was below \$10,000 (but was more than \$3,500). However, the SFA's procurement policy recommends obtaining three bids for purchases up to \$10,000. The State's threshold for requiring informal bids are for purchases between \$3,500 and \$25,000. In the other instance, the SFA acknowledges that it should have put it out to bid, but did not.



- i. **Technical Assistance:** When performing small purchase (informal procurements), the SFA should obtain price or rate quotations from two or more qualified sources for small purchases (2 CFR 200.320(b)).

- d. **Comment:** The SFA did not maintain records sufficient to detail the procurement as per 7 CFR 3016.36(9). As a result, we were unable to test if a clear and accurate description for technical requirements were provided as no bid documentation was kept as per 2 CFR 200.319(c)(1).
 - i. **Technical Assistance:** The SFA should maintain records sufficient to detail a significant history of all small purchases and ensure that a clear and accurate description of the product or service being procured is included.

- e. **Comment:** The SFA does not ensure compliance with Buy American as per 7 CFR 210.21(c)(3)(d).
 - i. **Technical Assistance:** The SFA should provide oversight to ensure compliance with the Buy American provision.

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. 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,

Lynda Westphal, MHS, SNS
NSLP Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Robin Klein, Child Nutrition Director, St. Anthony Department of Juvenile Corrections

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