



October 30, 2017

Trent Bodily, Director  
Mini-Cassia Juvenile Detention Center  
718 H Street  
Rupert, ID 83350

Dear Mr. Bodily,

On September 6, 2017, State Department of Education (SDE) Coordinator Heather Blume conducted an Administrative Review of Mini-Cassia Juvenile Detention Center (JDC) for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- USDA Foods

The State agency (SA) would like to commend Charlotte Reedy and the entire staff of Mini-Cassia Juvenile Detention 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, 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 – Professional Standards**

Develop a plan for tracking training hours in order to comply with the Professional Standards requirements. Explain this plan and the frequency of the tracking (monthly, quarterly, etc.) system to the State agency.

**Timeframe for CAP completion:** September 29, 2017

**Sponsor Response to CAP:** Charlotte emailed the professional development tracking sheet and plan to document training for Mini-Cassia JDC staff and the staff of the contracting agency, Thomas Cuisine Management on September 29, 2017.

## **Finding 2 – Food Safety**

A copy of the food safety plan (HACCP) must be posted in a location accessible to staff serving meals. Annual and as-needed food safety training must occur and documentation of training (agenda and sign in sheet) must be kept on file for three years plus the current year. (7CFR210.13(b))

Print a copy of relevant food safety procedures from the Download Forms section of MyIdahoCNP and make available to staff who help with meal service at Mini-Cassia JDC. Email a plan for training staff on Food Safety.

**Timeframe for CAP completion:** September 29, 2017

**Sponsor Response to CAP:** A copy of the food safety plan (HACCP) has been copied from the MyIdahoCNP website and placed in the Control Room of the Juvenile Detention Center. Staff will be required to read relevant food safety procedures and record their training time on the “Professional Standards Training Log”. Notification of this plan was emailed on September 29, 2017.

## **Finding 3 – Nondiscrimination Statement**

Update the non-discrimination statement to the correct [USDA Non-Discrimination Statement](#) available on the State Agency website.

**Timeframe for CAP completion:** September 29, 2017

**Sponsor Response to CAP:** A link to the “USDA Nondiscrimination Statement” was added to the Mini-Cassia County website while the State agency reviewer was on-site.

## **Finding 4 – Buy American Provision**

Each SFA is required to purchase domestic agricultural commodities 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 food service must have proof that the domestic product is significantly higher in price or not available in sufficient quantities. 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 product shortages).

**Timeframe for CAP completion:** September 29, 2017

**Sponsor Response to CAP:** The requirement to purchase domestic agricultural commodities or products that are produced and processed substantially in the United States or territories has been

discussed with Thomas Cuisine Management. It has also been added to the Mini-Cassia JDC “Invitation to Bid” for future invitations. A copy of the Invitation to Bid was emailed to the State agency on September 29, 2017.

## Commendations

- Charlotte was extremely organized and helpful. She had all the review documentation prepared beforehand and answered all questions with a great attitude.
- Jeff and Karla with Thomas Cuisine Management were very receptive to feedback and provided the requested documentation in a timely manner.
- Kitchen staff delivering the meals followed the proper protocol to correct food temperatures upon delivery. They were also quick to deliver a grain serving when it was noted that the roll that was on the planned menu was missing.

## Technical Assistance (TA)

### **Dietary Specifications and Nutrient Analysis**

- Technical Assistance (TA) was made to switch the cranberry juice, which was 15% juice, to the mainline juice which was 100% juice.
- The cook who prepares the JDC foods mentioned that she would typically use the fryer for items like corn dogs. TA was given to use the oven during the review and Jeff, the manager, stated that is how it always should be done. Staff training was recommended for those preparing the JDC menu.
- Provided technical assistance on the calorie ranges as shown by the nutrient analysis.

### **Meal Components and Quantities**

- It was noted that the portion size of the cornbread should be increased to meet the 2 oz. minimum grain eq. or add an additional grain to meet this requirement.
- Product formulation statements were needed, and later provided, for the Pillsbury biscuit and graham crackers.
- Additional product formulation statements were needed for the Krustez Wheat and Honey Pancakes, Krustez Whole grain Muffin Mix, and General Mills bowl pack cereals.
- Reviewer advised weighing out the meat items, such as chicken or steak, to ensure a 2 oz. weighted portion size rather than a 2 oz. volume portion size.
- Product Formulation Statements from the manufacturers need some work. The manufacturer did not split the amount of whole grains from enriched grains in formulation statements. Whole grains and enriched grains do not show individual amounts of each type of grain.

### **Food Safety and Buy American Provision**

- Technical Assistance was given to request health inspections from the public health departments, unless adequate food safety inspection documentation can be provided by other inspection agencies.
- The most recent food safety inspection report must be posted in a location visible to the public. (7 CFR 210.13(b))

- 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 on the [Department of Health and Welfare website](#).

### **Civil Rights**

- Update the Civil Rights Statement to the current nondiscrimination statement as directed by USDA. The full statement may be found on the [Idaho Child Nutrition Program website](#) and should be included on participant intake manual.

### **Professional Standards**

- The United States Department of Agriculture has established minimum Professional Standards for school nutrition professionals who manage and operate the National School Lunch and School Breakfast Programs, effective July 1, 2015. The standards provide annual training requirements for all school nutrition professionals. It is required that some form of documentation be kept on file to show Professional Standards compliance; options include the FNS online tracking tool at <http://www.fns.usda.gov/school-meals/professional-standards> and two Professional Standards tracking resources available in MyIdahoCNP under Download Forms in the Professional Standards section.
- Keep a Professional Standards Tracking log for employees who work with the meal service as discussed. This pertains to both Mini-Cassia staff who work with meal delivery and to employees of Thomas Cuisine Management.

### **Procurement**

- The Procurement Review (first round) is giving a baseline on where purchasing procedures need to improve. Please follow the guidance provided in your general procurement review completed by Keddington & Christensen, LLC.

### **Food Service Management Contract**

- Comment: The SFA did not monitor the FSMC through periodic on-site monitoring as required in 7CFR 210.16(a)(3).
- Technical Assistance: The SFA should perform a periodic on-site visit to monitor the food service operation.
- Comment: The SFA did not monitor for compliance with the “Buy American” provision as required in 7 CFR 210.21(d).
- Technical Assistance: The SFA should perform monitoring 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 located on the Idaho Child Nutrition Programs website.

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,

Heather Blume., M.S., R.D., L.D., S.N.S.  
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs  
Charlotte Reedy, Deputy Director, Mini-Cassia Juvenile Detention Center

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