



October 11, 2017

Mr. Steve Jett, Superintendent  
Southwest Idaho Juvenile Detention Center  
222 N 12th  
Caldwell, ID 83605

Dear Mr. Jett,

On August 29, 2017, State Department of Education (SDE) Coordinators Heather Blume and Lynda Westphal conducted an Administrative Review of S.W. Idaho Juvenile Detention Center for the following United States Department of Agriculture (USDA) programs:

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

The sites reviewed were the Southwest Idaho Juvenile Detention Center.

The State agency (SA) would like to commend Dawn Mathis and the entire staff of the Southwest Idaho 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 (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 – Annual Mandatory Training**

Staff from the facility did not complete annual training that was offered on-line through the state of Idaho CNP. Dawn must take the training by the due date and it is recommended that Kevin, the manager from CBM, should be trained in meal patterns.

**Timeframe for CAP completion:** September 14, 2017

**Sponsor Response to CAP:** Certificates from the On-Line classes taken August 30, 2017, and September 11, 2017, were sent via e-mail on September 13, 2017.

### **Finding 2 – Meal Counting and Claiming**

It appears that the July 2017 meal counts were off by milk counts (inmate getting extra milk periodically). Only count the number of meals given. If extra milks are served, they are just extra component – not reimbursable. Have a procedure in place to ensure this does not happen in the future. Over claimed six lunches and seven breakfasts, which totals \$34.49 and will be disregarded.

**Timeframe for CAP completion:** September 14, 2017

**Sponsor Response to CAP:** Per e-mail from Steve Jett on August 30, 2017 “Dawn and I looked over the meal counts and I conducted a training to make sure correct figures are being used to prepare reimbursement claims”.

## Commendations

- Dawn does a good job with the paperwork and the staff of the facility was nice, accommodating and quick to answer questions for the reviewers, which was appreciated.

## Technical Assistance (TA)

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

- Steffanie Sandoval, RD, LD, contractor, reviewed the Breakfast and Lunch Certification tools for grades 9-12 and provided TA to Kevin, food service manager at the adult jail, on the following topics:
- Additional documentation was needed for the following products: turkey “ends and pieces”, breakfast patty, and charbroil patties.
- The turkey ends and pieces did not have a product formulation statement (PFS). Distributor stated they did not have these statements as the products were a by-product. If no formulation statement can be provided, the product should be changed for another product with a valid PFS or CN label.
- The breakfast patty and charbroil patties need the Alternate Protein Product (APP) statement which was received after the review.
- The hamburger bun also did not meet the 2 ounce equivalent for grains. No other grains were offered at this meal. Kevin stated he would change out this product for two slices of whole grain (WG) bread that would meet the minimum 2 ounce grain equivalent.

## Meal Components and Quantities

- Steffanie Sandoval, RD, LD, contractor, reviewed the Breakfast and Lunch Certification tools for grades 9-12 for the review week of July 9-15. The reviewer compared the recipes, CN labels, product formulation statements and production records for the review week.
- All food needs to be properly credited prior to service for USDA programs. If formulation statements are not available, another product must be substituted. Turkey ends and pieces served on July 28, 2017, required a product formulation statement for credible Meat/Meat Alternate (M/MA). As this is a repeat finding from the last review, the meals from July 28, 2017, 27 lunches, which results in \$89.37 being disallowed.
  - Kevin informed the contractor they have ordered a new turkey product that is CN labeled to use for their menus and the labels were uploaded on September 10, 2017.
- Charbroil patties need the APP statement. (received)
- Production records lists waffles, yet pancakes were given. Make sure, if a product is never going to be used, to change the production records.

## Food Safety

- Sanitize the thermometer prior to use and in between every food it is used on. Train applicable staff and document training.
  - Per e-mail from Steve Jett 8/30/17 “We also trained the Job Coach from the Western Idaho Training Company to make sure the thermometer will be sanitized correctly. I will hold the same training for all staff during the next scheduled training days.”
- 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

- On July 29, 2016, the USDA Food and Nutrition Service (FNS) finalized regulations to create a framework and guidelines for written wellness policies established by LEAs. (§210.30) The final rule requires LEAs to fully comply with the requirements of the final rule by June 30, 2017. Federal legislation requires school districts to implement a local wellness policy.
  - Addressing an evaluation conducted once every three years of the wellness policy and the extent to which schools are in compliance, how the district policy compares to model wellness policies, and the progress made in attaining local wellness policy goals.
  - Identifying a way to share the wellness policy content and implementation with the public, which you do on your website by posting the policy.
- For further Wellness Policy guidance and resources please visit the [Idaho SDE Child Nutrition Programs School Wellness website](#) or contact Heather Blume, State Department of Education Nutrition Assessment and Promotion Coordinator, at hblume@sde.idaho.gov, 208.332.6902.

### **Professional Standards**

- Gave TA that ten hours of training must be taken every year (this can be averaged over two years as long as twenty hours are taken every two years).
- Tracking on a Professional Standards tracking log should occur on an annual basis, however keeping certificates in a file is adequate.

### **Procurement**

- A Code of Conduct and Procedures are followed using the State of Idaho Code.
- 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.
- The full Procurement review letter will be sent under separate e-mail.

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

Fiscal action from this review includes the over claim of six lunches and seven breakfasts, which totals \$123.86 and will be disregarded. 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  
Dawn Mathis, Child Nutrition Director, Southwest Idaho Juvenile Detention Center

**This institution is an equal opportunity provider.**