



November 8, 2018

Dawn Burns, Director
Ada County Juvenile Detention Center
6300 West Denton Street
Boise, ID 83704

Dear Director Burns,

On October 24, 2018, State Department of Education (SDE) Coordinator Jennifer Butler conducted an Administrative Review of Ada County Juvenile Detention Center for the following United States Department of Agriculture (USDA) programs:

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

The State agency (SA) would like to commend Lynette Simpson and the entire staff of Ada County 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 – Civil Rights

Detention officers serving meals to residents must have annual foodservice civil rights training as they are interacting with program participants while operating foodservice duties. All other foodservice authority staff completed required training by watching the SA's civil rights video or taking training online. The detention officers and their supervisors have the option to read and sign-off on the "Civil Rights Training for Frontline Staff" handout.

Corrective Action: Upload a dated sign-in sheet to provide documentation that all detention officers and their supervisors have received civil rights training.

Due Date for CAP completion: Due November 8; completed November 5, 2018.

Corrective Action Response: SFA uploaded dated sign-in sheets documenting Civil Rights training for four separate shifts and on-call staff.

Finding 2 – Afterschool Snack Program (ASSP) Production Records

Several ASSP Production Records did not reflect the creditable amount of the grain or meat/meat alternate items. The graham cracker was incorrectly listed to credit as only $\frac{3}{4}$ oz. eq.; the actual 1 oz. eq. amount was validated and corrected on the production record while SA review was onsite. The missing creditable amounts for scratch recipe items must be calculated and included on the production record: turkey sandwich, coffee cake, and blueberry granola bar. The ham sandwich and abracadabra bar inaccurately indicated crediting for 1 cup milk, production records for these items should be corrected and the 3 oz. eq. creditable grain amount for the abracadabra bar confirmed.

Corrective Action: Upload corrected production records accurately reflecting the creditable amount for items served.

Due Date for CAP completion: Due November 8; completed October 26, 2018.

Corrective Action Response: SFA uploaded corrected ASSP Production Records showing accurate creditable amounts.

Finding 3 – Meal Components and Quantities

Contractor CN Resources conducted the menu review and identified that for the week of menu review, the lunch menu did not meet the minimum daily requirement for meat/meat alternate and grain. A grain and meat/meat alternate was offered daily, however the daily minimum required portion sizes were not met.

Corrective Action: Upload documentation demonstrating that the menu findings have been corrected.

Due Date for CAP completion: Due October 12, completed September 26, 2018.

Corrective Action Response: SFA revised the spaghetti recipe to include an increase in lentils and parmesan cheese. A new hamburger bun product has been obtained. This revised recipe and hamburger bun nutritionals were uploaded into MyIdahoCNP.

Commendations

- Congratulations on being awarded \$6,505 in FY17 for an oven range as part of a USDA Equipment Grant. Your initiative in applying for this grant is appreciated and shows your commitment to your students.
- During the menu review, the CN Resources contractor advised that the quality of meals served was very high and great to see; all staff was very open to all technical assistance provided; and the level of care for the specialized population served was outstanding.
- Lynette Simpson was very diligent in preparing for the administrative review. Her efforts in completing the off-site modules in a timely manner and in gathering documentation prior to the review were greatly appreciated.
- Keep up the best practice of implementing a cycle menu (4-week).
- The attention given to planning a special Thanksgiving meal shows how much foodservice staff cares for the residents they serve. This was also evident with how visually appealing the day of review menu was.

Technical Assistance (TA)

Meal Components and Quantities

Independent contractor CN Resources completed the menu review and provided the following TA:

- The labeling submitted was not acceptable for the egg patty served on Friday. An official Child Nutrition (CN) label will not contain a watermark. This item was not needed to meet daily meal pattern requirements. Efforts to obtain an official CN label or Product Formulation sheet should be made, if this product is to credit towards the meal pattern. Reference [TA07-2010 \(v.3\)](#) for more information.
- Menu variations to accommodate preferences must be consistent with the food and nutrition requirements specified in Program regulations in order for children's meals to be eligible for reimbursement [7 CFR 210.10 and 7 CFR 220.8]. To accommodate preferences for no pork, while meeting requirements, consider substituting another 2 oz. eq. of meat/meat alternate in place of the meatballs with pork. Providing a substitution ensures the meat/meat alternate requirement is met.
- 2 oz. equivalents of meat/meat alternate are required daily for grades 9-12. This was not met on one day. On Monday 1.5 oz. equivalent of meat was offered. 1 oz. eq. from the cheese stick and 0.5 oz. eq. from the lentils in the spaghetti sauce. The recipe as written provides .19 cups of cooked lentils per serving (0.5 oz. equivalent of meat/meat alternate). Consider increasing the amount of lentils in the recipe to 2 3/8 cup which will provide ¼ cup cooked lentils (1 oz. equivalent of meat/meat alternate), or 0.5 oz. of parmesan cheese could be added.

- 2 oz. equivalents of whole grain-rich grains are required daily for grades 9-12. This was not met on two days. The hamburger bun served on Tuesday and Saturday provides 1.5 oz. eq. of grain, per the product formulation sheet provided. Consider switching to a larger bun that weighs at least 56 grams or offering a small grain-based dessert to make up the .5 oz. eq. difference.
- Review the mashed potato recipe for accuracy and consider increasing the amount of pearls to 8.75 cups. The recipe calls for 7.375 cups of dry potato pearls for 35 servings which comes out to .21 cups per serving. The label for the pearls indicates that .25 cup of pearls is needed to provide ½ cup serving.

Food Safety and Buy American Provision

CN Resource provided the following TA during their on-site review:

- Emphasize the need to wash hands before glove use when food safety plan is reviewed. Facility has policy to use gloves during all recipes. Train on gathering supplies prior to beginning recipe preparation to minimize need to continuously wash hands and change gloves.
- The most recent food safety inspection report was posted in the kitchen. As the entire facility, including kitchen, is not open to the public, the report must be moved to a “publicly visible location” [7 CFR 210.13(b)].
 - While the SA reviewer was onsite, a copy of the report was hung on the wall behind the desk in the reception area.
- For annual training on the food safety plan, add name of each SOP to the sheet staff sign after reading. Also, add specific dates of yearly cycle (October 1 to September 30) for clarity.
 - SA reviewer confirmed dates were added and discussed crediting time toward professional standards.
- 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.
 - The SA’s “Buy American Exemption Form” was completed prior to the SA onsite review for canned pineapple from Thailand, bananas from South America, and canned mushrooms from Holland. Continue to complete and retain this documentation for any applicable foods.

Afterschool Snack Program (ASSP)

- Some production records did not indicate the crediting amount for grain or meat/meat alternate item served. Ensure that this field is always accurately completed on all production records.

Procurement

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

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
NSLP Coordinator

cc: Colleen Fillmore, Ph.D., R.D.N., L.D., S.N.S., Director, Child Nutrition Programs
Lynette Simpson, Child Nutrition Director, Ada County Juvenile Detention Center

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(3) email: program.intake@usda.gov.

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