



November 13, 2018

Matt Johnson, Director  
Liberty Canyon Boys Ranch  
330 W. Main  
Emmett, ID 83617

Dear Director Johnson,

On October 25, 2018, State Department of Education (SDE) Coordinators Heather Blume and Teresa Goodsell conducted an Administrative Review of Liberty Canyon Boys Ranch 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 Sierra Quenzer and Kimberly Wilder and the entire staff of Liberty Canyon Boys Ranch 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

The Civil Rights statement used is an outdated statement.

**Corrective Action:** Please update your non-discrimination statement to the correct USDA non-discrimination statement available at the State Agency website:

<http://www.sde.idaho.gov/cnp/files/resource-center/civil/general/Non-Discrimination-Statement-English.pdf>

**Due Date for CAP Completion:** November 9, 2018

**Corrective Action Response:** This was completed while State agency reviewers were onsite.

### Finding 2 - Local 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. 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 that must include language:

- Permitting parents, students, school board, PE teachers, school health professionals, school food service staff, administrators, and community members to participate in the development, implementation, review, and update of the local wellness policy.
- Identifying wellness policy leadership of one or more LEA and/or school official(s) who have the authority and responsibility to ensure each school complies with the wellness policy.
- Specifying measurable goals for nutrition education, nutrition promotion, physical activity, and other school-based activities to promote student wellness that are written with consideration for evidence-based strategies.
- Addressing nutrition guidelines for all foods and beverages sold on the school campus during the school day and for providing school meals that adhere to Federal meal pattern requirements.
- Identifying nutrition standards for non-sold foods and beverages available during classroom and school celebrations.
- Stating a policy for food and beverage marketing that allows the marketing and advertising of only those foods and beverages that meet Smart Snacks in School nutrition standards.
- 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. For more information regarding local wellness policies, please visit the Idaho SDE Child Nutrition Programs School Wellness website.

**Corrective Action:** Submit a plan for how a wellness policy will be developed and implemented. Consider using the State agency "Sample RCCI Wellness Policy" and completing the Idaho Wellness Policy Progress Report found at: <http://www.sde.idaho.gov/cnp/hne/wellness.html>

**Due Date for CAP Completion:** November 9, 2018

**Corrective Action Response:** This was completed on November 12, 2018.

### Finding 3 - Professional Standards

All newly hired Food Service Directors must have at least eight hours of food safety training, not more than five years prior to their starting date or completed within 30 days of their starting date.

**Corrective Action:** Provide a plan for newly hired kitchen staff to receive the appropriate level of food safety training (the Food Safety in School course from the Institute of Child Nutrition is sufficient).

**Due Date for CAP Completion:** November 9, 2018

**Corrective Action Response:** This was completed on November 8, 2018.

### Finding 4 – Meal Components and Quantities

*An independent contractor representing CN Resources completed the menu review and noted the following:* Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for breakfast.

**Corrective Action:** Provide the date that the finding was brought into compliance or the planned date of completion, the name(s) and title(s) of the SFA representative(s) that will ensure compliance, and provide a written statement that meal signage has been posted.

**Due Date for CAP Completion:** November 9, 2018

**Corrective Action Response:** This was completed while State agency reviewers were onsite.

### Finding 5 – Meal Components and Quantities

*An independent contractor representing CN Resources completed the menu review and noted the following:* For the week of menu review, the lunch menu did not meet the minimum daily and weekly requirements for meat/meat alternate. A meat/meat alternate was offered daily, however the minimum daily and weekly requirements were not met. Additionally, the lunch menu did not meet the minimum daily vegetable requirement. Vegetables were offered daily, however the minimum required portion size was not met.

**Corrective Action:** Provide a written statement that the daily and weekly meat/meat alternate and daily vegetable requirements are now met. Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance. Submit any necessary documentation to demonstrate that the menu findings listed are now corrected. This documentation may include: production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.

**Due Date for CAP Completion:** November 9, 2018

**Corrective Action Response:** This was completed prior to State agency reviewers arriving onsite.

### Finding 6 - Water

The SFA must ensure that free water is available for consumption by program participants. Schools can provide free water in a variety of ways. For example, schools can offer water pitchers and cups

on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups with drinking water (7 CFR 210.10 a (i)).

**Corrective Action:** Submit documentation that water will be made available during meal services.

**Due Date for CAP Completion:** November 9, 2018

**Corrective Action Response:** This was completed while State agency reviewers were onsite.

### **Finding 7 – Food Safety**

Storage violations were observed on-site. The SFA had food that was not stored 6 inches off the floor.

**Corrective Action:** Provide the date that the finding was brought into compliance or the planned date of completion. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. Provide a written statement that all food is stored at least six (6) inches off of the floor.

**Due Date for CAP Completion:** November 9, 2018

**Corrective Action Response:** This was completed while State agency reviewers were onsite.

### **Finding 8 – Food Safety**

Chest freezer did not have a temperature log.

**Corrective Action:** Provide the date that the finding was brought into compliance or the planned date of completion. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. Provide a written statement that all temperature documents must be maintained for a minimum three years and the current.

**Due Date for CAP Completion:** November 9, 2018

**Corrective Action Response:** This was completed while State agency reviewers were onsite.

### **Finding 9 – Food Safety**

The SFA's food safety plan does not contain the required elements. Staff did not sign and date when each SOP was reviewed and implemented.

**Corrective Action:** Provide the date that the finding was brought into compliance or the planned date of completion. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. Provide a written statement that the food safety plan has been updated to include the required elements.

**Due Date for CAP Completion:** November 9, 2018

**Corrective Action Response:** This was completed while State agency reviewers were onsite.

### **Finding 10 – Afterschool Snack**

The SFA must conduct a self-review of each afterschool snack operation twice per year that follows these guidelines: The SFA conducts the first self-review during the first four weeks that the afterschool snack program begins each school year; and conducts the second self-review of the afterschool snack program prior to the end of each school year. Ensure production records are completed daily.

**Corrective Action:** Complete the self-review of the afterschool snack program and upload the review form.

**Due Date for CAP Completion:** November 9, 2018

**Corrective Action Response:** This was completed on November 8, 2018.

## Commendations

- Label organization is clear and easy to follow. Great job!
- Sierra and the team have done a tremendous job preparing for the review while being short-staffed. Thanks for all your hard work to keep the ship afloat!
- The storage procedures in the dry storage area incorporated clear plastic tubs that readily display the food items while keeping them contained and safe from pests.
- Site staff were responsive to requests for information and receptive to suggestions, technical assistance and corrective actions during on-site visit.
- Observed proper food safety and handling practices and clean kitchen. Newly hired kitchen manager has knowledge and skills she puts into practice.
- Kim had a wonderful rapport with the residents as they came through the line to receive their meals.

## Technical Assistance (TA)

### Dietary Specifications and Nutrient Analysis

- *An independent contractor representing CN Resources completed the menu review and provided the following TA:*
  - During the review, Child Nutrition labels or Product Specification Statements (PFS) were discussed with the SFA. The SFA must ensure that Child Nutrition labels or Product Specification Statements are being maintained in order to document an item's compliance with the meal pattern. The SFA should have a folder or a binder to keep labels for all menu items, that way they are easy to find and can be referenced when determining menu compliance. PFS for current Rib product on lunch menu secured from vendor prior to meal service.

### Meal Components and Quantities

- *An independent contractor representing CN Resources completed the menu review and provided the following TA:*
  - Update production record to reflect accurate amount of fruit juice (1 cup) because residents are allowed 2 of the 4-oz boxes on days juice is offered. This will help with correct crediting and adhering to juice limit if menus are changed in the future. Production records were discussed with the SFA. The SFA must ensure that all sites are keeping accurate and complete production records for the meals they produce. The 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 production records so that everyone can complete the records.
  - On the day of review, the minimum daily quantity requirement for vegetable was not met for lunch. Less than 1 cup planned. Correct menu deficiency prior to service - menu planned 1 lettuce leaf, 1 slice tomato, and 1/2 cup sweet potato fries - increase offering to 1 cup of vegetable. The week of the on-site review was short in the red/orange

vegetable subgroup. This was corrected on the day of review since the review was completed on a Monday. Check future weeks to ensure all vegetable subgroups are met.

- Recommend updating the cycle menus to more accurately reflect what is being served since the last time the cycle was updated was in 2016.
- The federal regulations require menus to be planned that meet the minimum daily 2 ounce equivalent meat/meat alternate requirement for grades 9-12. On Monday, the ham and cheese sandwich provided 1.25 ounce equivalents meat/meat alternate. In order for this recipe to meet the 2 ounce equivalent meat/meat alternate requirement consider the following: Increase the ham in the recipe to 8 pounds to provide 1 ounce equivalent meat/meat alternate per serving. Please note the formulation sheet provided indicated that 2.55 ounces of ham provides 2 ounce equivalent meat/meat alternate. Choose 1 ounce cheddar cheese slices or use 2 slices of American cheese per sandwich to provide 1 ounce equivalent meat/meat alternate. On Saturday, the peanut butter and jelly sandwich only provides 1 ounce equivalent meat/meat alternate. Choose a CN labeled peanut butter and jelly sandwich that provides 2 ounce equivalent meat/meat alternate or consider serving a 1 ounce cheese stick with the sandwich. The federal regulations require menus to be planned that meet the minimum weekly 14 ounce equivalent meat/meat alternate requirements. If the daily 2 ounce equivalents meat/meat alternate are met on Monday and Saturday, the weekly requirements will be met.
- The federal regulations require a minimum of 1 cup of vegetable to be offered each day for grades 9-12 which was not met on Tuesday and Sunday. On Tuesday, only 7/8 cups vegetables were credited toward the meal pattern. The 1 cup of tossed salad is creditable at ½ cup vegetable (leafy green vegetables are creditable at half volume). The pizza provides 1/8 cup vegetables. The menu indicates that ½ cup cherry tomatoes are to be served, but because only ¼ cup cherry tomatoes were served, the 1 cup minimum wasn't met. Consider serving ½ cup cherry tomatoes according to menu in addition to the pizza and salad to meet the minimum daily requirements. On Sunday, only ½ cups vegetables were served. Add an additional ½ cup vegetables to the menu this day.
- During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal.
- List both fat free and low-fat milk instead of low fat milk variety on menus and production records for accuracy of products offered.

## Food Safety

- *An independent contractor representing CN Resources completed the menu review and provided the following TA:*
  - Put open rice in sealed bin similar to oatmeal and flour. Not all items were marked for date received.
  - Add additional thermometers to walk in refrigerator (temperature on outside dial appears inaccurate and is above 41 degrees F. The refrigerator thermometer added indicates inside of walk in is less than 30 degrees F so a new thermometer is suggested to assess current temperatures. Chest freezer temperatures missing,

locate the thermometer in the chest and record temps. By the end of site-visit, the new thermometer in walk-in indicated proper temperature of 41 degrees F.

- Documentation was needed to support food products that were not procured domestically for pineapple, mandarin oranges, fruit cocktail and bananas available for state site review. This was corrected before the State agency arrived onsite.

### Civil Rights

- Update all program forms to ensure the most current non-discrimination statement is used. Many forms, sample sign in sheets and agendas, are available in the download forms section of MyIdahoCNP.

### Procurement

- A separate procurement review was completed by Keddington & Christensen, LLC; 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,

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  
Sierra Quenzer, Quality Assurance Specialist, Ada County Juvenile Detention Center

### Civil Rights

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- (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).

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