

November 01, 2021

Mr. Skip Greene, Superintendent
Idaho Juvenile Corrections Center #2607
2220 East 600 North
St. Anthony, ID 83443

Dear Superintendent Greene,

On October 18, 2021, State Department of Education (SDE) Coordinators Lynda Westphal conducted an on-site Administrative Review of Idaho Juvenile Corrections Center and TJ Goodsell conducted the paperwork review for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program Seamless Summer Option (SSO)
- School Breakfast Program Seamless Summer Option (SSO)
- Afterschool Snack (ASSP)
- USDA Foods

The State agency (SA) reviewed the following sites(s).

- Idaho Juvenile Corrections Center, St. Anthony

The State agency (SA) would like to thank Carla Sykes and the entire staff of Idaho Department of Juvenile Corrections, St. Anthony 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 that State agencies conduct an Administrative Review a minimum of one time during a five-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 – Meal Components and Quantities - Breakfast

- CN Resource completed the menu review on September 15, 2021 and provided the following CA:

For the week of menu review, the breakfast menu did not meet the minimum daily fruit requirement. Fruit was offered daily, however the minimum required portion size was not met.

Corrective Action Plan (CAP): Provide a written statement that the fruit requirements are now met. Include a detailed statement to describe what specific changes were made to the menu, for the week of review, to correct all menu review findings and bring the menu into compliance. Submit supporting documentation to demonstrate that the menu findings listed above are now corrected. This documentation may include: menus, 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: October 14, 2021

Corrective Action Response:

Corrective action was discussed on the phone with CNR and email was received from SFA with corrective action statements. The fruit requirements are now met with the following changes:

Wednesday - 4 ounces of apple juice added to the menu;

Thursday - serving size for grapes increased to 1 cup;

Saturday - 4 ounces of grape juice added to the menu; and

A SY21-22 SSO & NSLP Meal Pattern Waiver Request form for Whole Grain Rich (WGR) flexibility will be submitted.

Finding 2 – Meal Components and Quantities - Lunch

- CN Resource completed the menu review on September 15, 2021 and provided the following CA:

For the week of menu review, the lunch menu did not meet the minimum daily fruit requirement. Fruit was offered daily, however the minimum required portion size was not met.

For the week of menu review, the lunch menu did not meet the minimum daily vegetable requirement. Vegetables were offered daily, however the minimum required portion size was not met. For the week of menu review, the lunch menu did not meet the minimum daily requirement for grain. A grain was offered daily, however the minimum required portion size was not met.

Corrective Action Plan (CAP): Provide a written statement that the fruit, vegetable, and daily grain requirements are now met. Include a detailed statement to describe what specific changes were made to the menu, for the week of review, to correct all menu review findings

and bring the menu into compliance. Submit supporting documentation to demonstrate that the menu findings listed above are now corrected. This documentation may include: menus, 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: October 14, 2021 extended to October 18, 2021

Corrective Action Response:

Corrective action was discussed on the phone with CNR and email was received from SFA with corrective action statements. The fruit requirements are now met with the following changes:

Fruit - the serving size for grapes has been increased to 1 cup;

Vegetable - the lettuce serving size was increased to meet 1 cup credible vegetables on Friday.

Daily grain - label uploaded for a new deli bun to credit 2.5 oz. eq. and meet daily requirements.

Finding 3 – Meal Counting and Claiming

A systemic error was discovered with consistent meal counting practices when using the daily enrollment for the claim. The SA identified that there were five days that were off resulting in the claim being off by two meals. This would have resulted in \$13.56 being disallowed.

Corrective Action Plan (CAP):

Identify a new practice to ensure breakfast and lunch totals are accurate for all meals. Upload a narrative describing the new practice and what steps will be taken to implement new processes.

Due Date for CAP Completion: November 1, 2021

Corrective Action Response: Per Food Service Director’s CAP upload: “In response to Identifying a new practice to ensure that breakfast and lunch totals are accurate for all meals I have assigned a staff from each of the two shifts will take responsibility for the meal count and I as the Supervisor I also will be double checking and using a keen eye to detail to ensure the Breakfast and lunch totals are accurate for all meal counts.”

COMMENDATIONS

- Carla and her team were great to work with. They have high standards and provide the site with excellent food service.
- The school nutrition staff were open to questions and receptive to technical assistance.
- Frequent handwashing was observed – excellent implementation of food safety personal hygiene!

TECHNICAL ASSISTANCE (TA)

Forms

- Gave TA on finding forms in Download Forms in MyIdahoCNP.

Meal Counting and Claiming

- Gave TA on double checking the claim and shared the Excel meal counting sheet that can be used to count meals.

- Please look at Finding 3 for the systemic finding in claiming.

Dietary Specification and Nutrient Analysis

Meal Components and Quantities - Breakfast

- Independent Contractor CN Resource completed the menu review and provided the following TA with a detailed Menu Review Results Report:
- Recommendations were included to bring all areas into compliance. All menus served must meet all daily and weekly meal pattern requirements for the specific grade group. The sponsor was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.
 - All grains offered must be whole grain-rich to meet requirements. The menu met 93% whole grains for the week of review. The waffle served on Sunday was not whole grain-rich.
 - Complete the Meal Pattern Waiver Request form, allowing meal pattern flexibilities which are available for milk, whole grain-rich, sodium, and vegetable subgroups. The state agency will consider requests that are targeted and justified based upon disruptions to the availability of food products resulting from unprecedented impacts of COVID-19. [Click on this link to complete the Meal Pattern Waiver request survey.](#)
 - The federal regulations require specific serving sizes of fruit/vegetable for breakfast. Servings were sometimes less than the required 1 cup serving. On Wednesday, Thursday and Saturday only 1/2 cup fruit was served.
 - Increase the serving sizes of fruit these days to 1 cup or serve an additional 1/2 cup of fruit.
- A Child Nutrition Label or Product Formulation Statement can be used to determine how processed food items contribute to the meal pattern. Without this documentation it may be difficult to determine if the meal component was satisfied.
 - A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not available for all processed menu items. The meal pattern requirements were still met these days with the grain choices that were offered. After the daily 1 oz. eq. grain minimum is met, the weekly minimum can be met with additional grains or meat/meat alternates. The egg products served these days were not credited due to the missing documentation.
 - A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not available for the menu items listed below. Choose a product with this documentation in order to determine meal pattern crediting.
 - Egg Patty served on Monday.
 - Cheese Omelet served on Saturday.

Meal Components and Quantities - Lunch

- During the Administrative Review the results of the menu review were provided to the sponsor in a detailed Menu Review Results Report from CN Resource.

Recommendations were included to bring all areas into compliance. All menus served must meet all daily and weekly meal pattern requirements for the specific grade group. The sponsor was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

- The federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent grain requirement for grades 9-12. This requirement was not met on Tuesday.
 - The bun served with the Rib-B-Que only provides 1.75 oz. eq. grains.
Serve a bun that provides at least 2 oz. eq. grains per serving.
- The federal regulations require a minimum of 1 cup of fruit to be offered each day for grades 9-12. This requirement was not met on Tuesday. Only 1/2 cup (4 oz.) of grapes was served this day.
 - Ensure that at least 1 cup of fruit is served daily. This can be accomplished through serving 1 cup of grapes or 1/2 cup grapes with 1/2 cup of another fruit choice such as canned fruit or 100% fruit juice.
- The federal regulations require a minimum of 1 cup of vegetables to be offered each day for grades 9-12. This requirement was not met on Friday when only 7/8 cup vegetables was served.
- Create a recipe for the Idaho Nachos served on Friday that includes all of the items listed on the Production Record that were used for crediting.
 - Keep in mind that raw leafy green vegetables, such as lettuce and spinach, are creditable at half volume. The amount of shredded lettuce served this day was 3/8 cup which credits at 1/8 cup creditable vegetable. Increase the amount of lettuce served this day to 1/2 cup to provide 1/4 cup creditable vegetable per serving and meet the daily requirement with the tater tots and tomatoes.
- A Child Nutrition Label or Product Formulation Statement can be used to determine how processed food items contribute to the meal pattern. Without this documentation it may be difficult to determine if the meal component was satisfied. A Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not available for the menu item listed below. Choose a product with this documentation in order to determine meal pattern crediting.
 - Country Fried Steak Patty served on Saturday.
- Meal pattern crediting was determined based on the product documentation submitted for the items below; however, it is required that the Product Formulation Statement for items listed below are signed and dated by the manufacturer, OR the official Child Nutrition Label from the product packaging is secured.
 - Breadstick served on Sunday and Wednesday
 - Onion Rings served on Thursday
 - Country Fried Steak Patty served on Saturday
- The Child Nutrition (CN) Label submitted for the Hamburger Patty included a watermark. Please secure for your records the actual CN label from the product packaging, without the watermark.

Buy American

- During the review, Buy American requirements were discussed with the SFA. SFAs must review products and delivery invoices or receipts to ensure that the domestic food that was solicited and awarded is the food that is received. TA given to include canned Mandarin Oranges from China and canned Pineapple from Thailand in documentation to cover when produce delivery is not received or sufficient for meal needs. If delivered non-domestic produce is accepted by the SFA, then the Buy American exception form must be filled out and back-up documentation should be provided by the vendor.

Local School Wellness Policy

- FNS is waiving statutory and regulatory requirements at 7 CFR § 210.31 and providing a new first triennial assessment deadline of June 30, 2022, for states that opt in to: *COVID-19: Child Nutrition Response #98 Nationwide Waiver of Local Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs.*
- LWP assessment is not evaluated during an AR.

HACCP (Food Safety)

- TA was given on the Institute of Child Nutrition (ICN) HACCP plan and where to locate it in Download Forms in MyIdahoCNP. Carla downloaded the form and put it in the binder. She will train staff on the manual and food safety procedures.

Professional Standards

- Gave TA on the Professional Standards tracker in Download forms to use to track the training for all of the staff.

Procurement

- A separate procurement review was completed by Kathrine Forstie in SY20-21 with a SA closure letter sent following completion of CA (if needed); please follow the guidance provided.

FISCAL ACTION

Fiscal action in the amount of \$13.56 is below the \$600 threshold set by USDA and will be disregarded.

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,

Lynda Westphal

Electronically Signed

Lynda Westphal, MHS, SNS
Coordinator, NSLP

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Carla Sykes, Child Nutrition Director, Idaho Juvenile Corrections Center, St. Anthony

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