



December 23, 2019

David Birch, Superintendent
Department of Juvenile Corrections – Nampa Center
1650 11th Ave N
Nampa, ID 83687

Dear Superintendent Birch,

On October 24, 2019, State Department of Education (SDE) Coordinators Teresa Goodsell and Jessica Spoja conducted an Administrative Review of Department of Juvenile Corrections – Nampa Center for the following United States Department of Agriculture (USDA) programs:

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

The State agency would like to thank Cheryl Knox and the staff of Department of Juvenile Corrections – Nampa 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, however Idaho has received a waiver to conduct reviews on a five-year schedule 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:

Finding and Corrective Action Plan (CAP)

Finding 1 – Meal Counting and Claiming

Meal counts for both breakfast and lunch for the review period did not equal the number of reimbursable meals claimed. An over-claim of one breakfast meal and three lunch meals was discovered. This counting error is unallowable per the Administrative Review Manual. The State agency determined that this was a non-systemic issue arising from counting errors.

Corrective Action: Upload a copy of the October daily meal counts and the claiming consolidation form for breakfast and lunch. The State agency will validate the number of reimbursable meals served to ensure meal counting and claim numbers are accurate.

Due Date for CAP Completion: November 8, 2019

Corrective Action Response: On 11/6/19, the SFA uploaded copies of the October claim, daily meal counts, and claim consolidation form for breakfast and lunch. The SA validated the accuracy of the claim.

Finding 2 – Professional Standards

Please develop a plan for tracking training hours for kitchen staff in order to comply with the Professional Standards requirements. Annual staff training must include Offer versus Serve, Food Safety (HACCP), and Civil Rights.

Corrective Action: Provide a written plan for ensuring annual training occurs in the future and have staff complete the required trainings for SY19-20. Upload the training plan and documentation into MyIdahoCNP to validate staff training.

Due Date for CAP Completion: November 8, 2019; extended to November 15, 2019

Corrective Action Response: On 11/6/19, the SFA provided written confirmation that calendar reminders were set up for completing required trainings within three weeks of each new school year. Additionally, on 11/14/19, copies of agenda and sign-in sheets for OVS and Food Safety trainings were submitted and certificates of completion for Civil Rights training for all staff were also provided.

Commendations

- CNResource provided the following commendation: Outstanding job meeting all meal pattern requirements for the week of menu review. All daily and weekly meal component and food quantity requirements were met.
- The staff are friendly and helpful. It was great working with you!
- Cheryl, Matt, and Sherri had wonderful interactions with the students during breakfast and lunch service. It is apparent they take the time to get to know each of the students they serve. Their positivity lifted up the students as they came through the line.
- Great job utilizing the XChange platform for claiming available Bonus USDA Foods products that contribute to the meal program. Using this valuable resource will save the facility funds on food costs throughout the year.

Technical Assistance (TA)

Afterschool Snack Program (ASSP)

- The Afterschool Snack Program must complete production records (documenting changes or substitutions as applicable) to show component compliance and note number of portions prepared, served, and leftover for every day the ASSP operates. The State agency provided a simplified production record, found in the download forms section of MyIdahoCNP, that may be helpful in ensuring complete records are kept.

Civil Rights

- A procedure for receiving and processing Civil Rights complaints must state that all complaints associated with Child Nutrition Programs are forwarded to the State agency within three working days. Please add this procedure to your civil rights file, a compliant procedure is located on the State agency civil rights web page. (7 CFR 210.15(a)(6))

Professional Standards

- Ensure that documentation is retained to validate all front line staff who interact with students during meal service have received the appropriate Civil Rights training. The SA provide a copy of a Civil Rights training sign-in sheet for use until the facility completes updates to an existing training tracking software system that will be utilized by all staff.

Your review is now closed.

Fiscal action in the amount of \$12.70 is to be assessed from this review, however it is below the \$600 threshold set by USDA so will be disregarded. 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,



Teresa Goodsell, MPA, SNS
NSLP and USDA Foods Program Coordinator

cc: Colleen Fillmore, PhD, RDN, LD, SNS, Director, Child Nutrition Programs
Cheryl Knox, Food Service Director, Department of Juvenile Corrections – Nampa

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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.

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