



**SHERRI YBARRA**  
SUPERINTENDENT OF  
PUBLIC INSTRUCTION

650 W. STATE STREET  
P.O. BOX 83720  
BOISE, IDAHO 83720-0027

OFFICE: 208-332-6800  
FAX: 208-334-2228  
SPEECH/HEARING  
IMPAIRED: 1-800-377-3529

September 7, 2016

Mr. J. Taylor, Director  
District 1 Juvenile Detention Center  
210 Dalton Avenue  
Coeur d'Alene, ID 838154

Dear Mr. Taylor,

On August 18, 2016, State Department of Education (SDE) Coordinator Tamara Donovan conducted an Administrative Review of District 1 Juvenile Detention Center (JDC) for the following United States Department of Agriculture (USDA) programs:

National School Lunch Program (NSLP)  
School Breakfast Program (SBP)

The District 1 Juvenile Detention Facility and Adult Detention facility kitchen were reviewed.

The State agency (SA) would like to commend Eric Sheffield and the entire staff of the District 1 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:

## Finding and Corrective Action Plan (CAP)

### Finding 1- Meal Components and Quantities

Breakfast cereal, product of Mexico, and oatmeal, product of Canada, were being served to the students. Food items available in the United States must be purchased and used whenever possible when participating in USDA school meal programs per the Buy American provision.

**Timeframe for CAP completion:** September 8, 2016.

**SFA Response to CAP:** Updated menus and recipes were received by the SA on 8/19/16.

- On August 2, 2016, the SA was informed that District 1 JDC stopped serving the cereal to students; a compliant product had been found with an expected delivery date of August 28. On August 30, the SA was informed that the cereal did not arrive and that a local purveyor to procure USA cold cereal was being located. (Note: Meal pattern compliance is not an issue as two slices of whole wheat bread are served at every breakfast.) In the interim, farina, product of the USA, is served to the students at breakfast as an "extra" item.

## Commendations

- Eric Sheffield responded to SA requests promptly and was helpful throughout the review process. Eric and Brandie Bradley's efforts assisting the SA reviewer during the on-site visit is appreciated.
- Gavin Hofer and the student helper were conscientious in providing accurate portions of the meal servings on the serving line. They used good food safety procedures including hair restraint and hand washing and the serving kitchen was very clean.

## Technical Assistance (TA)

**Procurement** - added post exit conference after clarification

- District 1 JDC is claiming meals and receiving reimbursement from federal funds which requires adherence to the federal guidelines found at 2 CFR Part 200. Since District 1 JDC is obtaining meals from the jail, District 1 JDC must:
  - 1) Obtain rate quotations from an adequate number of qualified sources – OR
  - 2) If the District 1 JDC obtains the meals from the jail, then the jail must go out to bid a minimum of once every five years (contract awarded for one year, with the option for four one-year extensions).

If District 1 JDC would like to use Option 1, then the facility must have a Code of Conduct, Written Procurement Procedures, and retain the results from the solicitations for food purchases. If Option 2 is chosen, then the jail must follow government-wide regulations in regards to procurement and go out to bid at a minimum of every five years. This involves a public solicitation for the bidding of services, not reliance on a company inquiring to bid on services. There are many different companies in Idaho that provide food service to jails and

juvenile detention facilities. Please review Policy Memos SP12-20165, SP04-2016, and the Public Procurement of Goods and Services documents attached for reference. A sample code of conduct was provided via email to Brandie Bradley.

### **Wellness Policy**

- The Wellness Policy Final Rule was published on August 16, 2016, with a timeline for implementation of August 29, 2016 through June 30, 2017. The SA directed Eric to the CNP site (Download Forms) for updated wellness policy guidelines. For further Wellness Policy guidance and resources please refer to the State agency website: <http://www.sde.idaho.gov/cnp/hne/wellness.html> or contact Heather Blume, State Department of Education Nutrition Assessment and Promotion Coordinator, at [hblume@sde.idaho.gov](mailto:hblume@sde.idaho.gov), 208.332.6902. Please add the USDA non-discrimination statement to the Wellness Policy; statement found on the CNP website under Civil Rights.

### **Professional Standards**

- Technical assistance provided in developing / augmenting Eric's system to track employee training to comply with professional standards requirements.

### **Resource Management**

- State agency reminder that employee hours spent working in child nutrition must be tracked; Eric has a system in place.

### **Meal Components and Quantities**

- Production records must show how food items are crediting toward the meal pattern requirements for compliance with USDA regulations. Production records must document the actual food items prepared and served (e.g., state "steamed carrots" instead of "hot veggies" and "applesauce" instead of "fruit"). Ensure updated product formulation statements are retained on file. Ensure all food labels, CN labels, PFS, etc. are on retained on file.
- Fresh apple served at lunch was a 164 count apple; the meal pattern requires one cup of fruit be served at lunch (138 count apple is 1 cup per the Food Buying Guide). This apple size will be served in the future.
- As three out of seven recipes credited for inadequate meat/meat alternate (m/ma), review all entree recipes to ensure meal pattern compliance.
- Technical assistance provided in menu planning:
  - 7/10- Inadequate m/ma; increased turkey in turkey stew from 4.52# to 6.5# to credit 2 oz eq per serving.
  - 7/11 - Production record corrected to indicate 2 slices whole grain bread; lettuce amount and lettuce form updated in salad recipe (6# bagged lettuce).
  - 7/13 - Inadequate m/ma; increased chicken in chicken noodle casserole recipe from 5.625# to 6.75# to credit 2 oz eq per serving.
  - 7/14 - Inadequate m/ma; increased chicken in chicken salad recipe from 6# to 6.75#; if 6.75# raw = 2 oz eq per serving; if 6.75# cooked chicken = 3 oz eq. Inadequate legume vegetable subgroup for the week; increased pinto beans in recipe from 2.15# to 3.5#.

7/16- Product formulation statement for the breaded chicken patty noted 2.50 oz eq m/ma total, although the figures provided on the PFS show the product credits for less than this. Updated PFS information documents that the product credits for 1.5 oz eq; .5 oz eq of real cheese will also be served to ensure a total of 2 oz eq m/ma provided at this lunch meal.

- Menu updated to current USDA non-discrimination statement

### **Food Safety**

- The food safety plan was updated for both the JDC kitchen/cafeteria and the jail kitchen sites while the SA was on site in regards to the standard operating procedure for the clean-up of bodily fluids.
- Food items in walk-in freezer at the jail were stored on the floor (recent delivery per Karen Heath, kitchen manager); food items must be stored 6 inches off floor.
- Ensure that all personnel in the jail kitchen, where food is prepared, have hair restraints.

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

At this time there will be no fiscal action. Should you wish to appeal 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 support of the Child Nutrition Programs.

Sincerely,



Tamara Donovan, RD, LD, SNS  
NSLP Coordinator

Cc: Colleen Fillmore, PhD, RD, LD, SNS, Director, Child Nutrition Programs  
Eric Sheffield, Food Service Director, District 1 JDC

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