



January 11, 2024

Eric Sheffield, Director  
District 1 Juvenile Detention Center  
210 E Dalton Avenue  
Coeur d'Alene, ID 83815

Dear Director Sheffield,

On November 3, 2023, State Department of Education (SDE) Coordinators Cambria Steffler and Cassandra Thompson conducted an Administrative Review (AR) of District 1 Juvenile Detention Center for the following United States Department of Agriculture (USDA) programs:

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

The site reviewed was District 1 Juvenile Detention Center.

The State agency (SA) would like to commend Lauren Gibson and the entire staff of 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, requires a unified accountability system designed to ensure that participating school food authorities (SFA) comply with USDA requirements. The objectives of the AR 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 AR a minimum of one time during a three-year cycle, however Idaho has received a waiver to conduct reviews on an alternate 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:

## **FINDINGS AND CORRECTIVE ACTION PLAN (CAP)**

### **Finding 1 – Civil Rights**

The nondiscrimination statement (NDS) must accompany any printed and web-based materials referencing FNS programs. Web pages associated with program operation should list the full USDA NDS with details on participants' right to file a complaint. The NDS on the website is outdated and needs to be replaced with the updated version.

**CAP:** Post the full USDA NDS on the school food service webpage. Upload the link to the webpage when this has been updated.

**Due Date:** November 20, 2023; Completed November 6, 2023

**Response:** The website for the JDC has been updated with the correct NDS.

### **Finding 2 – Food Safety**

The most recent food safety inspection report must be posted in a location visible to the public (7 CFR 210.13(b)). The current food safety inspection is posted in the office and is not visible to the public.

**CAP:** Move the food safety inspection to a publicly visible location.

**Due Date:** Due November 20, 2023; Completed November 3, 2023

**Response:** The FSD moved this inspection report while the SA was on site. The report has been posted in the main lobby of the facility to which the public has access.

### **Finding 3 – Meal Components and Quantities - Lunch**

The vegetable component meal pattern requirements were not met for the week of menu review. The federal regulations require a minimum of 1 cup of vegetable to be offered each day for grades 9-12. This requirement was not met on Wednesday, 9/20/23 and Sunday, 9/24/23, with only 1/2 cup offered each day.

**CAP:** Provide a written statement that the vegetable 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 under step 1 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:** Due September 27, 2023; Returned for Correction; Completed October 2, 2023

**Response:** The updated production record for Week 1- Day 3 (9/24/23) shows the broccoli was increased to 1 cup to meet the daily requirements. The updated production record for Week 4- Day 6 (9/20/23) shows 1 1/4 cup total vegetables to meet the daily requirements.

#### **Finding 4 – Meal Components and Quantities - Lunch**

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 Wednesday, 9/20/23, Friday, 9/22/23, and Sunday, 9/24/23, with only ½ cup offered.

**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 under step 1 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:** Due September 27, 2023; Returned for Correction; Completed October 2, 2023

**Response:** The updated production records for Week 1-Day 1 (9/22/23) and Week 1-Day 3 (9/24/23) show canned fruit was increased to 1 cup to meet the daily requirement each day. The updated production record for Week 4-Day 6 (9/20/23) shows an apple served to credit as 1 cup fruit to meet the daily requirement.

#### **Finding 5 – Meal Components and Quantities - Lunch**

Ensure menus are followed as planned, and if substitutions are made, they continue to meet meal pattern requirements. The planned menu was not followed for the week of menu review. The substitutions made were not acceptable to meet program requirements.

- For Monday- Friday 9/18 - 9/22, Tortilla chips were on the menu but not planned for on the Production records.
- On Wednesday, 9/20/23, 1 cup of vegetables (½ cup mashed potatoes and ½ cup mixed vegetables) were listed on the menu. However, only ½ cup broccoli was listed on the production record, which resulted in a daily vegetable finding.
- On Wednesday, 9/20/23, an apple was listed on the menu which credits as 1 cup fruit. However, only ½ cup canned fruit was listed on the production record, which resulted in a daily fruit finding.
- On Friday, 9/22/23, and Sunday, 9/24/23, the menu listed 1 cup canned fruit, but the production record only listed ½ cup canned fruit. This led to the daily fruit finding.
- On Sunday, 9/24/23, the menu listed 1 cup broccoli, but the production record only listed ½ cup broccoli. This led to the daily vegetable finding.

**CAP:** Submit a copy of documentation of training on meal pattern requirements and making appropriate menu substitutions, for all staff who participate in menu planning and meal service. Include a copy of the agenda and sign-in sheet. Provide a statement that the SFA will ensure that all menu substitutions are acceptable to meet meal pattern requirements.

**Due Date:** Due September 27, 2023; Completed September 27, 2023

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**Response:** The FSD uploaded certificates of completion for the NSLP breakfast and lunch meal pattern trainings, and provided a statement that the FSD will ensure substitutions meet the NSLP breakfast and lunch meal patterns.

### **Finding 6 – Meal Components and Quantities**

The federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent meat/meat alternate requirement for grades 9-12. This requirement was not met on Tuesday, 9/19/23, with only 1.75 oz. eq. offered.

**CAP:** Provide a written statement that the daily meat/meat alternate 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 under step 1 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:** Due September 27, 2023; Completed September 25, 2023

**Response:** The updated menu and production record for Week 4 Day 5 of the menu cycle show 4 Tbsp of peanut butter served to meet the 2 oz. eq. meat/meat alternate requirement.

## **COMMENDATIONS**

- The FSD was very welcoming to the SA and was very helpful in answering questions about the facilities procedures.
- The kitchen staff run an efficient meal service and maintain an organized space to efficiently serve their meals.
- The front office does an excellent job in their record retention practices. Both their claims and meal counts are organized in a binder utilizing tabs that span greater than three years plus current. Their production records are maintained electronically using the software 'Paperclip.' The production records are organized in electronic folders that are clear, concise and are easily retrievable.

## **TECHNICAL ASSISTANCE (TA)**

### **Meal Components and Quantities**

- Independent contractor CN Resource completed the menu review and provided the following TA:
  - Production records are a written record demonstrating that a reimbursable meal was served. They also provide valuable information for planning and forecasting menus.
  - The date should be included on each day's production record. The production record submitted for Monday, 9/18/23, does not include the date on it.

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- The production records list Milk 1% and Milk Skim but do not list flavors. Labels were submitted for 1% white milk and skim chocolate. Update production records to include chocolate milk.
- A standardized recipe is a recipe that has been carefully adapted and tested to ensure that it will produce a consistent product each time it is prepared. The recipes submitted were not always written in standardized format with complete information.
  - The recipe yields for the Boston Baked Beans and the brown rice are 25 ½ cup servings. The production record for Monday, 9/18/23, lists 1 cup as the serving size for the baked beans for 25 students. The production record for Wednesday, 9/20/23, lists 1 cup as the serving size for brown rice for 25 students. Update the recipes so the recipe yield serving sizes match the production record serving sizes.
- 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.
  - The Child Nutrition (CN) Label submitted for the hot dog showed an expired CN number (issue date 2/2019). The CN number was verified as active on the USDA CN Label Verification Report.
  - Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the Breaded Chicken Patty. The spec sheet submitted included a CN number and meal pattern crediting statement but was not an official CN Label or PFS. The CN number was verified as active on the USDA CN Label Verification Report.
  - A sponsor should obtain current manufacturer nutrition facts labels and maintain a file with copies of all products used as part of school meals.
  - The nutrition facts label submitted for the Coleslaw was expired, dated 5/21/2008. Secure a current label for this menu item and maintain it on file.
- The labels submitted for the following items were generated by the distributor or vendor. Obtain labels directly from the manufacturer of the product or from the product packaging and keep them on file, so they can easily be referenced when determining menu compliance.
  - Apple juice
  - Orange juice
  - Peanut butter
- Ensure menus are followed as planned, and if substitutions are made, they continue to meet meal pattern requirements. All kitchen staff should be trained on making menu substitutions to ensure meal pattern requirements remain met.

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## Food Safety

- Each SFA must have a written food safety plan for compliance with Hazard Analysis Critical Control Point (HACCP) program criteria found in 7 CFR 210.13(c). SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP or other FNS programs. The Food Safety plan (HACCP) must have an employee exclusion standard operating procedure that is required by Idaho Food Code. Please update your plan to be in compliance.

## FISCAL ACTION

There is no fiscal action resulting from this review.

## YOUR REVIEW IS NOW CLOSED.

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,

*Cambria Steffler*

Cambria Steffler, MS, RD

NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Jennifer Butler, MEd, SNS, NSLP Coordinator, Idaho Child Nutrition Programs  
Lauren Gibson, Child Nutrition Director, District 1 Juvenile Detention Center

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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; or
2. **fax:**  
(833) 256-1665 or (202) 690-7442; or
3. **email:**  
[Program.Intake@usda.gov](mailto:Program.Intake@usda.gov)

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