



October 11, 2024

Jessica Barawed, Detention Director
Ada County Juvenile Detention Center
6300 West Denton Street
Boise, ID 83704

Dear Detention Director Barawed,

On September 10, 2024, Idaho Department of Education Coordinators Cassandra Thompson, Jax Dunham and Jessica Medrano conducted an Administrative Review (AR) of Ada County Juvenile Detention Center for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP) Operating Universal Free Lunch option
- School Breakfast Program (SBP) Operating Universal Free Breakfast option
- USDA Foods
- Afterschool Snack Program (ASSP) Operating Universal Free Afterschool Snack option

The site reviewed was the Ada County Juvenile Detention Center.

The State agency (SA) would like to commend Daniel Burckhard and the entire staff of Ada County 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 or have the short statement accompanying a link to the full statement. The full NDS is available in both English and Spanish at the following link: [Civil Rights](#).

CAP: Post the full NDS on the school food service webpage. Notify the state agency when the website has been updated.

Due Date: September 25, 2024

Response: The sponsor posted the full USDA NDS on their food service webpage. Completed: September 10, 2024.

Finding 2 – Meal Components and Quantities – Lunch

For the week of menu review, the 9-12 lunch menu did not meet the requirement of no more than 50% of the fruit offerings may be in the form of juice. The menu offered 64% juice (14% more than allowable) for the week of menu review for grades 9-12.

CAP:

1. Provide a written statement in the Corrective Action Response box to describe the specific changes made to the menu, for the week of review, to correct all menu review findings and bring the menu into compliance.
2. 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.
3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: September 4, 2024

Response: Completed: September 3, 2024

1. The menu was updated and shows that fruit gels on Sunday and Wednesday have been replaced with fresh fruit to meet the weekly juice limit. All menus going forward have the fruit gel replaced by fresh fruit to fully adhere to the guidelines.

Debbie Critchfield, Superintendent of Public Instruction

(208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov

2. The sponsor uploaded supporting documentation into MyIdahoCNP that indicates changes made to bring the menu into compliance.
3. The Supervisor and Assistant Supervisor will oversee this area and ensure compliance with the menu change.

Finding 3 – Meal Components and Quantities - Lunch

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirements for grain. 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 September 27, 2024, with only 1.25 oz. eq. offered.

CAP:

1. Provide a written statement in the Corrective Action Response box to describe the specific changes made to the menu, for the week of review, to correct all menu review findings and bring the menu into compliance.
2. 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.
3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

Due Date: September 4, 2024

Response: Completed: September 3, 2024

1. The sponsor updated the recipe and portion size to reflect the 2oz equivalent grain requirement.
2. The sponsor uploaded supporting documentation into MyIdahoCNP that indicates the changes that were made to bring the menu into compliance.
3. The supervisor and Assistant Supervisor will oversee this area and ensure future compliance with the updated menu.

COMMENDATIONS

- The Production Records were immaculate! The entire month is preprinted where only daily counts and occasional notes need to be added. This saves time and the State Agency appreciates your efficiency. Nice work!
- The food nutrition team manages an amazing kitchen. Their kitchen is extremely clean, and all storage areas were organized and very tidy. It was appreciated to witness the temping of foods prior to service, as well as the comradery in the kitchen. It was a pleasure to see you working as a team.
- The state agency appreciates On-Site Monitoring is conducted monthly, despite it not being mandatory at this location. By following this 'best practice,' you can ensure compliance and make adjustments in real time when necessary. It is recognized at the state agency that you are going above and beyond!

Debbie Critchfield, Superintendent of Public Instruction

(208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov

- The food service staff is enacting great care into their program. They were very well organized, and their kitchen was very well kept. They made sure to clarify any questions, and their systems were well developed.

TECHNICAL ASSISTANCE (TA)

Meal Components and Quantities – Breakfast

Independent contractor CN Resource completed the menu review and provided the following Technical Assistance:

- During the Administrative Review the results of the menu review were provided to the sponsor in 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:
 1. The worksheet indicates the daily milk as not being met; however, this is not a finding for RCCIs. Per SP 05-2022, RCCIs may meet the milk variety requirement over the week rather than daily. Ada County Juvenile Detention Center currently uses this flexibility.
 2. Consider adjusting the toast recipe to be clearer on the amount of bread that is in the recipe to ensure the daily ounce equivalence is met.
 3. Secure an updated Product Formulation Statement (PFS) for the sausage patty and breakfast pizza. The documents submitted had an issue date that was greater than 5 years old. The CN numbers were verified as active on the USDA CN Label Verification Report.
 4. The menu was not followed for the week of menu review, however the planned substitutions made were documented and acceptable to meet meal pattern requirements. The toast was listed on Monday's menu; however, the toast was not listed on the production record as planned to be offered. Milk was missing from the menu on Monday and Friday due to running out of space on the menu. Try putting a general statement on the menu, such as "1% white milk or fat free chocolate milk offered daily." This would eliminate having to list milk each day on the menu and help when there is no room on a specific day.

Meal Components and Quantities – Lunch

Independent contractor CN Resource completed the menu review and provided the following Technical Assistance:

- During the Administrative Review the results of the menu review were provided to the sponsor in 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

Debbie Critchfield, Superintendent of Public Instruction

(208) 332-6800 | 650 W. State St., Boise, ID 83702 | sde.idaho.gov

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:

1. Milk was missing from the menu on Friday due to running out of space on the menu. Try putting a general statement on the menu, such as “1% white milk or fat free chocolate milk offered daily.” This would eliminate having to list milk each day on the menu and help when there is no room on a specific day.
 2. The production sheet should be updated for the fish sticks to indicate the serving size of four each to ensure the quantity matches the recipe utilized.
 3. The CN Labels submitted for the fish sticks, beef patties and meatballs were greater than 5 years old. Obtain a current CN Label for these items and keep them on file to verify meal pattern crediting.
- Per SP 05-2022 RCCIs may meet the milk variety requirement over the week rather than daily. Ada county Juvenile Detention Center currently uses this flexibility.

Food Safety

- The SFA has Buy American documentation available on-site for current products not produced in the United States and has retained Buy American Exception Forms from previous years past the 3 years plus the current year requirement. The SFA must note that Buy American documentation must be completed annually for any products that are produced outside of the United States.
- 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). The RCCI is fully compliant, as they have met the necessary requirements for their HACCP Manual. The state agency does recommend all Standard Operating Procedures are kept in one location and are organized in a manner where documents can be found efficiently when needed.

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,

Cassandra Thompson

Cassandra Thompson
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs
Daniel Burkhard, Food Service Director, Ada County Juvenile Detention Center

CIVIL RIGHTS NONDISCRIMINATION STATEMENT

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

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

This institution is an equal opportunity provider.