October 23, 2015

From: Esther Hansen, RDN

Hansen, LLC

1224 E. Elizabeth St.

Ft. Collins, CO 80524

Attention: Lt. Staci Shaffer

Larimer County Detention Center

2405 Midpoint Dr.

Ft. Collins, CO 80525

Dear Lt. Shaffer,

After thoroughly inspecting your kitchen and analyzing your vendors, products, and menus, it is my professional opinion that the Larimer County Detention Center (LCDC) kitchen adequately meets the nutritional needs of its inhabitants It also adequately adheres to kosher dietary standards except for throughout the 10 days of Passover. Allow me to elaborate.

-Nutrition Standards-

There is no federal government agency such as the United States Department of Agriculture (USDA) that regulates a correctional facility’s nutrition standards or food service program. However, government bodies such as the USDA and the National Academies of Science publish nutrition recommendations and guidelines.

There also exists non-government, national credentialing agencies such as the American Correctional Association that set standards for nutrition at facilities like LCDC. At the state level, The Colorado Department of Corrections sets regulatory policy, the newest of which goes into effect December 15, 2015, with standards for food service and menu planning.

LCDC contractually requires that Aramark meet the American Correctional Association’s standards and Medical Diet Procedure Guide. My audit concludes that Aramark has met and exceeded these requirements by fulfilling the following standards not explicitly indicated on the contract:

* Colorado Department of Corrections Regulation 1550-02
* Reference Daily Intake (RDI, formerly RDA as written in the contracts) set by The Food and Nutrition Board of Institute of Medicine, National Academy of Sciences
* The Dietary Guidelines for Americans by the USDA and the Department of Health and Human Services (HHS)

Per the contract with LCDC, Aramark has created a menu with the following requirements explicitly indicated in the contract:

* 28-day menu (4-week cyclical)
* 3 meals per day
* 2,800-calorie per day average over a 7-day cycle (excepting certain therapeutic diets)
* Oversight by a Registered Dietitian Nutritionist (RD or RDN)
* Includes special, religious or therapeutic diets such as kosher, vegetarian, and other medical diets as prescribed by medical or dental personnel or clergy
* Nutritionally meets or exceeds RDIs when averaged over a 7-day cycle

With the aforementioned lack of definitive regulatory standards, I judge that Aramark, on behalf of LCDC, has gone above and beyond their contractual obligation to create a nutritionally adequate menu.

- Kosher Standards -

1. Kosher Certifications

Rabbis are the ultimate authority on whether or not a food is kosher and can certify it as such. Aramark has certifications for each kosher food through the following agencies:

* 1. Chicago Rabbinical Council
  2. Council of Orthodox Rabbis of Greater Detroit
  3. KOAOA
  4. National Council of Young Israel
  5. Star-K
  6. The Kashrus Division of the Rabbinical Council of New England
  7. The Scroll K Vaad Hakashrus of Denver
  8. Rabbi Don Yoel Levy for OK Kosher Certification
  9. Rabbi J.H. Ralbag for Triangle K, Inc.
  10. Union of Orthodox Jewish Congregations of America
  11. Vaad Hoeir of St. Louis

1. Kosher Classifications

Kosher foods are classified as meat, dairy, or pareve (neutral, neither meat nor dairy). Kosher laws forbid cooking milk and meat together at any time. Most guidelines suggest not eating milk and meat within 6 hours of one another. In an effort to comply and simplify, Aramark has created a lacto-ovo vegetarian diet (with vegan options) that consists *only* of dairy or pareve foods.

1. Kosher Kitchen

Even though kosher foods are certified when they arrive at LCDC, they can become un-kosher after certification through contamination of milk and meat or by contamination with non-kosher foods. The LCDC has a separate area of its kitchen for preparing kosher meals with separate cookware and serving ware. The kosher side of the kitchen is adequately separate from the non-kosher side such that there is no risk of contamination, except perhaps during Passover due to the more stringent rules at that time.

In addition to kosher regulations, Passover kosher laws require an additional restriction of all yeast and leavening agents. Not only are leavened foods prohibited, but kosher foods cannot be prepared in a kitchen where leavening agents are present. Particular cleaning rituals must be observed to rid a kitchen of leavening agents adequately to be Passover kosher. I do not believe LCDC’s shared kitchen is separate enough to fulfill Passover kosher laws.

I suggest having a Passover-specific menu that eliminates yeast and leavening agents by using only Passover-kosher foods that are ordered pre-prepared. I do not believe the separate area of the kitchen will be separate enough to comply with the dietary practices during this time (April 20, 2016–April 30, 2016). The simplest way to comply as Passover kosher is to order pre-prepared meals during that time.

Thank you for the opportunity to work with you. Please contact me with any further questions.

Sincerely,

Esther Hansen, RDN

Registered Dietitian Nutritionist

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