



Audit of the Federal Bureau of Prisons' Documentation of its Compliance with Select National Menu Requirements



AUDIT DIVISION

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Introduction

In 2008, the Federal Bureau of Prisons (BOP) introduced its National Menu to better ensure standardized food service operations across each of its 122 institutions. Through the National Menu, the BOP must provide inmates with three nutritionally adequate meals each day, prepared and served in a manner that meets established government health and safety codes.¹ According to the BOP, during fiscal year (FY) 2024, it served approximately 428,000 meals per day, equating to more than 150 million meals in that year alone.

The National Menu includes standardized recipes and product specifications for food procurement, preparation, and meal service at all BOP institutions. It also covers certain variations that can help meet the medical, religious, or other specific dietary needs of inmates. One of the requirements related to the National Menu is for institutions to document any changes made to the planned National Menu on an “as-served” menu, which provides evidence that basic daily serving requirements are met each week at each BOP institution. As-served menus are prepared using the automated Federal Nutrition System, which is pre-populated with food items from the National Menu.

Audit Objective

Our audit objective was to assess the BOP's compliance with the “as-served” menu documentation requirements for standard and certified religious meals served through the National Menu.²

¹ See BOP, Program Statement 4700.07, *Food Service Manual*, April 8, 2024; <https://www.bop.gov/policy/progstat/4700.07.pdf>, accessed February 4, 2026.

² Although we did not assess food quality or safety as part of this audit, the OIG has recently performed and continues to perform oversight in these important areas. For additional

Recommendation

We make one recommendation to the BOP to strengthen its compliance with the as-served menu documentation requirements for certified religious meals. In response to a draft of this report, the BOP provided information and documentation of actions taken that we determined are sufficient to close the recommendation. Appendix 2 contains the BOP's response and Appendix 3 contains our summary of the recommendation's closure.

Audit Results

For most of the dietary variations offered by the BOP under the National Menu, BOP institutions are required to create and maintain “as-served” menus that document changes to the planned menu, when necessary.³ The “as-served” menu is intended to provide evidence that the food served to inmates on a weekly basis met the basic daily serving requirements of the National Menu. As-served menus are prepared using BOP's Federal Nutrition System, which is an automated system pre-populated with approved National Menu food items. If any adjustments or substitutions are needed at an institution for preapproved National Menu items they must be made within policy, and the institution must note the change with its as-served menu. Once completed, as-served menus must be signed by an institution's Food Service Administrator or their designee and retained for 2 years.

As shown in Table 1, the BOP offers several variations through its National Menu, along with special or

details on this work, please see Appendix 1.

³ BOP's Food Services Branch does not generate as-served menus for therapeutic diets, except for renal dialysis diets. Therapeutic diets are approved by BOP Health Services and cannot be modified at the institution-level.

therapeutic diets, medical diets, and certified religious diets.⁴

Table 1

**BOP National Menu
Dietary Variations as of (2024-2025)**

National Menu	Special or Therapeutic
Standard	Low Fiber
High-Rise	Gluten Free
Women's	Clear Liquid
Guaynabo ^a	Renal Dialysis
Controlled Movement ^b	Modified Consistency
Medical Diet ^c	Certified Religious
Diabetic	Kosher
Calorie Controlled	Halal
Sodium Controlled	
Fat Controlled	
Cholesterol Controlled	

^a The Guaynabo menu is only available in Puerto Rico.

^b The Controlled Movement menu is for high security facilities.

^c Medical diet meals must be authorized by the BOP's Health Services staff for medical reasons.

Source: BOP

National Menu Documentation

We obtained the as-served menus for standard, certified religious, renal dialysis, women's, and high-rise meals (where applicable) served to inmates at six institutions and compared the documentation to the planned National Menu meals. We tested 14 weeks of as-served menus from Federal Correctional Institution (FCI) Atlanta in Georgia (a high-rise facility); thereafter, we tested the as-served menus for 1 week from Federal Prison Camp (FPC) Bryan in Texas (a women's facility), Federal Correctional Complex (FCC) Butner in North Carolina, FCI Fairton in New Jersey, FCC Florence in Colorado, and FCI Terminal Island in California. Overall, we found that these six institutions generally recorded as-served menus that were consistent with applicable National Menu requirements.

⁴ We did not review BOP's supporting documentation for special or therapeutic or medical diets as part of this review.

⁵ 28 C.F.R. § 548.10 (2025).

⁶ As of July 2025, the BOP formally recognized 28 religions with approximately 142,685 inmates formally associated with them.

Certified Religious-Menu Documentation

Federal regulations require the BOP to provide all inmates a reasonable and equitable opportunity to observe their religious dietary practices within the constraints of budget limitations and consistent with the security and orderly running of the institution.⁵ Accordingly, the BOP generally allows inmates to self-select foods from their institution's standard National Menu offerings as the primary way to meet their religious needs, such as through the selection of no-flesh and salad bar items.⁶ If self-managed adjustments to National Menu offerings do not meet an inmate's needs, the inmate may request to participate in the BOP's certified religious diet program.⁷ This option provides nationally recognized, religiously certified kosher and halal foods. According to the BOP, with exceptions for bread and beverages, these kosher and halal certified meals are procured and served in sealed, individual serving packages marked with the appropriate religious certification.

Our review of the as-served menus from the same six institutions noted above found that they consistently lacked evidence that certain food items, including required items like vegetables, were served with their certified religious meals. In fact, as shown in Table 2, at least two-thirds of the documented lunches and dinners tested within our sample had no record of vegetables (required by the National Menu) being served at all.

Table 2

Percentage of Certified Religious Meals Tested from As-served Menus that were Missing Documentation of Required Vegetables

Atlanta FCI	68 percent
Bryan FPC	71 percent
Butner FCC	71 percent
Fairton FCI	71 percent
Florence FCC	71 percent
Terminal Island FCI	71 percent

Source: OIG analysis of BOP records

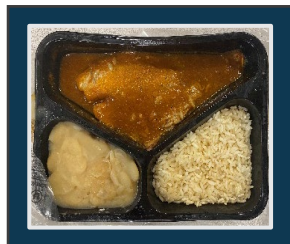
Notably, during our on-site observation at FCI Atlanta,

⁷ If an inmate is not satisfied with the two noted options, an inmate may seek a "new or unfamiliar" religious accommodation within their institution for consideration. If approved, this type of accommodation might include alternative dietary adjustments.

we witnessed vegetables, along with other unrecorded food items being served. The image below shows a certified religious dinner served at FCI Atlanta, which included a fish fillet with tomato sauce, rice, and lima beans.

Figure 1

A Certified Religious Dinner Served in FCI Atlanta



Source: OIG photograph (April 7, 2025)

Although we observed that this meal contained tomato sauce, white rice, and lima beans, these three items were not recorded on FCI Atlanta's as-served menu for the date of our visit, as shown in Table 3, below.

Table 3

Comparison of the BOP's National Menu Certified Religious Meal Requirements to the As-served Certified Religious Menu at FCI Atlanta, April 7, 2025

Certified Religious Menu Requirement	As-served Menu	OIG Observed Serving
Fish fillet	Recorded as-served	Yes
Tomato sauce	No record	Yes
White rice	No record	Yes
Lima beans	No record	Yes
Two tartar sauce	Recorded as-served	Yes
Two slices of bread	Recorded as-served	Yes
One margarine	Recorded as-served	Yes
Whole fresh fruit	Recorded as-served	Yes
Kosher Beverage	Recorded as-served	Yes

Source: OIG analysis of FCI Atlanta's records for meal service on April 7, 2025

When we inquired about the incomplete documentation across each of the six institutions previously noted, BOP officials from each institution told us that the certified religious meals arrive at their institutions pre-packaged. However, according to BOP's Food Service Program Coordinator, the Federal

Nutrition System, which is used to prepare the as-served menus, does not reflect all food items contained within the pre-packaged meals. The Program Coordinator further stated that the Federal Nutrition System is not designed to populate the as-served menus with all food items that may come in the pre-packaged certified meals.

We recognize that a lack of documentation showing that certain required food items being served with certified religious meals does not necessarily mean the items were not served (as demonstrated by our observations at FCI Atlanta). Nevertheless, we believe all BOP institutions must be able to demonstrate compliance with National Menu requirements so they can provide reliable assurance that basic daily serving requirements are regularly met for those inmates approved to receive certified religious meals.

Conclusion and Recommendation

Because BOP's Federal Nutrition System does not currently allow institutions to fully capture all the items served with its certified religious meals, BOP institutions cannot provide assurance that National Menu requirements and the religious needs of certain inmates are regularly met.

Therefore, we recommend that the BOP:

1. Update the Federal Nutrition System to allow institutions to fully capture the items served with certified religious meals so that as-served menus can demonstrate compliance with National Menu requirements. If updating the Federal Nutrition System is not feasible or cost-effective, BOP should take alternative steps to ensure that all as-served menus are comprehensive and contain all the items served in its certified religious meals.

APPENDIX 1: Audit Scope and Methodology

Objective

The U.S. Department of Justice, Office of the Inspector General (OIG) performed this audit to assess the BOP's compliance with the "as-served" menu documentation requirements for standard and certified religious meals served through the National Menu.

Scope and Methodology

Generally, the scope of our work was from June 2024 to June 2025. To achieve our audit objective, we visited the Federal Correctional Institution (FCI) Atlanta in Georgia during the survey phase of the audit. While at FCI Atlanta, we interviewed officials and observed food service operations and the provision of inmate meals. We also analyzed FCI Atlanta's as-served menu documentation and other available data on food served at this location. In addition to FCI Atlanta (low security), we also reviewed the same documentation for five additional BOP facilities, including: (1) Federal Prison Camp (FPC) Bryan in Texas (minimum security); (2) Federal Correctional Complex (FCC) Butner in North Carolina (low and medium security); (3) FCI Fairton in New Jersey (medium security); (4) FCC Florence in Colorado (ADMAX penitentiary, high and medium security), and (5) FCI Terminal Island in California (low security).⁸

In addition to our work at the institution-level, we interviewed officials from the BOP's National Food Service Branch and Chaplaincy Services Branch at BOP headquarters. We also obtained and reviewed BOP's annual inmate survey on eating preferences for FYs 2022 to 2024, which the BOP uses, along with other factors, when updating the National Menu each year, along with the BOP's analysis of the responses. Lastly, we reviewed the nutritional analyses performed by the BOP, which follows the annual menu update.

Although we did not assess food quality or safety as part of this audit, we considered ongoing and recently completed OIG oversight performed in these important areas. Specifically, in FY 2024, the OIG performed unannounced inspections of several BOP institutions' food service operations and found risks to food safety caused by food storage equipment malfunctions and sanitation failures, such as inoperable freezers, broken mobile heating carts used to transport inmate meals, and unhygienic conditions in food service areas.⁹ In 2023, during our unannounced inspection of FCI Tallahassee, the OIG identified alarming conditions of its food service and storage operations, including our observations of inmates being served moldy bread and vegetables rotting in a refrigerator in a food preparation area.¹⁰ Additionally, in August 2024, the OIG initiated an audit of the BOP's acquisition and life cycle management of major equipment supporting food services. This audit was ongoing as of the date of this report.

Statement on Compliance with Generally Accepted Government Auditing Standards

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusion based on our audit objective.

Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objective. We did not evaluate the internal controls of the BOP to provide assurance on its internal control structure as a whole. The BOP's management is responsible for the

⁸ ADMAX is an administrative security U.S. penitentiary.

⁹ U.S. Department of Justice, Office of the Inspector General, [Concurrent Inspections of BOP Food Service Operations, Evaluations and Inspections](https://oig.justice.gov/reports/concurrent-inspections-bop-food-service-operations) Report 25-062 (June 2025), <https://oig.justice.gov/reports/concurrent-inspections-bop-food-service-operations>

¹⁰ U.S. Department of Justice, Office of the Inspector General, [Inspection of the Federal Bureau of Prisons' Federal Correctional Institution Tallahassee](https://oig.justice.gov/reports/inspection-federal-correctional-institution-tallahassee) Report 24-005 (November 2023), <https://oig.justice.gov/reports/inspection-federal-bureau-prisons-federal-correctional-institution-tallahassee>

establishment and maintenance of internal controls in accordance with 28 C.F.R. § 548.20. Because we do not express an opinion on BOP's internal control structure as a whole, we offer this statement solely for the information and use of the BOP.¹¹

The internal control deficiency we identified is discussed in the Audit Results section of this report. However, because our review was limited to those internal control components and underlying principles that we found significant to the objective of this audit, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

Compliance with Laws and Regulations

In this audit we tested, as appropriate, given our audit objective and scope, selected transactions, records, procedures, and practices, to obtain reasonable assurance that the BOP's management complied with federal laws and regulations for which noncompliance, in our judgment, could have a material effect on the results of our audit. Our audit included examining, on a test basis, the BOP's compliance with the following regulation that could have a material effect on the BOP's operations:

- 28 C.F.R. § 548 (2025)

This testing included interviewing BOP personnel, analyzing data, assessing internal control procedures, and examining procedural practices. Nothing came to

our attention that caused us to believe that the BOP was not in compliance with the aforementioned regulation.

Sample-Based Testing

To accomplish our audit objective, we performed sample-based testing of the BOPs as-served menus from six BOP institutions. We compared 14 weeks—June 30, 2024, to October 5, 2024—of FCI Atlanta's as-served high-rise and certified religious menus to the National Menus and analyzed the results. Additionally, we compared 1-week of as-served menus for standard, certified religious, renal dialysis, women's and high-rise meals (where applicable) from FPC Bryan (women's menu), FCC Butner, FCI Fairton, FCC Florence, and FCI Terminal Island to the National Menus and analyzed the results. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the areas we reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected.

Computer-Processed Data

During our audit, we obtained information from the BOP's Federal Nutrition System and SENTRY.¹² We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

¹¹ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

¹² SENTRY is a real-time information system consisting of various applications for processing sensitive but unclassified

inmate information and for property management. Data collected and stored in the system includes information relating to the care, classification, subsistence, protection, discipline, and programs of federal inmates.

APPENDIX 2: Federal Bureau of Prisons' Response to the Draft Audit Report



U.S. Department of Justice

Federal Bureau of Prisons

Office of the Director

Washington, DC 20534

January 26, 2026

MEMORANDUM FOR JASON R. MALMSTROM
ASSISTANT INSPECTOR GENERAL
AUDIT DIVISION

FROM:

A handwritten signature in blue ink that reads "William K. Marshall III".

William K. Marshall III, Director

SUBJECT:

Response to the Office of the Inspector General's Draft Audit Report:
The Federal Bureau of Prisons' Documentation of its Compliance with
Select National Menu Requirements

The Federal Bureau of Prisons (BOP) appreciates the opportunity to respond to the Office of the Inspector General's (OIG) thorough draft audit report, The Federal Bureau of Prisons' Documentation of its Compliance with Select National Menu Requirements.

The BOP is committed to providing inmates with meals that are nutritionally adequate, properly prepared, and attractively served. The BOP's National Menu ensures standardized food service operations across its institutions and provides inmates with three nutritionally adequate meals each day, prepared and served in a manner that meets established government health and safety codes. Inmates are generally allowed to self-select food from their institution's standard National Menu offerings as the primary way to meet their religious needs, such as through the selection of *no-flesh* and salad bar items. If self-managed adjustments to the National Menu offerings do not meet the needs of the inmate, the inmate may request to participate in the BOP's Certified Religious Diet Program. This option provides nationally recognized, religiously-certified kosher and halal foods.

The BOP is dedicated to providing clear and concise menu options to the inmate population and offering certified religious meals appropriately. At BOP institutions, certified religious meals are provided as complete, pre-assembled meals produced in accordance with nationally approved specifications that define tray configuration, required items, and portion weights. Meals are listed on menus as a single meal, verified through established ordering and receiving standards prior to service, and delivered as sealed trays that remain sealed from the manufacturer through distribution and opened only by the inmate. This end-to-end process from national specifications and receiving verification to sealed tray service provides reliable assurance and documentation that all required certified diet components, including vegetables, are included and served as required.

The BOP values OIG's assessment of the BOP's compliance with the "as-served" menu documentation requirements for standard and certified religious meals served through the National Menu and its recommendation to strengthen the BOP's compliance. The BOP offers the following response to OIG's recommendation:

Recommendation One: Update the Federal Nutrition System to allow institutions to fully capture the items served with certified religious meals so that as-served menus can demonstrate compliance with National Menu requirements. If updating the Federal Nutrition System is not feasible or cost-effective, BOP should take alternative steps to ensure that all as-served menus are comprehensive and contain all the items served in its certified religious meals.

BOP Response: The BOP concurs with this recommendation. The Federal Nutrition System is an inventory management system that allows the BOP to track inventory levels and associated costs. Updating the Federal Nutrition System would not enhance compliance or support cost containment. The BOP's compliance is demonstrated through nationally approved specifications, in contracts that define all required items, tray configuration, and portion weights; meals are listed as complete meals on menus, verified through established receiving standards, and provided as sealed trays from the manufacturer through service. These existing controls, along with contract evaluations, provide sufficient assurance and documentation that all required items are served and meet specifications.

That stated, to further ensure transparency and ease of verification, BOP institutions have updated their As-Served Menu Retention Folders, which are maintained at each institution, to include a hard copy of the applicable version of the Certified Religious Diet Menu, Religious Diet General Specifications, and the Religious Diet Specifications Quote Sheet. Those documents collectively represent all items included in the certified religious diet meals. Institutions will continue to have access to all current certified religious diet documentation on the Central Office Food Service Branch Sallyport/intranet page.

APPENDIX 3: The Office of the Inspector General Analysis and Summary of Actions Closing the Audit Report

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) provided a draft of this audit report to the Federal Bureau of Prisons (BOP). The BOP's response is incorporated in Appendix 2. In response to our draft audit report, the BOP concurred with our recommendation and provided sufficient documentation of completed corrective actions. As a result, the status of the audit report is closed. The following provides the OIG analysis of the BOP's response.

Recommendation for the BOP:

- 1. Update the Federal Nutrition System to allow institutions to fully capture the items served with certified religious meals so that as-served menus can demonstrate compliance with National Menu requirements. If updating the Federal Nutrition Systems is not feasible or cost-effective, the BOP should take alternative steps to ensure that all as-served menus are comprehensive and contain all the items served in its certified religious meals.**

Closed. The BOP concurred with our recommendation and stated the Federal Nutrition System is an inventory management system that allows the BOP to track inventory levels and associated costs. The BOP maintained that updating the Federal Nutrition System would not enhance compliance or support costs containment and added that its compliance is demonstrated through nationally approved specifications in contracts that define all required items, tray configuration, and portion weights. The BOP stated that meals are listed as complete meals on menus verified through established receiving standards and provided as sealed trays from the manufacturer through service. The BOP stated these existing controls, along with contract evaluations, provide sufficient assurance and documentation that all required items are served and meet specifications.

The BOP also stated, to further ensure transparency and ease of verification, its institutions have updated their "as-served" menu retention folders, maintained at each institution, to include a hard copy of the applicable version of the certified religious diet menu, religious diet general specifications, and the religious diet specifications quote sheet. According to the BOP, these documents collectively represent all items included in the certified religious diet meals. The BOP added that institutions will continue to have access to all current certified religious diet documentation on the Central Office Food Service Branch intranet page.

We reviewed the BOP's documentation and determined its corrective actions are sufficient to ensure institutional as-served menus contain all items served in certified religious meals. Therefore, this recommendation is closed.