Iowa Department of Education Bureau of Nutrition and Health Services State Review Summary Report Ottumwa Comm School District (50490000)

March 3-6, 2020

Program Year: 2020

Month of Review: January

Lead Reviewer: Shea Cook

Org Representative(s): Yvonne Johnson

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Three students were listed in the system as directly certified for free meals. No direct certification documents verified that status. An additional two students from two households were directly certified as free on the 8/2 download. At later dates (8/9 and 10/8) both households also submitted paper applications. Determination made for each application was at the reduced benefits level and the benefits were changed in the system to reduced when they should have remained with the higher benefit level of free.	For your response please upload copies of the letters notifying the families of the reduction and increase in benefits.	
1000 - Local School Wellness Policy	V-1000	Under the final rule of the Healthy, Hunger-Free Kids school districts are required to conduct a triennial assessment of local wellness policy implementation. There is no documentation to demonstrate that an assessment has been completed. In addition, results of the triennial assessments must be made available to the public.	For your response please submit a timeline for completing an assessment of the local wellness policy and how you will make the information available to the public once it is complete. It is the expectation that a wellness assessment and corresponding documentation will be on file and available to the public by the start of the 18/19 school year.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	Nonprogram foods are defined as any food sold during the school day that is not part of a reimbursable meal to a student. Provision 206 of the Healthy Hunger Free Kids Act requires that nonprogram foods raise revenue sufficient to cover the costs of the food. The financial report on lowaCNP indicates the district is not currently raising enough revenue from the sale of its nonprogram foods.	For your response please complete and submit the nonprogram revenue tool. If the tool indicates that additional nonprogram revenue is needed please describe your plan to increase nonprogram revenue.	

Bureau of Nutrition and Health Services

State Review Summary Report

Ottumwa Comm School District (50490000)

March 3-6, 2020

Site - Level Findings: Pickwick Early Childhood Center (0301)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Breakfast	V-0300	Adult meals were incorrectly included in the January claim for reimbursement at this site.	Claims were adjusted on site and no further action is required.	
400 - Meal Components and Quantities - Breakfast	V-0400	There are no production records for breakfast at this site. All meals served in the National School Lunch Program must be documented with food production records, regardless of who employs the staff serving the meals.	For your response attach two weeks' worth of completed food production records for breakfast meals at this site.	
400 - Meal Components and Quantities - Lunch	V-0400	On observation 15 meals were missing the meat/meat alternate component. Staff ran out of sausage and students at the serve only location were served a meal without the component.	For your response please outline the procedure that will be used when service is running short on required components. (i.e. Who will be responsible for calling the production kitchen to order more food. Will you stock additional back up components on site, etc.?)	
1400 - Food Safety	V-1400	Staff in the kitchen at the time of meal service were unfamiliar with a HACCP plan and could not locate it. Any person serving reimbursable meals under the NSLP, regardless of who they are employees of, is required to follow the food safety requirements and guidelines of the program.	For your response please indicate where the HACCP plan is located in the kitchen, who will provide staff in the kitchen with an overview of the plan, and when yearly food safety training of kitchen staff will take place.	
1400 - Food Safety	V-1400	There are no written temperature logs documenting temperatures for milk coolers, refrigerators, etc.	For your response please identify who will be responsible for maintaining temperature logs. Additionally, please submit one week's worth of temperature logs.	

Site - Level Findings: Liberty Elementary School (0427)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Signage explaining the components of a reimbursable meal must be posted at or near the beginning of each service line for lunch and breakfast. There was no signage at this site.	For your response please indicate where signage will be posted and who is responsible for daily updates.	
1700 - Afterschool Snack	V-1700	The afterschool snack program must be monitored twice per year, once within the first four weeks of operation. No document is on file to show that monitoring happened within the first four weeks of operations.	For your response please complete and submit onsite monitoring for the afterschool snack program. Additionally, please identify who will be responsible for making sure that the program has been monitored within the first 4 operational weeks of SY21.	
1700 - Afterschool Snack	V-1700	The fruit and vegetable component of Afterschool Snack require a 3/4 cup of serving to meet the meal pattern. Snack served on the day of review and three snacks during the review period only contained 1/2 cup of fruit or vegetable.	For your response please submit one week's worth of completed food production records with serving sizes noted to verify that the required amount of fruit and vegetable is being served to meet the requirement. January claim was adjusted on site to disallow 154 snacks from the review week and no further action is required for claims.	

Bureau of Nutrition and Health Services

State Review Summary Report

Ottumwa Comm School District (50490000)

March 3-6, 2020

Site - Level Findings: James ElementarySchool (0459)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	During breakfast service 25 meals were served without the required 1/2 c of fruit. This error was the direct result of lack of understanding of OVS requirements at breakfast.	For your response please indicate your plan for staff training on offer versus serve, the timeline for completing that training, and who will be responsible for completing the training.	
400 - Meal Components and Quantities - Breakfast	V-0400	Production records evaluated from the review period indicate that fruit juice was the only fruit offered on 3 of the 5 serving days. No more than half of the fruit requirement can be met with fruit juice.	For your response please submit one week's worth of completed food production records that demonstrate that the fruit requirement has been met.	
400 - Meal Components and Quantities - Lunch	V-0400	Production records evaluated for the review period do not indicate that portions sizes offered met the minimum meal pattern requirements for the age group being served. Food production records indicate that the red/orange subgroup was 3/8 c short of the required 3/4 c weekly requirement, legumes were 1/4 c short of the required 1/2 cup weekly requirement, and the other subgroup was 1/4 c short of the weekly 1/2 c requirement. Additionally, on Monday of the review week food production records do not indicate that the minimum daily amount of 1 oz grain was served. FPRs indicate that 2.8 oz of chicken nuggets were served which would equal 4.5 chicken nuggets. CN label on the product indicates that 5 nuggets equals 1 oz of grain.	For your response please submit completed food production records and menu certification worksheets for 1 week of lunch.	
1900 - Fresh Fruit and Vegetable Program (FFVP)	V-1900	There is no cost documentation to support the claim for administrative labor. A time study may be conducted for labor hours that are consistent from month to month, such as administrative labor time. This time study should be conducted at the start of each year and then kept on file and would include documentation of one month of actual time devoted to the FFVP administrative tasks. Administrative labor hours may also be documented on a labor time log or other time record.	Submit one month time sheet or time study which documents administrative labor hours as claimed. If a time study is completed, please keep on file with other FFVP documents to confirm administrative hours for subsequent claims.	

Org - Level Technical Assistance

Area Question	Comments
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Bureau of Nutrition and Health Services

State Review Summary Report

Ottumwa Comm School District (50490000)

March 3-6, 2020

700 - Resource Management	PROCUREMENT:
	1. The 2019-2020 written procurement plan did not identify the estimated
	value for each procurement event. A cost analysis should be completed for
	each procurement event prior to writing solicitation documents. A good
	place to start for estimated cost is a vendor usage/velocity report for
	frequent procurement events such as prime vendor, milk, and bread. For
	new or infrequent procurement events, online research or contacting
	vendors for information about products to be purchased or for service
	charge is a good start.
	2. The Code of Conduct did not identify district policies related to conflicts
	of interest, gifts to employees, and disciplinary actions for violation of job
	duties. Technical assistance provided to list district policies 402.04 Gifts to
	Employees, 413.04 Classified Employee Suspension, and 413.05
	Classified Employee termination, and 707.05 Internal Controls in the Code
	of Conduct policy.
	Chocolate 2% reduced fat milk - 12 ounces was purchased at the high
	school. This product was not on the original milk solicitation. A separate
	procurement would have to be conducted for items not on the original
	solicitation documents. Similarly, add 6" white whole wheat hot dog and 4"
	white whole wheat hamburger buns on specifications for bread vendor. If
	district plans to renew contract with dairy and bread vendor, be sure to add
	items purchased frequently but not on original solicitation on the renewal
	documents along with estimated quantity to ensure addition of these items
	will not cause a material change in the contract.
	2. A reference is made to Buy American regulations at 7 CFR 210.21 on all
	formal bids for agricultural commodities - milk, bread, and prime vendor.
	The full Buy American statement should be included in all future
	solicitations for agricultural products. See state agency procurement small
	and formal solicitation prototypes for language.
	3. An exception to Buy American log must be maintained for purchase of
	non-domestic agricultural product. A Buy American exception log template
	is available on IowaCNP.
	4. A one-time purchase was made using the micro-purchase method from
	a vendor based in Illinois. None of the broadline distributors in state carry
	this particular vendor's products. The vendor's sales staff visit SFAs.
	Orders are shipped directly to the SFA. Vendor claims their products are
	unique. There is anecdotal information from FSDs that product is high-
	quality. In future, FSD should check for similar products available from
	other vendors to ascertain the price is reasonable.
	5. A one-time purchase for bib aprons was made using micro-purchase
	method. No documentation was maintained to show the SFA attempted a
	price with vendors to demonstrate it was reasonable before making the
	purchase. Technical assistance was provided to maintain documentation of
	price checks (whether online, call/email to vendor) to justify item purchase
	price was reasonable.
	6. Written descriptions for the products should be sent to vendors whether
	using small or formal methods of procurement. 6. A written description of
	the product, equipment, or service should be available procurement events
	using the small or formal methods of procurement. When a brand is
	specified then each specification should include "or equal" so as not to
	restrict competition. A general statement that "like products will be
	considered" is not enough. When price/rate quotations are obtained from
	vendor websites, this documentation should be maintained as a hard copy
	or electronically. This will show that the product(s) purchased met the

Bureau of Nutrition and Health Services

State Review Summary Report

Ottumwa Comm School District (50490000)

March 3-6, 2020

		SFA's written description and that price check was completed with at least three vendors. 7. The Prime Vendor product descriptions showed codes that were specific to a particular vendor. This is not acceptable and restricts other vendors from responding to a solicitation. 8. When a vendor is awarded a contract using bottom line evaluation method, estimated quantity of each product and extended cost must be completed to arrive at bottom-line cost for each vendor. Technical assistance was provided. A milk cost spreadsheet is available on lowaCNP. 9. The School Food Authority (SFA) included some federal terms and conditions in small and formal methods. For all the required federal terms and conditions to be included in small and formal procurement, check the state prototype templates posted on download forms on lowaCNP or Appendix II to 2 CFR 200 1. http://federal.elaws.us/cfr/title2.chapterii.part200.appii 9. The solicitation documents for prime vendor, milk, and bread stated the vendor would be awarded a contract for a period of three years. A contract should be awarded only for a year initially with the option for up to four (4) one-year renewals provided vendor meets SFA requirements as specified in contract. 10. The prime vendor solicitation stated "an estimated amount of products are provided," however, the specification documents showed no annually estimated amount for any items. Estimated annual quantity for each product should be provided in solicitation documents. 11. The evaluation for vended beverages was not completed correctly resulting in the wrong vendor being awarded the contract. The SFA must re-bid vended beverages for the upcoming school year. 12. Public notification when using formal method of solicitation should be a newspaper with a large circulation in the district's service area. This would be the Des Moines Register. School districts have another option to post formal solicitation on the Department of Administrative Services (DAS) website. Information was provided.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	If parents wish to file a complaint about any child nutrition program, this is the process that should be used: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	A number of food service staff have completed training in topics that are not directly related to their duties in school nutrition. Training not directly related to nutrition duties do not count towards professional standards hours. Examples of topic that do not count towards professional standards for nutrition include lock down training, CPR, first aid, student behavior, crisis response, etc.
1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	Training hours for employees who do not work for school nutrition but have nutrition duties should be tracked and kept on file with training records for nutrition employees. Civil rights training is required, but additional training beyond that should be specific to the tasks that the individual is responsible for within child nutrition. In this case it would be appropriate for

Bureau of Nutrition and Health Services

State Review Summary Report

Ottumwa Comm School District (50490000)

March 3-6, 2020

		individual to attend applications and direct certification training and verification training webinars.
1400 - Food Safety	American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	FSD had been documenting nondomestic agricultural products by analyzing invoicing from prime vendor that identifies nondomestic products. This would be appropriate for canned goods like tropical fruit, mandarin oranges, etc. Discussed reasons for documenting nondomestic agricultural products at sites where food is delivered.
, ,		SA discussed nonprogram revenue and tracking expenses more accurately to improve the reliability of the numbers reported in the financial report. SA recommended that the business official and FSD work together to more accurately track nonprogram expenses.

Site - Level Technical Assistance Pickwick Early Childhood Center (0301)

Area	Question	Comments
•	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	SA discussed possible strategies for age appropriate signage for this site.

Site - Level Technical Assistance Liberty Elementary School (0427)

Area	Question	Comments
500 - Offer versus Serve		Most meals are pre-plated with all components on the line for students to pick up. Although one students was observed asking not to have one of the components, they student had to ask specifically and a tray was plated for her specifically. Pre-plating the meals does not give the students the appearance of choice as required for OVS. While the SA realizes that the staff do this to save time and get the students through the line to give them plenty of time to eat, this is not OVS. If SFA is not going to implement OVS properly they should change to serve only and offer full quantity of all 5 components to each student. If SFA wants to continue OVS, as is best practice, FSD should provide OVS training for all staff.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	Inspection report was not posted in a publicly visible location. Inspection was moved while on site and no further action is required.
1700 - Afterschool Snack	1706 Review production records for a minimum of 5 days from the review period.	Food production records for Afterschool Snack do not indicate the serving sizes planned. For example, during the review period items like celery, apple slices, and juice planned serving size is listed as "one." That notation does not provide any information on how the component meets the meal pattern requirements for afterschool snack. Production records should list components in measurable amounts. SA recommends using the Afterschool Snack production record template NSLP012 located in Download Forms on lowaCNP.

Site - Level Technical Assistance James ElementarySchool (0459)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	offered?	On the day of review only juice was offered to meet the fruit component, even though fresh fruit was also menued. For both breakfast and lunch, only 50% of the fruit offered to students can be juice. At least 90% of fruit

Bureau of Nutrition and Health Services

State Review Summary Report

Ottumwa Comm School District (50490000)

March 3-6, 2020

		offered at breakfast is juice which is well above the maximum. If there is a day when only juice is offered, then there must be a day that week when only fruit (canned, frozen, dried) is offered. Best practice is to offer fruit and juice daily.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Production records should reflect the actual serving sizes and amounts of food being served to students. Production records for the review week indicate amounts that do not match the product specifications and do not reflect that the meal pattern is being met. SA discussed documenting quantities in actual amounts. SA suggests additional training on food production records. A short webcast on food production records can be found on the following website: https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Site is listed as an OVS site on the application packet, however, OVS is not being implemented properly. Staff is pre-plating meals and students are not given the option to decline components unless they specifically ask and a new meal is plated. SA and FSD discussed OVS training options, the differences between OVS as breakfast and lunch and strategies for helping staff to implement OVS properly. If SFA does not wish to utilize OVS at this site the application packet should be amended to reflect that it is a serve only site and serve full quantity of components daily. The OVS error at breakfast resulted in 25 nonreimbursable meals.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	During breakfast service there is one nutrition staff member on the line to serve the meal. SA discussed OVS requirements for breakfast with line staff and suggested moving the fruit component to the beginning of the line so that it would be easier to make sure that a student has a fully reimbursable meal that includes the required fruit component.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1901 Did the cost documentation provided support the school's FFVP claim for reimbursement?	January 2020 claims for reimbursement was reviewed. The FFVP claims for fresh fruits and vegetables do not document the actual costs as indicated on the vendor invoices. All produce for FFVP is purchased as single serve items packaged in a case. Cost for produce is reported as a unit/serving cost on the claim instead of case cost, therefore the total cost of each produce item does not add up exactly to invoice cost. A spreadsheet was developed and shared with the food service director. Technical assistance was provided. A similar spreadsheet will be used to report FFVP claim for reimbursement going through the rest of the School Year (SY)
1900 - Fresh Fruit and Vegetable Program (FFVP)	1905 Is the FFVP widely publicized within the school?	Food service director stated the Fresh Fruit and Vegetable Program (FFVP) is publicized annually via the school district newsletter. The FFVP menu is displayed on the computer screens at the FFVP school selected for review. The reviewer was not able to find the newsletter on the district website during the on-site review. Please maintain a hard or electronic copy of the newsletter with FFVP documents. Maintain documentation of any other promotion of the FFVP.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1910 Did the FFVP meal service follow HAACP principles and applicable sanitation and health standards, including the handling of any left overs?	Discussed with FSD, the possibility of purchasing plastic tubs with lids for classroom distribution of FFVP snacks. Tubs should be run through the ware washer daily. Recommended distribute FFVP SOP to classroom teachers and substitute teachers at the beginning of the year and following winter and spring break to reiterate safe handling of food in classrooms to include cleaning of classroom tables before and after FFVP snacks as well as proper hand washing.

Iowa Department of Education Bureau of Nutrition and Health Services State Review Summary Report Ottumwa Comm School District (50490000)

March 3-6, 2020

	 Recommend school food service staff make occasion random visits to observe FFVP service in classroom to ensure safe food handling practices are followed. Recommend using the time for morning announcement to publicize the FFVP snack for the day along with the continued practice of using the TV monitors at the school to display FFVP snack menu. Check out the Pick a Better Snack website for more recent updated fresh produce nutrition education materials. Share these with teachers via Google doc.
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Org - Level Commendations

Description

CERTIFICATION AND BENEFIT ISSUANCE: The 30 days of eligibility status is provided to all families who were eligible for benefits in the previous school year. • The approved letter of notification of eligibility is sent to all families who apply for benefits including those families who were denied benefits. • Applications are processed and benefits are administered within 10 operating days of the application being received. • Direct certification lists are downloaded in a timely manner and kept on file. All students in the household are extended benefits. • Income applications are complete with parent signatures, income information, names of all family members and social security numbers. • Denied applications were determined accurately. • The correct income guidelines were used and the conversion rates were used properly.

CIVIL RIGHTS: The correct public release was sent to a local media outlet and published. • The SFA provides forms in other languages as needed for Limited English Proficient households including income applications, verification information and the negative balance policy. • The SFA works closely with the school nurses, students and families to ensure that all students have their special dietary needs met. Diet modification forms are completed and on file for students with special dietary needs. An approved milk alternate is made available for students with a dairy intolerance. • The "And Justice For All" poster is on display in all cafeterias. • The racial ethnic form was completed and shows that students were not discriminated against when applying for free or reduce price meals.

COMPETITIVE FOODS: Nutrition calculator printouts are on file for all a la carte foods and beverages and vending machine items sold in the district.

FOOD SAFETY: The temperatures for hot foods are monitored and recorded on the food production records. • Temperatures are monitored and recorded for the refrigerators, freezers and milk coolers. • The food service director emailed the health inspector requesting a 2nd inspection. • The SFA's HACCP plan is available. • The food service director, head cooks at each site and many food service staff are ServSafe certified. • Good food safety practices were observed while SA was on-site. • Foods are stored properly.

ON-SITE MONITORING: • On-site monitoring forms have been completed for all sites in the district for lunch. • On-site monitoring forms have been completed for 50% of the breakfast sites.

PROCUREMENT: The food service director attended regional procurement training in Fairfield last fall. A written procurement plan for SY 2019-2020 is completed. The plan identifies procurement events, procurement method used, contract award type, and vendor response evaluation method. The correct procurement method was used for vendors selected for review. Micro-purchases are kept to a minimum. Each micro-purchase transaction was below the SFA's micro-purchase threshold. Purchase orders and invoices is available for selected vendors. Prime Vendor, milk, and bread solicitations included the Buy American Provision. Public notification was issued in the Ottumwa Courier for all formal solicitations. Adequate number of vendors were contacted to provide responses. Documentation was on file for vendors who were contacted for each procurement. The SFA did an excellent job with utilization of the allotted Planned Assistance Level (PAL) for USDA Foods - 100 percent utilization. The SFA is doing very well with PAL utilization for the current school year.

PROFESSIONAL STANDARDS: Training hours are tracked for all staff with school nutrition responsibilities. • Civil rights training was provided to all staff with school nutrition program responsibilities. • Documentation is on file for all training received.

RESOURCE MANAGEMENT: The SFA charges the correct paid student lunch price according to the required PLE tool and the correct adult lunch price. • The SFA has a negative balance policy to address negative student lunch accounts. • Expenses made during the review period were allowable. • Revenues received went directly into the school food service line item account and there are numerous checks and balances to ensure the process is followed. • Records are kept for 3 years plus the current year.

SCHOOL WELLNESS POLICY: The wellness policy contains all of the required elements and has been updated in the past 3 years as required. • The wellness policy is available to members of the public by being posted on the district's website. • The general public is invited to participate in the wellness committee.

VERIFICATION: The verification report and process were completed on time. • The correct information was collected from parents and eligibility status was determined correctly. • Families were notified of verification selection and the verification results with a letter that contained the correct information including information on their ability to appeal if they disagree with the results. • The applications selected for verification were confirmed and signed to show that the original eligibility status was determined correctly.

Iowa Department of Education Bureau of Nutrition and Health Services State Review Summary Report Ottumwa Comm School District (50490000)

Site - Level Commendations Pickwick Early Childhood Center (0301)

Description

March 3-6, 2020

Civil Rights: The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.

Food Safety: The latest Health Inspection Report was posted in a publicly visible location. • Food temperatures are recorded on the daily food production record. • Good food safety procedures were observed. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures.

Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts.

Site - Level Commendations Liberty Elementary School (0427)

Description

Afterschool Snack Program: The "And Justice For All" poster is on display where snacks are served. • The snack count was taken at the point of service and is reasonable when compared to the review period count.

Civil Rights: The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.

Food Safety: A copy of the written food safety plan was available on site. • The latest Health Inspection Report was posted in a publicly visible location. • Temperature logs are maintained for all coolers-including milk coolers, freezers, refrigerators and for the dishwasher. • Food temperatures are recorded on the daily food production record. • Good food safety procedures were observed. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures.

Meal Counting and Claiming: The Point of Service is at the beginning of the line and students punch their unique number into a key pad. • Meal counts during the on-site review were reasonable when compared to the review month counts. • Meal count totals for the month of January were accurate and complete. • Point of Service counts and filed claims appear accurate. • Edit checks are performed.

Water: Free potable water is available to all students for lunch and breakfast.

Site - Level Commendations James ElementarySchool (0459)

Description

Civil Rights: The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.

Food Safety: A copy of the written food safety plan was available on site. • The latest Health Inspection Report was posted in a publicly visible location. • Temperature logs are maintained for all coolers-including milk coolers, freezers, refrigerators and for the dishwasher. • Food temperatures are recorded on the daily food production record. • Good food safety procedures were observed. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures.

Fresh Fruit and Vegetable Program (FFVP): The FFVP is available to all enrolled children in the elementary school building. The FFVP is offered during the day outside of the school breakfast and school lunch meal service time. The school is on track to spend no more than 10% of its total grant on administrative costs. Cost documentation for fresh produce was available to validate January claim for reimbursement. Produce invoices are well organized. FFVP menu for January was available. On the menu, produce from the DoD Fresh program was indicated. When DoD produce was served, this was not claimed from FFVP grant dollars. For January, a good variety of fruits and vegetables were served. Standard operating procedure for the FFVP preparation, distribution, and service is available. Iowa State University Extension offers Pick a Better Snack nutrition education lessons at all FFVP grant schools. Nutrition Education materials are also provided by school food service to teachers.

Meal Counting and Claiming: The Point of Service is at the beginning of the line and students punch their unique number into a key pad. • Meal counts during the on-site review were reasonable when compared to the review month counts. • Meal count totals for the month of January were accurate and complete. • Point of Service counts and filed claims appear accurate. • Edit checks are performed.

Water: Free potable water is available to all students for lunch and breakfast.