

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Forest City Community School District (22950000)
Date of Review: January 7th – 9th, 2020

Program Year: 2020
Month of Review: December
Lead Reviewer: Donna Matlock
Org Representative(s): Glenda Keough

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	SFA misread columns on DC (direct certification) list where one household should have been "other reduced" and was recorded as "other free."	For your response, indicate how you will ensure that direct certification benefits will be correctly transferred to the POS in the future. Indicate the date that changes to benefits were made for those receiving benefits at the incorrect level.	We will be using the eligibility Import wizard moving forward and if for any reason Rose Marie needs to do it manually she will use Donna's suggestion of Highlighting the free or reduced columns. The incorrect benefit was changed to reduced on 01/27/20

Site - Level Findings: Forest City High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	<i>This is a repeat violation from the 2017 Administrative Review.</i> Minimum daily requirement of Grains did not meet the requirements for the age/grade (9-12) group being served.	Describe in a plan how alternate meals will meet the meal pattern serving portions. Submit FPR copies of one (1) week showing the ounce equivalents of the alternate meal with additional grain item (roll, bread stick, or additional	

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		<p>TA: SA provided suggestions to alternate meal. SFA offers an alternate meal, 1 cheese stick, 6 oz. yogurt, and 1 oz. granola. SFA needs to increase granola to 2 oz. or provide another 1 oz. grain, such as a roll or bread stick.</p>	<p>granola).</p>	
<p>400 - Meal Components and Quantities - Lunch</p>	<p>V-0400</p>	<p>Production records evaluated from the review period do not indicate that portion sizes available meet the minimum meal pattern requirements for the age/grade group(s) being served.</p> <p>1) The alternate meal offered during the review month did not meet the minimum 2 oz. grain equivalent for grades 9-12 throughout the school year. FSD did not consider the grain equivalence when they decided to serve the alternate meal at the high school.</p> <p>2) Dec. 6th meal - breaded pork chop patty CN label indicates 2 Meat/Meat Alternate and .5 oz. Grain. No other grains are offered with this meal resulting in a shortage of 1.5 oz. grain. Grades 9-12's daily minimum serving is 2 oz. for grains. SA suggested adding a dinner roll to meet the minimum serving of 2 oz. grains.</p>	<p>1) SA made suggestions for increasing the grains for the alternate meal by adding a 1 oz. roll/bread stick, or granola.</p> <p>FSD corrected onsite and added a 1 oz. grain of crackers to the alternate meal immediately.</p> <p>2) SA suggested FSD add a dinner roll, minimum of 1.5 oz. grain for this meal to be compliant moving forward.</p> <p>Describe in a plan how CN (Child Nutrition) labels or PFS (Product Formulation Statements) will be used to determine the Grain equivalence to ensure the meal pattern is being met for the daily minimums and weekly range.</p>	

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1100 - Smart Snacks in School	V-1100	<p>Competitive foods and beverages sold to students during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) did not meet Smart Snack guidelines.</p> <p>PowerAde is sold during lunch service and accessible to grades 5-8. This product is not compliant for grades K-8.</p>	Provide a plan on how the district will achieve and maintain compliance with Smart Snack requirements.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	133 Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified?	Provided technical assistance with Infinite Campus showing SFA how to import the DC (direct certification) list to reduce errors in matching benefits. SFA's IT needs to be involved to set system up for importing lists as required.
100 - Certification and Benefit Issuance	135 Are the Direct Certification lists retained on file by the SFA?	The record keeper has been in this position for one year. She was unaware of another DC list, potential list, to download. SA walked her through the Dept. of Education portal to show her the lists to download to ensure all students receive the correct benefits.
700 - Resource Management		SA provided TA (Technical Assistance) for USDA Foods. DF (Diverted Foods) usage report shows 4 processors at a 100% - 1) Chef's Corner Foods; 2) JTM Provisions Co. Inc., 3) Rich Products Corp., 4) Tyson Foods Inc.

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		<p>FSD plans to utilize the DFs while there is 3 months left before school ends. <i>SFA is required to utilize PAL funds of 95% or higher by the last order of the school year.</i></p>
700 - Resource Management		<p>SA provided TA on procurement processes and methods to use for purchases.</p> <p>Equipment repairs and maintenance are no longer direct charges to the nutrition fund. Equipment repairs/maintenance must be charged to nutrition fund as <i>indirect costs</i>.</p> <p>SFA did not have sufficient documents for review - no contract or copy of purchase method for Reinhart Foodservice. Shared the "Buy American" clause, procurement templates located in Download Forms of IowaCNP, escape clause for contracts if not satisfied with services, and required disclosures to include while soliciting and awarding contracts.</p>
RMCR - Revenue From Non-program Foods	10 If the SFA found that its revenue ratio was less than its food cost ratio, did the SFA take additional steps to sufficiently increase its non-program food prices, add sufficient funds to its nonprofit food service account, and/or take other actions to adequately resolve the problem?	SA recommended SFA increase non-program food prices to cover non-program food costs.
RMCR - Revenue From Non-program Foods	6 Did the SFA assess its compliance with the Revenue from Non-program Foods requirements?	<p>SA worked with SFA in completing the USDA Non-Program Revenue Calculator based on financial report tool. Based on non-program food costs, non-program revenue is not adequately contributing to total revenue.</p> <p>SFAs non-food program food costs are 48% where</p>

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		non-program revenue is 20% resulting in a deficit of \$168,208 to comply, recouping to cover food costs.
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Site - Level Technical Assistance Forest City High School (0109)

Area	Question	Comments
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	FSD stated that the Health Inspector usually shows up in the fall but has not this year. SA suggested FSD contact the DIA to make a request for the first health inspection. USDA requires 2 health inspections per school year. SFAs are required to make requests for inspections if one has not been received. Response was received by DIA that a new person just started and should be out doing inspections in April.

Org - Level Commendations

Description
<ul style="list-style-type: none"> • Benefit documents, as well as all paperwork, were very well organized. • The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. • The correct and current benefit issuance list was available. • 98% applications were correctly determined, signed and dated by the household member and the SFA, were complete with SSN's and case numbers, and all applications were determined within ten days. • Income was only converted to annual when there was more than one frequency of income. • Rollover applications were removed if the household did not apply within thirty days of the school year. • Access to benefit information is correctly limited. • Free meals are extended to all members in the household. • Waivers are provided to applicants and indicate specific fees. • Eligibility is kept confidential. • The SFA has a back-up system for benefit issuance documents and system.
<ul style="list-style-type: none"> • The "And Justice for All" civil rights poster was posted in the cafeteria. • Annual civil rights training was provided to food service staff and documented. • A copy of the district's public release was on file, documenting that it was submitted to local media. • The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. • Ethnic/racial information is collected and the form is completed. • No discrimination was observed. • SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. • The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and at least 50% were completed for breakfast prior to February 1st. • The correct state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school's website.

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• The correct number of applications were verified and were correctly selected from error prone applications. • All income sources were verified with at least one month's income, and the process was completed on time. • The application(s) selected for verification were confirmed prior to verification. • The SFA had at least one person attend training. • The verification report was completed accurately and on time.

• The district has a current wellness policy on file. • The SFA's wellness policy was reviewed and revised on May 14, 2019. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. • The wellness policy and the most recent assessment of the policy are available to the public via district website. • The SFA completed an assessment of their wellness policy on June 2019. • The following individuals' PE teacher, food service staff, superintendent, community members are involved in reviewing and updating the LWP. • Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.

• The Resource Management section of the Off-Site Assessment tool was completed on time. • Financial records that were reviewed, indicated appropriate and allowable expenditures. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. • There were no unresolved findings from the previous Administrative Review or from a state audit. • The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. • Money is not transferred out of the account to support other programs. • The SFA effectively utilizes its USDA entitlement for commodities. • Reports are filed on time, and all records are maintained for at least three years plus the current year.

Site - Level Commendations Forest City High School (0109)

Description
<p>• Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of December were accurate and complete. • Point of Service (POS) counts and filed claims appear accurate. • Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. • Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. • Cashiers are trained, and daily edit checks are performed. • All students selected a reimbursable meal without having a prompt to select a ½ cup of fruit or vegetable as one of the three required components.</p>
<p>• School Breakfast Program (SBP) outreach was sent out at the beginning of the year to inform families of the availability of the program. • Reminders of the SBP were also sent out throughout the school year. • Outreach included announcements, newsletters, the school website, posters, etc. • Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer. • The information was shared via websites, lunch menus, newsletters, phone calls, flyers, etc.</p>
<p>• The Food Service Director (FSD) does a great job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat. • All meal components were available at the beginning of meal service on the days of observation and throughout meal service. • Overall; menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption. The SFA provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal. • Menus included some homemade entrees, and standardized recipes are used for food production. • Free potable water is</p>

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available to all students for lunch and breakfast. • Offer vs. Serve (OVS) was being implemented properly. All students observed selected ½ cup of fruit and/or vegetable. Students have the option to decline any one or two of the five components. • At least two types of milk are offered. • Many low fat and low sodium food items were observed in storage. • Students had sufficient amount of time to eat after receiving meals. • Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch. A monthly menu is also posted. • Food service staff was polite and respectful to students, other staff, and each other. • Nutrient analysis was not required.

• The Food Service Director completed the USDA menu worksheets for the week of December 2nd-6th for breakfast and lunch at the Middle/High School. The worksheets showed the serving portions and component contributions meeting the meal pattern. • The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that Middle/High School is at low risk for (non)compliance with Dietary Specifications regulatory requirements. • Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, controlling the portion sizes of condiments, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats.

• The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. • The latest Health Inspection Report was posted in a publicly visible location. • Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Good food safety procedures were observed.