

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
North Iowa Community School District (08730000)
Date of Review: January 21st – 24th, 2020

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	Q209cF: The application(s) selected for review were incorrectly verified. TA was provided when verifying applications with pay stubs, the SFA must use gross income and not net income, which resulted in a decrease of benefits from "reduced to paid."	Q209cC: Identify who will attend the SAs (State Agency's) Verification Webinar.	
200 - Verification	V-0200	Q215bF: The SFA did not get SA approval for an extension to complete verification in the current/prior school year.	Q215bC: Describe your intention to obtain approval from the SA if in the future you are unable to complete verification by the November 15th deadline.	
800 - Civil Rights	V-0800	SFA did not do the full Civil Rights training that includes all required information on federal and state ethnic/racial classes.	SFA needs to provide civil rights training to all staff involved with the nutrition program POS (Point of Sale/Service), cooks, monitors, etc. prior to the end of the current school	

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		SA shared the Dept. of Education website where resources, webinar, and power point is available to use for training. This webpage can found at this link: https://www.educateiowa.gov/pk-12/nutrition-programs/civil-rights-training-participating-organizations-child-nutrition-programs .	year.	
1000 - Local School Wellness Policy	V-1000	1. SFA could not provide documentation to show the review and update process of the Local School Wellness Program. SFA provided documentation showing a board meeting was held on June 17, 2019. Wellness Policy was listed for discussion but a motion was made to move and motion carried. 2. The most recent assessment of the local wellness policy was not submitted.	The SFA must update the policy to demonstrate compliance with FNS requirements. USDA requires SFA's to review the policy and conduct an assessment every three (3) years to be compliant. The SFA must review and submit the district's plan on how it will conduct an assessment on the implementation of the LWP (Local Wellness Policy) goals by June 30, 2020. <i>Once completed the assessment must be made available to the public.</i>	
RMCR - Revenue From Non-program Foods	V-RMCR	SFA did not calculate compliance using the USDA Non-Program Revenue Calculator tool or 5-day reference period. TA: SA helped SFA complete the USDA Non-Program Revenue Calculator tool matched using the Financial Report Tool in IowaCNP.	At the end of each year, the SFA must determine whether the percentage of revenue from non-program food sold is equal to or greater than the percentage of money spent on non-program food. SA shared various ways SFA can increase non-program revenue through price increases of a la carte foods (adult	

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		<p>Currently the SFA's non-program food costs is \$29,405 (26%) while non-program revenue is 12% with a short fall of \$34,010 to adequately contribute to the non-program food costs.</p>	<p>meals, 2nd entrees or sides, extra milk, catering, vending to another CN program, vending, snacks, beverages).</p> <p>Currently, the POS (Point of Sale) JMC software is only capturing adult meals and Little Bison Child Care center meals. Additionally, the campus is open to 9-12 graders which may attribute to the lack of participation in meal service.</p> <p>SA suggested offering additional a la carte items outside of the NSLP meal service to improve deficit, by making vending available for afterschool activities, and increase daily participation by limiting open campus to seniors only.</p> <p>Provide a plan describing how the SFA will adopt internal controls to ensure that noncompliance does not occur in the future.</p> <p>Available in IowaCNP "Download Forms" are tools to assist in determining non-program food costs. NSLP120 - Menu Costing Worksheet and NSLP150 - Non-Program Revenue Tool or access additional guidance and tools at https://educateiowa.gov/reporting-nonprogram-food-costs-how-and-why-may-2016. <i>Recommend using "Food Cost Calculator" to accurately reflect program/non-program food costs.</i></p>	
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Site - Level Findings: North Iowa High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	<p>Repeat finding from 2016-2017 AR.</p> <p>Minimum daily requirement of Grains did not meet the requirements for the age/grade (9-12) group being served.</p> <p>SFA served a WG breaded pork patty - component contribution is 2 oz. M/MA and .5 oz. Grain. Daily minimum serving of grains for 9-12 grade is 2 oz. Grains. FSD offered a 1 oz. dinner roll with meal but was still .5 oz. short on grains for the day.</p> <p>TA: SA recommended adding a 1.5 oz. bun or dinner roll to meet the minimum daily serving size of 2 oz. Grains.</p>	As a result of this being a repeat finding; 330 meals cannot be claimed.	

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	214 If a student's eligibility changed due to verification,	Original determination remained the same but during the onsite visit, SA found application was determined incorrectly. The SFA will be notifying household of error and will follow required timelines in decreasing

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		benefits to paid.
700 - Resource Management		<p>SA shared with FSD when purchasing over the threshold of \$10,000 to include the "Buy American" disclaimer, and a escape clause if customer service is adequate.</p> <p>Reinhart Foodservice was not competitively purchased. There's no contract, SA discussed that all small and formal purchases must be competitively solicited/purchased.</p> <p>SFA was not aware of the AEA webpage to access all procurement records of contracts, price lists, etc. SA inquired, AEA provided a login and password to get SFA onto the site moving forward.</p>
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	<p>SFA submitted a "Welcome Back to School" power point covering blood borne pathogens and a few slides related to civil rights which does not cover all the required areas pertaining to the CNP (Child Nutrition Programs) or the Iowa Non-Discrimination Statement which includes additional classes of ethnicity/race.</p> <p>SA shared the Dept. of Education website where resources, webinar, and power point is available to use for training. This webpage can found at this link: https://www.educateiowa.gov/pk-12/nutrition-programs/civil-rights-training-participating-organizations-child-nutrition-programs.</p>
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	SA provided FSD training tracker templates to document all staff's education CEU's.

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RMCR - Nonprofit School Food Svc Acct	3 Did the SFA's net cash resources exceed its 3 month average monthly expenses?	<p>SFA's plan is to wait until the end of the current school year to determine salaries, IDC (indirect costs) and any plans to put toward equipment purchases.</p> <p>SA discussed additional allowable costs to the nutrition fund such as uniform/clothing allowance, staff hiring, and free breakfast as a way to spend down excess dollars in nutrition fund.</p>
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Site - Level Technical Assistance North Iowa High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	SA provided a folder containing multiple resources including the Breakfast template signage on what is a reimbursable meal.
400 - Meal Components and Quantities - Breakfast	409 Review production records and other supporting documentation.	SA worked with the FSD in revising the breakfast certification worksheet to reflect completed FPRs meeting the meal pattern and component contributions.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	SA worked with FSD in revising the lunch certification worksheet to reflect the completed FPRs for the review period.

Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE: • 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. • All 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. VERIFICATION: • The correct number of applications were verified and were correctly selected from</p>

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error prone applications. • 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. MEAL COUNTING & CLAIMING: • 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.

Site - Level Commendations North Iowa High School (0109)

Description
<p>• 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. • FSD is very organized and training is done annually on SOP's.</p>
<p>CIVIL RIGHTS: • The “And Justice for All” civil rights poster was posted in the cafeteria. • 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.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: • The Food Service Director (FSD) does a nice 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. • 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. • Standardized recipes are used for food production. • Free potable water is available to all students for lunch and for 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. NUTRITIONAL QUALITY OF SCHOOL MEALS: • The Food Service Director completed the USDA menu worksheets for the week of December 16-20, 2019 for breakfast and lunch at the 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 high school is at low risk for (non)compliance with Dietary Specifications regulatory</p>

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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.