

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Montezuma Community School District (44370000)**  
**January 28-31, 2020**

**Program Year:** 2020  
**Month of Review:** December  
**Lead Reviewer:** Christine Crow

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Two students received reduced price benefits because one of the students is on the DC list as other reduced. The other student in the home however, is on the DC list as other free. Therefore, both students should have been receiving free benefits since 07/02/2019. TA provided to the determining official on the DC list, notifying the family of their changed eligibility status, and refunding the family while revising the claim. The determining official sent the family the letter of notification of eligibility status to inform them that their eligibility status changed and that the student's lunch account will be reimbursed. The eligibility status for these students was changed in their point of service system. No further action required.	No further action required.	
200 - Verification	V-0200	One family selected for verification did not provide proof of income and therefore their eligibility changed to paid. The letter of verification results was sent to notify the parents of their eligibility change. However, they did not get the correct amount of time to appeal the decision to decrease benefits before the benefits	Provide written confirmation that the verifying official will take the 2020-2021 verification webinar hosted by Deb Linderblood in fall of 2020.	

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		<p>were decreased. SFAs must give families 10 calendar days to appeal the decision to decrease a student's benefits before the benefits actually change. TA provided to the verifying official.</p> <p>The SFA conducted the standard verification process but instead of selecting 3% of total applications to verify, they selected 3% of students receiving benefits to verify. This resulted in 2 applications being selected for verification instead of 1 application. TA provided to the verifying official who agrees to select 3% of total applications next year.</p>		
1000 - Local School Wellness Policy	V-1000	<p>SFAs are required to assess the progress of how the goals written in the wellness policy are being implemented. The assessment/progress report must be completed at least once every 3 years and made available to the public. The marketing goal written within the policy states that the school prohibits the marketing of brands promoting predominantly low-nutrition foods and beverages but there are 2 coolers in the cafeteria and high school breakfast serving line that market a cola drink. SA encourages the SFA to contact the vendor to see if they could provide a different cooler or suggested covering up the marketing with student art work. TA and a progress report template was provided.</p>	<p>Provide a timeline of when the wellness committee will assess the goals written within the wellness policy. Describe the SFAs plan on meeting the marketing goals written within the policy.</p>	
1200 - Professional Standards	V-1200	<p>The food service director has documentation to show that she received 7 hours of professional standards training for this school year. Food service directors are required to have documentation on file to show that they have received 12 hours of training annually in their school nutrition responsibilities.</p> <p>SA suggests the food service director may consider take training on the following topics: verification training, HACCP plan and food safety</p>	<p>Describe the training that the food service director will receive to meet the additional 5 hours of training needed for the remainder of the school year.</p>	

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		training, nonprogram food costs, and/or standardized recipes. TA provided on professional standards requirements and suggested training topics.		
1400 - Food Safety	V-1400	The SFA has a Hazard Analysis Critical Control Point (HACCP) Plan that contains all but one of the required Standard Operating Procedures (SOP) needed. Since the SFA provides food to different organizations outside of the school, an SOP for preparing food for transport is needed. The SFA's HACCP Plan has not been updated or reviewed recently. SA encourages the food service director to review and update their plan to ensure it is applicable to the SFAs needs and to train staff on how to use it. TA was provided on HACCP Plans and while SA was onsite, the food service director created an SOP for transporting food and scheduled a staff meeting to review the HACCP Plan on 02/14/2020.	No further action needed.	

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1400 - Food Safety	V-1400	<p>The freezer was 10 degrees Fahrenheit on the day of observation. Freezers must be kept at 0 degrees Fahrenheit or below. While SA was onsite, the food service director called and had the freezer repaired.</p> <p>The refrigerator and freezer in the high school breakfast service area do not have a thermometer. Temperatures must be monitored and recorded. In addition, since this service area is shared with the concession stand that is operated at night and on weekends by another school group, the school nutrition refrigerator/freezer must be locked to prevent theft. While SA was onsite, the SFA purchased and installed a lock for this refrigerator. TA provided to the FSD.</p>	<p>Send a copy of the temperature log that states the freezer's current temperatures are within the normal range.</p> <p>Send a copy of the temperature log for the refrigerator/freezer in the high school breakfast service area.</p>	
RMCR - Revenue From Nonprogram Foods	V-RMCR	<p>The SFA provides meals to Meals on Wheels community members when school is in session. Instead of providing a bill and receiving payment from participating community members, the local churches provide a donation to the school nutrition fund. Of the community members who participate, 2 of them pay for their own lunch and are charged \$2.50 per meal. The school nutrition fund must charge at least the USDA required, adult price of \$3.75 for all meals. The church donates an amount monthly, but the amount is not consistent and does not always cover the cost of the meals provided. While SA was onsite, the SFA determined the total number of meals served this school year and the total amount of money donated. Based on the price of \$3.75 per meal, the SFA received donations to cover all but \$70.75. There must be a funding source in place that agrees to ensure all Meals on Wheels meals will be paid for at the USDA adult lunch price.</p>	<p>Describe how the SFA will ensure that all meals provided for the Meals on Wheels program will be paid for at the USDA adult lunch price.</p> <p>While SA was on-site, the food service director signed a new agreement with the day care center director that states meals provided will be charged at \$3.75 per meal. No further action for this CA.</p>	

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		<p>The SFA also provides meals to the day care across the street and charges them \$2.50 per meal. The SFA is unsure if this covers the cost of the meals provided as the portions of food provided is smaller than a normal student meal. The SFA must sell the vended meals at a price that will cover the cost of providing those meals. TA provided on the adult lunch price and nonprogram revenue requirements.</p>		
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**Site - Level Findings: Montezuma Elementary School (0409)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	SFAs are required to post signage that describes how their menu meets the meal pattern. Although the SFA had signage in the 504 cafeteria and in the main cafeteria, there was no signage in the high school breakfast serving area. TA provided to the food service director on signage requirements and a sample sign was provided.	Submit a copy of the signage posted or take a picture of the signage on display at the high school service line.	
400 - Meal Components and Quantities - Breakfast	V-0400	Although all daily and weekly meal pattern requirements are met, the 6-12th grade students have a breakfast sandwich that contains bacon or sausage, egg and cheese on a biscuit or croissant daily. Based on the labels and recipes provided, the sodium amount for these sandwich ranges from 730 mg – 800mg sodium. The target one sodium limit for a 6-8th grade student for breakfast is 600 mg and for a 9-12th grade student is 640mg. Therefore, these sandwiches must be modified to meet the sodium restrictions for the School Breakfast Program. SA suggests that the SFA use toast, a bagel, or a tortilla	Describe how the breakfast sandwiches will be modified to meet the sodium restrictions. Provide the revised recipes and the labels for the food items in the revised recipes.	

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		instead of the croissant or biscuit as those have less sodium. The SFA may also consider limiting the number of items inside the breakfast sandwich to just 1-2 food items instead of all 3.		
400 - Meal Components and Quantities - Lunch	V-0400	The recipes for the scalloped potatoes and ham, and sloppy joe were not credited accurately and the chili recipe did not accurately reflect the amount of the ingredients that staff use to make the chili. Because the recipes were not credited accurately the daily and weekly meat/meat alternate requirements were not met. (Although this is a repeat menu finding, no fiscal action will be taken during this AR since the food service director did not receive technical assistance on recipe crediting in the previous AR.) When crediting recipes, the SFA must use the crediting information and CN labels for all ingredients, such as ground beef 85/15 or ham. TA provided to the food service director on standardized recipes and how to credit recipes. Standardized recipe resources provided.	Submit the chili recipe that reflects what the school nutrition staff are actually preparing. Submit the scalloped potato and ham and sloppy joe recipe with the correct ingredient amounts that allow the recipes to provide 2 oz. meat/meat alternate.	
1100 - Smart Snacks in School	V-1100	All foods and beverages sold to students during the school day outside of the school's reimbursable breakfast and lunch meals, must meet Smart Snack requirements. The cheese muffins sold in the vending machine are not whole grain rich and therefore do not meet Smart Snack requirements which state all grain items sold must be whole grain rich. TA provided to the food service director.	Provide written confirmation that the cheese muffin will not be purchased and sold to students during the school day.	

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Area	Question	Comments
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	<p>One application received was incomplete as it only listed 2 of the family's 4 children. The application was processed as having 6 family members (4 children and 2 adults) as the determining official knows the family has 2 younger children at home and the family indicated on the application that there were 6 people in the household. The application must include the names of all members that reside in the home, even if the children aren't going to school. TA provided to the determining official who asked the family to complete the application with the other children's names and birthdays to confirm that there are actually 6 people in the household. The family updated the application while SA was onsite to include all children.</p>
100 - Certification and Benefit Issuance	130 Is household notification of denied benefits consistent with FNS requirements?	<p>SFAs must send the letter of notification of eligibility to all families that complete an income application for benefits and are denied so that families are aware of their ability to appeal the decision. TA provided to the determining official.</p>
700 - Resource Management		<p><b>PROCUREMENT:</b></p> <ul style="list-style-type: none"> <li>· The SFA had a procurement plan that contained many required elements. It did not contain the mircopurchases that are typically made or the point of service update. SA provided TA on what to include on the procurement plan and the differences between the contract award types. TA was also provided on saving all price lists and conducting contract management monthly to ensure that the vendors are charging the price agreed upon in the bid.</li> <li>· Although the code of conduct contains the other required elements, it does not contain a disciplinary policy that describes consequences that would be taken if the code was violated. TA provided to the food</li> </ul>

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		<p>service director.</p> <ul style="list-style-type: none"><li>· A Buy American exception log is required to document all items purchased and/or received that do not meet the Buy American provision. The log must contain the name of the item and the reason why it was purchased or received even though it did not meet the Buy American provision. A template is located in Download Forms. TA provided.</li><li>· Small Purchase Review: The bids sent for milk include a list of products that the SFA is intends on purchasing, quality and delivery specifications and a due date of when the bid must be returned. The 2018-2019 bid was sent to 2 potential vendors. Only one response was received even though the SFA was not overly restrictive. The bid document does not include any terms and conditions or estimated amount of products to purchase. Details on the amount the SFA intends on purchasing for all products, delivery specifications, quality specifications and any other detail that the SFA will use to evaluate and award the bid must be included in the bid. Terms and conditions as required by USDA must be included in all informal and formal bids. Examples include the Buy American provision, debarment certification statement, and equal opportunity provision. The language for the these terms/conditions as well as other terms and conditions that are required when schools intend on purchasing more from a vendor are included in the SA Small Purchase (3 Bids and a Buy) template located in Download Forms. TA provided.</li><li>- The food service director called vendors on 11/01/2018 to get price quotes from 3 different slushy vendors. Documentation was available to show the product and amount that the SFA is interested in purchasing. SA encourages the SFA to include all other delivery and product quality or nutrition specifications as well as the required terms and conditions. See the Small Purchase (3 Bids and a</li></ul>
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		Buy) template for the required terms and conditions.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The USDA's complaint procedure must be followed in the event that a civil rights complaint is made against the school nutrition program. A copy of the procedure and a sample complaint form were provided along with TA on the procedure.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	Although the food service director informs families of the school's breakfast program at registration, SA suggestions reminding families of the availability of breakfast throughout the year. The SFA might consider sending newsletters or an email communication to families to tell them about the importance of breakfast and the cost and availability of breakfast at school.
RMCR - Nonprofit School Food Svc Acct	10 Excluding equipment purchases made with USDA grants, did the SFA purchase equipment during the RM review period that cost at or above the capitalization level established by the State or SFA for financial statement purposes or at or above \$5,000 (whichever was less)?	If SFAs spend more than \$5000 on equipment it must be on the State Agency's (SA) pre-approved equipment list. If the equipment needed is not on the list, SA approval must be requested if using school nutrition funds. TA provided to the food service director along with the SA approved equipment list.
RMCR - Revenue From Nonprogram Foods	7 If Yes, what process did the SFA use to calculate its compliance with the revenue from nonprogram food requirements in 7 CFR 210.14(f)?	Although the 2018-2019 IowaCNP Financial Report states that the nonprogram food revenue does not adequately cover the cost of nonprogram food, the FSD did her own calculation to show that her nonprogram food costs are less than their revenue. Upon further discussion, the nonprogram food cost and revenue calculation in the IowaCNP financial report did not include the cost and revenue of all nonprogram food costs. The SFA's nonprogram foods include catering, concessions, vending, preK snacks, adult meals, 2nd entrees, extra milks, a la carte items, Meals on Wheels, and daycare meals. To calculate the nonprogram food cost, SFAs can calculate the total cost of all program lunch and breakfast meals provided throughout the school year and subtract that number by the total food cost to get the nonprogram food cost. SA encourages the FSD and business

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		manager to work together to calculate the nonprogram food cost and revenue for the Certified Annual Report going forward.
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**Site - Level Technical Assistance Montezuma Elementary School (0409)**

Area	Question	Comments
800 - Civil Rights	811 Is the USDA “And Justice for All” poster displayed in a prominent location and visible to recipients of benefits?	Although the SFA has the “And Justice For All” poster on display in the main cafeteria, one needs to be on display in the concessions area where the 6-12th grade students are served breakfast. TA provided to the food service director and additional “And Justice For All” posters were provided.
1300 - Water	1300 Is free potable water available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)?	SFAs are required to provide free, potable water in the same location where students eat breakfast and lunch. The water fountains that are closest to the cafeteria are outside the cafeteria doors and around the corner. This may be a barrier for some students who would like water with their meals. SA encourages the SFA to place a cooler with a spigot with water and cups in the main lunch room and 504 cafeteria.

**Org - Level Commendations**

Description
BREAKFAST AND SUMMER FOOD SERVICE OUTREACH: • The SFA informs families of their breakfast program at registration and by posting the menu online. • The SFA informs families about the Summer Food Service Program through the school website, the local cable channel, radio advertisements, the local newspaper, and outreach posters.
CERTIFICATION AND BENEFIT ISSUANCE AND VERIFICATION: • Students who received benefits in the previous school year have the 30 day carryover of benefits. • Families that are on the DC list receive the SA template letter of notification of eligibility status. • There is a backup system for updating the benefit issuance documents. • Benefits are extended to all students within the household. • The DC list is downloaded twice monthly and kept on file. • Student benefit status is kept confidential. • Applications are processed within 10 days of receiving them. • Student’s benefit status is

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correctly transferred to the point of service. • Applications contain all required signatures, dates, social security numbers and are determined correctly. • The verification process and report were completed on time. • The SFA selected from error prone applications first. • The eligibility status of the application selected for verification was confirmed and signed by the confirming official before the family was notified of being selected. • The verifying official followed up to remind the family selected for verification when they did not respond. • The family selected for verification was provided the SA template letter of notification of verification selection and results.

**CIVIL RIGHTS:** • The correct Iowa and USDA nondiscrimination statements are on the district's food service website. • Program materials are available in Spanish. • The "And Justice For All" poster is on display in a public location for the main cafeteria. • All staff with responsibilities within the school nutrition program received civil rights training on 08/22/2019. • The SFA works with the school nurse and families to ensure that all students with special dietary needs receive foods that meet their restrictions. Students that have special dietary restrictions have documentation on file to show what they can and cannot have and it is signed by a prescribing official. • The Ethnic/Racial form was completed to show that no discrimination was made against any racial or ethnic group when providing benefits. • The public release was sent to the local media outlet before the start of the school year.

**COMPETITIVE FOODS:** • The food service director has a binder that contains labels and nutrition calculator printouts of all food and beverages sold to students during the school day to show that the foods sold meet Smart Snack requirements. • All beverages sold to students meet Smart Snack requirements.

**FOOD SAFETY:** • The SFA has multiple nutrition staff that are ServSafe certified. • The most recent health inspection report is on display in a public location. • Nutrition staff monitor and record the temperatures for the dishwasher, milk cooler, a la carte beverage coolers, and the walk-in cooler and walk-in freezer. • Food temperatures are taken and recorded on the food production record.

**MEAL COUNTING AND CLAIMING:** • The SFA conducts edit checks to ensure that they do not claim more meals than students that are enrolled in each eligibility status. • The edit check report matches the claim for the review period of December. • All meals served during the observed breakfast and lunch service were reimbursable. • Offer versus serve is implemented accurately. • The count taken during the observed meals is reasonable when compared to the review period counts.

**MEAL PATTERN REQUIREMENTS:** • A variety of entrees are offered each day and throughout the month. • Students have multiple vegetable options to pick from daily. • There are at least 2 approved milk options to pick from. • CN labels, product formulation statements (PFS), and standardized recipes are on file for all menu items. • FPR are complete with the menu items including condiments and milk, serving temperatures, total quantity prepared, serving size, planned and actual number of servings, and leftover amounts. • The daily and weekly lunch meal pattern requirements are met for all components for the K-8th grade students, including the meat/meat alternate, grains, fruit, vegetables, milk and all of the vegetable subgroups. • The breakfast daily and weekly meal pattern requirements are met for K-12th grade students. • The lunch daily and weekly requirements for grain, fruit, milk, total vegetable, and vegetable subgroup requirements were met for the 9-12th grade students. • The breakfast and lunch menus served during the day of observation met all daily meal pattern requirements. • Portions of condiments are controlled and the SFA has many low sodium canned vegetables and canned fruits that are canned in their own juice.

**PROCUREMENT:** • The SFA has a code of conduct that includes details on conflict of interest for employees selecting a vendor and a gift policy. • The procurement plan includes the correct local purchase thresholds, many procurement events, the value of each event, the procurement method used, and the contract award type, duration of contract, evaluation method used, and individuals responsible for contract management. • The small purchase bids sent for milk include all products they intend on purchasing, food safety and HACCP specifications and a due date of when bid responses must be returned. The SFA sent out their milk bid to multiple vendors but only received one response back even though they were not overly restrictive. The SFA selected the correct, lowest price vendor for all small purchases. All small procurement events were done within the local small purchase threshold. • The micropurchase event reviewed shows that the SFA spent their money equitably throughout the community and purchased items at a reasonable

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price. A micropurchase log is maintained. The SFA belongs to a purchasing group and maintains all agreements and price lists to conduct contract management.

**PROFESSIONAL STANDARDS:** • Staff that work more than 20 hours per week (in the school nutrition program) must have at least 6 hours and staff that work less than 20 hours per week need 4 hours of training. Documentation is available to show that full and part time staff received training, including civil rights training. • Professional standards training is tracked for all employees on the School Nutrition Association's tracking tool. • The food service director provided training, including civil rights training, to the recently hired food service staff person. • Cashiers received training on their job responsibilities that are related to the school nutrition program, including civil rights.

**RESOURCE MANAGEMENT:** • All program documents are saved for 3 years plus the current year. - The SFA used the PLE tool to increase the paid student lunch price accordingly. - The school nutrition account balance has less than 3 months of operating costs. - The correct adult meal price was charged to all adults eating lunch at the school. - All expenses charged to the school nutrition fund were allowable expenses. - The payment of nonprogram foods was deposited directly into the school nutrition fund. - The SFA used 94.69% of their USDA PAL dollars and is on track to spend efficiently for this school year.

**WELLNESS POLICY:** - The wellness policy contains all required elements and is made available to the public as it's on the school's website. - The wellness committee has a variety of stakeholders that participate and they meet regularly.