

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Moravia Comm School District (44910000)**  
**January 28-30, 2020**

**Program Year:** 2020  
**Month of Review:** December  
**Lead Reviewer:** Shea Cook  
**Org Representative(s):** Marie Padgett

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	<p>14 students were identified as receiving free benefits on the benefits issuance document. There were no applications on file to confirm the benefits status. Additionally, none of the applicants were on direct certification lists for SY20.</p> <p>Due to application and verification errors identified during the previous administrative review the SA recommended that the district train an additional individual on processing applications and verification. There is no evidence that recommendation was followed and errors in both areas have continued.</p>	For your response upload a copy of each letter sent to the families notifying them of the reduction in benefits. Additionally, please identify who within the district other than the food service director will participate in the training webinars on applications/direct certification in July 2020 and verification in September 2020.	
100 - Certification and Benefit Issuance	V-0100	14 students were not changed to paid status at the end of the 30 day carry-over period when they should have been, resulting in a high error rate for certification and benefits issuance.	For your response please do the following: 1) Identify the procedure that will be used in the future to make sure that a student's eligibility status is change to full paid after the 30 day carry over has expired. 2) Identify the individual who will be responsible for confirming that all students who have not completed an application by the end of the 30 day carry over are moved to paid on the benefits issuance document.	
100 - Certification and Benefit Issuance	V-0100	Two applications were incorrectly determined as reduced because not all of the sources of income were accounted for in the calculations. Both applications should have been denied by income. In addition to the determining official incorrectly determining the benefits, the confirming official and then a follow up signature from an additional staff member also did not correctly determine the benefits.	For your response please upload the letters that were sent to both families notifying them of the reduction in benefits and identify the date when benefits were changed in the system.	
200 - Verification	V-0200	SFA verified the incorrect number of applications. Only one application was required to be verified,	Identify the individual who will attend the verification webinars in the fall.	

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		but documentation on file indicates that two applications were verified.		
200 - Verification	V-0200	Application selected for verification were not selected from the number of applications that were identified as error prone as required.	Explain how you will make sure that applications chosen for verification are selected from the applications identified as error prone.	
700 - Resource Management	V-0700	Fiscal action for this review is still pending final results of the review.		
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	SFA nutrition account has a balance in excess of its three month average monthly expenses.	For your response please describe a plan for spending your excess operational balance.	
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 IowaCNP 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.	

**Site - Level Findings: Moravia Elementary School (0409)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	<p>The point of service (POS) process is not acceptable. There must be an exchange at the POS for students to receive their meal. On observation some students did provide their number to the cashier, but many students did not. The result is a disorganized point of service process and an incorrect count that the SA believes based on observation has resulted in the SFA missing reimbursable meals that could have otherwise be claimed. There is no way the cashier can enter the student identification numbers needed to charge a meal and monitor trays for reimbursement at the same time.</p> <p>Lack of acceptable process at the POS is a repeat finding from the two previous reviews during SY14 and SY17. During SY17 the district's initial response to the corrective action for POS was not accepted. The reason for that denial was specifically communicated to the Superintendent via letter dated 04/11/2017 and a specific corrective action which included using a keypad at the POS for students to enter their own numbers was laid out for the district to follow. Although the keypad was ordered the corrective action was not implemented, resulting in a repeat</p>	<p>For your response identify who will be responsible for placing a keypad at the point of service so that students can enter their id numbers to charge a meal.</p> <p>For your response identify the date when keypad was placed at the point of service and it use implemented.</p>	

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		<p>finding for three consecutive administrative reviews. The persistence of this error over the last six years has likely cost the district significant money due to under claiming reimbursable meals.</p> <p>Because this has been a systemic problem SA will make a follow up visit to verify that corrective action has been implemented. SA may place a hold on future reimbursement if corrective action has not been implemented by the time of the follow up visit.</p>		
400 - Meal Components and Quantities - Lunch	V-0400	<p>Production records must include all items served as part of a reimbursable meal including condiments, planned serving sizes for all food items for all grade groups, adults, and a la carte; the number of planned servings for all food items including condiments for each grade group, adults and a la carte; the total amount of each item prepared in measurable amounts such as each, pound, #10 can, etc.; the amount of each food item left over; and the actual number served for each grade group, adults and a la carte.</p>	<p>For your response please submit one week's worth of completed food production records.</p>	
500 - Offer versus Serve	V-0500	<p>Offer versus serve is not being properly implemented during lunch or breakfast.</p>	<p>For your response all nutrition employees responsible for serving students during breakfast and lunch need to watch the following webcasts:(1) Build a Healthy Lunch (Offer vs. Serve) (2) Build a Healthy Breakfast (Offer vs. Serve)</p> <p>Upload a sign in sheet documenting completion for each individual identified above.</p>	
1100 - Smart Snacks in School	V-1100	<p>Three vending machines were accessible to students in grades 7-12 during the school day. All three machines included items that are unallowable. Additionally, there were no documentation on site for any of the products offered in the vending machines.</p>	<p>For your response please identify the individual who is responsible for the vending machines and describe your plan for either removing the non-compliant items or making the vending machines inaccessible between midnight and thirty minutes after the last bell of the school day.</p>	
1100 - Smart Snacks in School	V-1100	<p>Non-compliant beverages were available for purchase as a la carte items for students in grades 7 and 8.</p>	<p>FSD placed restrictions on purchasing for students in grades 7 and 8 and placed signage in the a la carte area indicating which products are available for purchase by 9-12 grades students only while SA was on site. No further response is necessary.</p>	

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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	105 How long does the application's approval take from the date the SFA receives the application from the household?	Free lunch letters should be signed and dated by the FSD. Two lunch letters on file had no date or signature. Additionally, one application was returned with tax documents attached. The SFA should not collect income information unless an application is being verified. If a family attempt to turn in income documentation with an initial application it should be returned to the applicant and not collected.
100 - Certification and Benefit Issuance	120 How and when are the following changes made to the point of service and benefit issuance document:	A student's eligibility status from the previous school year carries over for up to 30 operating days into the new school year, or until a new eligibility determination is made, whichever comes first. The 30 operating days begins on the first operating day of school. SA suggests SFA check with software company to see if there is a setting in the system that changes students who have not submitted a current application can be moved to paid. If the system cannot do this SFA needs to develop a plan to manually remove students from the carry over at the end of the 30 day period.
700 - Resource Management		<p><b>PROCUREMENT</b></p> <p>Technical assistance provided to include all anticipated procurement events on the Written Procurement Plan. The written procurement plan should be reviewed annually prior to conducting procurement decisions. It is recommended to review procurement plan annually in February/March.</p> <p>SFA should include estimated annual usage in request for pricing in order to get best pricing. SA shared electronic resource Three Bids and a Buy document developed for evaluating bottom line pricing based on estimated annual usage.</p> <p>It is best practice to allow vendors a minimum of five-six weeks from date vendor is contacted to the due date for pricing/bids to be returned. This is to allow the vendor adequate time to respond.</p> <p>A number of required terms and conditions were absent from price request documents including Buy American, debarment statement, termination of cause and convenience, equal opportunity, small business, etc. SA suggested utilizing the Three Bids and a Buy template document to help with including all of the required terms and conditions.</p> <p>Guidance was given on writing more specific product specifications in price request documents including but not limited to size, nutritional information, delivery expectations, etc. For example, milk pricing was requested without specifying if the SFA wanted paper or plastic cartons or if the pricing included firm or escalator pricing.</p> <p>All documents, including price comparison documents, price request documents/letters, advertisements for bidding opportunities, contracts, price lists, etc. should be kept on file.</p>

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		<p>SA strongly suggests that district personnel responsible for purchasing and bidding for the nutrition program attend procurement training.</p> <p>Micro Purchase:</p> <p>SA gave clarification on spreading the wealth for micro purchases. Clarification was also given on documenting reasons for not spreading the wealth (e.g. significant difference in price between vendors, distance to travel to another vendor).</p> <p>Small Purchase:</p> <p>Milk was procured as a small purchase, but it is over the local formal threshold of \$10,000 and should have been procured as a formal purchase. Formal contracts are labor intensive as they require many terms and conditions that are not required for a small purchase. Additionally, public notification in a major circulating newspaper in the school district's service area is required when using the formal methods of procurement which creates an expense for each formal contract. SA strongly recommends that the school board consider revising the purchasing policy for school meals program. Many districts have a \$25,000 threshold for school nutrition. The federal small purchase threshold is \$250,000.</p> <p>Formal Purchase:</p> <p>The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and the specifications of the product solicited. Price on the invoice should match bid pricing. SFA should check pricing for a variety of food and non-food items in contract monitoring.</p> <p>SFA has a signed agreement with the GPO to purchase food and supplies. SFA also requested pricing from an additional vendor for the same items. The vendor declined to bid on the contract. SA advised FSD that unless they plan to discontinue the relationship with the buying group they did not need to bid the same items from an additional vendor as that was already done for them through their GPO contract.</p>
700 - Resource Management		<p>During the past two years the SFA has left \$23,893 in USDA foods funds unspent. \$12,703 remains unspent for SY20. SA recommended that SFA participate in DoD to help spend all of their allotted USDA funds.</p>
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	<p>If parents wish to file a complaint about any child nutrition program, this is the process that should be used: <a href="http://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer">www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer</a>.</p>
1000 - Local School Wellness Policy	1000 Provide a copy or appropriate web address of the current Local School Wellness Policy.	<p>Local school wellness policy was last updated in November of 2016. SA recommends updating policy, as language referring to SMI reviews is outdated and SMI reviews are no longer conducted.</p>
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	<p>Parents, students, PE teachers, school health professionals, school administrators, the school board, representatives of the SFA and the general public must be permitted to contribute to the development,</p>

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		implementation, review, and update of the LWP. Meetings should be documented and meeting minutes, agendas, and attendance records should be kept on file to demonstrate that meetings are taking place as required.
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 shared electronic tracking resources.
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?	Any district employee acting as a hearing, verification, or confirming official need to complete yearly civil rights training at minimum.
RMCR - Nonprofit School Food Srvc Acct	3 Did the SFA's net cash resources exceed its 3 month average monthly expenses?	SA discussed the requirement that a nutrition account have no more than three months operational balance with school business official and suggested some ideas for spending excess balance including new equipment, wages for food service employees, and increased offerings of fresh fruits and vegetables.
RMCR - Nonprofit School Food Srvc Acct	9 If the SFA encumbered bad debt from unpaid student meal accounts during the RM review period, how did it ensure that only allowable non-Federal revenues were used to restore operating losses? (Unpaid Meal Charges: Guidance and Q&A SP 23-2017)	While the district does have a negative balance policy it is not followed. SA suggests updating the policy to reflect the actual practices within the district.

**Site - Level Technical Assistance Moravia Elementary School (0409)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable <b>breakfast</b> to students for all applicable grade groups?	SA recommends additional breakfast signage to help explain the components of a reimbursable breakfast.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable <b>lunch</b> to students for all applicable grade groups?	SA recommends additional signage explaining the components of a reimbursable lunch. Additional signage on the food bar would be especially helpful in information students on the amounts of fruits and vegetables they need to select to make a reimbursable meal.
400 - Meal Components and Quantities - Lunch	406 If the school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	SA discussed strategies for differentiating the menu and offerings for students in grades 7-8 and students in grades 9-12 and how to document those differences in production records. Because all students in grades 7-12 come through the line at the same time structuring meal service to account for the differences is difficult. SA suggested that SFA should discuss this with administration while the lunch schedule is being created for the next school year. If students must be served together SA stressed the importance of signage.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	SA discussed elements of a complete food production record and the importance of documenting quantities of all foods prepared on production record, including food bar. SA strongly encourages SFA to watch webcast on production records located at <a href="https://www.youtube.com/watch?v=pPMTX-khe4&amp;feature=youtu.be">https://www.youtube.com/watch?v=pPMTX-khe4&amp;feature=youtu.be</a> . SA also encouraged FSD to allow kitchen staff to complete food production records, as they are the ones preparing and serving the food.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	A number of errors were noted during meal observation due to OVS being incorrectly implemented. The nature of the errors were a direct result of misunderstanding about the rules of OVS and due to the nature of the errors. During lunch the SFA is losing out on considerable reimbursement because meals were misidentified as a la carte purchases when they were

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		<p>actual fully reimbursable meals. During lunch students who selected a main entrée that consisted of both the meat and grain component and a fruit were charged for an a la carte main entrée and fruit because cashier believed that students are required to take milk. Students are not required to take milk under the rules of OVS. This error was observed during lunch observation on two consecutive days.</p> <p>During breakfast OVS was incorrectly implemented as 20 meals were lacking either the required three items or 1/2 c of fruit or vegetable.</p>
500 - Offer versus Serve	502 Is there signage explaining what constitutes a reimbursable meal to students including the requirement to select at least 1/2 cup fruit or vegetable?	SA recommends additional signage to help students choose a reimbursable meal. Signage on the salad bar would be especially helpful in reminding students that they must choose 1/2 c. of fruit or vegetable to make a reimbursable meal.
1100 - Smart Snacks in School	1104. Are students able to purchase foods during the school day?	If vending machine are operational during the school day all items, including beverages, must be documented as being compliant with Smart Snack requirements for all of the grades that have access to the vending machines during the school day. Documents must be kept on file that certify that all items meet the Smart Snack guidelines. The vending machines, while not the responsibility of the SFA, must be compliant with Smart Snack guidelines per the final rule of the Healthy Hunger Free Kids Act of 2010. The entity operating the vending machines is responsible for documenting compliance and supplying the documentation to the FSD so compliance can be verified.
1400 - Food Safety	1404 Is a copy of the written food safety plan site specific and available at each school?	HACCP Plan needs to be updated.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	Food safety inspection is not posted in a publicly visible location. Safety inspection was moved while on site and no action is required.
1400 - Food Safety	1411 a. Did a review of agricultural food components indicate violations of the Buy 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?	Three varieties of produce (red and green peppers and cucumbers) were products of Mexico. SA discussed documenting all non-domestic produce received.

**Org - Level Commendations**

Description
<p><b>CERTIFICATION AND BENEFIT ISSUANCE:</b> 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.</p>
<p><b>CIVIL RIGHTS:</b> • The correct public release was sent to a local media outlet and published. • The SFA works with the school nurses, students and families to ensure that all students have their special dietary needs met. • All staff with responsibilities in the school nutrition program received civil rights training. Documentation is on file. • The “And Justice For All” poster is on display in the cafeteria.</p>
<p><b>COMPETITIVE FOODS:</b> Nutrition calculator printouts are on file for all a la carte foods and beverage items sold.</p>
<p><b>FOOD SAFETY:</b> Temperatures are monitored and recorded for the refrigerators, freezers and milk coolers. The temperatures for the dishwasher are also monitored and recorded. • The food safety inspection report is on display in a public location. • The food service director emailed the health inspector requesting a 2nd inspection. • The SFA’s HACCP plan is available at each site. • 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.</p>

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<p><b>MEAL PATTERN AND NUTRITION QUALITY:</b> • The menu offers a salad bar and hot vegetables to provide options to students. • The menu offers a variety of vegetables, fruits and entrees. • Signage is made available informing students of how the menu constitutes a reimbursable meal. • The breakfast menu provided during the review period met the daily and weekly meal pattern requirements for all grade groups. • The lunch menu met the daily and weekly meal pattern requirements for fruit, grain, meat/meat alternate, and milk, dark green, red/orange, other and starchy vegetable subgroups. • The SFA purchases many low or reduced fat, low sodium products. • The SFA offers 3 different and approved types of milk to students.</p>
<p><b>PROCUREMENT:</b> The SFA has a written Procurement Plan that identifies the estimated value and procurement method for each anticipated procurement event. • When using the micro-purchase method, each transaction with the vendor was below the local micro-purchase threshold of \$5,000. The purchase prices were reasonable. • The district is a member of a Group Purchasing Organization.</p>
<p><b>PROFESSIONAL STANDARDS:</b> Training hours are tracked for all nutrition staff. • Civil rights training was provided to all nutrition staff. • Documentation is on file for all training received. • Full and part time school nutrition employees have received the required number of training hours for the school year.</p>
<p><b>REPORTING AND RECORD KEEPING:</b> Records are maintained for at least three years plus the current year.</p>
<p><b>SCHOOL BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM OUTREACH:</b> Breakfast is promoted via district menus and announcements. • Families are informed of the Summer Food Service Program at the end of the school year.</p>
<p><b>SCHOOL WELLNESS POLICY:</b> The wellness policy contains all of the required elements. • The wellness policy and assessment are made available to members of the public as they are both posted on the district's website.</p>
<p><b>VERIFICATION:</b> 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.</p>

**Site - Level Commendations Moravia Elementary School (0409)**

<b>Description</b>
<p><b>Civil Rights:</b> The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.</p>
<p><b>Food Safety:</b> Good food safety procedures were observed. • Opened food products were labeled and dated. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Staff are ServSafe certified.</p>
<p><b>Meal Counting and Claiming:</b> Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.</p>
<p><b>Water:</b> Free potable water is available to all students for lunch and breakfast.</p>