

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
DUBUQUE COMM SCHOOLS (18630000)
December 3-5, 2019**

Program Year: 2020
Month of Review: October
Reviewer: Sandra Fiegen and Shea Cook
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Free eligibility for one student was determined by information given to SFA on a Hills and Dales residential program RCCI roster. However, Hills and Dales does not participate in a nutrition program and cannot certify a student's eligibility. Therefore, there is no valid documentation on file to confirm the eligibility status of this student.	Valid application was obtained while SA was on site and no further action is required.	

Site - Level Findings: Fulton Elementary School (0472)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1700 - Afterschool Snack	V-1700	Menus reviewed did not meet meal pattern requirements: for two days, a fruit juice and a vegetable were served together, and on another day, a frozen fruit item plus milk was served. Additionally, some fruit items (frozen fruit slushie) did not meet the minimum portion requirement.	Several resources were reviewed, and a discussion about planning reimbursable snacks was held. As corrective action, please send a 20 day menu of snacks for the afterschool snack program with serving sizes noted. Additionally, please indicate the followup training to be held with managers who prepare the afterschool snack for distribution. At the middle school kitchen, it was noted that the manager would adjust the items planned for the snack, which resulted in a non-reimbursable combination on one day.	

Site - Level Findings: George Washington Middle School (0218)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Eisenhower Elementary School (0436)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

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Site - Level Findings: Alternative Learning Center, Alta Vista Campus (8871)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		<p>Technical Assistance for Procurement was given in the following areas:</p> <p>Micro Purchase: A local foods purchase was incorrectly identified as a micro purchase. Price quotes were obtained for the products that the school was interested in purchasing, making it a small purchase instead of a micro purchase.</p> <p>Small Purchase: SFA was advised that vendors should be given a minimum of 4 weeks to respond to a request for pricing. SA encouraged SFA to exercise best practice of at least 6 weeks response time.</p> <p>□ □</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?	We discussed the difference between the board policy for hearing procedure, and the civil rights complaint process. The USDA civil rights complaint process is found in the USDA non-discrimination policy. Resources were given to the food service director.
1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements?	We discussed the wellness policy assessment and the need for site-based confirmation of assessment.

Site - Level Technical Assistance Eisenhower Elementary School (0436)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	During lunch observation, students were assisted in scooping the fruit and vegetable items from the bar. Occasionally a teacher would scoop the item for the child, and frequently the scoop did not contain the minimum of 1/2 cup of fruit or vegetable needed. You are encouraged to train teachers to scoop a full 1/2 cup scoop if they are assuming that responsibility for the child.

Site - Level Technical Assistance Fulton Elementary School (0472)

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Area	Question	Comments
1900 - Fresh Fruit and Vegetable Program (FFVP)	1905 Is the FFVP widely publicized within the school?	Encouraged the school to provide a message to the teaching staff who hand out the snack about the purpose of the program (in exposing children to new tastes), and encouraged the administrative person who orders the snack to choose snack items that are not usual sometimes.

Site - Level Technical Assistance Alternative Learning Center, Alta Vista Campus (8871)

Area	Question	Comments
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?	Currently 6-8 and 9-12 students are served in the same area at the same time in an alternative program serving students with behavioral challenges. The same meal pattern is offered to all students grades 6-12 to avoid conflict between students that will escalate behaviors. There is no waiver on file allowing for this exception to the meal pattern at this site. SA discussed obtaining a waiver and the meal pattern.

Org - Level Commendations

Description
AFTERSCHOOL CARE SNACK PROGRAM: The SFA conducted on-site monitoring of all sites that provide the afterschool care 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.
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. • All staff with responsibilities in the school nutrition program received civil rights training, including all non-food service staff and substitutes. Documentation is on file. • The “And Justice For All” poster was on display in all reviewed sites. • 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 items sold. • All competitive foods sold during the on-site review meet the Smart Snack requirements.
HACCP/FOOD SAFETY: 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. • Health Inspection Reports are posted in a publicly visible locations. • Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. • The kitchens 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 at each reviewed location.
MEAL PATTERN AND NUTRITION QUALITY: The menus at the selected sites offered a variety of vegetables, fruits and entrees. • The cafeteria has many posters encouraging healthy foods and activity. • 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. • Food production records, CN labels, and standardized recipes were on file for all meals served during the review period. • Condiments are proportioned and limited to control calories and sodium. • The SFA purchases many low or reduced fat, low sodium products. • The SFA offers 3 different and approved types of milk to students. • The food service director completed the menu certification worksheets. • Foods found in storage met the Buy American provision. • Free, potable water is available for students during their meal times.
PROCUREMENT: • The bids sent to potential vendors contain the Buy American provision and staff monitor products to ensure items delivered are made in the US. • Bids included estimated annual usage, detailed product specifications, and all of the required terms and conditions. • The SFA conducts contract management as staff ensures orders received are what was delivered and that prices match what was

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<p>written on the bid. • All vendors have signed a debarment certification statement. • Micro purchases were conducted accurately as funds were spent evenly throughout the community. • Small purchases were made according to the SFA's local purchasing thresholds. • The SFA completed the off-site procurement questionnaire and the food service director attended the regional procurement training. • The SFA has a procurement plan that includes a signature page, debarment certification statement, code of conduct and purchasing methods that will be used based on local purchasing thresholds. • The district is a member of a Group Purchasing Organization. • A signed agreement with the Group Purchasing Organization is on file. • The district has maintained a file for all procurement-related information.</p>
<p>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. • Full and part time school nutrition employees have received the required number of training hours for the school year. • Substitute employees received civil rights training and training applicable to their job responsibilities. • Non-food service employees received civil rights training and training based on the school nutrition program responsibilities.</p>
<p>RESOURCE MANAGEMENT: The SFA has a negative balance policy to address negative student lunch accounts and that policy is communicated to families yearly as required. • The SFA does an exceptional job communicating with families to address negative accounts and their efforts are reflected in an extremely small amount of negative accounts balances for a district its size. • 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. • The non-program food revenue adequately covers the cost of the non-program foods. • The SFA charges the correct paid student lunch price according to the required PLE tool and the correct adult lunch price.</p>
<p>SCHOOL BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM OUTREACH: Families are informed of the school breakfast program and the Summer Food Service Program through the district's website, social media and school announcements. • The SFA also reminds families of school breakfast through the promotion and celebration of National School Breakfast Week.</p>
<p>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 and assessment are made available to members of the public as they are both posted on the district's website. • The general public is invited to participate in the wellness committee as meeting information is posted on the districts website, community newsletter and social media sites.</p>
<p>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.</p>

Site - Level Commendations George Washington Middle School (0218)

Description
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.
All meal components were available at the beginning of meal service on the day of observation and throughout meal service, and all meals observed met at least the minimum daily requirements.
Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one or two of the five components.
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.
The food service staff were positive, happy and eager to visit with the students, and displayed pride in the important work that they are completing each day.

Site - Level Commendations Eisenhower Elementary School (0436)

Description
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 school provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal.
All meal components were available at the beginning of meal service on the days of observation and throughout meal service, and all meals observed met at least the minimum daily requirements.
Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one or two of the five components.
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.

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The food service staff were positive, happy and eager to visit with the students, and displayed pride in the important work that they are completing each day.

Site - Level Commendations Fulton Elementary School (0472)

Description
Afterschool programming begins with a snack for all children involved in the activities. The snack count for reimbursement is made at the time the snack is distributed, and all children received both components of the snack.
Afterschool snack required monitoring is completed within 4 weeks of program inception at each site.
Children were seen enjoying the fresh broccoli snack that was served as a Fresh Fruit and Vegetable Program snack on the day of review. Staff strive to encourage the children to take a snack, and offer a second snack to those who want it when there are leftovers.
Correct recordkeeping documentation is maintained for the Fresh Fruit and Vegetable Program, and all expenses claimed are allowable and reasonable.

Site - Level Commendations Alternative Learning Center, Alta Vista Campus (8871)

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. • Digital thermometers are used. • 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.
Meal Components and Quantities: Students have both a main entrée and several alternate entrée selections to choose from daily. • All meal components were available at the beginning of meal service on the day of observation and throughout meal service. • All meals observed met at least the minimum daily requirements. • Students had sufficient of time to eat after receiving meals. • Signage was posted explaining what constitutes a reimbursable meal at lunch.
Offer vs. Serve: Offer vs. Serve is being implemented properly. • All students observed selected 1/2 cup of fruit and/or vegetable. • Cafeteria staff have been trained on offer vs. serve. • There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at breakfast and lunch.
This site is an alternative learning center with some challenging behaviors and staff do a good job of working with the students. Staff and overall cafeteria environment were kind and welcoming to students. SFA has worked diligently to offer students in the alternative setting the same options and opportunities that students in a traditional setting receive.