

Iowa Department of Education  
 Bureau of Nutrition and Health Services  
 State Review Summary Report  
 St Athanasius School (32048104)  
 Date of Review: February 11<sup>th</sup> – 13<sup>th</sup>, 2020

**Program Year:** 2020  
**Month of Review:** January  
**Lead Reviewer:** Donna Matlock  
**Org Representative(s):** Anne McClain

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	<p>Household applications were not correctly approved: one household was reduced and should be free; one household was determined reduced and should be paid.</p> <p>SFA has not been completing the section "For Administrators Only." Without completion, SA was unable to see what method of determination was used, or household size, was missing the determining officials signature resulting in an incomplete application.</p> <p>SFA was using old application versions from 2016-2017. SA shared where to find the SA's current application located in Download Forms of IowaCNP.</p> <p>Provided TA on prototype</p>	<p>Q 126 ca: Submit copies of State Agency prototype letters notifying households of an increase or decrease in benefits.</p> <p>Determining Official will participate in the Application Approval and Direct Certification – Part 1 &amp; 2 webinar at this link: <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-meals/income-eligibility-and-verification">https://educateiowa.gov/pk-12/nutrition-programs/school-meals/income-eligibility-and-verification</a>. State your intentions to do this.</p> <p>Attach a copy of the training certificate.</p>	

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		notification letters and verification letters for use moving forward. Additionally, shared in an email the LEA Calendar (NSLP040) which lists due dates for different operations of food service; and the Financial Report Resource tool (NSLP071) for non-public/private SFA's.		
100 - Certification and Benefit Issuance	V-0100	<p>The SFA does not use the SA (State Agency) prototype notification of eligibility letter.</p> <p>The SFA's software program, Power Lunch, does not produce a notification letter. Power Lunch sets up an email to notify families of eligibility only. SFA was unaware of the requirement to document notification either by email or use of a notification letter.</p> <p><b>TA:</b> SA shared with SFA the SA prototype letter located in IowaCNP under Download forms.</p>	Q 129 ca: For your response, indicate whether notification of eligibility will be verbal or written, who will notify households, and how the notification will be documented. If using written notification, submit a copy.	
100 - Certification and Benefit Issuance	V-0100	One household application was correctly determined as reduced, but the household received free benefits. Application should be removed from regular applications and identified as DC with date noted on application.	Q 133 ca: For your response, indicate how you will ensure that direct certification lists contain the correct information; and matches are conducted within required timeframes.	

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		<i>Household appeared on 11/4/2019 DC (direct certification) list as "other reduced" but SFA was not capturing the additional columns of "Other Free or Other Reduced."</i>		
200 - Verification	V-0200	Q209cF: The application(s) selected for review were incorrectly verified.  SFA verified application with a determination remaining at "reduced" benefits. SA verified application against income submitted and determined application to be "free" benefits.	Q209cC: Identify who will attend the SA's (State Agency) Income Eligibility Webinar.  Notify family of increase in benefits using the SA "Verification Results letter to Household" - ELIG136.	
200 - Verification	V-0200	Q213F: The SFA does not have a notice of adverse action that contains all required information and/or notification of appeal rights.  TA was provided showing SFA where to locate the SA's "Verification Results Letter to Households Prototype VI - ELIG136" located in Download Forms of IowaCNP.	Q213C: Send a copy of your revised notice of adverse action letter or indicate if you will be using the SA's Prototype VI letter.	
1000 - Local School Wellness Policy	V-1000	The most recent <i>assessment</i> of the LWP (Local Wellness Policy) was not submitted.	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.  Information, resources and sample assessment and template on the LWP	

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			<p>can be found at the Nutrition &amp; Health Services website:  <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/school-wellness">https://www.educateiowa.gov/pk-12/nutrition-programs/school-wellness</a></p> <p><i>Once completed the assessment must be made available to the public.</i></p> <p>USDA requires SFA's to review the policy and conduct an assessment every three (3) years to be compliant.</p>	
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**Site - Level Findings: St Athanasius School (8104)**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
300 - Meal Counting and Claiming - Lunch	V-0300	On the day of review the POS did not have a cashier in place to accurately scan or count meals. Some classroom teachers would scan student bar codes based on post it notes (with meal counts from morning) or provide a list of students that wanted a hot meal. Post it notes can easily stick together and lists can result in unreliable meal counts.	<p>Submit a plan to have a cashier at the POS to ensure meal counting accuracy.</p> <p>Please indicate who will be trained for the POS (Point of Sale/Service).</p>	
400 - Meal Components and Quantities - Breakfast	V-0400	<p>1. Minimum daily requirement of Grains did not meet the requirements for the age/grade group being served.</p> <p>2. The planned menu from the review period did not meet the required minimum and maximums.</p> <p>Breakfast options were cheese</p>	Describe in a plan how the SFA will ensure all meals meet the daily minimum and weekly component contribution ranges moving forward.	

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		omelet & a slice of toast (1 oz. grain) <b>or</b> a muffin (.75 oz. grain) which is short .25 oz. grain. Over the course of the week the grain is short. FSD needs to add a minimum of 1.25 oz. grain to fall within the weekly range for grains (8 - 10 oz.). Meat/Meat Alternate foods may be added to meals to count toward the grain contribution.		
400 - Meal Components and Quantities - Lunch	V-0400	<p>The planned menu from the review period did not meet the required minimum and maximums.</p> <p>Grains are short over the course of the week and do not meet the minimum weekly range of 8-10 oz. An additional 2 ounces of grain needs to be added to meet the weekly range for this weekly cycle menu.</p>	Describe in a plan how the SFA will ensure all meals meet the daily minimum and weekly component contribution ranges moving forward.	
500 - Offer versus Serve	V-0500	<p>Offer vs. Serve is not being implemented properly by the reviewed school.</p> <p>There is no signage at or near the beginning of the service line explaining what constitutes a reimbursable meal.</p> <p>FSD and volunteers thought milk</p>	<p>Watch the tutorial on OVS (Offer vs. Serve) and attach the training certificate. Tutorials can be found at this link: <a href="https://ilopd.iowa.gov/">https://ilopd.iowa.gov/</a>.</p> <p>Additional training webinars link is <a href="https://educateiowa.gov/pk-12/nutrition-programs/learning-tools-schools">https://educateiowa.gov/pk-12/nutrition-programs/learning-tools-schools</a>.</p> <p>Menu Planning &amp; Recipes link</p>	

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		<p>was required for breakfast and lunch to meet a reimbursable meal. For breakfast, staff were confused about what constitutes components versus walking away with a total of 3 items, of which one item must be fruit/fruit juice.</p> <p>For lunch, staff was telling students to take a vegetable, fruit, and milk.</p>	<p>is <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-meals/menu-planning-and-recipes">https://educateiowa.gov/pk-12/nutrition-programs/school-meals/menu-planning-and-recipes</a></p>	
1400 - Food Safety	V-1400	<p>SFA has some sample documentation on hand pertaining to food safety but no plan to reflect the actual flow of operations in food preparation, heating and cooling, equipment and sanitization. Hand washing sink is not separate from food preparation and noted on health inspection report.</p> <p>Discussed by identifying and using a separate sink for hand washing by posting a sign indicating hand washing only. Train staff/volunteers on proper handwashing procedures.</p>	<p>Describe in a plan when the HACCP (Hazard Analysis Critical Control Point) plan will be revised to meet the needs in the operations of food service.</p>	
1400 - Food Safety	V-1400	<p>SA observed boxes on the freezer floor. All food boxes must be at least 6 inches off the floor and at least 6 inches or more from the freezer ceiling.</p> <p>TA was provided on food safety and</p>	<p>Describe in a plan how you will ensure the storage violation will be fixed and prevented in the future.</p>	

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		SOPs during onsite visit.		
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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	Due to eligibility determination errors, SA shared the ICAVES tool with the FSD. SA walked through the process of determining applications with the tool. FSD practice working on the tool to get familiar with the tool for use moving forward.
100 - Certification and Benefit Issuance	130 Is household notification of denied benefits consistent with FNS requirements?	Technical assistance was offered on notification of denied benefits. Households must be notified in writing. The notification must include the reason for denial, the right to appeal the decision, how to appeal the decision, and the right to reapply at any time.
100 - Certification and Benefit Issuance	132 Does the direct certification list utilized by the SFA:	The SFA has been downloading the DC (direct certification) list, but SFA uses a MAC computer which is not compatible to the formats provided for downloads. So the SFA was missing the last half of the columns showing "Other Free & Other Reduced" and date of approval.  SA walked FSD through the DC website and what formats to download. SA recommended updating computer software for compatibility or use a computer that is compatible to download DC lists.
100 - Certification and Benefit Issuance	135 Are the Direct Certification lists retained on file by the SFA?	SFA was unaware of the DC Potential list resulting in no documentation for household matches. SFA is small otherwise SFA has been extending benefits to all household members as required.
200 - Verification	207 a. Did the SFA complete verification?	SA walked through the verification process with SFA and recommends SFA participate in annual webinars to be up to date with information.
700 - Resource Management	709 With the exception of milk, did the SFA sell Smart Snacks*, second entrees, and/or catering?	SFA serves 2nd meals. SA discussed that all meals must be charged to cover food costs. SFA records names of those who have seconds and enters into their accounts after lunch.

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800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	SFA's are required to send out <b>annually</b> the Public Release notice to the newspaper or local media informing the public/community the SFA participates in free/reduced meals.  SA shared the Public Release notice located in Download Forms in IowaCNP, ELIG080.
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?	<b>FSD must provide training to all persons involved with food service operations before the end of the school year and annually moving forward.</b>  All persons involved with the nutrition program; volunteers, cooks, staff, cashiers, etc. must receive civil rights training.  Record training with date, time, location, and signatures and retain documentation for 3 years plus the current school year.
1200 - Professional Standards	1214 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.	School FSD's (Food Service Director) are required to have 12 hours annual training applicable to the position.  Technical assistance was provided on training opportunities for Professional Standards requirements. FSD <b>must</b> complete 12 hours of training by June 30, 2020. <i>New fiscal year begins July 1, 2020.</i>  SA shared our nutrition web page on Professional Standards, Guidelines and resources for "What's New in School Nutrition" webinars, webcasts and tutorials, ICN (Institute of Child Nutrition) E-learning Portal, USDA training opportunities, and SA Summer Short Courses offered annually.
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 training tracking templates with FSD.
1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose	FSD will need to provide food safety training and civil rights training for all volunteers and non-food service staff involved with food service operations.

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	responsibilities include duties related to the operation of the School Nutrition Program?	
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?	SA shared that all SFA's are required to promote the SFSP (Summer Food Service Program) even though they do not participate in the program.  SA shared the SFSP webpage for posters, flyers, and link to share on the SFA's webpage.
RMCR - Nonprofit School Food Srvc Acct	13 Did all recorded expenses represent an activity or function recognized as reasonable, necessary, allocable and otherwise compliant with the provisions of 2 CFR 200 Subpart E?	SA found flower seeds as a purchase to the nutrition fund. Moving forward SFA will ensure allowable costs are made to the nutrition fund.

**Site - Level Technical Assistance St Athanasius School (8104)**

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	317 a. Based on meal observation, does the meal counting system as implemented prevent overt identification of students receiving free and reduced price benefits?	Students walk through the line without exchanging names or ID numbers. Discussed with SFA that it's important for students to exchange their name or ID numbers to ensure accurate meal counts.
300 - Meal Counting and Claiming - Lunch	318 At the selected school(s), does each type of meal service line as observed on the day of review provide an accurate	Discussed with SFA the requirements and importance of accurate meal counts at the POS by sharing acceptable meal counting procedures.

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	count by eligibility category at the point of service (or approved alternate)?	
400 - Meal Components and Quantities - Breakfast	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	<p>SA provided FSD with an excel Menu Planning tool formulated to show if component contributions and vegetable subgroups are being met daily and weekly. We walked through the worksheet so FSD understands how to use it.</p> <p>SA shared with FSD the USDA Interactive FBG (Food Buying Guide) link and how to use it. FBG can be found at this link:  <a href="https://foodbuyingguide.fns.usda.gov/MasGuestUsers/GuestUserLogin?ReturnUrl=%2FHome%2FHome">https://foodbuyingguide.fns.usda.gov/MasGuestUsers/GuestUserLogin?ReturnUrl=%2FHome%2FHome</a></p> <p>Through an email, SA also shared additional web sites that offer standardized recipes. A USDA muffin recipe that meets the daily minimum ounce equivalents of grain will be used moving forward.</p>
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 provided a breakfast sign explaining a reimbursable meal. Shared with FSD the nutrition website for additional signs and templates for future use.
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 provided FSD with lunch signage to use for daily menu and what is required for a reimbursable meal.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	<p>It was not possible to complete the breakfast and lunch certification worksheets on the FSD's MAC computer so it was completed on the SA's computer. SA and FSD worked together on completing the certification worksheets required for the AR (Administrative Review).</p> <p>SA walked through the worksheet so if FSD chooses to use it, she can moving forward.</p>
1400 - Food Safety	1404 Is a copy of the written food safety plan	SA shared the Iowa State University website on HACCP where SOP (Standard Operating Procedures) templates can be downloaded and edited to reflect actual operations in the kitchen facility. All links

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	site specific and available at each school?	<p>shared via email too.</p> <p>Website also provides free training videos and handouts plus resources. ISU Food Safety link is <a href="https://educateiowa.gov/pk-12/nutrition-programs/learning-tools-schools">https://educateiowa.gov/pk-12/nutrition-programs/learning-tools-schools</a>.</p> <p>ICN (Institute of Child Nutrition) has various training opportunities for many topics at <a href="https://theicn.org/">https://theicn.org/</a>.</p> <p>HACCP - School Food Service for SOP's and guide to food safety link is <a href="https://www.extension.iastate.edu/foodsafety/HACCP">https://www.extension.iastate.edu/foodsafety/HACCP</a>.</p> <p>Foodservice Employee Training Videos link <a href="https://www.extension.iastate.edu/foodsafety/foodservice-employee-training">https://www.extension.iastate.edu/foodsafety/foodservice-employee-training</a>.</p>
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	SA recommends putting thermometers in freezer, refrigerators and milk cooler to ensure outside thermometers are operating properly.
1500 - Reporting and Recordkeeping	1502 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	<p>FSD was unable to located prior year FPRs or other documentation pertaining to food service operations for meal service.</p> <p>Records must be retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits. Temperature logs are to be kept for 6 months.</p>
Meal Compliance Risk Assessment Tool	6 Does the site utilize cycle menus?	<p>SA shared, the use of cycle menus will help forecast food orders, and simplify menus ensuring weekly menus meet the meal pattern and required portions and component contributions.</p> <p>SA shared via email and while onsite walked through some websites with cycle menus.</p>
Dietary Specifications Assessment Tool - Breakfast	1 Are specifications considered when purchasing menu items and condiments to limit the following?	Provided guidance on trans-fats and foods should only contain natural producing trans-fats, keeping in mind when ordering foods there's no trans-fats listed on nutrient labels.
Dietary	19 Standardized recipes are	SA shared and walked through the following websites with standardized recipes.

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Specifications Assessment Tool - Breakfast	followed: all ingredients are weighed or measured with standardized weight or measuring utensils.	<p>USDA Standardized Recipes at <a href="https://www.choosemyplate.gov/">https://www.choosemyplate.gov/</a>.</p> <p>ICN (Institute of Child Nutrition) Recipe Box at <a href="https://theicn.org/cnr/recipes-for-schools/">https://theicn.org/cnr/recipes-for-schools/</a>.</p> <p>Menus that Move (Ohio) at <a href="http://education.ohio.gov/Topics/Student-Supports/Food-and-Nutrition/Resources-and-Tools-for-Food-and-Nutrition/Menus-that-Move">http://education.ohio.gov/Topics/Student-Supports/Food-and-Nutrition/Resources-and-Tools-for-Food-and-Nutrition/Menus-that-Move</a>.</p> <p>Bureau of Nutrition &amp; Health Services Menu Planning &amp; Recipes at <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-meals/menu-planning-and-recipes">https://educateiowa.gov/pk-12/nutrition-programs/school-meals/menu-planning-and-recipes</a></p>
Dietary Specifications Assessment Tool - Breakfast	20 Meal pattern for appropriate age/grade groups are used for menu planning, including the meal patterns and serving sizes.	SA provided copies of the NSLP (National School Lunch Program) & SBP (School Breakfast Program) Meal Pattern and the Grains/Bread Chart.
Dietary Specifications Assessment Tool - Lunch	25 Larger portions and/or bonus items and/or seconds are offered (offering portion sizes that are inconsistent with the planned menu). Entrées sold a la carte are exempt.	<p>SA shared with FSD that all extra foods must be charged as a la carte. Revenue from a la carte covers the costs of served food.</p> <p>Additional servings must be recorded on FPR's to indicate food as "a la carte or adult meals." All FPR's must document the amount of food prepped, planned number of servings, and leftovers.</p>

**Org - Level Commendations**

<b>Description</b>
<ul style="list-style-type: none"> <li>• Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of January were accurate and complete.</li> <li>• Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.</li> <li>• Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period.</li> </ul>
<ul style="list-style-type: none"> <li>• The correct and current benefit issuance list was available.</li> <li>• Income was only converted to annual when there was more than one frequency of income.</li> <li>• Rollover applications were removed if the household did not apply within thirty days of the school year.</li> <li>• Access to benefit information is correctly</li> </ul>

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limited. • Free meals are extended to all members in the household. • Eligibility is kept confidential.
• 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 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 9/3/2019. • 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 is available to the public via school website. • The following individuals’ Physical Ed. & Health teacher, parents, students, FSD, and Principal 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. • No indirect costs are charged to the food service program. • 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 St Athanasius School (8104)**

<b>Description</b>
• 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. • 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. • Menus included many homemade entrees, and standardized recipes are used for food production. • Free potable water is 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)? • 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. • Recess is scheduled before lunch service. • 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 “And Justice for All” civil rights poster was posted in the cafeteria. • The latest Health Inspection Report was posted in a publicly visible location. • Food Service workers wore proper hair restraints and practiced good gloving procedures.
• The Food Service Director completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that St. Athanasius 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

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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.