

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Burlington Ind School District (69370000)
March 10-12, 2020

Program Year: 2020
Month of Review: February
Lead Reviewer: Shea Cook
Org Representative(s): Patty McPherson, Julie Rappenecker, Lisa Beames

Site - Level Findings: West Burlington Elem School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Breakfast	V-0300	During breakfast service there was no exchange at the point of service between student and cashier. While it is nice to see staff interacting with students in a positive and friendly way, there needs to be a transaction between student and cashier at the point of service in order to claim a reimbursable meal. The cashier greets each child by name and enters their meal without any information from the student. That is not a process that would work to obtain accurate meal counts if there was a substitute cashier who was unfamiliar with the students. There must be an exchange at the point of service for a reimbursable breakfast just as there is for lunch.	For your response please outline what process will be used to ensure that there is an exchange at the point of service in order for students to receive a reimbursable breakfast.	
400 - Meal Components and Quantities - Breakfast	V-0400	During observation 11 meals did not include the required 1/2 c of fruit or vegetable and were not reimbursable. An additional 4 meals only contained 2 of the 3 required food items.	For your response please provide training to staff on OVS for breakfast and submit a dated sign in sheet showing that training has been completed. A training webcast on OVS for breakfast can be found on the Department website at the following location: https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	The final rule of the Healthy, Hunger-Free Kids Act requires school wellness policies to include language that prohibits the marketing of foods and beverages that do not meet Smart Snack nutrition standards. No language for marketing is included in the current policy.	For your response please provide a timeline for updating your local wellness policy. If the policy has been recently updated please attach a copy of the policy or provide the website address where the policy is posted on the district website.	

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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	109 Who at the SFA receives the direct certification documents from the state or local agency and who is responsible for issuing and updating the benefit list?	The application packet does not reflect the district employee who is currently processing applications. SA helped SFA revise packet on site to update information.
700 - Resource Management		<p>Technical Assistance for Procurement was given in the following areas:</p> <ul style="list-style-type: none"> · Technical assistance provided to include all anticipated procurement events on the Written Procurement Plan with yearly totals. The written procurement plan should be reviewed annually prior to conducting procurement decisions. It is recommended to review procurement plan annually in February/March. · SFA should continue to document any non-domestic agricultural products that are purchased. There is a template document on IowaCNP that includes all of the requirements that must be noted (product description, date received, reason for acceptance, and country or origin) if any non-domestic items are received. <p>Micro purchase:</p> <ul style="list-style-type: none"> · Based on SY19 vendor paid list the SFA needs to spread the wealth for micro purchases between more local businesses. Of the approximately \$275 spent in micro purchase in SY19 all but \$14.80 was spent at one vendor. After attending training at the beginning of SY20, FSD has been working to spread the wealth this school year. <p>Small Purchase:</p> <ul style="list-style-type: none"> · 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. Bread price requests were sent to potential vendors on 3/16 and responses were due by 4/6. Allowing vendors longer response time may result in better pricing for the SFA. · Total milk purchased for 18/19 was \$35,291.64. By district purchasing thresholds this should have been a formal bid, but was procured as a small purchase. LEA is in the process of revising local purchase thresholds and in SY21 milk procurement will fall within the district small purchase threshold. · A number of required statements were absent from the price request documents including Buy American, debarment statement, termination for cause and convenience, equal opportunity, small business, etc. · When utilizing the small purchase method SFA is sending letters under the heading of "Bid Request." This language is incorrect and suggest a formal contract. SA advised SFA to change the title of small purchase pricing requests to "Request for Pricing" to accurately reflect the type of purchase method being used.

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		Formal Purchase: · SFA does exercise contract management by price checking invoices. SFA was encouraged to continue price checks and to include a variety of food and non-food items from the bid in those checks.
1000 - Local School Wellness Policy	1000 Provide a copy or appropriate web address of the current Local School Wellness Policy.	SA recommends updating the local wellness policy language. Current policy language for foods sold outside of school meals could be simplified to comply with the final rule, that all foods sold outside of the school meal must meet Smart Snack nutrition guidelines. Prototype wellness policy can be found on the Department website at the following location: https://educateiowa.gov/documents/school-wellness/2016/09/sample-school-wellness-policy .
1000 - Local School Wellness Policy	1005 <i>Provide a copy of the most recent assessment on the implementation of the local school wellness policy.</i>	Assessment of local wellness policy is located on website, but date when assessment was completed is not noted on the document. Make sure that future assessments are dated so that compliance with the triennial requirement can be verified.
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?	Documentation was on file to verify that 2 of the 3 non-nutrition staff with food service responsibilities completed civil rights training. The third employee did complete training and could describe the content, but there was no documentation on file to confirm it.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	Copies of outreach materials delivered via email or newsletter should be kept on file to verify that outreach was completed.
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 encourages additional SFSP outreach. Free outreach materials that may be helpful to families without internet access can be found at the following location: http://bestpractices.nokidhungry.org/programs/summer-meals/promote-summer-meals#summer-meals-outreach-resource-toolkit
RMCR - Revenue From Nonprogram Foods	9 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	SA recommends that FSD and business official work together to improve the reporting for school nutrition numbers on the CAR. Information from the car populated into the financial report on IowaCNP does not match. FSD's more detailed numbers demonstrate that the SFA is in compliance, while the numbers populated from the CAR do not.

Site - Level Technical Assistance West Burlington Elem School (0409)

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	SA discussed strategies to make OVS more efficient given the logistics of the lunchroom. SFA currently uses a card system where students decide which components they want before lunch and then the cards are delivered and meals are plated according to student's stated preferences as each class goes through the lunch line. This system only works if teachers follow the process and at least three classes did not bring their cards, making service slower as a teacher stood in the line and communicated the choice from the student to the server. SA encouraged FSD to think about a true OVS system where students decline or request components as they are being served for the older students as they go through the line. Logistics of the serving window do make it difficult for staff to hear younger students and the card system may be the best option.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	SA recommends additional OVS training, particularly as it pertains to breakfast service. 15 non-reimbursable meals were served at breakfast

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		and the majority of those errors were a result of improper implementation of OVS.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	SFA asked for a second inspection from the inspector verbally on site while inspector was conducting inspection. SFA recommended that the FSD document request in writing via email and keep a copy of the request on file.

Org - Level Commendations

Description
CERTIFICATION AND BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were extremely well organized. • 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. • Access to benefit information is correctly limited.
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. An approved milk alternate is made available for students with a dairy intolerance. • All staff with responsibilities in the school nutrition program received civil rights training, including all non-food service staff and substitutes. • The "And Justice For All" poster is on display in all cafeterias. • The racial ethnic form was completed and shows that students were not discriminated against when applying for free or reduce price meals.
FOOD SAFETY: The temperatures for hot foods are monitored and recorded on the food production records. • 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, 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.
MEAL COUNTING AND CLAIMING: The edit check reports matched the claim. • The day of review meal counts were reasonable with the review period counts.
MEAL PATTERN AND NUTRITION QUALITY: 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. • 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 4 different and approved types of milk to students. • The food service director completed the menu certification worksheets.
ON-SITE MONITORING: On-site monitoring forms have been completed for all sites in the district for lunch. • On-site monitoring forms have been completed for 50% of the breakfast sites.
PROCUREMENT: The SFA has a written Procurement Plan that includes federal and local thresholds, identifies the estimated value and procurement method for each anticipated procurement event. • The Code of Conduct policy identifies the policy number of the board-approved disciplinary process for employees who violate their job duties. • When using the micro-purchase method, each transaction with the vendor was below the local micro-purchase threshold of \$10,000. The purchase prices were reasonable. • 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. • The food service did an excellent job utilizing USDA Foods Planned Assistance Level (PAL) in SY19 and is on track to utilize funds in SY20. • FSD and additional district personnel attended regional procurement training. • FSD's request for pricing included product specifications and estimated annual usage.
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. • Non-food service employees received civil rights training and training based on the school nutrition program responsibilities.
RESOURCE MANAGEMENT: 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. • The SFA has a negative balance policy to address negative student lunch accounts. • 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.

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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, menus, and school announcements.
SCHOOL WELLNESS POLICY: 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, staff, administration, students, and parents are invited to participate in the wellness committee as meeting information is shared via email.
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. • Applications selected for verification were correctly pulled from the pool of error prone applications.

Site - Level Commendations West Burlington Elem School (0409)

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. • 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.
Meal Components and Quantities: All meal components were available at the beginning of meal service on the day of observation and throughout meal service. • All lunch meals observed met at least the minimum daily requirements. • The menus met weekly and daily meal pattern requirements for the grade groups. • CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • Four types of milk are offered. • Signage was posted explaining what constitutes a reimbursable meal at lunch.
Meal Counting and Claiming: The Point of Service is at the beginning of the line where students' ID cards are scanned for a meal. • Meal counts during the on-site review were reasonable when compared to the review month counts. • Meal count totals for the month of February were accurate and complete. • Point of Service counts and filed claims appear accurate. • Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. • Edit checks are performed.
Offer vs. Serve: Offer vs. Serve is being implemented properly at lunch. • 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.