

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Brooklyn-Guernsey-Malcom Community School District (08460000)
December 16-18, 2019

Program Year: 2020
Month of Review: November
Lead Reviewer: Christine Crow
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One student was provided reduced benefits because of income when the state agency found him in elookup as free due to food assistance benefits as of 10/02/2019. TA provided.	While SA was onsite, the determining official sent the family a letter of notification of benefits to inform them that they will receive free benefits and will be reimbursed for all reimbursable lunch and breakfast meals purchased since 10/02/2019. The student's eligibility status was changed to free and the claim was revised while SA was onsite. No further action required.	
900 - SFA On Site Monitoring	V-0900	If the SFA has more than one site, the onsite monitoring form found in Download Forms (NSLP260) must be completed before February 1 at both sites for lunch and 50% of sites that serve breakfast. This form must be completed annually. The onsite monitoring form has not been completed for either site. TA provided to the food service director on completing the form for both sites at lunch and breakfast.	Submit the completed onsite monitoring form for both sites at lunch and breakfast. While completing the onsite monitoring form for breakfast, document how the point of service line is managed to ensure preschool students check out with the cashier after getting their breakfast meal.	
1000 - Local School Wellness Policy	V-1000	The wellness committee has not conducted an assessment of the implementation of the goals written within the wellness policy. The assessment	1. Describe when the assessment of the implementation of wellness policy goals will be conducted. 2. Describe how the assessment will be made	

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		must be conducted every three years and must be made available to the public. An assessment reporting form and TA was provided to the authorized representative and food service director.	available to the public.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The 2018-2019 vendor paid list shows that the school nutrition fund paid \$109.71 to the BGM Clearing fund which is a student activity group. The documentation for this charge shows that the student group ordered and paid for ice cream sandwiches in March 2019 from the primary vendor. The school nutrition fund then reimbursed the student group for the ice cream sandwiches. The food service director denies selling those ice cream sandwiches as part of a reimbursable meal or a la carte item. Notes on the invoice also support the finding that the student group purchased and used the ice cream sandwiches. Therefore, the ice cream sandwiches the school food service account paid for was done in error and the student activity group must reimburse the school nutrition fund. TA provided to the authorized representative.	Provide proof that the \$109.71 was deposited back into the school food service account from the BGM Clearing fund account.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	Currently the school nutrition program caters a breakfast to the Kiwanis twice a month. Documentation is available to show that the Kiwanis paid the school nutrition fund for these breakfast meals but there is no documentation to show how the price of those meals is determined or how many people ate the catered meal. Neither the authorized representative nor the food service director know how this price is determined. The price of the meals served must cover the cost of food and labor needed to prepare and serve these meals. If the Kiwanis club members are receiving the same menu items as a student breakfast, they must be charged at least the minimum adult price for a breakfast. TA provided to the food service director.	Provide documentation to show how many breakfast meals were served to the Kiwanis members at their next breakfast and a bill to show they were charged an amount that covers the cost of those making and serving those meals.	

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Site - Level Findings: Brooklyn-Guernsey-Malcom Jr-Sr High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Breakfast	V-0300	The edit check generated from the point of service system that was used to submit the claim for USDA reimbursement included some adult meals and 2nd meals sold to students which are not reimbursable. The authorized representative runs the report on the point of service computer system daily and transfers the number of paid, reduced, and free meals to her own spreadsheet. The numbers on this spreadsheet are used to submit the claim. There was one day in November in which the SFA made a human error in the spreadsheet and claimed the number of breakfast meals served in the lunch claim and claimed the number of lunch meals in the breakfast claim. TA provided to the authorized representative and encourages her to generate the claim numbers directly from the point of service system report that only includes student (first) reimbursable meals.	Provide written confirmation that the claim numbers will be generated from the monthly state report that only includes the first reimbursable meals served to students. Submit this report for the breakfast and lunch meals served at the elementary and junior high for the month of December.	
400 - Meal Components and Quantities - Lunch	V-0400	1. There were two items served during the week of review where the crediting information for the menu items was not clear. The turkey taco filling was served in ¼ cups when the crediting information listed on the CN label is measured in ounces. The macaroni and cheese recipe is not complete as it does not provide information on the total number of servings or the total yield. Therefore, the State Agency cannot confirm the crediting information for	1. Provide the weight of ¼ cup turkey taco filling. If it does not provide at least 2 ounces of meat/meat alternate describe the amount of turkey taco filling provided to meet the 2 ounce meat requirement. Provide the food production record for the day in January that the turkey taco filling is served to show the serving size. 2. Revise the macaroni and cheese recipe to show the total yield and total number of	

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		<p>this recipe. TA provided to the food service director on standardized recipes and weighing the taco filling.</p> <p>2. The SFA uses a lettuce blend that is 80% romaine and 20% iceberg. During the week of review, they provided 1 cup of the lettuce blend to meet the dark green vegetable requirement. Since the blend does not consist of 100% dark green vegetables, only 0.4 cups of dark green vegetables were served. No other dark green vegetables were served that week and therefore the requirement was not met. TA provided to the food service director on the requirement and how to modify the lettuce to meet requirements. While SA was onsite, the food service director cancelled her next order of the 80/20 lettuce blend and will be ordering 100% romaine lettuce for all lettuce salads. No further action required.</p> <p>3. The food service director credits 2/3 cup of macaroni and cheese served to 9-12th grade students as 2.5 oz. meat/meat alternate and 1.25 oz. of grain and is offered as an alternate entrée during the week of review. Although when the macaroni and cheese is served as the primary entrée item it is served with a muffin to meet the grain requirements for 9-12th grade students, there was not an additional grain served with the macaroni and cheese when offered as an alternate entrée item. Therefore, the 9-12th grade students who selected the alternate entrée option on 11/18/2019 were short on their daily grain requirement. This is a repeat finding and fiscal action may be taken. TA provided.</p>	<p>servings one recipe makes. Describe how the SFA will provide 2 oz. grain to the 9-12th grade students when the macaroni and cheese is served as an alternate entrée.</p>	
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1100 - Smart Snacks in School	V-1100	There is a vending machine in the cafeteria that contains snack items and beverages. The vending machine is on during the defined school day (midnight until 30 minutes after dismissal), is available for 7th – 12th grade students and sells 100% juice, water, and flavored water. Beverages sold in the vending machine must meet the Smart Snack requirements for the lowest grade group that has access to the machine. Junior high students can have 100% juice (up to 12 ounces), plain water, and milk. Flavored water and low calorie drinks are not allowed for middle school or junior high students. Juice that is 100% and is diluted with water and/or has carbonation is allowable. TA provided to the teacher responsible for stocking the vending machine.	Provide written confirmation that the flavored water was removed from the vending machine. Describe what product(s) replaced the flavored water.	
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Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	208 When a confirmation review was conducted:	A confirming official must check and sign the application to confirm that the original eligibility status was determined accurately before the letter of notification of verification selection is sent. The application selected for verification was not signed by a confirming official. TA provided to the verifying official who agrees to have someone confirm the application selected for verification in school year 2020-2021.
700 - Resource Management		<p>PROCUREMENT:</p> <ul style="list-style-type: none"> - The procurement plan does not include a date of when it was reviewed and the federal and local purchase thresholds are not accurate based on the purchasing policy submitted by the SFA. Procurement plans are required to be completed annually prior to

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		<p>sending out bids for the next school year. All procurement plans must be saved for three years plus the current year. TA provided to the food service director on the local purchasing policy and federal purchasing thresholds. SA encourages the use of the updated procurement plan found in Download Forms (NSLPPROC008).</p> <ul style="list-style-type: none"> · The procurement plan does not include all intended purchases for the 2019-2020 school year. Examples of items not included on the plan include micropurchases (special diet foods and emergency foods), and gloves. TA provided on using the vendor paid list as a guide for developing the annual procurement plan. · Contract management must be conducted to ensure items delivered were what was ordered, that items received are what is on the invoice, and that the SFA is charged the price agreed on in the bid. While reviewing invoices and prices lists from the 2018-2019 school year, the SA discovered that the SFA was charged more for their purchase of pizza in May 2019 than what was listed on the price list. TA provided to the food service director on contract management responsibilities. · The SFA described the milk purchase as a formal procurement method when it resembles a small or informal procurement method. The milk bid included delivery, product and other specifications but did not include the terms and conditions. Bids must include terms and conditions as required by USDA. SA and FSD review the 3 Bids and a Buy template found in Download Forms which includes all the terms and conditions that are required based on amount spent.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The SFA must have a complaint policy in place that meets USDA requirements. TA provided on USDA's complaint policy and a handout was issued to the authorized representative that describes the USDA complaint procedure and form.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	The SFA has signed diet modification statements on file for students with special dietary needs. Some of the diet modification forms state that almond milk will be offered as a nutritionally equivalent cow's milk alternative. Almond milk is not nutritionally equivalent to cow's milk as

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		only lactose free milk, lactose reduced milk, and some soy milks are nutritionally equivalent. TA provided to the food service director who currently is not providing almond milk to any students except for one who has a signed diet order for it. See the Creditable Milk Alternatives form in Download Forms (NSLP036) for additional information on nutritionally equivalent milk alternatives.
1400 - Food Safety	1403 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?	There were canned mushrooms from Spain located in the store room that were not included on the SFA's Buy American log. TA provided to the food service director on the Buy American provision. The food service director contacted the vendor who reported that the mushrooms grown in the US were \$15 more expensive and she agrees to include the mushrooms on the Buy American log. TA provided.
RMCR - Revenue From Nonprogram Foods	9 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	Per the 2018-2019 IowaCNP Financial Report, the SFA is charging an adequate amount for their nonprogram foods. The business manager is new to the district and was not able to confirm how the nonprogram revenue from school year 2018-2019 was calculated. SA suggests calculating the average cost of a reimbursable lunch and breakfast meal to help determine the cost of all program breakfast and lunch meals served. Once the program food cost is determined the SFA can subtract that from total food cost to determine the nonprogram food cost. TA provided to the food service director and business manager.

Site - Level Technical Assistance Brooklyn-Guernsey-Malcom Jr-Sr High School (0109)

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	318 At the selected school(s), does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	Although the point of service line at the breakfast is orderly for the majority of service, the preschool aged students do not always check out with the cashier which forces the cashier to chase them down or not get counted or claimed for reimbursement. The cashier knows all of the students and their numbers which makes it easy for her to ensure all students get counted, even if they don't check out with her. However, in the event that she was not able to work, the substitute would not be able to catch all of those students. Students must give the cashier their name or ID number to ensure that they are accurately charged for their meal, claimed for reimbursement, and to allow the cashier to ensure they have everything on their tray to make a reimbursable meal. During the observed breakfast 2 preschool students went through the line without

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		checking in with the cashier. The cashier then had to chase those students down to make sure they were counted and claimed and had what they needed to make a reimbursable meal. Although the older students are familiar with the process, the preschool students need some additional assistance in learning the process to ensure all students have a reimbursable meal and get counted and claimed appropriately. The cashier has asked an aide to assist the preschool students in checking out with the cashier before going to sit down. SA requests that the food service director complete the onsite monitoring form for breakfast to ensure the preschool students are counted and claimed properly.
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The food service director offers 5.5 ounces of 100% tomato juice as a juice option at breakfast daily. The tomato juice provides 470 mg of sodium which will put the breakfast meal over the target one sodium levels (640 mg or less for 9-12th grade students and 600 mg or less for 6-8th grade students). TA provided to the food service director on decreasing the serving size of the tomato juice and/or decreasing the frequency in which it is served. The food service director agrees to remove it from the menu and it was not available during the observed breakfast.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	Each site is required by USDA to receive two health inspections every school year. Only one health inspection was received in the previous school year and the site has not received any inspections for the current school year. The SFA must email or write a letter to their health inspector to request two inspections during the year. Correspondence must be saved to document request. TA provided to the food service director.

Org - Level Commendations

Description
CERTIFICATION AND BENEFIT ISSUANCE: • The SFA provides 30 day carryover of benefit status to any student receiving benefits in the previous

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school year. • Applications are processed within 10 days of the SFA receiving the application. • The state agency template letter of notification of benefits was sent to all families on the Direct Certification list and those that completed a denied application. • Benefits are extended to all students within the household. • The Direct Certification list is checked regularly and kept on file. • Benefits are accurately transferred to the point of service system. • The income applications received are complete with all required information and are accurately determined, including the denied applications. •

CIVIL RIGHTS: - The SFA has a translator onsite to help communicate with students that have Limited English Proficiency and applications and program materials are available in Spanish for families if needed. - Civil rights training was provided to all employees with responsibilities in the Child Nutrition Program. - The public release was sent to the local media before the school year started. - The “And Justice For All” poster is on display in a public location. - Diet modification forms are available for students that have special dietary needs and the nutrition staff work with students and their families to ensure that they get menu items that meet their needs.

FOOD SAFETY: - The SFA has a Hazard Analysis and Critical Control Point Plan (HACCP) at each site. The HACCP plan is complete with all required elements and Standard Operating Procedures. - The nutrition staff monitor and record the temperatures of the cooling equipment. - All freezers, coolers, and refrigerators were kept at the proper temperature and food was stored properly. - The most recent food safety inspection report was on display in a public location. - The food service director and one other nutrition staff member are ServSafe certified. - The nutrition staff exhibited good food safety procedures while SA was onsite. -

MEAL COUNTING AND CLAIMING: • A backup plan is in place in case the point of service system does not work. The cashier has trained a backup cashier. • The SFA completes an edit check monthly to ensure that they do not claim more meals than eligible students. • The students who were counted and claimed as having a reimbursable meal had all required components. • Offer versus serve was implemented correctly. • The number of free, reduced price and paid students served during the observed meal is reasonable when compared with the number of meals served during the review period.

NUTRITION QUALITY AND MEAL PATTERN REQUIREMENTS: • Food production records are available for all meals served during the review period and are complete with the items served, total quantity prepared, serving size, planned servings for main entrée, and leftovers for the main entrée items. CN labels and/or product formulation statements are available for all combination menu items served. • The SFA offers a variety of entrée options and at least two different types of vegetables daily. • At least two different types of milk are offered. - Free, potable water is available at breakfast and lunch. • At least 50% of grains served are whole grain rich. • Grain based desserts are limited to 2 ounces during the week of review. • Offer versus serve is implemented correctly and all students during the observed lunch had a reimbursable meal. • The breakfast and lunch menu served during the observed meals met all daily meal pattern components. • The breakfast menu served during the review period met all the daily and weekly meal pattern requirements for all components. • The lunch menu served during the review period met the daily and weekly meal pattern requirements for fruit, milk, meat/meat alternate, total vegetables, and red/orange, bean/legume, starchy, and other vegetable subgroups.

PROCUREMENT: • The SFA has a procurement plan for the 2019-2020 school year that includes some of the SFA’s intended purchases, the anticipated value of each event, the procurement method used, the contract award type, the duration of the contract, and the evaluation or determination method used. • The code of conduct contains all the required elements. • The SFA indicated that they purchased their milk using the formal procurement method but their procurement documents more closely resembled the small procurement method. The amount that the SFA intends on purchasing is less than the local small purchase threshold. Bids were sent to three vendors and two vendors responded. The SFA selected the lowest price bidder. Bids included product, delivery and other specifications that the SFA was using to evaluate bids. A due date of when vendors needed to respond by was also listed on the bid. • The purchases made at the Brooklyn Grocery and Kwik Star met micropurchase requirements as they were within the micropurchase threshold. • The food service director maintains a Buy American exception log to document all items that do not adhere with the Buy American provision. - The SFA maintains a micropurchase log documenting all micropurchases made. • The SFA participates in the AEA group

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purchasing organization and maintains their agreement documents. • The SFA saves all monthly and weekly price lists for the GPO and milk bids.

PROFESSIONAL STANDARDS: - • The food service director is ServSafe Certified (06/07/2018) • All staff with responsibilities within the school nutrition program received civil rights training. • All full and part time nutrition staff and the food service director received the required number of professional standard training hours as evidenced by the training attendance logs and certificates on file. • The authorized representative/determining official received the required number of training hours. • The training hours for all staff within the nutrition program are tracked on a tracking tool. • The food service director was hired after July 1, 2015 and met hiring standards.

RESOURCE MANAGEMENT: • The SFA had a positive account balance in December 2018 and did not have to complete the PLE tool or increase paid student lunch prices. • The SFA charged the correct adult lunch price per USDA requirements. • The school nutrition account is tracked separately from the other school program accounts. • The school nutrition fund does not transfer funds to other program accounts. • The district spent 99.68% of their USDA Paid Assistance Level dollars in the 2018-2019 school year. • Per the 2018-2019 financial report in IowaCNP, the SFA's nonprogram food revenue adequately covers the cost of nonprogram food costs. • The school nutrition fund does not exceed three months operating costs. - Program documents are saved for three years plus the current year. - The district has a negative balance policy that they provide to all families at the beginning of the school year.

SCHOOL BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM OUTREACH: • The SFA informed all families about the Summer Food Service Program (SFSP) by posting information on the school's website, by sending home information with all students, advertising on the local television channel and posting flyers around the community. • The SFA informs families about their breakfast program with flyers, school announcements, and social media posts.

SCHOOL WELLNESS POLICY and COMPETITIVE FOODS: • The SFA has a wellness policy that has been reviewed and updated within the past three years, contains all required elements and is made available to the public. - The food items available in the vending machine meet Smart Snack requirements.

VERIFICATION: • The SFA selected the correct number of applications to verify (1) and selected it from error prone applications first. • The SFA followed up with the selected family when they did not respond to the initial notification. • The SA template letter of notification of verification results was sent to the family and the results were reduced according to the correct time frame. The benefits were also changed in the point of service system. • The verification process and report were completed on time.