

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Oskaloosa Christian School (50138301)
February 4-6, 2020

Program Year: 2020
Month of Review: January
Lead Reviewer: Shea Cook
Org Representative(s): Carol DeRonde

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One application impacting two students was approved for free but should have been reduced. One source of income was not accounted for when determination was made.	For your response please attach a copy of the letter notifying the family of the reduction in benefits.	
200 - Verification	V-0200	The application chosen for verification was not selected from the applications identified as error prone.	For your response please identify how you will make sure that applications chosen for verification are chosen from the applications identified as error prone.	
800 - Civil Rights	V-0800	Individuals who serve as the confirming official are also required to complete yearly civil rights training at minimum.	For your response please have the confirming official complete civil rights training and upload a sign in sheet showing that individual has completed training.	
1000 - Local School Wellness Policy	V-1000	The final rule of the Healthy Hunger Free Kids act requires that the school wellness policy, including any updates to and about the wellness policy, must be made available to the public. Currently only the wellness policy assessment is posted on the website under the wellness policy link. Additionally, the local wellness policy should be updated every three years and needs revision.	For your response please provide a link to where the local wellness policy is posted on the school's website. Additionally, please state your timeline for updating the current local wellness policy.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	In 2016 the USDA required all schools participating in the National School Lunch Program establish a local meal charge policy. Although the SFA has a process they follow, there is no written policy in place.	For your response please state your timeline for developing a negative balance policy and who will be responsible for developing the policy. It is the expectation that a written negative balance policy will be in place by the end of the school year.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	SFA has not completed the financial report on IowaCNP.	For your response please complete the financial report located on IowaCNP.	

Site - Level Findings: Oskaloosa Christian School (8301)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	133 Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified?	Free lunch letters should be signed and dated by the FSD when collected.
700 - Resource Management		<p>Technical Assistance for Procurement was given in the following areas:</p> <p>Micro Purchase: SA gave clarification on spreading the wealth for micro purchases. Currently SFA makes the majority of their micro purchases from one local business because of better pricing. SA advised that if SFA wants to make purchases based on pricing the small purchase method is the method of purchasing that should be used. Cost is not a factor when using the micro purchase method.</p> <p>Small Purchase: Guidance was given on writing more specific product specifications in price request documents including but not limited to size, nutritional information, packaging materials, delivery expectations, etc. Additionally, when requesting pricing for milk the SFA may want to consider requesting pricing for a number of other dairy items that they use and currently purchase from other vendors. The milk vendor may be able to supply yogurt, sour cream, and cottage cheese, etc. at a lower price.</p> <p>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. Price request for milk only allowed the vendor 19 days to respond.</p> <p>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. SA suggests using the Three Bids and a Buy document to identify required terms and conditions.</p> <p>SFA should include estimated annual usage in request for pricing in order to get best pricing.</p> <p>Formal Purchase: SFA should exercise contract management by price checking invoices. SFA was encouraged to price checks a variety of food and non-food items from the bid in those checks.</p>
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	Parents, students, representatives of school food service, physical education teachers, school health professionals, school board members,

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		and school administrators must all be invited to participate in the wellness policy process and to serve on the wellness committee. Documentation to show that all parties were invited to attend should be kept on file.
1200 - Professional Standards	1214 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.	4 hours of first aid training are documented towards completion of professional development hours for the current year. Allowable trainings should focus on day-to-day operation of the school nutrition program. Professional standards hours for school nutrition employees must be job specific and intended to help employees perform their duties in school nutrition. General topics such as first aid, school lock down training, food trade shows, etc. are not directly related to nutrition responsibilities, do not count toward completion of required hours, and should not be paid for out of food service.
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?	Non-domestic produce, red peppers from Mexico, were observed in storage. SA provided guidance on keeping a log to document any non-domestic produce received. Log should include date, description of item, and reason for its acceptance. A template for documenting non-domestic agriculture is available in Download Forms in IowaCNP.
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?	SA encourages additional SFSP outreach. Free outreach materials can be found at http://bestpractices.nokidhungry.org/programs/summer-meals/promote-summer-meals#summer-meals-outreach-resource-toolkit

Site - Level Technical Assistance Oskaloosa Christian School (8301)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	FSD production records noted serving sizes in amounts that were by crediting instead of by serving size of the food. For example, serving size for pizza worth 2 M/MA was listed as 2 instead of 1 slice. SA clarified that serving should be actual number or measurement of what is being served (i.e. 1 slice, 3/4 c., 6 pieces).
1300 - Water	1300 Is free potable water 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)?	All students eat lunch in individual classrooms. SA reminded FSD that it is a requirement that all students have free access to water during meal service. SA suggested that FSD make sure that all classroom teachers know of the requirement and are reminded that students cannot be denied access to water.
Infant and Pre-K Meal Pattern Checklist - Lunch	2 Is the SFA using the meal pattern flexibility and offering one menu when Pre-K students are co-mingled in the meal service area?	PreK students come through the serving line as a group and eat in their classroom. They are not co-mingled and should follow the CACFP meal pattern, which does not allow them to have chocolate milk.

Org - Level Commendations

Description
APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used, elookup is used to identify directly certified students, and benefits are accurately transferred in a timely manner to the POS system. The correct and current benefit issuance list was available. All applications were complete with SSN's and adult

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<p>signatures and all applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Carry over applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential.</p>
<p>CIVIL RIGHTS: The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was completed by all nutrition staff. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. Ethnic/racial information is collected and the summary form is complete and on file. No discrimination was observed. The current state and federal non-discrimination statements are listed on household notification letters and the shortened statement is on the posted menu.</p>
<p>FISCAL ACTION: Fiscal action for this review is less than the allowed USDA disregard for both NSLP and SBP so no claim adjustments are needed.</p>
<p>HACCP/FOOD SAFETY: The SFA has a written Food Safety plan that includes most required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures.</p>
<p>MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the January review month counts. Meal count totals for the month of January appeared accurate and complete. There was a point of service, POS, at the beginning of the line as approved on the SFA application. Although Point of Service is at the beginning of the line, there is a designated and trained employee verifying that each reimbursable meal meets regulations. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: All meal components were available at the beginning of meal service on the days of observation and throughout meal service. Menus met weekly and daily meal pattern requirements for each age/grade group within the school. 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 and well organized. Standardized recipes are used for food production. Low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. Food service staff was polite and respectful to students, other staff, and each other. All students were observed to have a reimbursable meal during the day of the review.</p>
<p>PROCUREMENT: 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 school is a member of a Group Purchasing Organization which helps keep prices low.</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 are on track to receive the required number of training hours for the school year. Substitute employees received civil rights training and training applicable to their job responsibilities.</p>
<p>REPORTING AND RECORD KEEPING: Records are maintained for at least three years plus the current year.</p>
<p>RESOURCE MANAGEMENT: 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. The SFA charges the correct paid student lunch price according to the required PLE tool and USDA requirements.</p>
<p>SCHOOL WELLNESS POLICY: The wellness policy assessment is made available to members of the public via posting on the school's website.</p>
<p>VERIFICATION: The correct number of applications were verified. All income sources were verified, and the process was completed on time. The application selected for verification was confirmed prior to verification.</p>

Site - Level Commendations Oskaloosa Christian School (8301)

Description
<p>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.</p>