

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Patricks School-Sheldon (59498101)
On-Site Review Dates: November 13-14, 2019

Program Year: 2020
Month of Review: October
Lead Reviewer: Deann Murphy
Org Representative(s): Paulette Karolczak

Site - Level Findings: St Patricks School (8101)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
600 - Dietary Specifications and Nutrient Analysis	V-0600	The dietary specifications for calories, saturated fat and sodium are easily exceeded when free seconds are provided to students. For K-8 graders, there is a maximum allowance of 650 calories, <10% saturated fat and <1230 mg sodium on average daily.	The SFA will explain how they will ensure that the calorie, saturated fat and sodium maximums for grades K-8 are met.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1200 - Professional Standards	V-1200	The FSD does not have a current Serve Safe certification, has not had food safety training in the past few years and had not been meeting the required 12 hours of Professional Standards training annually. The SFA is combining training for SY18-19 and SY19-20 so the FSD will need a minimum of 24 hours training for the 2 years.	The SFA will provide a list of training topics and a timeline of when the FSD will obtain the required 24 hours of training prior to June 30. Eight hours of her training should be in food safety.	

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?	If a household provides only one income frequency, i.e. weekly income, the SFA should use the weekly tab to calculate income. Only use the annual tab when there is mixed income frequencies, self-employment or annual income provided.
200 - Verification	208 When a confirmation review was conducted:	Discussed with the confirming official that when completing a confirmation review on applications, she serves as a second check to ensure all required information is listed on the application and that it is determined correctly. Required information includes all household names are present that the household is claiming, the last 4 digits of the household member's SSN or an indication that they do not have a SSN, and an adult signature.

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		as well as ensuring that the income has been determined correctly.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	Before sending a letter to the household requesting income documents during the verification process, the SFA should check E-lookup for the student's name. If found, verification is done and no letter needs to be sent. If the students name is not found, the SFA should proceed with verification as usual.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	The POS makes a noise when students who have a negative balance enter their PIN in the lunch line. This designates someone who owes money which is not allowed. The SFA should try to find a way to delete the noise.
700 - Resource Management		Discussed with the Authorized Rep changes in their current procurement plan including separating the 3 Prime vendor contracts, adding JMC updates as a sole source contract, and adding any anticipated equipment purchases or repairs in their plan. Discussed completing the procurement plan in spring of each school year and then sending out specs to vendors in late spring/early summer. The SFA should give vendors 4 weeks to reply to a small purchase bid request. Also discussed: When using the micropurchase method, foods purchased still need to be compliant with the meal pattern. During the review year, many grain foods purchased at the local grocery store were not whole-grain rich which was a requirement. Starting in SY19-20, only 50% of grains need to be whole-grain rich. Small Purchase: The SFA needs to send specs out to at least 2-3 vendors with both federal and local terms and conditions. There is a small purchase template available to use in IowaCNP. The Authorized Rep and the FSD should work together to ensure specs are correct. Formal: The SFA needs to spot check prices on vendor invoices, to communicate any returns that the vendor has credited prior to paying the bill, and to ensure that rebate checks go to the nutrition account.
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?	Staff need to use the NSLP Civil Rights training for everyone involved in the school lunch program. Training can be found on IowaCNP Download Forms.
1200 - Professional Standards	1213 Verify the SFA's response to Q1203 on the Off-site Assessment Tool.	Since the SFA is combining 2 years of Professional Standards (SY18-19 and SY19-20), the FSD needs to obtain a total of 24 hours training before June 30. At least 8 hours of this should be in Food Safety since her Serve Safe certificate has expired.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	The part time kitchen staff, the determining official and the confirming official all need to obtain 4 hours Professional Standards training prior to June 30, 2019. Everyone involved in the nutrition program needs to include Civil Rights training in their hours. Teachers who only serve designated portions during lunch should receive annual Civil Rights training and basic food safety training. They do not need the full 4 hours of training annually. Discussed with staff members where they could find applicable training. All training should apply to their jobs in the National School Lunch Program.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Suggest adding an SOP on cleaning tables and other work surfaces to your HACCP plan. Also, the SFA should have an SOP relating to their

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		Share Table (milk) in their HACCP plan.
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Site - Level Technical Assistance St Patricks School (8101)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	The SFA has limited portion scoops/ladles and some are not marked as to the portion they serve. Recommend the SFA purchase portion scoops/ladels for the kitchen that state the portion on them so that the FSD knows she is serving the proper portions to meet the meal pattern. Also, the FSD makes a fruit/jello salad for students on the menu. Foods that have 2 or more items included should have a standardized recipe on file.
400 - Meal Components and Quantities - Lunch	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	The school must provide all components of the meal, including a milk sub if needed. A list of acceptable milk substitutes that meet the NSLP requirements was sent to the Authorized Rep and the FSD.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Discussed with the FSD ways to combine some of the information she is writing in multiple places onto the Food Production Record in order to streamline and simplify her work. Temperatures and quantity prepared and served can all be written on the Food Production Record and do not need to be recorded elsewhere. Reference to numbered recipes can be listed on the FPR instead of listing each ingredient separately. Portions should be very user friendly so that a substitute can read them and know what needs to be served to each child. The colored, electronic menu certification worksheets can be used to ensure all components and subgroups are met, but are not required.
600 - Dietary Specifications and Nutrient Analysis	603 Were any areas identified during the Off-site review requiring technical assistance or corrective action prior to the beginning of the On-site portion of the review?	Allowing free second entrees increases the number of calories, saturated fat and sodium provided to students and can easily exceed the maximum requirements for those dietary specifications. All second entrees should be charged to students a la carte.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	The SFA must request a second inspection annually if the health inspector only comes once.
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	The SFA allows students to leave unwanted milk out for others to take at lunch. Milk should be put on ice to keep it cold and they need to have a waiver from the State Agency for this. Email sent to Carrie Scheidel to approve their waiver. Also, the SFA should have an SOP for this on file in their HACCP manual.
1400 - Food Safety	1411 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?	The SFA needs to have a Buy American exception form on hand to document foods that they accept that are non-domestic and the reason they were accepted. Items they routinely purchase that are not available domestically, i.e. bananas, mandarin oranges, pineapple, tropical fruit, can be written down once annually with a statement that the SFA orders these foods routinely. Other foods accepted that are non-domestic should be logged each time they come in. Discussed the Buy American exception template which can be found in IowaCNP, Download Forms.
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?	All records pertaining to the lunch program need to be kept for 3 years + the current year per regulations.

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Org - Level Commendations

Description
Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used, the SFA uses E-Lookup, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were correctly determined, applications were complete with SSN's and adult signatures, and all applications were determined within ten days. Families were notified if their carry over status was going to expire. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential.
December receipts that were reviewed indicated appropriate and allowable expenditures. The Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool. Indirect costs are being charged to the nutrition account correctly. Non-program food revenue covers non-program food costs.
Procurement: The SFA has a written procurement plan in place for SY19-20. They do not have a local purchasing policy so they use the federal thresholds. They also have an appropriate Code of Conduct on file that contains all the required elements. They had a staff person attend procurement training this year and the FSD has attended training in the past. For the on-site procurement review, all micropurchases were under the purchase threshold, prices were reasonable and the SFA tried to equitably spread the wealth. For Small Purchase: The SFA did receive quotes from 2 vendors in SY19-20, but one was received after school started. The SFA did accept the lower bid as required. For Formal: The FSD ensures that what she ordered is what was delivered. The SFA has their contract on file. The FSD receives pricing e-mails from the vendor and keeps them on file as required. The SFA used 98% of their USDA Foods allowance during SY18-19.
Professional Standards are being tracked as required.
The And Justice for All civil rights poster was posted in the cafeteria. The district has taken reasonable steps to ensure access to services are offered to Limited English Proficient households. Civil rights training was provided to all staff involved in the National School Lunch Program and documented. Ethnic/racial information is collected and the summary form is completed 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 has now been placed on the posted menu.
The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The application selected for verification was confirmed prior to verification. The SFA had at least one person attend training.
The district has a current wellness policy on file. There are goals for nutrition education, physical activity, and other school based wellness activities. The latest assessment of the policy was available. The SFA has a wellness committee consisting of a variety of stakeholders. Both the wellness policy and assessment are available to the public on the schools website.
The SFA has a flier ready to send out to families in May telling them about the summer feeding program as required annually.
There is no fiscal action required for this review so no claim adjustments are needed.

Site - Level Commendations St Patricks School (8101)

Description
All components/subgroups were included in adequate quantities in both the review week and the day of review. All students received a reimbursable meal using Serve Only serving style. The students had choices as to which milk they wanted, if they wanted margarine or not, and had access to pepper on the serving line. Free water is available to all students as required. The FSD has standardized recipes, CN labels and Nutrition Facts on file as well as daily Food Production Records to show that all meal pattern requirements are met. The monthly menu is posted in each classroom, is sent home with students and the daily meal is announced over the school loudspeaker each morning. Students seemed to have adequate time to eat lunch.
Meal counts during the on-site review were reasonable when compared to the (October) review month counts. Meal count totals for the month of October appeared accurate and complete. There was a point of service, POS, at the end of the line as approved on the SFA application. Students enter their PIN into the POS. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
The only Smart Snacks foods sold are second entrees and milk. Second entrees are exempt from Smart Snacks documentation and Fat Free and 1% milk are allowed for all grades.
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 the milk cooler, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean. Food Service workers and teacher helpers practiced good gloving procedures.