

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Kingsley-Pierson Comm School District (33480000)**  
**On-Site Review Dates: November 18-20, 2019**

**Program Year:** 2020  
**Month of Review:** October  
**Lead Reviewer:** Deann Murphy  
**Org Representative(s):** Scott Bailey

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	<p>Ill.J.g. of the contract states that three breakfasts are equivalent to two lunches and a conversion factor of .66 must be used to determine breakfast equivalence. Invoices for August, September, and October 2019 indicate that billing for breakfast was determined using an incorrect conversion rate. Corrected billing for August breakfast should be <math>212 \times .66 = 139.92 \times 3.4528</math> (fee per meal) = \$483.16. August billing was \$487.98, resulting in a \$4.82 overcharge in August. Overcharge for September was \$19.85 and overcharge for October was \$24.44.</p> <p>Additionally, invoices reflect that .67 was used to determine equivalences for adult breakfasts in September and October resulting in an overcharge of \$.03 in each month.</p> <p>Additional errors were found in the billing for extra milk sales due to a formula error in the FSMC's tracking spreadsheet.</p>	<p>For your response please upload a copy of the invoice(s) that reflect a credit for the breakfast equivalent rate errors for both student and adult breakfasts for August, September, and October and the credit invoice for the incorrect calculation of extra milk sales.</p> <p>Additionally, please upload a copy of the November invoice from the FSMC to verify that the error in the billing has been corrected and the correct conversion factor of .66 is being used to calculate breakfast equivalent meals.</p>	
1200 - Professional Standards	V-1200	The confirming official and the POS operators did not meet their required 4 hours Professional Standards training last year and have not yet received 4 hours training this year.	To fulfill this corrective action the SFA will submit their training tracker showing that all SFA staff involved in the National School Lunch Program have received their full 4 hours of training this school year.	

**Site - Level Findings: Pierson Middle School (0209)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

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**Org - Level Technical Assistance**

Area	Question	Comments
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	The SFA should attempt to directly verify through E-lookup the application(s) chosen prior to sending the verification letter to the household. If the child is found on E-lookup, the verification process is complete. If not, the SFA should continue with the verification process as usual.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	A reimbursable sack lunch must contain all minimum components and quantities, i.e. for grades K-8, 1 oz. eq. M/MA, 1 oz. eq. grain, 3/4 cup vegetable, 1/2 cup fruit, 1 cup milk.
700 - Resource Management		Discussed the general rules of both micropurchase procurement and small purchase procurement with both the FSMC FSD and the Business Manager. The SFA does not seem to currently know how micropurchases are being procured since they are just billed to the SFA from Lunchtime Solutions, Inc. Discussed with the FSMC FSD, the Superintendent and Business Manager using and sharing the Micropurchase Log to track micropurchases made throughout the year, showing that they are spreading the wealth evenly between various vendors, that the purchases are under the micropurchase threshold and that the purchases are reasonably priced. The SFA needs to oversee that the FSMC is following proper procurement practices. Also encouraged the SFA to use their vendor paid list from the preceding year to help complete their procurement plan for the next year so that all procurement would be included. Discussed appropriate policies to link into the Code of Conduct.
700 - Resource Management		SA provided clarification on reconciliation of FSMC invoices according to contract language.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	If there is a civil rights complaint regarding the USDA food program, please follow the procedure provided in your AR resource packet and notify the USDA of the complaint.
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?	The State Agency e-mailed the Iowa Civil Rights Manual to the Superintendent and noted the quiz available in the manual. If staff do the Civil Rights training on their own, recommend having them complete the quiz and keep it on file. The manual contains the answer key and a sign-in log for group training so that the SFA has a record of who participated.
800 - Civil Rights	810 Review program materials.	The posted menu needs to list either the full non-discrimination statement or the shortened non-discrimination statement, i.e. "This Institution is an Equal Opportunity Employer." Either statement needs to be the same font as the smallest print on the page, no smaller than font 9.

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1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements?	The Local Wellness Policy needs to be reviewed every 3 years. The SFAs current policy was last reviewed December 2016 so is due to be reviewed by December 2019 to stay in compliance. The Local Wellness committee meets annually and has discussed mostly issues of physical activity. Discussed with the Superintendent and Principal the intent of the local wellness policy regulation. Encouraged the SFA to use the committee to set annual wellness goals for the district to work on through the year in all policy goal areas. Then have the committee assess those goals at the end of the school year to see how they did. This assessment should be dated and made available to the public.
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.)	Recommend sharing the FSMC training tracker with the SFA on google drive or equivalent to help the SFA with oversight of program training requirements.
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?	The SFA staff who have responsibilities with the lunch program need to meet required professional standards training hours annually. Staff members who work with the program up to 20 hours a week, i.e. confirming official, determining official, and POS operators need a minimum of 4 hours training annually. At least part of this training needs to be in the area of Civil Rights. Other training should be job specific, i.e. the determining and confirming official should have annual training in the area of application approval, verification, etc., and the POS operators should have annual training in Offer vs. Serve, cashier training, etc.
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?	The USDA requires that SFAs promote breakfast to households throughout the year. At minimum, the SFA should send households information on the breakfast menu, cost and times available twice a year, as well as encouragement for students to participate in breakfast. The SFA might consider doing this at each semester, during PT conferences, for special weeks, i.e. Dr. Suess Week, National School Breakfast Week, etc. They can send a notice to households via text, e-mail, newsletter, or work with the FSMC to put something on their posted menu on the website.
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	Discussed on-site with the Business Manager how to determine their non-program food revenue and non-program food expenses. This needs to be completed annually and if the revenue from these foods sold does not exceed expenses, the SFA needs to raise their non-program food prices. A template and example on how to calculate this was e-mailed to the Business Manager to complete.

**Site - Level Technical Assistance Pierson Middle School (0209)**

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	When observing lunch service at Pierson Middle School, the cashier told a few students to go back and get more fruits/veggies on their tray to make a reimbursable lunch. One student sat down at the lunch table and started eating before returning to the salad bar to get more fruits/vegetables in his bowl. All students who pass by the cashier need to have 3 components on their tray with one component being 1/2 cup fruit/vegetable before sitting down in order to claim that meal for reimbursement. Students can return to the salad bar if allowed for extra fruits/vegetables. Recommend further education and monitoring for the cashier to ensure compliance.

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900 - SFA On Site Monitoring	901 a. Was the on-site review of the <i>lunch</i> counting and claiming procedure completed prior to February 1?	The SFA on-site monitoring form (Download Form NSLP260) needs to be completed at both school sites annually by February 1.
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**Org - Level Commendations**

Description
Annual civil rights training was provided food service staff and documented. Ethnic/racial information is collected and the summary form is complete and on file. No discrimination was observed during the on-site review. The non-discrimination statement is posted on all documents dealing with the lunch program.
Benefit documents were well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. All applications were correctly determined, they were complete with SSN's and adult signatures, and all applications were determined within ten days. Carry over applications were removed if the household did not apply within thirty days of the school year. Families that refused benefits were taken off the eligibility list. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential.
December 2018 payments that were reviewed indicated appropriate and allowable expenditures. The Paid Lunch Equity, PLE, tool was completed and prices were increased as needed. The SFA utilized 99% of their USDA entitlement funds in SY18-19 for commodities and takes advantage of DoD for fresh fruits and vegetables. Reports are filed on time, and all records are maintained for at least three years plus the current year.
Menus offer students a wide variety of entrees, and fresh fruits and vegetables each day. Lunch participation at the MS is very good. All meal components were present at the beginning of both lunch and breakfast and throughout the meal service. Menus met both daily and weekly minimums and calories, saturated fat and sodium levels were within acceptable ranges. Documentation was available to show that all quantities were met. Food Production Records, CN labels, Product Formulation Statements, standardized recipes and/or Nutrition Facts were available for all foods/meals served. Free water was available at both meals as required and the SFA provided cups near the POS for students to use if they wanted. Students seemed to have sufficient time to eat their lunch. Signage was posted so students knew what they needed to take to make a reimbursable meal.
The contract with the FSMC is a fixed-price contract. The SFA retains signature authority. The SFA program director has completed the required food safety training and professional standards hours. The SFA completed two monitoring reviews of the FSMC in the last School Year (SY) and submitted monitoring forms to SA as required. The SFA has had one advisory committee meeting in the current SY and held two advisory committee meetings last SY as required. Those meetings included the required stakeholders and menu planning and preferences were discussed as required. The usage of USDA Foods is tracked by the SFA.
The correct number of applications were verified and were correctly selected randomly since there were no 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 wellness policy and assessment located on the schools website on their own wellness tab. The policy has goals for nutrition education, physical activity, and other student based wellness activities. The SIAC committee meets to discuss wellness annually.
The SFA has a current Procurement plan and Code of Conduct on file. They have on file Buy American exception forms for foods that are accepted that are non-domestic.
The SFA has a district-wide written Food Safety plan that includes the 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, dishwasher, and sanitizer. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures.
The SFA promotes a neighboring school's summer feeding program.
There was no fiscal action in relation to this review so no claim adjustments will be needed.

**Site - Level Commendations Pierson Middle School (0209)**

Description
All students were able to purchase a second entree if they have purchased a full meal first. Students in grades 6-8 may purchase a la carte foods. All foods sold a la carte meet Smart Snacks regulations and the SFA has documentation on file for these.

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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. At the middle school, students pick up and scan their cards all in the lunch line. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.

The And Justice for All civil rights poster was posted in the cafeteria.