

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Hinton Comm School District zz (29880000)
On-site Review Dates: October 22-24, 2019

Program Year: 2020
Month of Review: September
Lead Reviewer: Deann Murphy
Org Representative(s): VALERIE KOVARNA

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	There was 1 Certification and Benefit issuance error found related to the lack of a SSN on the income application.	The error was corrected on-site. No further CA is needed.	
700 - Resource Management	V-0700	<p>PROCUREMENT: Hinton 3- and 4-yr preschool program participates in Child and Adult Care Food Program (CACFP). The preschool lunches are not claimed through the NSLP but claimed through CACFP.</p> <p>The preschool program vends meals from Thrive, the SFA's FSMC. Hinton CACFP organization has an agreement with the school district to vend only preschool lunches. Per FSMC RFP section III.J.6(f), vended meals (preschool lunches) should be converted to a meal equivalent and the fixed price/meal applied to meal equivalents. Three invoices from the FSMC were reviewed - November 2018, December 2018, and January 2019. In each of invoice there was a separate line item for lunches vended by the FSMC to the preschool. The preschool lunches were counted as similar to NSLP student reimbursable lunches as one meal equivalent for each lunch served. Per district business manager, the preschool pays the district directly (this is how it has been done historically). Any CACFP reimbursement the SFA received for preschool lunches is returned to the school nutrition funds to offset the cost of the preschool lunches. For SY 2018-2019, the preschool signed a CNP_121 Food Service Contract between for-profit food service and child/adult care organization agreement with the district. For SY 2019-2020, the preschool signed a CNP 120b Internal Food Service Agreement with the district.</p>	<p>1. The school district will review all FSMC invoices received for SY 2019-2020. Provide the state agency with a summary of what was billed and paid and what the bill should have been if preschool meals were counted as "other meal equivalents."</p> <p>Next Steps (moving forward):</p> <p>2. The preschool will provide the FSMC Food Service Director and the school district authorized representative with a daily lunch count. The FSMC will bill the school district for the preschool meals as "other meal equivalents" and not as currently shown on the invoice.</p> <p>3. Annually the preschool can sign a CNP-120b Internal Food Service Agreement with the school district. This agreement will state in the <i>Name of the Organization's Food Service</i> the district name and in parentheses that the school food service is operated by FSMC. Provide the name of the FSMC.</p> <p>4. The preschool will file claims for preschool lunches via the CACFP program using the meal counts from the meal participation records. Please note: the daily lunch count provided in #2 and actual lunch count from</p>	

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			<p>meal participation may not always match if a child who was expected to eat lunch left early.</p> <p>5. At present, the preschool reimburses the nutrition fund for lunches using the following calculation: (preschool lunches served x \$2.80) – CACFP lunch reimbursement. Going forward, this practice will discontinue. The district and preschool CNP-120b will establish a preschool lunch price. The preschool will reimburse the school nutrition fund for the counts provided as stated in the #2 at the price per enrolled participant lunch agreed on in <i>Internal Food Service Agreement #5</i>. A price per center personnel lunch is not necessary if the teachers who sit with the children during family style meal service do not eat with the children.</p> <p>6. All reimbursement (including lunch) received by the preschool program via CACFP will go into the preschool account.</p>	
1000 - Local School Wellness Policy	V-1000	The SFA has not made their wellness policy goals assessment available to the public as required.	The SFA will state how and when they plan to make their wellness goals assessment available to the public.	

Site - Level Findings: Hinton Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Two weeks of the review month did not offer legumes which are a required subgroup in the meal pattern. The SFA must offer at least 1/2 cup legumes to students each week.	1). The SFA will provide the SA with a month of menus showing that they contain at least 1/2 cup legumes each week. 2) The SFA will state who will be responsible for approving all menus provided by the FSMC each month.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	137 Did the SFA accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document?	Issues were detected in Power School that made it difficult to get an accurate meal count for F/R/P students. Oct. meal counts were checked for accuracy after errors were fixed and the issues seem to be fixed, but the staff will need to watch this closely to ensure continued accurate meal counts. The September claim was adjusted with an accurate meal count.
200 - Verification	209 Based on the review of verified applications:	Tax forms should only be accepted as verification of income if the

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		household member is self-employed. The school should ask for pay stubs so that current pay can be verified. Also, if 3 income sources are listed on the application, the household should submit proof of all 3 incomes.
700 - Resource Management		<p>1). The district recently revised the dollar amount for noncompetitive purchases on the board's purchasing -bidding policy. The previous dollar amount was \$10,000. The revised amount is \$7,500. Please update the local district and school food service purchase threshold for micro-purchase on School Food Authority (SFA) written procurement plan for SY 2019-2020.</p> <p>2). Suggested using the micro-purchase log on IowaCNP Download Forms to track purchases and ensure they are equitably distributed among qualified vendors.</p> <p>3). FSMC invoices for three months were reviewed. Expenses were validated. The meal equivalent conversion factor for breakfast was applied to the charge per meal and not the total breakfast counts for the month. Although this did not change the total amount charged to the SFA, the conversion factor should be applied to total breakfast count.</p> <p>4). When documenting the advisory committee meeting minutes include all discussion related to menu planning. For example, when student surveys are conducted tally the responses to show what data was collected, the results, and how that information was used to improve school food service.</p> <p>5). Review vendor invoices carefully before payment is sent. One small ware vendor charged sales tax to the SFA. The SFA paid the vendor including sales tax.</p> <p>6). The SY 2019-2020 written procurement plan includes the purchase of a tilt kettle for estimated cost of \$14,000. Technical assistance was provided that state agency approval is required prior to conducting a solicitation and purchase for any equipment with an estimated cost per unit over \$5,000 unless the equipment is listed on the state agency pre-approved equipment list. The list was sent to the SFA, but is currently being revised. Contact your consultant or Patti Harding with any questions on equipment purchases.</p> <p>7). Maintain all records to document that procurement was conducted competitively. When price quotes are obtained from vendors via email, the emails must be saved to a folder to document that price quotes were obtained from adequate (two or more) vendors, a description of the product(s) for which price quotes were solicited, the responses received from each vendor. The folder should be accessible to current school employees responsible for procurement. It is recommended to use the small purchase (3 Bids and a Buy) template available in IowaCNP download forms.</p>
800 - Civil Rights	810 Review program materials.	The non-discrimination statement on the menu needs to be the same size font as the other print on the page and no less than font 9. Recommend limiting the non-discrimination statement to the shortened statement, "This Institution is an Equal Opportunity Provider" to allow more space on the menu.
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 and approved every 3 years. The current policy is due to be reviewed in December, 2019. The final rule requires a wellness committee to give input into the policy and

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		goals assessment. Currently the advisory committee meets, but based on meeting minutes wellness discussion is minimal. Discussed the role of the wellness committee, including setting and then evaluating wellness goals for the district annually. The Policy goals need to be assessed at minimum every 3 years and made public. Reviewed with the SFA staff how they could improve their current goals assessment and make it public. Best practice is to complete 1 assessment at each building in the district. Encouraged the SFA staff to consider posting all their wellness information on its own wellness tab on their website.
1200 - Professional Standards	1214 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.	Most of the training the SFA FSD has taken this year was through the CACFP program and does not count towards NSLP. The SFA FSD will still need to obtain a total of 12 hours of NSLP Professional Standards training prior to June 30, 2019. A resource was e-mailed to her telling her how she could obtain this training. The SFA should keep a copy of the FSD Civil Rights training on file if she does it off-site.
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?	The SFA needs to have a Buy American Exception log on-site at each school. The log should list all foods the SFA accepts throughout the year that are non-domestic. Discussed with the FSD where to find a template for this.
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 SFA currently provides summer meal and breakfast information through links on their website to the Department of Education Monthly Nutrition Newsletters. This information is difficult to find and generic. Suggested the SFA staff use a flier from IowaCNP Download Forms to promote summer each spring and putting a blurb on their menu or website about promoting breakfast at least twice annually. Both summer and breakfast promotion needs to be sent to households. Breakfast promotion should include the menu, times breakfast is available at each school, cost and why breakfast is important.
RMCR - Nonprofit School Food Srvc Acct	13 Did all recorded expenses represent an activity or function recognized as reasonable, necessary, allocable and otherwise compliant with the provisions of 2 CFR 200 Subpart E?	The microwave purchased and paid for in December 2018 is an unallowable expense from the Nutrition Fund. It is used for students who bring their lunch from home to heat up their food. Nutrition staff will not be using it for purposes of preparing or serving meals through the NSLP. The SFA needs to reimburse the nutrition fund for this expense with their auditors assistance since it occurred during the last fiscal year.
RMCR - Revenue From Nonprogram Foods	2 For each of the categories selected, what process(es) did the SFA use to ensure that all funds received from the sale of nonprogram foods were deposited into the SFA's nonprofit school food service account?	After a conversation with Keerti Patel regarding the FSMC contract and preschool meals, the SFA needs to set a price they will charge the preschool for lunch meals. The CACFP reimbursement should not be factored into this charge, but should instead go to the pre-school to offset their meal costs. The SFA needs to set a price that will cover their cost for producing each meal, i.e. including food, labor, supplies.
RMCR - Revenue From Nonprogram Foods	9 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	When calculating non-program food revenue, the SFA needs to include breakfast food costs into their calculations. Similar to lunch, calculate the average cost of breakfast and multiply that times the number of reimbursable breakfasts served over the course of the year. Add that total to the lunch cost calculation. Subtract that total from total food costs to determine reimbursable food costs.

Site - Level Technical Assistance Hinton Elementary School (0409)

Area	Question	Comments
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400 - Meal Components and Quantities - Breakfast	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	The kitchen manager at the Elementary is allowing students to take 2 cartons of milk at breakfast as part of their reimbursable breakfast. While this is a local decision, allowing extra milk adds extra calories to the meal pattern which puts the SFA at risk for exceeding the dietary specifications. Recommend allowing only 1 milk with the reimbursable meal and having students pay for a second milk.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	At least 1/2 cup legumes must be offered to all students weekly per meal pattern requirements. Recommend the SFA FSD check the FSMCs monthly menu to ensure all components and subgroups are included.
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 on-site lunch monitoring form needs to be completed at both sites annually. It still needs to be completed at the Elementary before Feb. 1, 2020. Fifty percent of the sites need to have breakfast monitoring completed annually.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	The SFA is required to have 2 health inspections annually. Since the Health Department has not yet come this year, the SFA is encouraged to e-mail them asking for their first inspection. Keep the e-mail on file for your records.
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	Discussed high freezer temperatures noted at the elementary school with the FSD and kitchen manager. Temperatures recorded over 10 F need to have a corrective action plan. It was discovered that the temperature was increasing due to a recent defrost cycle and the thermometer being too close to the door. Once the thermometer was moved closer to the back of the freezer, the temperature went down into a more appropriate range.

Org - Level Commendations

Description
Annual civil rights training was provided to all applicable staff and documented. Ethnic/racial information is collected and the summary form is completed. No discrimination was observed. SFA on-site monitoring has been started to help ensure that both sites are meeting program requirements. The SFA uses the SA template for their household notification letters which contain the proper non-discrimination statements.
Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are transferred manually in a timely manner to the POS system, and denied applications were correctly determined. 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.
PROCUREMENT: The SFA business manager and FSD attended state agency regional procurement training held at Hinton CSD. The procurement plans for SY 2018- 2019 and SY 2019 -2020 were completed. The local small-purchase threshold was correctly identified. For SY 2019 - 2020, all anticipated procurement events were completed including the procurement method and contract award type. The code of conduct identified the district policies relating to disciplinary action. This is the School Food Authority's (SFA) first renewal year with a Food Service Management Company (FSMC). 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. The SFA authorized representative completed two monitoring reviews of the FSMC in the last School Year (SY). The advisory group consisting of parent, students, and teachers met twice last SY to discuss menu planning. The meeting minutes are documented for both meetings along with a sign-in sheet that identifies the name, title, email, and phone number of the meeting attendee. The usage of USDA Foods is tracked by the SFA. At the end of the School Year (SY), the business manager will make sure the SFA is credited with all USDA Foods received. The SFA procures capital equipment and small wares for school food service. Per USDA requirement and criteria, vendors were selected to review procurement practices. To review compliance with micro-purchase, three vendors were selected. Each transaction with the vendor was below the local threshold for micro-purchase (\$10,000 in SY 2018-2019), prices were reasonable, and an attempt was made to equitably distribute purchases among qualified vendors. Two vendors were selected to review compliance with small purchase. The procurement with each vendor was in compliance with the small purchase method. The superintendent (retired) obtained price quotes via email for equipment costing \$1000 or more. Two vendors were contacted to provide price quotation. The SFA participated in the USDA Foods Direct Distribution and DoD Fresh programs. The SFA did an excellent job maximizing utilization of their allocated Planned Assistance Level (PAL). In SY 2018 - 2019, 98.37 percent of PAL was utilized. All equipment maintenance and repair costs charged to nutrition funds in SY 2018-2019 were reimbursed. Auditors assisted business manager in calculating and applying an indirect costs to nutrition fund.

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Professional Standards: Documentation is available showing that the FSD for both the FSMC and the SFA are adequately qualified for their positions. The FSD and all staff for the FSMC have either met or are close to meeting their professional standards training hours for this year. The SFA FSD has taken 4 hours Professional Standards training so far this year and the SFA non-nutrition staff have met their required training hours.

The correct number of applications were verified in SY18-19 and were correctly selected from error prone applications. The verification process was completed prior to the Nov. 15 deadline. The application selected for verification was confirmed prior to verification. The SFA had at least one person attend verification training.

The district has a current wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The latest assessment of the policy was available.

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 at the Elementary School. Temperature logs are maintained for coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean.

Site - Level Commendations Hinton Elementary School (0409)

Description

All meal components were available at the beginning of meal service on the days of observation and throughout meal service at both breakfast and lunch. Food Production Records for both the hot meal and the salad bar, CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. Standardized recipes are used for food production. Water was available as required. Students seemed to have sufficient time to eat after receiving meals. Signage was posted at both meals explaining what constitutes a reimbursable meal. A monthly menu is also posted on-line that lists calories, etc. The elementary cafeterias were well supervised, and staff interacted well with the students. The cashier was new to her position, but watched to ensure students had a reimbursable meal. She sent students back who did not have adequate food on their tray. Offer vs Serve is done correctly. Students can give a thumbs up or thumbs down if they do not want a component.

Students at the elementary buildings may purchase milk a la carte or a second entree. These foods either meet or are exempt from Smart Snacks regulations. The students who want seconds must check with the POS prior to getting one to make sure they are able to have one which helps keep negative balances in check.