

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Panorama Comm School District (51210000)**  
**SNP - Review ID: 5816**

**Program Year:** 2020  
**Month of Review:** October  
**Lead Reviewer:** Brenda Windmuller  
**Org Representative(s):**

**Site - Level Findings: Panorama Elementary (0424)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Students consuming a second entrée as part of their reimbursable meal are exceeding the maximum allotted calorie and sodium levels allowed by the NSLP. Second entrees are allowed if the student is paying for the item as an a la care item.	The SFA will describe their policy change to charge students at the elementary school for second entrees and the price that they will charge.	
400 - Meal Components and Quantities - Lunch	V-0400	Students receiving milk substitutions based on diet modification forms must be provided with an alternate product with nutritional value equal to that of cow's milk.	The FSD will submit invoice showing the purchase of a compliant product.	
400 - Meal Components and Quantities - Lunch	V-0400	Production records evaluated from the review period do not indicate that portion sizes offered met the minimum meal pattern requirements for the age/grade group(s) being served specifically pertaining to vegetable sub-group bean/legume. Only 1/4 cup serving was recorded for the week, 1/2 cup serving over the course of the week is required.	The SFA will submit production records for lunch service at the elementary for November 25-December 20th documenting planned servings and serving sizes provided to students.	

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
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700 - Resource Management	V-0700	<p>The SFA is required to include terms and conditions in all small and formal purchase solicitations based on contract value. These terms and conditions include but are not limited to: Buy American, Termination for Cause, Termination for Convince, Equal Employment, Targeted Small Business, and Suspension and Debarment Certification.</p> <p>The required terms and conditions were not included in the solicitations reviewed.</p>	The SFA will submit a draft of the milk solicitation to be sent out for the 2020/2021 school year.	
1000 - Local School Wellness Policy	V-1000	The Wellness Policy must be reviewed once every three years.	The SFA will submit the agenda for the December 2019 school board meeting showing that the review of the Panorama Community School District Wellness Policy #507.9 will be completed.	

**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Agreements valued at \$10,000 or more should have a termination for cause clause.</p> <p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p>

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		<p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none"><li>• All price adjustments throughout the year</li><li>• All invoices</li><li>• All contracts and agreements</li><li>• All bids solicited</li><li>• Documentation that a vendor did not reply to bid (if applicable)</li><li>• Documentation of why you selected a specific vendor (Selection Rubrics)</li><li>• Copies of bid solicitation</li><li>• Debarment statements</li><li>• CD provided by the AEA (if applicable)</li></ul> <p>Three types of purchases, (Federal Thresholds):</p> <p><b>Micro-purchase-</b> under or equal to <b>\$10,000</b>(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><li>• Track micro purchases, what purchased when and dollar amount.</li><li>• Purchases should be distributed around community, not just one store.</li></ul> <p><b>Small Purchases-</b> Purchases that are <b>under \$250,000</b> (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none"><li>• Include all terms and conditions</li><li>• Include terms: Buy American and Equal Opportunity</li></ul>
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		<ul style="list-style-type: none"> <li>• Include Termination for Cause and Convenience if \$10,000 or more</li> <li>• Attain Signed Debarment Statements</li> <li>• Awarded on lowest price (unless written documentation to justify)</li> <li>• Maintain documentation</li> </ul> <p><b>Formal Purchase-</b> Purchases equal to and <b>exceeding \$250,000</b> (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <ul style="list-style-type: none"> <li>• Notice of accepting all types of formal purchase must be advertised.</li> <li>• Include all requirements of a small purchase</li> <li>• If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</li> <li>• Everything must be in writing.</li> </ul>
800 - Civil Rights	810 Review program materials.	The October printed menu does not have the non-discrimination statement on it. The entire statement or the abbreviated version must be on all program material. The abbreviated statement: "This institution is an equal opportunity provider." The FSD had already caught this error and corrected it on the November menu by the time of the on-site visit.
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 Wellness Policy must be reviewed every three years. The policy was last reviewed on November 14, 2016. (Administrative Review date: November 19-21, 2019.) Wellness Policy standards were sent to the SFA.
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?	Professional Development tracking from 2018-2019 does not support the completion of required Professional Development hours for all employees. Annually, all staff should complete Civil Rights training. All other training should be in areas relevant to their job. Staff should complete Professional Development on the following guidelines: Food Service Director- 12 hours Managers- 10 hours Full Time employees (20 or more hours/week)- 6 hours

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		Part Time employees (under 20 hours/week)- 4 hours  The USDA Professional Standards guidelines were provided to the FSD.
RMCR - Revenue From Nonprogram Foods	7 If Yes, what process did the SFA use to calculate its compliance with the revenue from nonprogram food requirements in 7 CFR 210.14(f)?	Catering items shall be charged at a rate that covers all expenses associated with the service to include food, labor, paper supplies, and delivery if applicable. All foods sold outside of a reimbursable meal is defined as Nonprogram Foods and the SFA should be able to provide documentation on formulas establishing compliant pricing.

**Site - Level Technical Assistance Panorama Elementary (0424)**

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Several students were observed going back for ranch dressing. This makes regulating the serving size difficult. Because condiments such as ranch dressing could cause students to go over on daily calorie and sodium allowances, it is recommended that students take the dressing the first time through the line and not be allowed to go back for more.
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 SFA was using almond milk as a milk substitute for a student who cannot have cow's milk. This product is not compliant for the milk component. TA was given: all milk substitutions must have the same nutrient content as cow's milk. The list of pre-approved products and nutrition guidelines was provided to the FSD.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	The week of the menu assessment was October 7- October 11. Vegetable sub-group beans/legumes was served only one time during this week, Thursday October 10th. On this day 1/4 cup of baked beans was served as documented on the production records. The SFA is required to offer 1/2 cup bean/legumes each week. This denotes a deficiency in the meal pattern and must be corrected. The site manager is encouraged to communicate with the FSD if errors are found so that they may be corrected before service.

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		In reviewing the monthly menus and production records, this appears to be an isolated error and not a systemic issue.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	<p>Initial review of October menus indicated a shortage of the dark green vegetable sub-group. Through observation and discussion, it was made clear that the actual serving size of lettuce salad is 1/2 cup, not the 1/4 cup recorded on the production records. The "serving size" column on the production records should indicate the actual size portion given to students, not how it credits. (Lettuce credits half the amount served.)</p> <p>When recording data on daily production records, the "planned servings" column should represent the number of students that you plan to eat that specific item on that day. The planned serving times the serving size for all age groups combined should equal the quantity of product prepared.</p> <p>There should be a column on the production records for each age group defined by the USDA meal pattern requirements, ie: K-5, 6-8, and 9-12.  Adults may be served a 9-12 grade size portion regardless of the building they are in.</p>
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	<p>The POS operator needed a little coaching during lunch service. Students are not required to select milk, and students are not required to select meat/meat alternate under OvS.</p> <p>During the on-site review, two students initially slipped by without taking 1/2 cup fruits or vegetables. Upon the SA pointing it out, the POS operator corrected the issue and both students went back to get the required component.</p> <p>The SA reviewed the requirements with the POS operator. Additional information on Offer vs Serve was shared with the FSD.</p>
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	<p>Food items such as dinner rolls were found in the freezer without labels and dates.</p> <p>Students coming back for seconds brought dirty trays back to the</p>

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		<p>serving line. Students were allowed to serve themselves side dishes. Contact between the serving utensils to the tray (previously eaten from) creates a cross-contact situation contaminating all food in the service container once the serving utensil is returned to the container. Clean trays or alternate serving containers should be used for serving seconds.</p>
<p>Dietary Specifications Assessment Tool - Lunch</p>	<p>25 Larger portions and/or bonus items and/or seconds are offered (offering portion sizes that are inconsistent with the planned menu). Entrées sold a la carte are exempt.</p>	<p>Students at the elementary school are allowed to have extra servings of entrees at no charge. When the SFA provides this as an extra, it must be included in the daily calorie, sodium, and fat calculations. Extra servings of fruits and vegetables are generally not a concern, however second entrees can easily stretch the calories and sodium beyond the daily allowances.</p> <p>One serving of the pizza served during the on-site visit contained 310 calories, 480 mg sodium and 4 g fat, doubling this serving size provided 620 calories (650 allowed), 960 mg of sodium (640 allowed), and 8 grams of fat (10 allowed). This calculation is for the hot entrée alone and does not take into account all of the additional food served on the day of review.</p> <p>Students should pay for second entrees.</p>

**Org - Level Commendations**

<b>Description</b>
<p>APPLICATIONS/BENEFIT ISSUANCE (100): 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 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 case numbers, and all applications were determined within ten days. Access to benefit information is correctly limited. Free meals are extended to all members in the household.</p>
<p>BREAKFAST &amp; SUMMER PROMOTION (1600): The SFA does an excellent job of promoting Summer Food Service Program (SFSP). The SFA served 3000 meals in its first year on the program and has secured outside funding to be able to serve meals in areas within the district which do not qualify for the SFSP. Promotion is done for the SFSP and Breakfast through their website and flyers.</p>
<p>CIVIL RIGHTS (800): The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided to all food service staff and documented. The district has proper documentation is on file for diet modifications. Ethnic/racial information is collected and the form is completed. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements.</p>

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<p>LOCAL SCHOOL WELLNESS POLICY (1000): The Wellness Policy has nutrition education, physical activity and other wellness goals included. An assessment has been completed and is posted on the school’s website. A wellness committee is in place to set goals and help assess the completion of the goals. The committee is made up of students, faculty, staff, and community members. The committee meets annually and minutes are kept.</p>
<p>MEAL COUNTING &amp; CLAIMING: 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 point where meals are served for all students observed at lunch. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.</p>
<p>PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events, and specifications were well-written. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances.</p>
<p>PROFESSIONAL STANDARDS (1200): There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented. Certificates and sign in sheets for training are kept on file. The FSD completed nearly 100 hours of Professional Development hours in 2018.</p>
<p>RESOURCE MANAGEMENT &amp; RECORD KEEPING (700): The Resource Management section of the Off-Site Assessment tool was completed on time. October receipts that were reviewed, indicated appropriate and allowable expenditures. Reports are filed on time, and all records are maintained for at least three years plus the current year.</p>
<p>The Food Service Department has a good working relationship with other departments within the school, partnering with the FFA sponsor to provide scraps for composting, in turn, utilizing fresh produce from their garden. This is a valuable education for the students to see the food go full circle.</p>
<p>The FSD spent 125.2% of the USDA Foods (commodities) money allocated to the SFA in 2018-2019. This shows a good use of the resources provided to them to aid in financial success of the program.</p>
<p>VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. The verification process was completed on time and properly documented.</p>

**Site - Level Commendations Panorama Elementary (0424)**

Description
<p>HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for 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. The Site Supervisor at the elementary and two individuals at the high school are ServSafe certified.</p>
<p>OFFER VS SERVE: The Site Supervisor at the elementary has a good working knowledge of Offer vs Serve and provides several options for students daily at both breakfast and lunch. Menus are posted by the door to the serving line to inform students about the daily menu.</p>
<p>Staff at the elementary school do a good job of monitoring portion sizes of meat, cheese, fruit, and condiments by pre-portioning them into portion cups.</p>
<p>The SFA has a water fountain available at meals, they also provided bottled water to all students. Several students were observed taking the bottled water at lunch.</p>
<p>The SFA recently received a waiver from the local Health Department to implement a share table for milk, string cheese, fruit juice and other perishable items. The chilled bin was nearly filled after breakfast service on the day of review. These items were brought back out at lunch time and every item in the bin was consumed by a student at lunch. This is a good example of how the share table should work and is feeding students who want the extra food.</p>