

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Ogden Comm School District (48780000)
Dates of Review: February 18 – 21, 2020

Program Year: 2020
Month of Review: January
Lead Reviewer: Deb Linderblood
Org Representative(s): Dr. Pam Dodge

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	On one free and reduced price application, the SFA approved the application on 1/9/20 but reduced price benefits were started on 1/6/20 in their point of sale system.	SFA changed the status in Infinite Campus to reflect a benefit start date of 1/9/20 while the State Agency was on-site. No further action is needed.	
1000 - Local School Wellness Policy	V-1000	The SFA does not have an active Wellness Committee that reviews policy goals and conducts the building assessments and triennial report. This is a repeat finding. Currently the Wellness policy is reviewed every 3 years by the Superintendent and the school board. All stakeholders of the wellness committee need to be able to have input into the school's wellness plan. Those stakeholders should include representatives from the school board, administration, food service, PE teacher, RN if applicable, student, parent and community member. The SFA also has not made their Building Assessment's available to the public and has not completed the triennial report. TA provided that the Building Assessments need to be completed annually and then every three years a Triennial Assessment is to be completed. The triennial assessment is due June 30, 2020.	The SFA will: 1.) attach an invitation to the members of the Wellness Committee for the next meeting which will be held during school year 2019-2020. The invitation needs to include all stakeholders listed in the finding, the date and time of the next meeting, and the agenda that will be discussed. 2.) state the month in school year 2019-2020 that you expect to complete the triennial assessment. 3.) state how you will communicate the building progress reports and triennial assessment to the public.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA's nonprogram revenue tool indicates that they need to bring in additional non-program revenue. Showed the Food Service Director the State Agency's newly developed food cost calculator which can be helpful when determining non-program food cost.	Indicate below the steps you will take to bring in additional non-program revenue and/or how you will decrease nonprogram food expenses.	

Site - Level Findings: Howe Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
------	-------------	---------------------	----------------------------	----------------------------

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Ogden Comm School District (48780000)
Dates of Review: February 18 – 21, 2020

400 - Meal Components and Quantities - Breakfast	V-0400	The SFA does not have breakfast signage explaining what constitutes a reimbursable breakfast. TA provided on where to find the State Agency's breakfast signage template. Discussed with the Food Service Director that as the menu planner, she needs to determine the number of items each food on the menu contributes. For instance, a breakfast sandwich could be 1 item or 2 items.	Develop and attach one weeks' worth of breakfast signage for the Elementary School.	
--	--------	---	---	--

Org - Level Technical Assistance

Area	Question	Comments
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Provided the Food Service Director with a sample Standard Operating Procedure and Food Production Record for days when sack lunches are provided to students.
700 - Resource Management		<p>Procurement:</p> <ul style="list-style-type: none"> • The written procurement plan should be completed yearly (around February-March) to reflect the upcoming school year's procurement events, correct procurement methods and contract award type. It is best practice to keep a separate procurement event page for each school year. This practice will help ensure that the correct procurement method is identified based on the estimated value of a particular purchase. TA provided that there is a revised Procurement Plan template on IowaCNP under download forms that the SFA should use for next school year. • TA provided that for equipment repair and preventive maintenance the SFA may use an unrestricted indirect cost rate to charge the nutrition account for these services. Explained to the SFA where to locate their indirect cost rate on the Department of Education webpage. • When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." Referred the SFA to the Micro-purchase log and reviewed how to use the log. • Prices on the invoice should match bid pricing or be lower unless SFA was given advance written notification per solicitation of any price increase. Food items procured by the SFA not on the GPO solicitation must be procured using appropriate procurement methods.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Ogden Comm School District (48780000)
Dates of Review: February 18 – 21, 2020

		<ul style="list-style-type: none"> • The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification and be at equal or lesser price. * Provided the FSD with the State Agency credit and rebate templates and explained the use of these. Also provided the Buy American exception log. Pineapple, mandarin oranges and bananas which are not produced in sufficient quantities in the US only have to be put on the log one time per year. * Provided the Food Service Director with the State Agency's pre-approved equipment list.
700 - Resource Management	701 At the end of the SFA's RM review period, did the food service have net cash resources that exceeded three months' average expenditures?	TA provided that on IowaCNP under Applications there is a Financial Report. For public schools this report is populated from the Certified Annual Report (CAR). Explained that the report does the SFA's nonprogram revenue tool and also shows their three month operating balance. The nutrition account as of when the CAR was completed had 2.47 months account balance. TA provided that they will want to monitor funds and begin to spend down some of the money in the account to keep it at or below 3 months account balance. If the account exceeds 3 months operating costs the State Agency will require that a spend down plan be submitted.

Site - Level Technical Assistance Howe Elementary School (0409)

Area	Question	Comments
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	The SFA has food in the store room that in only about 2 inches off of the floor. TA provided that all food needs to be stored at a minimum 6 inches off of the floor.

Org - Level Commendations

Description
<p>Certification and Benefit Issuance: The Determining Official participated in the Application Approval and Direct Certification webinar in July 2019. Benefit documents were very well organized. The current application for free and reduced price meals/milk and income guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the Point Of Service (POS) system, and denied applications were correctly determined. All applications were correctly determined, signed and dated by the household member and the SFA, were complete with Social Security Numbers and case numbers, and all applications were determined within ten days. The Determining Official re-checks each application a second time to be sure the initial determination was correct. Income was only converted to annual when there was more than one frequency of income. Rollover applications were removed if the household did not apply within thirty days of the school year. The notification letters which are generated from Infinite Campus were approved by the State Agency in the summer of 2019 for use in school year 2019-2020. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Waivers are provided to applicants. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.</p>

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Ogden Comm School District (48780000)
Dates of Review: February 18 – 21, 2020

Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria at the site reviewed, annual civil rights training was provided for full time food service staff and is planned for part time staff and a new hire. Training is documented. The SFA submitted the annual Public Release to the local media (Ogden Reporter). Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The correct state and federal non-discrimination statements are provided on all material describing the program including letters and the school's website.
Fiscal Action: Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for January seem to be needed.
Local Meal Charge Policy: The SFA developed and approved a meal charge policy on June 12, 2017. At the beginning of the school year, the policy was e-mailed to all households and staff. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.
On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and at least 50% were completed for breakfast prior to February 1st.
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. As of school year 2019-2020 the SFA began to use the State Agency small purchase template for soliciting bids from vendors. 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. All bids include a Buy American Provision. The SFA ensures that no vendors have been debarred or suspended by USDA. The SFA is a part of the AEA purchasing group and has a signed agreement for food, smallwares and chemicals. A review of the prices the SFA was charged from Martin Brothers for a sample of products showed that the SFA was charged the correct prices.
Professional Standards: The Food Service Director has completed 13.75 of the required 12 hours of training. All nutrition staff have started to obtain their required training for Professional Standards in school year 2019-2020 and additional training is planned. An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours.
Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.
Resource Management: All expenditures that were reviewed appeared allowable. There were no unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate financial account for the nonprofit school food service and net cash resources do not exceed three operating months. The Paid Lunch Equity (PLE) tool was completed and prices were increased as required. The Non-Program Revenue (NPR) tool was completed. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for USDA Foods. In school year 2018-2019 the SFA utilized 167.41% of their allotted PAL dollars through utilizing the DoD, Diverted Foods and Direct Distribution programs. To date in school year 2019-2020, the SFA has used over 100% of their allotted PAL dollars.
School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach is conducted by placing the breakfast menu on the district's web site and sending the menu home with students. The breakfast times are also posted in the school newsletter. Summer Food Service Program (SFSP) outreach was through the website, sending information home with students and through information in the monthly newsletter.
Smart Snacks: Students are able to purchase second milks and second entrees via a la carte sales. These foods meet the Smart Snack standards. Exempt leftover National School Lunch Program entrees are only sold the same day.
Verification: The correct number of applications were verified. The process was completed on time. The application selected for verification was confirmed prior to verification. The Verifying Official listened to the Verification and the Verification Reporting webinar in the fall of 2019. The verification report was completed accurately and on time.
Wellness Policy: The SFA's wellness policy was reviewed and revised on May 13, 2019. The public is made aware of the SFA's wellness policy via the district's website. The SFA completed an assessment of their wellness policy. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.

Site - Level Commendations Howe Elementary School (0409)

Description
Food Safety: The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site reviewed. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Food temperatures are documented on the Food Production Records. Dishwasher temperatures are taken and documented and thermometers are calibrated. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Food Service workers practiced good gloving procedures. Molly Nicholson at the site reviewed is ServeSafe Certified, as well as the Food Service Director.
Meal Components and Quantities: The Food Service Director does a god job of menu planning and has developed a cycle menu for breakfast and lunch. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. All meals observed met at least the minimum daily requirements. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch—including many fresh fruits and vegetables. Standardized recipes are used for food production. At least two types of milk are offered. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of January were accurate and complete. Point of Service (POS), counts and filed claims appear accurate. Infinite Campus is used as the school's POS system. Students are not overtly identified as free, reduced, or paid during the meal claiming process or

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Ogden Comm School District (48780000)
Dates of Review: February 18 – 21, 2020

during meal observation. Food Production Records (FPRs) were on file for all meals claimed for reimbursement for the review period. The cashier appeared aware of what constitutes a reimbursable meal. Daily edit checks are performed.

Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of January 6 - 10, 2020 for breakfast and lunch at the Elementary School. The worksheets showed that all meal components were offered and in the correct quantities at breakfast and at lunch. All vegetable sub-groups were offered in the correct quantities at lunch. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Elementary school is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen vegetables in place of canned or using low sodium canned vegetables, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats. A nutrient analysis was not required.

Offer vs. Serve: Offer vs. Serve is being implemented properly. All students observed selected 1/2 cup of fruit and/or vegetable or if they did not they were charged a la carte prices. Cafeteria staff have been trained on offer vs. serve. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at lunch.

Water: Free potable water is available to all students for lunch and for breakfast via a water fountain that is just outside of the cafeteria.