

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Webster City Comm School District (68670000)
Dates of Review: March 9 – 12, 2020

Program Year: 2020
Month of Review: January
Lead Reviewer: Deb Linderblood
Org Representative(s): Todd and Lori Hartnett

Org - Level Findings

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|--------------------|---|--|-----------------------------------|
| 100 - Certification and Benefit Issuance | V-0100 | Two free and reduced price applications were missing an adult signature and one was missing the social security number. One student was listed on the Benefit Issuance list as Free via SNAP (food assistance) as of 1/30/20. The SFA was unable to locate documentation to support this eligibility status. On 2/19/20 the Nutrition Department received a letter from the homeless liaison stating that this student should receive free meal benefits due to being homeless. Thus the SFA claimed free meals eaten by this student from 1/30/20 until 2/18/20 that should have been paid status. The error was recorded on the SFA1 and thus will be included when calculating if any fiscal action will be assessed to this review. | Show the State Agency that you have obtained the adult signatures and social security number. This was corrected on-site. No further action is required. | |
| 700 - Resource Management | V-0700 | 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. | | |
| 700 - Resource Management | V-0700 | In school year 2018-2019 the SFA only utilized 59.99% of their allotted PAL dollars. In school year 2018-2019 they participated in the DoD, Diverted Foods and Direct Distribution programs. In school year 2019-2020 they continue to participate in all three programs. TA provided that they may want to increase the PAL dollars that are allotted to DOD and adjust their diverted foods PAL dollars so that they go to food items they know they can use. | State your plan for how you will spend 95% or greater of your allotted PAL dollars each school year. The plan can include steps you have already taken. | |
| 700 - Resource Management | V-0700 | The nutrition account is currently running a negative balance. Per the IowaCNP Financial Report, the account balance as of June 30, 2019 was a negative of \$116,772.45. | List steps you have already taken and additional steps you will take to bring the nutrition account to a positive balance. | |
| 800 - Civil Rights | V-0800 | For the USDA short nondiscrimination statement | Attach the monthly menu for April showing that the | |

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| | | on their menus the SFA is currently using "This is an equal opportunity program." TA provided that the correct USDA short nondiscrimination statement should be "This institution is an equal opportunity provider." | correct USDA nondiscrimination statement is now on the menus. | |
| 900 - SFA On Site Monitoring | V-0900 | The on-site monitoring of lunch was only completed in 3 of the 5 schools. Monitoring was not completed at the Middle School and Sunset Heights Elementary. TA provided that each school year 100% of the schools must be monitored at lunch and 50% at breakfast. | Complete and attach the on-site monitoring form for the Middle School and for Sunset Heights Elementary. | |
| 1000 - Local School Wellness Policy | V-1000 | The Wellness Committee is currently comprised of the Food Service Directors, School Nurse, Principal and the Superintendent. The SFA does not have an active wellness committee made up of a variety of stakeholders, i.e. parents, students, PE teacher and the school board. The Wellness policy was last revised in April of 2017. Wellness policies need to be reviewed every 3 years. The policy currently does not include information regarding food and beverage marketing. Provided the Food Service Directors with a sample Wellness policy. Also, the current building assessments goals do not match the goals in the Wellness Policy. Lastly, the SFA has not yet completed a triennial assessment, which must be completed by June 30, 2020. | The SFA will describe their plan for: 1.) How they will include a variety of stakeholders on their Wellness Committee (parents, students, PE teacher and school board). 2.) When the Wellness Policy will be reviewed and revised 3.) Including language in their Wellness Policy regarding marketing of food and beverages. 4.) Assessing their progress on meeting the goals of the Wellness Policy so that the assessed goals match the goals in the policy. | |
| 1200 - Professional Standards | V-1200 | The cashiers at the SFA have only received 1 hour of professional training of their required 4 hours of professional standards training. TA provided that these individuals should have training on Offer vs. Serve, Food Safety, Reimbursable Meals, Civil Rights and POS operation. This is a repeat finding. | The SFA will provide a plan as to how the cashiers will obtain the 4 hours of required training on topics relevant to their job responsibilities. | |

Site - Level Findings: Webster City High School (0109)

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|--|--|----------------------------|
| 400 - Meal Components and Quantities - Breakfast | V-0400 | The SFA had breakfast signage but it does not explain what constitutes a reimbursable breakfast as it does not specify the number of items each breakfast food item counts as. | Complete and attach one weeks' worth of breakfast signage showing the number of items the menu planner wants each breakfast food item to count as. | |
| 400 - Meal Components and | V-0400 | For the 9-12th graders the SFA was serving a Jamwich which credits as 1 meat and 1 grain | State your plan for how you will assure that the 9-12th graders are always served 2 ounce equivalent of | |

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| Quantities - Lunch | | along with a 1 oz. bag of Doritos. A 1 oz. cheese stick was also made available but students were not required to take this. Ten students did not select the cheese stick. TA provided that students in all grades must be offered at least the daily minimum ounce equivalent of meat/meat alternate required in the meal pattern. The meat/meat alternate component may be offered in a main dish or in a meal dish and one other item. If the meat/meat alternate component is offered in two food items, the meat/meat alternate is credited if the student selects the required daily minimum for his/her grade group. Provided the Food Service Director and Assistant Food Service Director with the Offer vs. Serve Manual and referred them to page 12. | meat/meat alternate at lunch. | |
| 400 - Meal Components and Quantities - Lunch | V-0400 | The SFA was giving students who cannot drink cow's milk juice and water as a substitute. TA provided that the SFA must offer these students a milk substitute that is nutritionally equivalent to cow's milk. The SFA had the State Agency spreadsheet showing some products that are nutritionally equivalent to cow's milk. | State below the milk substitute that you will begin to use for students who cannot drink cow's milk. List the serving size and the amount of calcium, protein, Vitamin A, Vitamin D, Magnesium, Phosphorus, Potassium, Riboflavin and Vitamin B-12 that is in a serving. | |
| 1100 - Smart Snacks in School | V-1100 | Beverage a la carte items included Berry and Glacier Freeze Gatorade Thirst Quencher which has 80 calories in a 12 ounce container. TA provided that at the High School beverages can only have less than or equal to 60 calories in 12 ounces. Also, the SFA is selling Scoop chips with cheese sauce, Pretzel with Cheese Sauce and a Quaker Granola Chew Chocolate Chip bar which are not Smart Snack compliant. | State the product you will replace the Berry and Glacier Freeze Gatorade Thirst Quencher with that meets the Smart Snack Standards or state that you will discontinue selling this product and not replace it with another product. If you replace the product, state the name of the product(s), size of the container and the number of calories. Also, state the products you will use to replace the Scoop chips with Cheese Sauce, Pretzel with Cheese Sauce and the Quaker Chewy Granola Bar or state that you will discontinue selling these products and not replace them with another product. If you replace the product(s) attach the product's nutrition fact label and the Smart Snack's calculator page showing that they are compliant. | |

Org - Level Technical Assistance

| Area | Question | Comments |
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| 100 - Certification and Benefit Issuance | 133 Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified? | The homeless liaison is providing the Nutrition Department with a letter when she determines a student to be homeless, but the letter is not signed. TA provided that the homeless liaison needs to sign the letter prior to providing it to the Nutrition Department. TA also provided that when a student's eligibility category changes (i.e. was free by Medicaid and then becomes free by SNAP) the SFA needs to change the eligibility category in their POS system. This is important in order to get accurate numbers for the Verification Report. |

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| | | Some of the free and reduced price applications had the SFA's waiver statement but some did not. TA provided that if the SFA is using free and reduced price eligibility status to determine the households that get fees waived then prior to releasing this information they must have a signed waiver statement from the household. |
| 200 - Verification | 214 If a student's eligibility changed due to verification, | TA provided that when a household's eligibility changes to a lower benefit, the household is to be given 10 calendar days in which to appeal from the date of the letter. The benefit then must be changed within 10 operating days following the appeal period. TA also provided that households need to submit one month's worth of income documentation if they are selected for verification. Discussed that the SFA needs to be sure to verify all sources of income that are reported on the application. The SFA had an error on their verification report due to not reporting the results of verification and verification for cause. Assisted the SFA in correcting their report and explained that the results section must include the results for applications verified as well as applications verified for cause. |
| 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 Directors with a sample Standard Operating Procedure for sack lunches and also a sample food production record. |
| 700 - Resource Management | | <p>Procurement:</p> <ul style="list-style-type: none"> • The written procurement plan should be completed yearly (around February) 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. On the plan the SFA should identify if they will award based on line item or bottom line for any purchasing event using small or formal purchasing method. Each year the SFA should obtain the new year's procurement plan template from IowaCNP under download forms. • TA provided that for equipment repair and preventive maintenance the SFA needs to use a unrestricted indirect cost rate to charge the nutrition account for these services. Showed the SFA where to locate their indirect cost rate on the Department of Education webpage. These expenses will not be listed on the Procurement Plan. • Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a Buy) and formal methods of procurement. Referred the SFA to the state-prototype templates posted on IA_CNP. Reviewed the small purchase template. • When procuring milk and bread, along with specifications (descriptions) for all items to be procured, the estimated annual usage for each item should be provided. To ensure the district selects a responsive vendor with the overall lowest price (bottom line), the cost of each item on price quotation request should be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template |

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| | | <p>that calculates extended cost for milk was provided.</p> <ul style="list-style-type: none">• For milk, other things to consider when requesting price from vendors are: is pricing requested for paper cartons or plastic bottles, coolers to be provided at no charge. Analysis Critical Control Plan (HACCP) plan to ensure clean crates and milk cartons are delivered, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should inform vendors whether a firm, fixed price or a fixed price with economic adjustment (escalator clause) is requested.• For bread, provide vendors with a package count/package weight/weight per serving for each bread product. Review current school year bread product purchases to include any regularly purchased items when requesting price quotes.• The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and the description of the product solicited by GPO. 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.• 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. <p>* In school year 2018-2019 the nutrition account was charged for office supplies, printing services and cell phones. These cannot be charged directly to the nutrition account. An indirect cost should be used if the district wants to charge the nutrition account for these items.</p> <p>* TA provided regarding the beverage contract:</p> <ol style="list-style-type: none">1. The school district should exclude all school cafeterias from the definition of "campus" in all future beverage provider agreements that are not procured competitively.2. Any purchases from a commercial beverage provider paid from the nutrition funds must be competitively procured.3. A portion of the commissions or rebates received by the school district from a beverage provider must accrue to nutrition funds if the nutrition fund is paying for their beverages. The specific amount accrued to nutrition funds should follow the percentage commission on a sale of specific product(s) as per beverage provider agreement. <p>*TA provided on staff meetings and food purchases: Food can only be purchased with nutrition funds for a staff meeting if it is food to be served during a working breakfast or lunch.</p> <p>* TA provided that nutrition software updates are a sole source type of purchase. If the SFA decides to procure a new software system then this would need to be procured competitively. If they use a formal method so that they can have evaluation criteria there is a formal purchase template available on IowaCNP under download forms.</p> |
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| 700 - Resource Management | | TA provided that the SFA needs to add the following statement to their Food Service Meal Charge and Unpaid Meal Charge Regulation policy "Students who qualify for free meals shall never be denied a reimbursable meal." |
| 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? | Civil Rights training was provided in School Year 2019-2020 for all Nutrition full-time staff, part-time staff and all cashiers; however the Food Service Directors forgot to provide training for two subs who only work on occasion. TA provided that Civil Rights training is required yearly for all staff who interact with program participants. |
| 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)? | TA provided that on IowaCNP the Financial Report will complete the SFA's non-program revenue tool if the Certified Annual Report has all of the necessary dollar amounts. On the SFA's 2018-2019 Financial Report, there was \$0.00 for the cost of non-program foods. The Food Service Director is calculating the cost of their non-program foods (a la carte, adult meals, 2nd milks and 2nd entrees), but the amount she calculated did not get reported on the Certified Annual Report which populates the Financial Report. Discussed that the Business Manager needs to report the non-program food cost on the Certified Annual Report. |

Site - Level Technical Assistance Webster City High School (0109)

| Area | Question | Comments |
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| 400 - Meal Components and Quantities - Lunch | 409 Review production records and other supporting documentation. | The SFA uses Nutrikids production records. TA provided that in addition to recording meal components the SFA should add any condiments that are served with the meal. Each type of milk served needs to have the number served, total seconds and a la carte' sold needs to be recorded and under leftovers the quantity needs to be in the same unit of measure as what was prepared. Provided the SFA with a Checklist for Reviewing Food Production Records. |

Org - Level Commendations

| Description |
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| Certification and Benefit Issuance: Both Food Service Directors participated in the Application Approval and Direct Certification webinar in July of 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 Determining Official, were complete with case numbers, and all applications were determined within ten days. 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. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system. |
| Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria at the site reviewed, services are offered for Limited English Proficient households, annual civil rights training was provided for all food service staff and documented. The SFA submitted the annual Public Release to the local media (Daily Freeman Journal). Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed. |
| Local Meal Charge Policy; The SFA's meal charge policy was last reviewed on October 14, 2019. The policy was e-mailed or mailed to all households, was provided at registration and is given to all newly enrolled households. Staff were informed of the policy. |

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| On-site Monitoring: The on-site monitoring forms were completed for 50% of the sites for breakfast prior to February 1st. |
| Procurement: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. 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. The SFA ensures that no vendors have been debarred or suspended by USDA. The SFA is part of the AEA purchasing group and has a signed agreement for food and small wares. A review of a sample of Martin Brother's invoices found that the SFA is being charged the correct prices per their contract. |
| Professional Standards: The Food Service Director has completed 16 hours and the Assistant Food Service Director has completed 18 hours of their required 12 hours of professional training. All but one full-time and part-time nutrition staff have met required training for Professional Standards in school year 2019-2020. Additional training is planned. An organized annual Training Spreadsheet is maintained for each individual 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: There were no unresolved findings from the previous Administrative Review. 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 and no price increases were required. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs. |
| School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach included posting information at each school in English and Spanish, posting information on the Webster City Kitchen Facebook page, and posting on the Kitchen Twitter page. Menus are posted monthly at each school kitchen and are sent home with students each month. Summer Food Service Program (SFSP) outreach consisted of flyers being sent home in English and Spanish with students who receive free backpacks weekly during the school year. The radio station did an interview with employee. Flyers were posted at the All Cultures Equal Center, Upper Des Moines, Social Services Office, Library, Dr. Offices, Community Bulletin boards, posted at all Schools and is sent home with all students at the end of the school year. Information is posted on the Webster City Schools Kitchen Facebook page. Local churches placed an insert in bulletins. Information was emailed to all district school staff at Webster City and Northeast Schools. Menus are sent home with Students and posted at all schools. |
| Smart Snacks: Students are able to purchase foods via a la carte sales and vending machines. Exempt leftover National School Lunch Program entrees are only sold the same day, or the day after, they are initially offered. Documentation was available to show that a la carte sold to students during the meals met Smart Snack standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte. |
| Verification: The correct number of applications were verified and were correctly selected from error prone applications. The process was completed on time. The applications selected for verification were confirmed prior to verification. The Food Service Directors attended Verification and Verification Reporting training. |
| Wellness Policy: The public is made aware of the SFA's wellness policy via the school's web page, newsletters and it is posted on the Food Service facebook page. The following individuals are involved in reviewing and updating the LWP: Food service directors, school nurse, middle school principal, and superintendent. The district is working on making potential stake holders aware of their ability to participate in the Wellness Committee. The SFA completed an assessment of their wellness policy and the assessments are posted on the District's web page. 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 Webster City High School (0109)

| Description |
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| 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, a la carte coolers, freezers and refrigerators. Food temperatures are documented on the Food Production Record and also on a temperature log at the beginning of meal service and at the end of service. Dishwasher temperatures are taken and documented and thermometers are calibrated. Good food safety procedures were observed, including sanitizing the POS key pads frequently during meal service. The kitchen and storage areas were orderly and clean. Food Service workers practiced good gloving procedures. The following individuals at the site reviewed are ServeSafe Certified: Todd Hartnett, Sammy Hanson, Kim Cavanagh and Diane Lacey. |
| Meal Components and Quantities: The Food Service Director does a god job of menu planning. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. 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 breakfast and 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. Infinite Campus is used as the school's POS system. The POS was organized and orderly. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records (FPRs) were on file for all meals claimed for reimbursement for the review period. Cashiers are trained and appeared aware of what constitutes a reimbursable meal. 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 High School. The worksheets showed that all meal components were offered in sufficient quantities. At lunch all of the vegetable sub-groups were offered in sufficient quantities The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the High School is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition |

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quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, controlling the portion sizes of condiments, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen vegetables in place of canned, 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. 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 breakfast and lunch.

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