

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Marshalltown Comm School District (41040000)
Dates of Review: December 16 - 20, 2019

Program Year: 2020
Month of Review: November
Lead Reviewer: Deb Linderblood
Org Representative(s): Lynn Large

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The following eligibility errors were found: 1.) Four applications were missing social security numbers. 2.) Three students were given free meal benefits due to Infinite Campus improperly matching them and should have been paid status. 3.) One student did not get changed to paid status at the end of the carry-over period when they did not have an application and were not found on the direct certification list. 4.) One student was on the migrant list and the SFA overlooked him. SFA had him as receiving reduced price benefits when he should have received free meal benefits.	The SFA will: 1.) Attach copies of the four applications that were missing social security numbers or an indication of none showing this has been attained. 2.) For the remaining errors attach the letter of notice informing the household of the change in benefit status (be sure the letter states the names of all children in the household). This was completed while the State Agency was on-site. No further action required.	
1000 - Local School Wellness Policy	V-1000	The SFA has just recently put together a Wellness Committee after numerous committee members stopped participating. The committee needs to be made up of Administration, Board member, parent, student, PE teacher, a representative from food service, school nurse and a community member. Also, the SFA has not made their assessment available to the public.	The SFA will 1.) Submit to the State Agency 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 how you will communicate the results of the assessment to the households.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The SFA has exceeded its 3 month average monthly expenses (have 4.25 month worth of cash on hand) and has not submitted a spend down plan.	Develop and attach a spend down plan. Also submit your spend down plan to Patti Harding at patti.harding@iowa.gov .	

Site - Level Findings: Marshalltown High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA does not have signage telling students and cashiers how many items each food contributes toward a reimbursable meal. This is a repeat finding.	Attach one week's worth of breakfast signage showing how many items each food contributes to the meal pattern.	

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Site - Level Findings: ROGERS ELEMENTARY (0481)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
500 - Offer versus Serve	V-0500	At the start of meal service, nutrition staff allowed three students to go to their seats without taking 1/2 cup of fruit and/or vegetable. State Agency consultant provided TA that each student needed to have 1/2 cup of fruit or vegetable on their tray for it to be a reimbursable meal. Staff then began to make nearly every student take the 1/2 cup of fruit even if they already had 1 cup of romaine on their tray, thus making them take more than is required.	Train Roger's Elementary staff on offer vs. serve. Attach a sign-in sheet showing the title of the training, date, time and have each staff person sign that they received the training.	
Infant and Pre-K Meal Pattern Checklist - Lunch	V-IMPCL	Preschool staff told the State Agency consultant that at breakfast students have to take 3 of the 4 items. TA provided that offer vs. serve is not an option for preschool age kids.	Explain how you will train and then monitor that preschool staff are giving each student all 4 items at breakfast and not using offer vs. serve.	
Infant and Pre-K Meal Pattern Checklist - Lunch	V-IMPCL	Preschool staff were using the wrong size dippers to portion out the Mandarin Orange Chicken and the rice. A number 8 dipper was used for the chicken instead of a number 6 and a number 12 was being used for the rice instead of a number 8. Production records that are sent to the classroom have the size of dipper that is supposed to be used. This was corrected prior to students receiving their tray.	Explain your plan to educate and monitor that preschool staff are using the appropriate serving utensil for each food item.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance		12/18/19 Provided TA on application approval. The SFA needs to contact household on any questionable information (income reported/foster child/household size) on application. The Received by SFA date needs to be consistently recorded to ensure approval within 10 operating days. When determining income be sure to include income from all sources and any student income.
100 - Certification and Benefit Issuance	133 Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified?	TA provided that if students are directly certified, food assistance takes precedence and in their POS system the SFA must make sure this is put into their POS system under Certified Type. Made sure that the Food Service Director knows how to find the State Agency Prioritizing flow chart on IowaCNP.
700 - Resource Management		Procurement: · The written procurement plan should be completed annually (around February) to reflect the upcoming school year's

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		<p>procurement events. 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 for each procurement event to be procured using a small or formal method, identify the contract award type and solicitation evaluation to be used to select a vendor.</p> <p>It is recommended to use the current procurement plan template. An updated template will be posted in download forms in IowaCNP in January.</p> <ul style="list-style-type: none">· A Suspension and Debarment Certification statement should be obtained or verification on SAM.gov conducted for all procurement with an estimated value in excess of \$25,000. This applies to all small or formal procurement.· 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. Refer to the state-prototype templates posted on IowaCNP download forms. Reviewed each page of the small purchase template.· 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.· Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-domestic agricultural commodity is accepted. Referred the SFA to the State Agency prototype exception log and reviewed how to use. <p>When a brand is specified for food, supplies, or equipment, the SFA should allow for an "equal" or have a clear procedure for approval of a product.</p> <p>When the per-unit cost of equipment below \$5,000, refer to the Iowa Pre-Approved Equipment List to make sure state agency approval is not required. For any equipment with a per-unit cost exceeding \$5,000, state agency approval is required before sending the solicitation to vendors.</p> <p>As per current guidance from school finance, some items purchased using nutrition funds are not allowable. An example would be replacement parts for a kettle.</p>
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		<p>The USDA and Iowa non-discrimination statement in the Prime Vendor bid was incorrect. Please update to the most current versions for all future formal procurement.</p> <p>For all formal procurement please include Civil Rights Assurance statement provided by USDA. This was sent to the Food Service Director.</p>
700 - Resource Management		TA provided that each year all staff should be informed of the SFA's meal charge policy. While on-site the FSD stated that she would send an all staff email regarding the policy.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The link for the USDA complaint process/form which should be used if parents wish to file a complaint about any child nutrition program is: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	TA provided that on IowaCNP there is a revised diet modification form that the district should use going forward.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	The SFA completed the racial/ethnic form but did not assign a race and an ethnicity for each student. TA provided that on IowaCNP there is an electronic racial/ethnic form. TA provided that each student should be assigned a race and an ethnicity. The SFA revised the form while the State Agency was on-site.
1600 - School Breakfast and SFSP Outreach	1600 Did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	TA provided that the SFA should conduct breakfast outreach throughout the school year. Recommended flyers, promoting breakfast on their electronic signage board and putting information in any newsletters that may go to parents.
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?	TA provided that equipment repair/maintenance, postage, lock services, office supplies, and printing services cannot be charged directly to the nutrition account. These charges totaled \$11,418.47. These expenses should be billed as indirect cost to the nutrition department. Provided the Food Service Director with several handouts regarding indirect cost. In the future, be sure the nutrition account is charged for these items using an indirect charge. It is recommended that the unallowable costs be paid back to the nutrition account.

Site - Level Technical Assistance ROGERS ELEMENTARY (0481)

Area	Question	Comments
500 - Offer versus Serve	502 Is there signage explaining what constitutes a reimbursable meal to students including the requirement to select at least 1/2 cup fruit or vegetable?	TA provided that the SFA needs to have lunch signage that explains what constitutes a reimbursable meal. The State Agency sent the SFA 10 Build A Healthy Lunch posters.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The most recent food safety inspection was posted in the kitchen and was not publicly visible. TA provided that the inspection must be posted where the public can see it. This was corrected while the State Agency was on-site.

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1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	The SFA currently takes temperatures on all of their refrigerators and milk coolers. They have one small freezer above an upright refrigeration unit that temperatures were not being taken on or documented. TA provided that all refrigerators, freezers and milk coolers need to be monitored for temperatures. The Food Service Director made a copy of a temperature log sheet for this freezer while the State Agency was on site. No further action required.
1700 - Afterschool Snack	1708 Does the snack program conduct acceptable education or enrichment activities before, during, or after the snack meal service? <i>(N/A for Seamless Summer Option).</i>	TA provided that next year when the Food Service Director completes the application packet she needs to accurately reflect what enrichment activities are offered with the ASCP and who oversees these activities.
1700 - Afterschool Snack	1710 Is the USDA/FNS approved non-discrimination poster prominently displayed and visible to program participants?	TA provided that the USDA Justice For All poster needs to be posted in a location where participants of the After School Snack Program can see it.
1900 - Fresh Fruit and Vegetable Program (FFVP)		When reporting small supplies on the FFVP claims, the unit cost should be the cost on the invoice. For example, 18 x 24 bags, the cost/unit should be the cost on the vendor invoice which was \$13.74. This cost was for 250 bags. The estimated FFVP count for Rogers for October was 228. Therefore, the number of units would be $228/250 = 0.912$ and the total cost would be reported as \$12.53.
Infant and Pre-K Meal Pattern Checklist - Lunch	3 During the meal service, did you observe that all required meal components for Pre-K are available throughout the entire meal service?	On the day of review Pre-K students were served the same portion sizes as the K-5. TA provided that the CACFP meal pattern has less food for this age of student. Encouraged the Food Service Director to monitor food waste and if the students are leaving a lot of food to cut the portions down to be in line with the CACFP meal pattern.

Org - Level Commendations

Description
Certification and Benefit Issuance: 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. Income was only converted to annual when there was more than one frequency of income. 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.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria at the sites reviewed, services are offered for Limited English Proficient households, annual civil rights training was provided for food service staff and documented. The SFA submitted the annual Public Release to the local media (Times Republican). 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 material describing the program.
Fiscal Action: Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for November seem to be needed.
Food Safety: The SFA has a district-wide written Food Safety plan that includes all required elements. District wide the following individuals are Serv-Safe certified: Lynn Large, Maria Sanchez, Carol White, Kristie Kramer, Marla Peter, Rachel Menter, Rebecca Lunsford, Brenda Cook, Connie Mahlstedt, Julie Giannetto and Judy Graves.
Local Meal Charge Policy; The SFA developed and approved a meal charge policy on June 5, 2017 and was amended August 6, 2018 and November 5, 2018. The policy was mailed to all households and was available at registration. Nutrition staff were informed of the policy. 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 100% were completed for breakfast prior to February 1st.
Procurement: The SFA is a member of the Central Buying Consortium (CBC) lead by West Des Moines CSD. The group awarded contracts to a Prime Vendor for food and supplies (excluding milk) and a Produce vendor. These contracts allow the district to leverage better pricing for quality goods and services. The SFA has a written Procurement Plan that identifies procurement events, estimated value and procurement method for each procurement event. The correct procurement method was selected based on the estimated value of each procurement event. The contract award type and evaluation method for all

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<p>small and formal procurement was listed. The plan included a written Code of Ethics/Conduct. The Code of Conduct identified district policies related to conflicts of interest, gifts to employees, and disciplinary actions for violation of job duties. Prime Vendor, Produce, and Milk solicitations included the Buy American Provision. Further the Prime Vendor and Produce solicitation asked vendors to state procedures on informing SFAs prior to delivery on substitution of non-domestic product. Public notification was issued in the Des Moines Register for the Prime Vendor solicitation. The SFA informed potential vendors estimated value of a contract, contract award type such as cost reimbursable or fixed price and whether line item or bottom line would be used to evaluate vendor prices for items. The SFA provided estimated quantities for each item specified in small or formal procurement and used extended costs to award contract to a responsive vendor with the lowest overall cost. The SFA did an excellent job with utilization of the allotted Planned Assistance Level (PAL) for USDA Foods. Vendors were selected to review compliance with each procurement method. Sufficient documentation was available for each method to determine the significant history of the procurement.</p>
<p>Professional Standards: The Food Service Director has completed 11 hours of professional training of the required 12 hours. All nutrition staff have started to meet the required training for Professional Standards in school year 2019-2020. The Food Service Director has additional training planned for the school year. An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours.</p>
<p>Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.</p>
<p>Resource Management: 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. The Paid Lunch Equity (PLE) tool was completed and prices were increased as required. The Non-Program Revenue (NPR) tool was completed and no increase in prices were required. 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 98.51% of their allotted PAL dollars by using the DoD, Diverted Foods and Direct Distribution programs. In school year 2019-2020 the SFA is on track to utilize all of their PAL dollars.</p>
<p>School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach was sent out at the beginning of the year to inform families of the availability of the program. Reminders of the SBP were also sent out throughout the school year. Outreach included announcements, newsletters, the school website, posters, etc. Summer Food Service Program (SFSP) outreach was conducted through flyers being sent home in backpacks, media release, radio announcement and newspaper announcement.</p>
<p>Verification: The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification. The verification report was completed accurately and on time.</p>
<p>Wellness Policy: The SFA's policy was reviewed on April 2, 2018. The public is made aware of the SFA's wellness policy via the district's website. The following individuals are involved; in reviewing and updating the LWP: Food Service Director; Nutrition Supervisor; High School Teachers (2), Nurse and Principal; Middle School Nurse and an Elementary Principal. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The SFA uses the Alliance for a Healthier Generation's assessment form to complete the assessment of their wellness policy goals.</p>

Site - Level Commendations Marshalltown High School (0109)

Description
<p>Food Safety: A copy of the written food safety plan was available at the High School. 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 Food Production Records. Dishwasher temperatures are taken and documented. Good food safety procedures were observed. The kitchen, walk-ins and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures.</p>
<p>Meal Components and Quantities: The Food Service Director along with the Nutrition Supervisor does a good job of menu planning. Numerous entrée selections are available as well as an assortment of fruits and vegetables. 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. The menus met weekly and daily meal pattern requirements for the 9-12th graders. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. 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. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals.</p>
<p>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 November 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 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.</p>
<p>Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of November 11-15, 2019 for breakfast and lunch at the High School. The worksheets showed that all components were offered at breakfast and all components and vegetable subgroups were offered at lunch. 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 quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and using fruit in light syrup or in its own juice. A nutrient analysis was not required.</p>
<p>Offer vs. Serve: Offer vs. Serve is being implemented properly. All students observed selected 1/2 cup of fruit and/or vegetable except one. Cafeteria staff have been trained on offer vs. serve.</p>

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Smart Snacks: Students are able to purchase foods via a la carte sales. All foods sold meet the Smart Snack standards for nutrition content. Exempt leftover National School Lunch Program entrees are only sold the same day, or the day after, they are initially offered. Beverages sold meet the standards for the 9-12th age group of students. Documentation was available to show that all 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.

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

Site - Level Commendations ROGERS ELEMENTARY (0481)

Description
After School Care Program: Snacks are planned to meet the meal pattern components. The SFA is maintaining production records and conducting on-site monitoring.
Food Safety: A copy of the written plan was available at Rogers Elementary. Temperature logs are maintained for milk coolers and refrigerators. Food temperatures are documented on the food production records when the food is cooked at the high school, when the food is loaded into the delivery truck and when it arrives at the school. Good food safety procedures were observed. The kitchen was orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures.
Fresh Fruit and Vegetable Program (FFVP): The school is on track to spend no more than 10% of its total grant on administrative costs. Cost documentation was available to validate November 2019 claims for reimbursement. Cost documentation was well organized. FFVP menu for November was available. Nutrition education materials are provided by school food service to teachers on Fridays for the following week's planned FFVP menu. The teacher reads the nutrition education material and discusses the day's fruit/vegetable as students try their snacks. For November a good variety of fruits and vegetables were served. Standard operating procedure for the FFVP preparation and service is available.
Meal Components and Quantities: The Food Service Director along with the Nutrition Secretary does a god job of menu planning. All meal components were available at the beginning of meal service on the day of observation and throughout meal service. All meals observed met at least the minimum daily requirements. The menus met weekly and daily meal pattern requirements for the K-5 grade group. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. 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.
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 November were accurate and complete. 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.
Nutritional Quality of School Meals: The Food Service Director completed the Dietary Specifications Assessment tool for lunch which indicated that Roger's 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, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and using fruit that is canned in light syrup or in its own juice. A nutrient analysis was not required.
Offer vs. Serve: All but 3 students observed selected 1/2 cup of fruit and/or vegetable.
Water: Free potable water is available to all students for lunch and for breakfast via a water fountain just off of the cafeteria.