

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Pekin Comm School District (51630000)
January 6-8, 2020

Program Year: 2020
Month of Review: December
Lead Reviewer: Shea Cook
Org Representative(s): Ann Swanson, Natalie Kopsieker

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Benefits for a student who was directly certified as a foster child were incorrectly extended to all of the students in the household.	For your response please send a letter notifying the family of reduction in benefits for the four students in the household for whom benefits were incorrectly extended. Additionally, please attach a copy of the notification letter.	
200 - Verification	V-0200	SFA relies on their information system to choose application to be verified. Report from that system indicated that four applications were identified as error prone, but the system did not choose an error prone application for verification.	For your response please describe how you will make sure that application(s) chosen for verification will be chosen from applications identified as error prone.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	Nonprogram foods are defined as any food sold during the school day that is not part of a reimbursable meal to a student. Provision 206 of the Healthy Hunger Free Kids Act requires that nonprogram foods raise revenue sufficient to cover the costs of the food. The financial report on IowaCNP indicates the district is not currently raising enough revenue from the sale of its nonprogram foods.	For your response please complete and submit the nonprogram revenue tool. If the tool indicates that additional nonprogram revenue is needed please describe your plan to increase nonprogram revenue.	

Site - Level Findings: Pekin Elementary School (0427)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Pekin Comm School District (51630000)
January 6-8, 2020**

Area	Question	Comments
300 - Meal Counting and Claiming	314 Is the SFA following their approved SFA-SA Agreement/application (including POS)?	Application packet indicates that there are two points where meal counts are taken. With the addition of a new satellite location in another part of the building and a preschool location there are now actually 4 places where counts are taken. SA advised SFA to edit application packet to reflect the change.
300 - Meal Counting and Claiming	314 Is the SFA following their approved SFA-SA Agreement/application (including POS)?	Currently one individual is listed both the Authorized Representative and the Food Service Director on the application packet. SA recommends that the SFA separate those duties and report it as such on the application packet to accurately reflect the division of labor in the program. Although currently identified as the head cook, the individual in that position is performing all of the functions and taking on the responsibilities of a food service director and has been for some time. Officially naming that individual as the Food Service Director will be helpful for both individuals by assisting in making sure that both parties receive pertinent communications from the SA.
700 - Resource Management		<p>Technical Assistance for Procurement was given in the following areas:</p> <p>MICRO PURCHASE: Two micro purchases were identified as an unallowable direct costs. One charge for maintenance and repair and one charge for office supplies were identified as micro purchases, but are not an allowable direct cost and cannot be paid for out of nutrition funds. • Gage Foods was identified as a micro purchase on the off-site review tool, but it cannot be a micro purchase if money was not spent with other vendors.</p> <p>SMALL PURCHASE: • When utilizing the small purchase method SFA is sending letters requesting bids. This language is incorrect and suggest a formal contract. SFA should change the language on small purchase pricing requests to "Request for Pricing" to accurately reflect the type of purchase method being used. • Guidance was given on writing more specific product specifications in price request documents, including but not limited to size, nutritional information, delivery expectations, packaging, etc. • SFA was advised that vendors should be given a minimum of 4 weeks to respond to a request for pricing. SA encouraged SFA to exercise best practice of at least 6 weeks response time. • A number of required statements were absent from the price request documents for the bread bid including debarment statement, termination for cause and convenience, equal opportunity, small business, etc. • SFA should include estimated annual usage in request for pricing in order to get best pricing.</p> <p>FORMAL PURCHASE: SFA should routinely checking pricing for a variety of food and non-food items as part of the responsibility of contract monitoring.</p>
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?	SFA is due to review the local wellness policy. A meeting was planned for the fall, but was cancelled due to extenuating circumstances. Meeting has

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		been rescheduled for March and the local wellness policy will be reviewed at that time. The triennial assessment is also due and will be completed and the results will be posted by the end of SY20
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?	Vending machines have soft drink logos that are not Smart Snack compliant and do not comply with healthy marketing requirements. SFA is aware of the issue and has spoken to the vendor. SFA will continue to address the issue with a vendor.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	Only 1 hour of the USDA foods show can be used to satisfy professional standards hours, as the food show does not directly relate to the responsibilities that staff use in day to day operations of the nutrition program. SA recommends additional professional standards training before the end of the year to satisfy minimum number of hours needed for all those individuals who were credited 4 hours of professional standards time for attending the event.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	While the SFA does have a HACCP plan in place, it has not been updated. SA recommends reviewing and updating plan as needed.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	SA encouraged SFA to conduct additional summer food service outreach and provided outreach resources.
RMCR - Nonprofit School Food Srvc Acct	9 If the SFA encumbered bad debt from unpaid student meal accounts during the RM review period, how did it ensure that only allowable non-Federal revenues were used to restore operating losses? (Unpaid Meal Charges: Guidance and Q&A SP 23-2017)	SA recommends SFA consider revisions to negative balance policy so that it is an accurate reflection of actual practice in the lunchroom. Policy states that students who cannot charge meals due to an excess balance will be provided an alternate meal, however, that is not the practice.
RMCR - Revenue From Nonprogram Foods	9 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	SA discussed strategies for capturing nonprogram expenses more accurately.

Site - Level Technical Assistance Pekin Elementary School (0427)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Students are allowed to go through a salad bar to select add-ons to the salads that are available on a daily basis. While most students were responsible in their selections, some were observed taking excess cheese, cottage cheese, and pickles, which have high sodium content. SA discussed strategies for signage and offerings to help students make better decisions at the salad bar.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	SA recommends refresher training on OVS for breakfast. During observation 3 unallowable meals were observed. During breakfast students must take at least three items, one of which must be at least 1/2 a cup of fruit or vegetable. Two meals were missing the fruit/vegetable component and one meal only contained 2 items.
900 - SFA On Site Monitoring	901 a. Was the on-site review of the <i>lunch</i> counting and claiming procedure completed prior to February 1?	Although the site is technically a one site school, an satellite serving location for students in grades 7 and 8 have been opened in another section of the building. SA recommends yearly monitoring of that serving site.
1400 - Food Safety	1404 Is a copy of the written food safety plan site specific and available at each school?	SFA utilizes a sharing table. SA provided resources on sharing tables including SOP and information on waiver request.

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Pekin Comm School District (51630000)
January 6-8, 2020**

1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	There are no internal thermometers in the milk coolers. SFA indicated that they were in place at the beginning of the year, but have been broken or are missing. Thermometers should be replaced.
1400 - Food Safety	1411 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	Non-domestic produce, tomatoes from Mexico, were observed in storage. SA provided guidance on keeping a log to document any non-domestic produce received. Log should include date, description of item, and reason for its acceptance.

Org - Level Commendations

Description
CERTIFICATION AND BENEFIT ISSUANCE: The 30 days of eligibility status is provided to all families who were eligible for benefits in the previous school year. • The approved letter of notification of eligibility is sent to all families who apply for benefits including those families who were denied benefits. • Applications are processed and benefits are administered within 10 operating days of the application being received. • Direct certification lists are downloaded in a timely manner and kept on file. All students in the household are extended benefits. • Income applications are complete with parent signatures, income information, names of all family members and social security numbers. • Denied applications were determined accurately. • The correct income guidelines were used and the conversion rates were used properly.
CIVIL RIGHTS: The correct public release was sent to a local media outlet and published. • The SFA provides forms in other languages as needed for Limited English Proficient households when needed. • The SFA works closely with the school nurses, students and families to ensure that all students have their special dietary needs met. Diet modification forms are completed and on file for students with special dietary needs. An approved milk alternate is made available for students with a dairy intolerance, school is peanut aware. • All staff with responsibilities in the school nutrition program received civil rights training, including all non-food service staff and substitutes. Documentation is on file. • The "And Justice For All" poster is on display in all cafeterias. • The racial ethnic form was completed and shows that students were not discriminated against when applying for free or reduce price meals.
Fiscal action for this review is less than the allowed USDA disregard for both NSLP and SBP so no claim adjustments are needed.
FOOD SAFETY: Temperatures are monitored and recorded for the refrigerators, freezers and milk coolers. The temperatures for the dishwasher are also monitored and recorded. • The food safety inspection report is on display in a public location. • The food service director requested a 2nd inspection. • The SFA's HACCP plan is available. • The food service director is ServSafe certified. • Good food safety practices were observed while SA was on-site. • Foods are stored properly.
MEAL COUNTING AND CLAIMING: The point of service line for breakfast and lunch is organized and orderly which allows staff to ensure all students receive a reimbursable meal. • All students at the selected sites had a reimbursable meal at the lunch meal observed. • The edit check reports matched the claim. • The day of review meal counts were reasonable with the review period counts.
MEAL PATTERN AND NUTRITION QUALITY: The menu offers a variety of vegetables, fruits and entrees. • The cafeteria has many posters encouraging healthy foods and activity. • Signage is made available informing students of how the menu constitutes a reimbursable meal. • The breakfast menu provided during the review period met the daily and weekly meal pattern requirements for all grade groups. • The lunch menu met the daily and weekly meal pattern requirements for fruit, grain, meat/meat alternate, and milk, dark green, red/orange, other and starchy vegetable subgroups. • Food production records, CN labels, and standardized recipes were on file for all meals served during the review period. • The SFA purchases many low or reduced fat, low sodium products. • The SFA offers 3 different and approved types of milk to students. • The food service director completed the menu certification worksheets.
PROCUREMENT: The SFA has a written Procurement Plan that includes federal and local thresholds, identifies the estimated value and procurement method for each anticipated procurement event. • The Procurement Plan identifies the names and title of the individual(s) responsible for the selection, award, and administration of procurement contracts. • The Code of Conduct policy identifies the policy number of the board-approved disciplinary process for employees who violate their job duties. • When using the micro-purchase method, each transaction with the vendor was below the local micro-purchase threshold. The purchase prices were reasonable. • The district is a member of a Group Purchasing Organization. • A signed agreement with the Group Purchasing Organization for SY 2019-2020 is on file. • The signed agreement states that the school district agrees to procure food (excluding bread and milk) and non-food supplies through the Group's awarded Prime Vendor as well as vendors awarded the ware wash and small ware contracts. • The district has maintained a file for all procurement-related information. • The SFA's Authorized Representative attended regional procurement training.
PROFESSIONAL STANDARDS: Training hours are tracked for all staff with school nutrition responsibilities. • Civil rights training was provided to all staff with school nutrition program responsibilities. • Documentation is on file for all training received. • Full and part time school nutrition employees have received the required number of training hours for the school year. • Non-food service employees received civil rights training and training based on the school nutrition program responsibilities.

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Bureau of Nutrition and Health Services
State Review Summary Report
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January 6-8, 2020

RESOURCE MANAGEMENT: The SFA charges the correct paid student lunch price according to the required PLE tool and the correct adult lunch price. • The SFA has a negative balance policy to address negative student lunch accounts. • Expenses made during the review period were allowable. • Revenues received went directly into the school food service line item account and there are numerous checks and balances to ensure the process is followed. • Records are kept for 3 years plus the current year.

SCHOOL WELLNESS POLICY: The wellness policy contains all of the required elements. • The wellness policy and assessment are made available to members of the public as they are both posted on the district's website.

Site - Level Commendations Pekin Elementary School (0427)

Description
Civil Rights: The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.
Food Safety: A copy of the written food safety plan was available on site. • The latest Health Inspection Report was posted in a publicly visible location. • Good food safety procedures were observed. Opened food products were labeled and dated. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures.
Meal Counting and Claiming: The Point of Service is at the end of the line and students punch their unique number into a key pad. • Meal counts during the on-site review were reasonable when compared to the review month counts. • Meal count totals for the month of December were accurate and complete. • Point of Service counts and filed claims appear accurate. • Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. • Cashiers are trained and appeared aware of what constitutes a reimbursable meal. • Edit checks are performed.
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.