

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Underwood Comm School District (65340000)**  
**SNP - Review ID: 5817**

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

**Site - Level Findings: Underwood High School (0109)**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
400 - Meal Components and Quantities - Breakfast	V-0400	Students receiving milk substitutions based on diet modification forms must be provided with an alternate product with nutritional value equal to that of cow's milk.	The FSD will submit a picture of the replacement product with nutrition panel and an invoice showing the purchase of a compliant product.	
400 - Meal Components and Quantities - Lunch	V-0400	Production Records are missing the planned serving sizes and planned number of servings necessary to determine meal pattern compliance.	The SFA will submit production records for January 20-31, 2020, demonstrating that the SFA is adhering to meal pattern requirements.	
400 - Meal Components and Quantities - Lunch	V-0400	Vegetable sub-group beans/legumes is not being served weekly. A portion of 1/2 cup must be offered to students each week for each entrée and alternative meal.	The SFA will submit 1. The February menu including alternate meals. 2. Submit the planned serving sizes for each vegetable on the menu. 3. Submit all recipes for menu items which include vegetables. (example: chili or chef salad)	

**Org - Level Findings**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
700 - Resource Management	V-0700	The SFA must follow USDA procurement regulation when selecting vendors. Small purchase vendors have not been procured in accordance with standards.	The SFA will 1. Send at least one representative to the procurement training in March 2020. Articulate in your response who will be going and on which date. 2. Submit a rough draft of the milk and bread solicitations	

**Iowa Department of Education  
Bureau of Nutrition and Health Services  
State Review Summary Report  
Underwood Comm School District (65340000)  
SNP - Review ID: 5817**

			for school year 2020/2021, including all of the required terms and conditions.	
700 - Resource Management	V-0700	The SFA must have a code of conduct which addresses the disciplinary action to be taken should someone violate the code of conduct.	The SFA will submit the revised code of conduct with the board policy number which addresses the disciplinary action. The SFA should also submit the appropriate board policy.	
1000 - Local School Wellness Policy	V-1000	The SFA has not completed a Wellness Assessment within the past three years.	The SFA will 1. Attend the Wellness Assessment Webinar scheduled for January 15, 2020. 2. Submit a target date of when the assessment will be completed.	
1200 - Professional Standards	V-1200	Documentation does not support the completion of required Professional Development in school year 2018/2019. Minimal training hours have been documented to date for the 2019/2020 school year.	The SFA will 1. Submit the training tracker spreadsheet documenting all employees required to complete training and the number of required training hour. 2. Submit a written plan outlining the training each staff member identified plans to complete by June 2020 and an estimated completion date.	

**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. The SA worked with the FSD and Business Manager on the procurement plan and gave an overview of procurement regulations. The SA is offering a procurement training workshop on March 10 and 11, the SFA is encouraged to attend.</p> <p>Current vendors identified under the small procurement method have not been properly procured. Sysco and Reinhart appear to be used regularly and are identified as small purchases, however, no bid solicitation was sent and no formal agreement is in place. Bid solicitations for milk and bread are missing all required terms and conditions to include the Buy American provision. The SFA did not use a pricing matrix to determine the lowest bid for milk and bread. Two of the milk bids had blanks in</p>

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Underwood Comm School District (65340000)**  
**SNP - Review ID: 5817**

		<p>pricing, including the vendor awarded the bid. These bids are considered unresponsive and should be eliminated.</p> <p>The bread bid included a specific product number. All product descriptions should describe the product in detail, but never identify a specific brand or product line as not to eliminate competition. The bread solicitation also included specific pack sizes which were altered on the vendor's bid. By specifying a pack size, you are communicating that as a requirement, anything different is considered unresponsive. The SFA should document vendors who do not respond to bid requests.</p> <p>The SA reminded the SFA that only items identified on the bid may be purchased from the vendor. This includes Martin Brothers, where purchase should be made from the pre-determined product list (market basket).</p> <p>Procurement Plan and Code of Conduct must be completed annually. The Code of Conduct submitted does not contain the board policy addressing disciplinary action. Policy number 409.3 was identified during the AR and should be added to the Code of Conduct.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Agreements valued at \$10,000 or more should have a termination for cause clause.</p> <p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p> <p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p>
--	--	---

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Underwood Comm School District (65340000)**  
**SNP - Review ID: 5817**

		<p>SFA should keep on file:</p> <ul style="list-style-type: none"><li>• All price adjustments throughout the year</li><li>• All invoices</li><li>• All contracts and agreements</li><li>• All bids solicited</li><li>• Documentation that a vendor did not reply to bid (if applicable)</li><li>• Documentation of why you selected a specific vendor (Selection Rubrics)</li><li>• Copies of bid solicitation</li><li>• Debarment statements</li><li>• CD provided by the AEA (if applicable)</li></ul> <p>Three types of purchases, (Federal Thresholds):</p> <p><b>Micro-purchase-</b> under or equal to <b>\$10,000</b>(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><li>• Track micro purchases, what purchased when and dollar amount.</li><li>• Purchases should be distributed around community, not just one store.</li></ul> <p><b>Small Purchases-</b> Purchases that are <b>under \$250,000</b> (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none"><li>• Include all terms and conditions</li><li>• Include terms: Buy American and Equal Opportunity</li><li>• Include Termination for Cause and Convenience if \$10,000 or more</li><li>• Attain Signed Debarment Statements</li><li>• Awarded on lowest price (unless written documentation to justify)</li><li>• Maintain documentation</li></ul>
--	--	--

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Underwood Comm School District (65340000)**  
**SNP - Review ID: 5817**

		<p><b>Formal Purchase-</b> Purchases equal to and <b>exceeding \$250,000</b> (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <ul style="list-style-type: none"> <li>• Notice of accepting all types of formal purchase must be advertised.</li> <li>• Include all requirements of a small purchase</li> <li>• If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</li> <li>• Everything must be in writing.</li> </ul>
<p>1000 - Local School Wellness Policy</p>	<p>1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements?</p>	<p><b>WELLNESS POLICY:</b> Provided the Local Wellness Policy folder from Team Nutrition that includes the handout on the Summary of the LWP Final Rule, the "Does Your Wellness Policy Measure Up?" handout and the school Building Progress Report form as well as emailed a copy of the assessment template and the final rule to the Superintendent. Discussed the upcoming Wellness Assessment webinar which the Superintendent has registered for. The SA reiterated the need to complete the assessment once every three years and for the wellness committee to meet at minimum once per year.</p>
<p>1200 - Professional Standards</p>	<p>1214 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.</p>	<p><b>ANNUAL TRAINING:</b> Food Service Director was advised to maintain a spreadsheet with all staff, tracking training classes attended, date attended and length of time for each class. The SA provided a copy of the training tracking template to the SFA.</p> <p>All Food Service staff and SFA employees working with the School Lunch Program are required to take Civil Rights annually and complete annual training hours. Civil Rights training was last completed in May 2019. Training hours should meet the following guidelines:</p> <p>Director- 12 hours annually</p>

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Underwood Comm School District (65340000)**  
**SNP - Review ID: 5817**

		<p>Manager- 10 hours annually</p> <p>Full-Time Staff- 6 hours annually</p> <p>Part-time Staff- 4 hours annually</p>
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The High School building did not have a HACCP manual containing Standard Operating Procedures. The HACCP Manual at the Elementary did not contain the blood borne pathogen and body fluid clean up procedures. This policy was on site and provided to the SA. The FSD made copies of the HACCP manual and distributed it to all NSLP operating sites during the on-site review.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	<p><b>Breakfast Promotion:</b> The USDA requires SFAs to promote their breakfast program at least 2 times annually to households. Promotion should include breakfast price, times available and should encourage all students to attend. National School Breakfast week is March 9-13, and is a good time to promote breakfast. The SFA had an overall breakfast participation rate of 8% during the review period. The SA shared some strategies which may help to increase breakfast participation.</p> <p><b>Summer Meal Promotion:</b> The SFA should promote summer feeding programs to all students and households within their district every spring to be sure that families are aware of the availability of the program state-wide.</p> <p>.</p>
RMCR - Nonprofit School Food Srv 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?	The SFA is not allowed to charge maintenance supplies and repairs or vehicle expenses to the food service account. Some of these expenses may be recovered utilizing indirect cost. Fire suppression inspection was billed to the lunch account in 2019.

**Site - Level Technical Assistance Underwood High School (0109)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	Diet modifications requiring milk substitutions must comply with USDA standards. All milk substitutions must have equal

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Underwood Comm School District (65340000)**  
**SNP - Review ID: 5817**

		nutritional value as cow's milk. The SA provided the FSD with a list of pre-approved products and an outline of the requirements.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	<p>PRODUCTION RECORDS: Production records evaluated from the review period do not indicate that portion sizes offered met the minimum meal pattern requirements for the age/grade group(s) being served. Production Records are documentation of compliance with the meal pattern and should include: All food choices, food specifications, quantity prepared, and serving size for each age group at the site, planned number of servings, quantity of leftovers, and total number of students and adults who ate for each age group.</p>
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	<p>Planned menus for the focus week of November 4-8, 2019 and for the review month of November 2019 do not satisfy the vegetable subgroup requirements. Vegetable sub-group bean/legume is missing from the main entrée menu November 4-8 and is not represented on the alternate entrée meal at all in November. Missing serving sizes from production records coupled with observation of using a 3 oz. spoodle to serve vegetables during on-site review indicates other vegetable sub-groups may have been underserved. Evidence does substantiate that dark green and red/orange are available on the salad bar daily. Starchy vegetables and "Other" category vegetables appear to be served frequently, most likely fulfilling the requirement.</p> <p>The FSD must review menus to ensure that all required vegetable sub-groups are served each week in their required quantity. This should be documented through the use of production records.</p> <p>Seven meals were observe during the on-site review as missing the ½ cup fruit/vegetable. These are not reimbursable.</p>
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?	<p>The on-site monitoring of lunch and breakfast was completed for the middle school in 2019/2020. This on-site observation of the meal service must be completed each year for all sites for lunch and 50% of the sites for breakfast to ensure that processes are being followed and the site is compliant. This task must be completed by February 1st each year.</p>

**Iowa Department of Education  
Bureau of Nutrition and Health Services  
State Review Summary Report  
Underwood Comm School District (65340000)  
SNP - Review ID: 5817**

1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	HACCP: A bottle of dish soap was being stored above a food prep station. Food items in the cooler were not labeled and dated. Items in the freezer were removed from their original box, not labeled or dated. Re-using old cottage cheese containers for food storage, should be using NSP approved food containers. Temperatures of salad bar items should be monitored and recorded, the SA has concerns with an ice pack being the only chilling mechanism for proteins served in a 6" deep container (items were out from at least 10:45-1:15, then re-used the next day). A member of the staff should be monitoring all self-serve areas for food safety issues such as tongs and spoons falling into food containers. The temperature of the dishwasher should be taken and recorded at least once per day. Training is recommended on proper glove usage. The most recent health inspection report should be posted in a location visible to the public.
Dietary Specifications Assessment Tool - Lunch	22 Portion sizes for condiments (e.g. hot sauce, ketchup, mustard, salad dressing) are controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal.	SODIUM: Portion sizes of condiments like ketchup and ranch dressing should be limited. The FSD will need to review menus for calorie, sodium and fat content, to see what the portion limitations of condiments should be for each grade level. Factors such as using canned vegetables vs. fresh vegetables will change this number. The SFA should stay within the targeted levels outlined on the meal pattern requirement.  Salt shakers were available to students on the serving line on the day of review. This practice is discouraged as it too increase the sodium levels served to the student. The SA suggested incorporating a flavor station with salt-free spices.

**Org - Level Commendations**

Description
APPLICATIONS/BENEFIT ISSUANCE (100): Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were correctly determined, applications were complete with SSN's and case numbers, and all applications were determined within ten days. The SFA is transitioning to an electronic application to increase accessibility for families. Eligibility is kept confidential.

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Underwood Comm School District (65340000)**  
**SNP - Review ID: 5817**

CIVIL RIGHTS COMPLIANCE (800): Ethnic/racial information is collected and the form is completed. No discrimination was observed. The “And Justice for All” poster is visible to program participants.
COMPETITIVE FOODS (1100): Competitive foods and beverages sold to students during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) meet Smart Snack guidelines.
MEAL COUNTING & 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 2019 appeared accurate and complete.
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.
RESOURCE MANAGEMENT & RECORD KEEPING (700): Errors fell below the \$600 disregard level. No fiscal action is anticipated at this time. The Resource Management section of the Off-Site Assessment tool was completed on time. November receipts that were reviewed, indicated appropriate and allowable expenditures. The SFA effectively utilizes its USDA entitlement for commodities, spending 96.93% of the money allocated to them in 2018/2019. Reports are filed on time, and all records are maintained for at least three years plus the current year.
VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. The application(s) selected for verification were confirmed prior to verification. The SFA had at least one person attend training. The verification report was completed accurately and on time.

**Site - Level Commendations Underwood High School (0109)**

Description
MEAL REQUIREMENTS & COMPONENTS: 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. Standardized recipes are used for food production. Water was available as required. Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted.
OFFER VS SERVE: Offer vs. Serve is being implemented properly. 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. Students are given many choices at breakfast and lunch including a fruit and vegetable bar.