

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Roland-Story Comm School District (56430000)**  
**Dates of Review: February 11 – 14, 2020**

**Program Year:** 2020  
**Month of Review:** January  
**Lead Reviewer:** Deb Linderblood  
**Org Representative(s):** Candi Holm

**Site - Level Findings: Roland-Story Middle School (0209)**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
300 - Meal Counting and Claiming - Lunch	V-0300	The SFA's Point of Sale system does not have an edit check report and the SFA has not been completing one so it is not possible to determine if the free, reduced price and paid lunch counts exceeded the number of attendance adjusted eligible students. Provided a copy of the State Agency's Edit Check Report. The report is also available on IowaCNP under download forms (NSLP060). TA provided on how to complete the Edit Check Report.	State your intentions to complete an edit check report each month prior to submitting your claim. Complete and attach an edit check report for the month of February 2020.	
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA does not have signage at breakfast explaining what constitutes a reimbursable breakfast. TA provided on where to find the breakfast signage templates on the Bureau of Nutrition's website. Also discussed that as the menu planner the Food Service Director can decide if she wants breakfast items such as the breakfast pizza to be 1 item or 2 items. Once decided this information is communicated to nutrition staff and students via the breakfast signage.	Develop and attach 1 weeks' worth of breakfast signage.	
400 - Meal Components and Quantities - Breakfast	V-0400	Minimum daily grain requirement was not met for breakfast. The breakfast bar served on January 20, 2020 only credits for .25 grain and on January 21, 2020 no grain was offered, only a cheese omelet and sausage. TA provided that 1 oz. eq. of grain must be planned at breakfast before a meat/meat alternate can be planned. TA provided on how to use the bread/grain chart. This is a repeat finding. Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for January seem to be needed.	Complete and attach one weeks' worth of menus showing that each day a minimum of 1 oz. eq. of grain is offered. For each grain item attach the "CN" label, product formulation statement or nutrition facts label.	
400 - Meal Components and	V-0400	Several practices observed during the on-site review indicated high risk for the middle school	State four changes you will make to bring calories, sodium and saturated fat within guidelines. Also state	

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Quantities - Lunch		meal pattern to be above the calories, sodium and saturated fat guidelines for Grades 5-8th. This is a repeat finding. TA provided that on the salad bar to keep calories, sodium and saturated fat within the guidelines that serving just fruits and vegetables is preferred. Also discussed having a salad bar meal option in which students who select to a salad bar meal could select from pre-portioned meat/meat alternates. Signage stating the number of pre-portioned containers students can take would be needed.	by when you will make these changes.	
400 - Meal Components and Quantities - Lunch	V-0400	The SFA has a salad bar that offers a large variety of fruits and vegetables however the food production records (FPR) do not reflect all that is offered (romaine is offered daily but is never on the FPR and on 1/24/20 FPRs only show that broccoli and tomatoes were served). The FPRs for the daily menu also are incomplete as they do not have meal counts, total quantity to be prepared in measurable amounts, planned servings, adult meals, and leftovers. TA provided on how to accurately complete FPRs. Provided the Food Service Director with the SA's template for Daily Food or Condiment Bar Food Production Record. Also provided a Checklist for reviewing food production records and a list of vegetables in each subgroup. Recommended that the Food Service Director develop a recipe or recipes for what should be on the salad bar each day to assure that all vegetable sub-groups are met.	Complete and attach one week's worth of daily lunch food production records (for the main meal and for the food bar) for the Middle School showing that all required fields are completed.	
1100 - Smart Snacks in School	V-1100	At the Middle School there is a beverage vending machine that contains 12 oz. Body Armor Lyte Super Drink which is not allowed. TA provided that at the Middle School only milk, juice and water may be sold in the vending machine. Middle school may sell up to 12 oz. portions of milk, juice and diluted juice. There is no portion size limit for plain water. Also at breakfast a two count pop tart is being sold that is not Smart Snack compliant. There are also side dishes being sold at lunch that are not compliant.	State the allowable beverage that will replace the Body Armor Lyte Super Drink in the Middle School vending machine. Also, state the product you will replace the two pack pop tart with and attach the Smart Snack calculator page showing that the replacement product is compliant. Lastly state your intentions to run all sides that will be sold a la carte through the Smart Snack Calculator and only sell as a la carte if meets the standards.	
1400 - Food Safety	V-1400	Per several different Standard Operating Procedures that are in the SFA's Food Safety Plan, individuals who enter the kitchen area are to have on hair restraints. At the Middle School students are coming into the food preparation area to use the microwave and to get second portions of the main entrée.	State your intentions to enforce your Standard Operating Procedure and only allow individuals into the kitchen preparation area who have on proper hair restraints. Describe the changes you will make so that students do not need to come into the kitchen preparation area.	

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
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700 - Resource Management	V-0700	In school year 2018-2019 the SFA only utilized 75.52% of their allotted PAL dollars. The SFA now has a new Food Service Director and for school year 2019-2020 the SFA to date has spent all but \$2,614.82 of their allotted PAL dollars and is utilizing Direct Distribution and DOD.	Since the SFA is on track to utilize 95% or more of their allotted 2019-2020 PAL dollars no corrective action is required.	
1000 - Local School Wellness Policy	V-1000	The SFA currently does not have any students on their Wellness Committee and the policy is only being reviewed and revised every 5 years. The Wellness Committee also has not completed the annual progress reports or the triennial assessment. TA provided that the SFA needs to invite students to participate on the committee, the policy needs to be reviewed and revised every 3 years, progress reports need to be completed annually and the triennial report every 3 years. The triennial report is due by June 30, 2020. Provided the following handouts: "Does Your Wellness Policy Measure Up", Summary of the Final Rule and the Progress Report.	The SFA will: 1.) attach an invitation to the members of the wellness committee for the next meeting which will be held during school year 2019-2020. The invitation needs to include students, the date and time of the next meeting and the agenda that will be discussed. 2.) state your intentions to review and revise the Wellness Policy every three years. 3.) state the month in school year 2019-2020 that you expect to complete the wellness building assessments. 4.) state the month in school year 2019-2020 that you expect to complete the triennial report. 5.) state how you will make the Wellness policy, progress reports and triennial report available to the public.	
1200 - Professional Standards	V-1200	The new Food Service Director does not have a food safety certificate and is currently not planning to obtain one until next summer. TA provided that a food safety certificate was to have been obtained within 30 days of being hired.	Find a Food Safety class that is being taught in the next month or two. Indicate below the date you will take the class.	
1200 - Professional Standards	V-1200	The SFA has numerous students who work in the kitchen. Currently these students are not receiving any training. TA provided that they should have food safety training and if helping with serving then also training on how to determine portion sizes and the appropriate utensils to use.	Develop and attach a training handout that can be given to student workers prior to starting to work in the nutrition department which covers basic food safety. State your intentions to have each student sign a document that signifies that they have received training and that you will keep this documentation on file.	
1400 - Food Safety	V-1400	At the high school the SFA has a book with three different food safety plans so cannot tell which Standard Operating Procedures (SOPs) they actually follow. There are no dates on the SOPs indicating if they have ever been reviewed or revised. There was not a copy of the food safety plan at the Middle School. TA provided that the SOPs should be reviewed and revised on a yearly basis. Upon review the review/revision date should be documented. Provided the Food Service Director with sample SOPs from the Institute of Child Nutrition.	Develop and attach a Table of Contents showing the Standard Operating Procedures (SOPs) that you plan to have in your Food Safety Plan. State your intentions to: 1.) have the SOPs completed within a year 2.) make a copy of the Food Safety plan available at each site. Also complete and attach the following completed SOPs: 1.) Personal Hygiene 2.) Cleaning and Sanitizing Food Contact Surfaces 3.) Cooling Potentially Hazardous Foods.	

**Org - Level Technical Assistance**

Area	Question	Comments
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100 - Certification and Benefit Issuance	107 a. When and how are households notified of students' certified eligibility?	If households who are denied benefits come to the office with their application the SFA has been telling them verbally that their application was denied. TA provided that households who are denied benefits must always be provided written notification. The written notification will inform them of their right to appeal and the date by which they would need to appeal the determination.
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	TA provided that the SFA should always put a received date on applications as they are submitted to the school. This provided documentation that the application was determined within 10 operating days from the date it was received. Discussed that to organize applications the applications could be put into a binder with free applications under one tab, reduced under one tab and denied under another. Also encouraged the SFA to file applications in which the household has become directly certified in a separate file folder labeled "Became Dced". TA also provided that if the SFA has a homeless student, the homeless liaison should complete a letter on school letterhead stating that the student is homeless, date and sign the letter.
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 when a student(s) is/are found on the direct certification list as Foster Care, FIP, or other free and then is found later as Food Assistance eligible, the SFA needs to be sure to change the student(s) reason for their eligibility to Food Assistance as Food Assistance takes precedence. This way when they complete their Verification Report these student(s) will be captured accurately as being on Food Assistance.
200 - Verification	209 Based on the review of verified applications:	The SFA thought they had selected an error prone application but when the income on the application was entered into ICAVES Web they were not error prone. TA provided that if the SFA uses the standard verification process they need to randomly select from error prone applications. Also discussed that prior to sending the household the selection letter the SFA should use Elookup and attempt to find the student(s). If the student(s) is/are found on Elookup the student(s) is/are directly verified and a selection letter does not need to be sent to the household. Also discussed that if a household's benefits are decreased due to verification the household must be given 10 calendar days in which to appeal. Once the appeal period is over the SFA must change the student(s) benefit status within 10 operating days.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Proved the Food Service Director with a Standard Operating Procedure and Food Production Record to use when sack lunches are served to students.
700 - Resource Management		<p>Procurement:</p> <ul style="list-style-type: none"> <li>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</li> </ul>

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		<p>purchasing method. Provided a handout that specified items that do not need to be on the Procurement Plan.</p> <ul style="list-style-type: none"><li>• TA provided that the Bureau has a preapproved equipment list and if the equipment is on this list then State Agency approval is not need to purchase the item. If it is not on this list then State Agency approval is needed if it is over \$5000.00. Provided the SFA with the list.</li><li>• TA also provided that the SFA needs to have debarment statements from vendors when using small or formal procurement methods if the purchase is over \$25,000.</li><li>• The written code of conduct should identify the specific board policies that make a reference to ethics, gifts, suspension and dismissal action. Write in the policy numbers and titles on the school food service code of conduct that would apply to officers and employees who violate procurement procedures.</li><li>• 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. Reviewed each page of the small purchase template. Discussed that for Ross Chemicals the SFA should be using the small purchase method as they are not spreading the wealth. Also, discussed that the small purchase method can be used for items such as gluten free products. The Food Service Director can go to three different stores, compare prices, document and select the lowest priced vendor. This should be done yearly.</li><li>• When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." Provided the SFA with a Micro-purchase log and reviewed how to use the log.</li><li>• 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.</li><li>• For bread, provide vendors with a package count/package weight/weight per serving for each bread product. Review the current school years bread product purchases to include any regularly purchased items when requesting price quotes.</li><li>• 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.</li></ul>
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		<ul style="list-style-type: none"> <li>• 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, gave a copy and reviewed how to use.</li> <li>• 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.</li> </ul> <p>* TA provided regarding the beverage contract: The SFA has competitively procured their beverage contract. TA provided that when they solicit prices at the end of this contract they should include terms and conditions. Provided the Athletic Director with a copy of the State Agency small purchase template which has terms and conditions. Also recommended that verbiage be added that requires that all beverages put into vending machines that are operational during the school day be Smart Snack compliant.</p>
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	TA provided that on the SFA's monthly menu the short version of the USDA nondiscrimination statement needs to be added. The statement is "This institution is an equal opportunity provider." Also discussed that the USDA and Iowa nondiscrimination statement should be included on all materials regarding the nutrition program and/or the website if you have a nutrition page.
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: <a href="http://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer">www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer</a> .
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	TA provided that if a student needs a diet modification a Diet Modification Form should be completed by a Medical Professional. Gave the Food Service Director a copy of the Diet Modification form. It is also available on IowaCNP under download forms.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	TA provided that when completing the racial/ethnic form each student should have a race and an ethnicity so the totals in each section should be the same. Also informed the SFA that there is an electronic racial/ethnic form on IowaCNP under download forms which adds up the totals automatically.
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	The SFA is currently using the Iowa individual professional development tracking sheet. Showed the Food Service Director where to find the excel spreadsheet tracking tool that allows for all staff training to be tracked on one form and it also automatically adds up their completed hours.
1500 - Reporting and Recordkeeping	1501 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	The new Food Service Director is not sure if records have been retained for 3 years plus the current year. TA provided that this is the length of time nutrition programs are required to keep all documentation, except for temperature logs which must be kept for 6 months.
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?	TA provided that Summer Food Service Program outreach materials can

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		be found on IowaCNP under download forms.
RMCR - Revenue From Nonprogram Foods	9 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	TA provided that the SFA needs to include the food cost of catering and 2nd milks to their non-program food cost calculation.

**Site - Level Technical Assistance Roland-Story Middle School (0209)**

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	At the middle school there is one student that is allergic to milk. The SFA was providing him with juice. TA provided that the student must be offered a milk substitute that is nutritionally equivalent to cow's milk unless a medical professional puts on the diet modification form that the student should be given juice as a substitute. Provided the Food Service Director with some milk substitutes that meet the USDA substitution criteria.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	The FSD is new and has not done any training on Offer vs. Serve this school year. TA provided that this training should be done each year with staff who operate the POS or have the responsibility of checking student trays for a reimbursable meal. Provided the FSD with the Offer vs. Serve manual.

**Org - Level Commendations**

Description
Certification and Benefit Issuance: The Determining Official listens to the Application Approval and Direct Certification webinar every year. The current application for free and reduced price meals/milk and income guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the Point Of Service (POS) system, and denied applications were correctly determined. All applications were correctly determined, signed and dated by the household member and the SFA, and were complete with Social Security Numbers and case numbers. Income was only converted to annual when there was more than one frequency of income. Applications are approved by the Determining Official and then are confirmed by a second individual. 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. 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 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. Students with special dietary needs are accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed.
Local Meal Charge Policy: The SFA developed and approved a meal charge policy on June 12, 2017. The policy was made available to all households and staff via the July 2019 newsletter. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.
On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and at least 50% were completed for breakfast prior to February 1st.
Procurement: The Finance Director and the Food Service Director participated in the Procurement class in Ames. The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA also has a written Code of Ethics/Conduct for Nutrition. The SFA used the State Agency small purchase template for selecting their milk and bread vendor for school year 2019-2020. The estimated annual usage for each item was provided and prices were extended. All bids include a Buy American Provision and other terms and conditions. The SFA ensures that no vendors have been debarred or suspended by USDA. The SFA is a part of the AEA purchasing group and has a signed agreement for food, small wares and chemicals.
Professional Standards: The newly hired Food Service Director meets the hiring standards and has complete 30.5 hours of professional training in school year 2019-2020. All full time nutrition staff have completed three hours of professional training in school year 2019-2020 and additional training is planned. Annual Training Spreadsheets are maintained showing which staff have been trained and meet required annual hours.

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Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.
Resource Management: All expenditures that were reviewed appeared allowable. There were no unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate financial account for the nonprofit school food service and net cash resources do not exceed three operating months. The Paid Lunch Equity (PLE) tool was completed and prices were increased as required. The Non-Program Revenue (NPR) tool was completed and no increase in prices were required. Money is not transferred out of the account to support other programs. The SFA is on track in school year 2019-2020 to spend 100% of their allotted PAL dollars.
Smart Snacks: Students are able to purchase foods via a la carte sales and a beverage vending machine. 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 all but one a la carte item sold to middle school 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.
Summer Food Service Program Outreach: Summer Food Service Program (SFSP) outreach consisted of a poster containing the information on when and where summer lunches would be served is posted in the serving line at all three schools.
Verification: The correct number of applications were verified. All income sources were verified with at least one month's income, and the process was completed on time. The application selected for verification was confirmed prior to verification. The Verifying Official listened to the Verification and Verification Reporting webinars. The verification report was completed accurately and on time.
Wellness Policy: The SFA's wellness policy was reviewed and revised on March 20, 2017. The public is made aware of the SFA's wellness policy and assessments via the district's web site. The following individuals are involved in reviewing and updating the LWP: board member, school nurse, food service director, physical education teacher, superintendent, parents and finance director. 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 Roland-Story Middle School (0209)**

Description
Food Safety: The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Food temperatures are documented on the Food Production Record. Dishwasher temperatures are taken and documented. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Opened foods are labeled and dated. Food Service workers wore proper hair restraints and practiced good gloving procedures. Bobby Martin at the high school is ServeSafe Certified.
Meal Components and Quantities: The new Food Service Director is working on developing a five week cycle menu. 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 new Food Service Director is working on obtaining CN labels and Manufacturer's Statements for all menued items. A variety of entrees, fruits, and vegetables are offered throughout the month—including many fresh fruits and vegetables. Water was available as required. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of January were accurate and complete. Point of Service (POS), counts and filed claims appear accurate. Total K-12 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. All students selected a reimbursable meal.
Nutritional Quality of School Meals: Menu certification worksheets were completed for the week of January 20, 2020 for breakfast and lunch at the Middle School. The worksheets showed that at lunch all components were offered. The Food Service Director completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Middle school is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, offering some reduced-fat salad dressings, using frozen vegetables in place of canned 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. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at lunch.
Water: Free potable water is available to all students for lunch and for breakfast via a water fountain in the cafeteria.