

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Le Mars Comm School District (36000000)
On-site Review Dates: January 14-16, 2020

Program Year: 2020
Month of Review: December
Lead Reviewer: Deann Murphy
Org Representative(s): Steve Webner

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Le Mars Middle School (0209)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	State law does not allow students who owe money to be identified. The POS at the middle school clearly shows if a student has a negative lunch account balance. Recommend turning this notification off at the POS or having the scanner turn so that this is not visible to staff/students passing by the POS.
700 - Resource Management		PROCUREMENT: Discussed with the FSD ways to improve the SFAs procurement plan for accuracy. The Code of Conduct should have the policy name added to the links that discuss accepting gratuities and disciplinary actions. Micropurchase: Dollars spent on micropurchases should be spread evenly between vendors. In SY18-19, there was a wide range spent between vendors. The SFA should try to spread the wealth as evenly as possible. Small Purchase: Reviewed the Small Purchase template located in Download Forms on IowaCNP with the FSD. This can be used when soliciting bread, milk and canned goods. The form provides verbiage on all required federal terms and conditions and gives suggestions for possible local terms and conditions. The FSD should make food specs as detailed as needed, i.e. Whole grain rich bread, list the pack size, etc. so that vendors know exactly what the school wants.

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		Copies of specs sent to all vendors should be kept on file. Informal purchases do not need to be posted in the newspaper. When contracting a service, the SFA should first send out specs to various vendors. Only after a vendor is chosen should they send a written contract for them to sign. Keep all specs/vendors contacted on file. Formal Procurement: The FSD needs to spot check invoices to ensure bid prices match invoice prices. One price difference was noted by the State Agency's review of invoices. The SFA may wish to consider raising their formal procurement threshold so that all foodservice contracts can be informal. The milk bid was a mixture of formal and informal. Discussed with the FSD using the Formal IFB and public notice templates found in Download Forms in IowaCNP if the SFA continues to use the same thresholds next year. An IFB is totally dependent on price and an evaluation matrix is not needed. The SFA would need to have a formal bid opening with an IFB - not an RFP. All required federal and local terms and conditions need to be included in a formal procurement which are included in the template located on IowaCNP.
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 written USDA complaint form and procedure was given to the FSD to keep on file. If a parent or student has a discrimination complaint regarding the Child Nutrition Program, this procedure should be followed in notifying the USDA.
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?	The wellness committee should include community members, students, parents, board, administration, Foodservice, and also a PE teacher and district Nurse. All of these individuals should be able to give input into the wellness policy and goals assessment. The most recent wellness policy needs to be posted on the schools website and the posted assessments should be dated.
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?	Breakfast promotion should be sent to households so that they know not only the menu, prices and times served, but also why breakfast participation is important and healthy. This should be done at least twice each school year.
RMCR - Revenue From Nonprogram Foods	8 Did the SFA:	Discussed with the FSD providing the cost of all second entrees to the business manager to include in the non-program costs/revenue calculation.

Site - Level Technical Assistance Le Mars Middle School (0209)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	The MS serving staff did not know that students could have both the packaged Minicinnies or Frudel AND the cereal for breakfast as the FSD had planned. Recommend the FSD write on the transport sheets how she wants to credit breakfast items so that serving staff know. Also, recommend updating breakfast signage so that it is clear to students what they must take in order to make a reimbursable meal. For example, only list one day at a time on breakfast signage and list cereal, 1 item, Minicinnies, 2 items, juice, 1 item, fruit, 1 item, milk, 1 item, etc. This way students and staff are all aware of what makes a reimbursable breakfast.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	The serving staff need to provide the full 1/2 cup fruit/vegetable portion to each student to ensure they have at least 1/2 cup fruit or vegetable on their tray. Do not provide a partial serving to students. It is challenging for the

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		staff member at the salad bar to watch all trays and refill the salad bar at the same time.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	Please ensure that the health inspector either inspects the Junior High kitchen twice annually or that you request an inspection 2 times annually and keep the documentation on file.

Org - Level Commendations

Description
All staff involved in the Child Nutrition program, including kitchen and non-kitchen staff, have received their minimum Professional Standards training. The FSD determines which topics staff need to cover during the year. She tracks all staff in the district to ensure hours are met. Many staff members have received more than their minimum training. Staff work well together to provide the district with a well-run Child Nutrition Program.
Free/Reduced applications on file were complete with parent SSN and signatures. All applications were approved and transferred into the POS correctly. Denied applications were correct. Direct Certification downloads were completed regularly and kept on file. Students receiving direct certification were done correctly. Household members connected to these children were given extended benefits. The SFA honored the 30 day carry over and ended benefits if no application or DC listing was found. Households were notified in writing whether they were approved or denied using the State Agency template letter. Applications were determined within 10 days. Building principles watched the Application approval webinar. Eligibility is kept confidential.
PROCUREMENT: The SFA has a written procurement plan and Code of Conduct in place. Micropurchases: All micropurchases were under the local purchase threshold. Prices of each purchase were reasonable. Invoices were kept on file as required. The FSD uses a micropurchase log to separate vendors. Small Purchase: Small purchases were sent to a variety of qualified vendors. No unreasonable restrictions were placed on vendors so competition was kept fair and open. All purchases were under the specified threshold for a small purchase. The SFA has a copy of all vendor receipts which show that appropriate prices were charged based on bid prices. Formal Procurement: The FSD has a copy of her AEA Purchasing disk. She checks product quality and temperature when food is delivered and communicates any problems with the Business Manager so that bills are not paid until the problems are resolved. The SFA did put a public notice for their formal milk bid in a regional newspaper. Processing: In SY2018-19, the SFA used 105% of their USDA Foods Entitlement.
The correct number of applications were verified. They were selected from Error Prone applications. All income sources were correctly identified and the process was completed on time. Chosen applications were confirmed prior to households being sent notice. The confirming official attended training on the verification process.
The district had a positive balance in their nutrition account as of Dec. 31, 2018 so they were not required to raise their paid student lunch prices. Non-program food revenue exceeded non-program food costs as required. Vending machines stocked allowable foods and beverages that met Smart Snack requirements. All reports are filed with the State Agency in a timely manner. The SFA keeps all nutrition related program files for the required 3 years + the current year.
The district has a HACCP plan that contains the required elements. Each site has a copy of the HACCP plan. The latest health inspection report is posted in a public location. Temperature logs were maintained for food and food storage, including milk coolers, refrigerators, freezers, and dishwasher. Food service workers wear hair restraints and gloves during serving.
The district publishes information about the free summer feeding program available to students across the country in their spring newsletter so that families know where they can go for free meals when there is no school.
The SFA has a wellness policy containing goals for nutrition education, physical activity and other wellness based activities. The policy goals have been assessed and both the policy and the building assessments are posted on the school's website. The district has a wellness committee that contains multiple stakeholders.

Site - Level Commendations Le Mars Middle School (0209)

Description
Meal counting and claiming was done correctly. On-site meal counts were reasonable compared to the December Review month meal counts. The POS was placed where the application stated it should be. Students were not overtly identified as free, reduced or paid during meal observation. Food production records were on file for all meals claimed.
Menus met all meal pattern requirements at both breakfast and lunch on the day of observation and for the review week. All meal components were available at the beginning of meal service as well as at the end. A fruit/veggie bar allows students to select extra and often fresh fruits and vegetables. The SFA uses many low sodium foods. The FSD keeps track of calories, sodium and saturated fat content of meals to ensure that the requirements are being met. Free water is available as required. A monthly menu is posted at the beginning of the line as well as signage showing students what they need to take to make a reimbursable meal. Staff have training on OVS annually. Standardized recipes, CN, PFS and nutrient labels are all available to support meal pattern requirements.

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The Middle School had their new And Justice for All poster posted in a public place. The district has notification letters and applications available in English and Spanish and has translators available as needed. Annual civil rights training was provided to all staff involved in the program. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. Ethnic/racial information is collected and the summary form is complete and on file. No discrimination was observed. The SFA on-site monitoring was completed at all school sites to ensure that program requirements are being met. Both the household notification letters and the menu contain the non-discrimination statement.