

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Fremont-Mills Comm School District (23690000)
SNP - Review ID: 5818

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

Site - Level Findings: Fremont-Mills Middle And Senior High School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The SFA does not have a system in place to validate menus prior to service to endure that all components and vegetable sub-group requirements are met daily and weekly. On the day of review, seven meals were observed with an insufficient serving of vegetables (or fruit) as required by the meal pattern and Offer vs Serve.	The SFA will submit the completed weekly meal pattern worksheet provided by the SA for the week of March 2-6.	
1100 - Smart Snacks in School	V-1100	Beverages being sold to middle school students as a la carte items during lunch exceeded the 12 oz. limit prescribed by Smart Snacks regulations.	The SFA will submit 1. A list of all a la carte items to be sold, including the pack size. 2. Include what age group will have access to each item and 3. How the SFA will monitor this.	
1100 - Smart Snacks in School	V-1100	At the time of the Administrative Review, the Yearbook was selling valentine messages with a sucker for delivery during school on Friday (Valentine's Day). The sucker is non-compliant per USDA Smart Snacks regulations.	The SFA will outline their process to vet and approve fundraisers which include food in the future, ensuring compliance with Smart Snacks Regulations.	
1400 - Food Safety	V-1400	The SFA did not have a written food safety plan on site.	The SFA will submit a table of contents for all of the Standard Operating Procedures that will be included in the book.	

Org - Level Findings

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Iowa Department of Education
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700 - Resource Management	V-0700	The SFA is required to follow procurement regulations outlined by the USDA. Bid solicitations using the small procurement method must contain the Buy American Provision, Non-discrimination, and all terms and conditions required for the value of the procurement event.	The SFA will submit a draft of the 2020/2021 school year milk solicitation which includes all required elements.	
1000 - Local School Wellness Policy	V-1000	The SFA was not able to provide a completed Wellness Assessment at the time of the review.	The SFA will 1. Submit the completed assessment or provide a date that the assessment will be completed. 2. Describe how the completed assessment will be made available to the public.	

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	208 When a confirmation review was conducted:	VERIFICATION: The confirming official and the determining official must be two different individuals. Technical assistance was provided on Confirmation Reviews. Prior to any other verification activity, a determining official, other than the official who made the initial eligibility determination, must review each approved application selected for verification to ensure that the initial determination was accurate. (page 71 Eligibility Manual) The confirming official then signs and dates the application(s)
300 - Meal Counting and Claiming	314 Is the SFA following their approved SFA-SA Agreement/application (including POS)?	The SFA is operating OvS for grades 3-12, the application states OvS is for grades 5-12. The SFA should decide which age levels will receive OvS, accurately report it on the application, and follow that process on the serving line. TA was given on how to modify the application.
700 - Resource Management		PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. Required terms and conditions were not included on small

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Fremont-Mills Comm School District (23690000)
SNP - Review ID: 5818

		<p>procurement bid solicitations. The Buy American Provision was not included on appropriate bid solicitations. The agreement with the AEA had not been completed. Receipts lack detail/itemization. The SFA is not monitoring the contracts for pricing and agreement compliance. Vendors were miscategorized on the Off-site Procurement Tool. Micro-purchases did not contain the element of spreading the wealth.</p> <p>The SA will be offering procurement training in March and June 2020.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>All terms and conditions appropriate for contract value should be included in bid solicitations. (see small bid document on download forms)</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> <p>SFA should keep on file:</p> <ul style="list-style-type: none"><input type="checkbox"/> All price adjustments throughout the year<input type="checkbox"/> All invoices<input type="checkbox"/> All contracts and agreements<input type="checkbox"/> All bids solicited
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		<ul style="list-style-type: none"><input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)<input type="checkbox"/> Documentation of why you selected a specific vendor (Selection Rubrics)<input type="checkbox"/> Copies of bid solicitation<input type="checkbox"/> Debarment statements<input type="checkbox"/> CD provided by the AEA (if applicable) <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.<input type="checkbox"/> Purchases should be distributed around community, not just one store. <p>Small Purchases- Purchases that are under \$250,000 (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"><input type="checkbox"/> Include all terms and conditions<input type="checkbox"/> Include terms: Buy American and Equal Opportunity<input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more<input type="checkbox"/> Attain Signed Debarment Statements<input type="checkbox"/> Awarded on lowest price (unless written documentation to justify)<input type="checkbox"/> Maintain documentation
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Iowa Department of Education
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		<p>Formal Purchase- Purchases equal to and exceeding \$250,000 (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> <p><input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised.</p> <p><input type="checkbox"/> Include all requirements of a small purchase</p> <p><input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</p> <p>Everything must be in writing.</p>
700 - Resource Management		The SFA spent only 90.59% of the USDA Foods (Commodities) funds allowed them in school year 2019/2020. The SFA should make it a goal to spend a minimum of 95% of the funding. The SA provided TA to consider allocating more funds towards fresh produce, as the SFA has had no problem spending in that area.
800 - Civil Rights	810 Review program materials.	SA shared the abbreviated version of the nondiscrimination statement with the SFA. The abbreviated version is all that is required to be printed on program materials.
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?	<p>The most recent Wellness Policy was located by the Superintendent during the on-site visit. The SFA was reminded that the Wellness Policy and the assessment should be reviewed every three years. The policy provided and found on the web site does not have a review date to document when it was last reviewed. This should be replaced with the most recent version dated 11-13-18.</p> <p>The SFA did not provide an assessment of the wellness policy, nor was one found on the website. The assessment must be completed at minimum once every three years and be made available to the public.</p> <p>An assessment template was provided by the SA along with the Wellness Final Rule.</p>

Site - Level Technical Assistance Fremont-Mills Middle And Senior High School (0172)

Area	Question	Comments
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Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Fremont-Mills Comm School District (23690000)
SNP - Review ID: 5818

400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	Some additional communication between the cashier and staff is necessary to ensure that they are on the same page as to who is the final check of the tray to ensure each students receives a reimbursable meal, how items are crediting at breakfast, and systems for identify items meant for a la carte.
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	<p>Seven lunches were observed with only one tri-tater on the tray (1/4 cup) and no other fruits or vegetables. Under Offer vs Serve, all students must have a minimum of 1/2 cup fruits and/or vegetables.</p> <p>Students under Serve Only must receive the entire 3/4 cup of vegetables. On the day of review, the meal contained 1/4 cup potatoes and 1/2 cup calico beans. The serving spoodle for the beans must be filled to level and the entire contents must be emptied onto the tray. Students not receiving the full portion do not have a reimbursable meal.</p>
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	<p>Production Records should include the planned serving size for each grade level as well as the number of serving planned. This information is critical in determining if enough food was prepared to support the minimum serving sizes as prescribed by the meal pattern.</p> <p>A copy of all CN labels or product formulation statements should be kept on file for a period of three years plus the current year.</p>
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Students should be given the choice of what food items they want. During breakfast service, pineapple was being put on every student's tray without asking. The SFA must offer 1 cup of fruit at breakfast, but under Offer vs. Serve, students only have to take 1/2 cup.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	The SFA is currently selling beverages to middle school which exceed the 12oz limit as a la carte items at lunch. These items include 16 oz Snapple, 17 oz Ice, and 16 oz propel flavored water. Middle school beverages area limited to: plain water (carbonated or uncarbonated) unflavored or flavored non-fat or low-fat milk, 100% fruit or vegetable juice (12 oz), and 100% fruit or vegetable juice diluted with water carbonated or not carbonated with no

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Fremont-Mills Comm School District (23690000)
SNP - Review ID: 5818

		<p>added sweetener (12 oz)</p> <p>A copy of the Smart Snacks in School flyer was provided to the SFA.</p>
1100 - Smart Snacks in School	1106. Does the school hold fundraisers during the school day where students may purchase food or beverages?	The yearbook was holding a fundraiser at the time of the on-site review for valentine messages with a sucker attached. This is a violation of the Smart Snacks Standards. All foods sold to students from midnight until 30 minutes after school is out must meet Smart Snacks guidelines. The LEA should run any food item interested in selling through the Smart Snacks Calculator to ensure compliance. The SA provided the link to the Smart Snacks Calculator. This is a repeat violation.
1400 - Food Safety	1404 Is a copy of the written food safety plan site specific and available at each school?	The SFA does not have a collection of Standard Operating Procedures known as a HACCP Manual. Some individual SOPs are available and hanging around the kitchen. The SFA is advised to create a binder which includes all SOPs pertinent to the operation of the food service operation. The SA provided the SFA with resources which provide SOP templates.

Org - Level Commendations

Description
ACCESS AND REIMBURSEMENT (100): Benefit documents, as well as all paperwork, were well organized. The current application form was used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS, and denied applications were correctly handled.
BREAKFAST & SUMMER PROMOTION (1600): The SFA does a good job of promoting breakfast with flyers and daily announcements. Menus are posted in each cafeteria as well as the website. Summer Food Service Program(SFSP)- outreach for the SFSP program state-wide is shared via websites and flyers.
CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. 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.
MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the (January) review month counts. Meal count totals for the month of January appeared accurate and complete. There was a point of service (POS) at the point where meals are served for all students observed at lunch. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records, were on file for all meals claimed for reimbursement for the review period. The SFA has a great system in place for students wanting to purchase second entrees, and a la carte items.

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Bureau of Nutrition and Health Services
State Review Summary Report
Fremont-Mills Comm School District (23690000)
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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. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. Two members of the staff have attended Procurement training.

RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed, indicated appropriate and allowable expenditures. Reports are filed on time, and all records are maintained for at least three years plus the current year. The SFA does a good job of reviewing a la carte item prices regularly to ensure items are priced correctly at the point of sale.

VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time.

Site - Level Commendations Fremont-Mills Middle And Senior High School (0172)

Description
FOOD SAFETY (1400): The SFA maintains a clean and well organized kitchen, following safety standards: food handling, recording temperatures, proper labeling and food storage. The latest health inspection report was posted in a publicly visible location. Food Service Staff took temperatures of food product and recorded the temperatures daily. Temperature logs were kept on file for a minimum of 6 months.
MEAL PATTERN: The menu was complete with all food groups represented and served in their proper quantity. Water was available to all students during meal times. Menus for the month of review contained all required components. The Food Service Director and kitchen staff utilize standardized recipes which are well written and easy to follow. This standardization allows for consistency in products, making planning and production more efficient. The Food Service Department offers a flavor station for students to add seasoning to their meals without adding unwanted sodium. A salad bar is available to middle and high school students.
PROFESSIONAL STANDARDS (1200): Tracking was provided that documents that the director received the required 12 hours of annual training for the 2019/2020 school year. All but one regular full time and part time staff members have also completed their required hours for the year as of the date of the review.