

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Lee Comm School District (10790000)

Program Year: 2020
Month of Review: February
Lead Reviewer: Shea Cook
Org Representative(s): Amy Fogarty

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
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: Central High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		<p>PROCUREMENT:</p> <ul style="list-style-type: none"> • Technical assistance provided to include all anticipated procurement events on the Written Procurement Plan with yearly totals. The written procurement plan should be reviewed annually prior to conducting procurement decisions. It is recommended to review procurement plan annually in February/March. • There were a number of unallowable direct expenses charged to the

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		<p>nutrition fund including repairs, RevTrak fees, phone charges, and pre-employment background checks and physicals. Under Iowa code expenses such as human resources, custodial, utilities, repair and maintenance, fees for online payment, phone lines, pest control, payroll services, etc. must be charged as indirect costs to the nutrition program and cannot be charged directly. See https://www.educateiowa.gov/documents/indirect-cost-rates/2019/09/nutrition-programs-and-indirect-costs-calculation-and-coding for further guidance.</p> <p>MICRO-PURCHASE:</p> <ul style="list-style-type: none"> • SFA spent approximately \$500 more in micro-purchasing at one vendor on grocery products. SFA should make sure that money was spent more equitably between both vendors. <p>SMALL PURCHASE:</p> <ul style="list-style-type: none"> • When utilizing the small purchase method SFA is sending letters under the heading of "Invitation to Bid." This language is incorrect and suggest a formal contract. SA advised SFA to change the title of small purchase pricing requests to "Request for Pricing" to accurately reflect the type of purchase method being used. • SFA should include estimated annual usage when requesting pricing from vendors. • Guidance was given on writing more specific product specifications in price requests including but not limited to specific size and weight, container requirements, etc. • A number of required terms and conditions were absent from price request documents including Buy American, debarment statement, termination of cause and convenience, equal opportunity, small business, etc. SA suggested utilizing the Three Bids and a Buy template document to help with including all of the required terms and conditions. • Documents of which vendors were contacted and all pricing information should be maintained on file. <p>FORMAL PURCHASE:</p> <ul style="list-style-type: none"> • SFA does exercise contract management by price checking invoices. SFA was encouraged to continue checking pricing for a variety of food and non-food items in contract monitoring.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	Professional standards hours must relate directly to duties in the nutrition program. One manager was credited for 4 hours of professional standards hours for attending a food show. That time, while informational, does not count towards professional standards hours.

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1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	Individuals who do not work in child nutrition, but have duties related to child nutrition (ex. those individuals serving as hearing and confirming officials) should have, at minimum, yearly civil rights training.
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 recommends additional SFSP outreach. Free outreach materials can be found at http://bestpractices.nokidhungry.org/programs/summer-meals/promote-summer-meals#summer-meals-outreach-resource-toolkit
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	SA discussed tracking Nonprogram Expenses more accurately. Information on Financial Report reflects expenditures and revenue where exactly the same, which is accurate. SA also encouraged FSD to speak with the business official to improve the quality of the data for nonprogram expenses and revenue so that the information that loads into the financial report from the CAR will be more accurate.

Site - Level Technical Assistance Central High School (0109)

Area	Question	Comments
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?	On-site monitoring should be completed by February 1 of each calendar year.

Org - Level Commendations

Description
CERTIFICATION AND BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were extremely well organized. • 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. • Access to benefit information is correctly limited.
CIVIL RIGHTS: The correct public release was sent to a local media outlet and published. • The SFA can provide forms in other languages as needed for Limited English Proficient households. • 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. • All staff with responsibilities in the school nutrition program received civil rights training. Documentation is on file. • The racial ethnic form was completed and shows that students were not discriminated against when applying for free or reduce price meals.
MEAL COUNTING AND CLAIMING: The edit check reports matched the claim.
MEAL PATTERN AND NUTRITION QUALITY: The menu offers a variety of vegetables, fruits and entrees. • 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. • Condiments are proportioned and limited to control calories and sodium. • The SFA purchases many low or reduced fat, low sodium products. • The SFA offers 2 different and approved types of milk to students. • The food service director completed the menu certification worksheets. • Free, potable water is available for students during their meal times.
ON-SITE MONITORING: On-site monitoring forms have been completed for all sites in the district for lunch. • On-site monitoring forms have been completed for 50% of the breakfast sites.
PROCUREMENT: The SFA has a procurement plan that includes a signature page, debarment certification statement, code of conduct and purchasing methods that will be used based on local purchasing thresholds. • When using the micro-purchase method, each transaction with the vendor was below the local micro-purchase threshold. The purchase prices were reasonable. • Small purchases were made according to the SFA's local purchasing thresholds. • The district is a member of a Group Purchasing Organization. • The food service did a good job utilizing USDA Foods Planned Assistance Level (PAL). • The SFA conducts contract management as staff ensures orders received are what was delivered and that prices match what was written on the bid. • The SFA completed the off-site procurement questionnaire and the food service director attended the regional procurement training.

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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.
RESOURCE MANAGEMENT: The SFA charges the correct paid student lunch price according to the required PLE tool and the correct adult lunch price. • 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 BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM OUTREACH: • Families are informed of the school breakfast program and the Summer Food Service Program through school announcements.
SCHOOL WELLNESS POLICY: The wellness policy contains all of the required elements and has been updated in the past 3 years as required. • The wellness policy and assessment are made available to members of the public as they are both posted on the district's website.
VERIFICATION: The verification report and process were completed on time. • The correct information was collected from parents and eligibility status was determined correctly. • Families were notified of verification selection and the verification results with a letter that contained the correct information including information on their ability to appeal if they disagree with the results. • The applications selected for verification were confirmed and signed to show that the original eligibility status was determined correctly. • Applications selected for verification were correctly pulled from the pool of error prone applications.

Site - Level Commendations Central High School (0109)

Description
Meal Components and Quantities: The menus met weekly and daily meal pattern requirements for the grade groups. • CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • At least two types of milk are offered.
Meal Counting and Claiming: Meal count totals for the month of February were accurate and complete. • Point of Service counts and filed claims appear accurate. • Edit checks are performed.