

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
GMG Comm School District (26820000)
Dates of Review: January 14 – 16, 2020

Program Year: 2020
Month of Review: November
Lead Reviewer: Deb Linderblood
Org Representative(s): Angie Claassen

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The following benefit issuance errors were found: 1. One student was receiving reduced price meals and should have been free per the direct certification list. 2. One student was given free meal benefits as the SFA extended foster care benefits to the other sibling in the household when they should not have. 3. One application did not have a social security number.	Corrective Action completed while the State Agency was on-site. No further action is required.	
800 - Civil Rights	V-0800	The SFA does not have Diet Modification Request Forms on file for students needing their diets modified. Provided a copy of the Diet Modification Request Form. TA provided that the SFA should have households take this form to their student's doctor and have the form completed. Nutrition should be given a copy of the completed form.	State your intentions to have households submit a Diet Modification Request Form if their student needs special diet accommodations.	
1000 - Local School Wellness Policy	V-1000	Currently the SFA's Wellness Committee only consists of Administration and the School Board. The committee should include representatives from the school board, administration, food service, PE teacher, RN if applicable, student, parent and community members. All stakeholders of the Wellness Committee need to be able to have input into the schools Wellness Policy. The Wellness Policy has not been reviewed since October 14, 2014 however per the Superintendent in December Administration and School Board started a review. There has not been site assessments completed or a triannual report and thus the assessments and triannual report have not been made available to the public. TA provided and the "Does Your Wellness Policy Measure Up", Summary of the final rule and Progress Report handouts were provided. Also provided a sample Wellness	The SFA will show that they have begun the process to meet the regulations for their Local Wellness Policy by: 1.) Submitting to the State Agency an invitation to stakeholders for a Local Wellness Policy Committee Meeting. The invitation needs to state when the meeting will be held, who is being invited (include individual's title) and what topics will be covered at the meeting. If the meeting has already been held, the SFA should submit meeting minutes showing the same information. 2.) Providing the State Agency with a date the SFA expects the Local Wellness Policy to be reviewed and revised. 3. Provide the State Agency with a date the SFA expects the Policy Site Assessments to be completed. 4. Provide the State Agency with a date the SFA expects the Triennial Assessment to be completed. 5.) State how the SFA intends to communicate the Policy, Site Assessments and the Triennial Assessment to the public.	

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		Policy and referred the SFA to another sample policy on the Department's web page. Also showed the SFA where to find the template for completing the site assessments. Emailed the SFA a link to the Triennial Assessment webinar and a newly developed triennial assessment form. The triennial assessment form is to be completed no later than June 30, 2020.		
1200 - Professional Standards	V-1200	The majority of the Nutrition staff and staff that have duties related to the Food Service Program have not started to complete their required training hours for school year 2019-2020. TA provided that the Food Service Director must have 12 hours, Food Service Manager 10 hours, Full-time Food Service staff 6 hours, Part-time staff 4 hours and staff that have nutrition related duties need 4 hours of training relevant to their position. Training that has been completed is not being tracked which is a repeat finding. TA provided that a training tracker tool is available on the Bureau's web site (https://educateiowa.gov/pk-12/nutrition-programs/school-meals/professional-standards-school-nutrition). TA also provided that there are webinars, tutorials and webcasts on the Bureau's web site which can be used for training (under Learning Tools-Schools). It is recommended that the Determining Official and Verifying Official listen to the Application Approval and Direct Certification webinar, Verification Webinar and the Verification Reporting webinar to complete the majority of their required training. Also encouraged the Food Service Director to participate in the State Agency monthly webinars which are on the third Monday of each month and are called News to Know in School Nutrition.	Complete and attach a training tracker spreadsheet showing the training completed by each nutrition staff and staff who have nutrition related duties. Also attach a plan showing the training that will be completed between now and the end of the school year for all staff involved in the nutrition program (Food Service Staff, Determining Official, POS operators).	
1400 - Food Safety	V-1400	The SFA does not have a written food safety plan. Emailed the Food Service Director a template food safety plan that can be tailored to reflect the actual food service practices. Discussed that a copy of the food safety plan should be at each site.	Develop and attach the table of contents showing the Standard Operating Procedures that will go into your food safety plan. Also attach Standard Operating Procedures reflecting what your practices are for Personal Hygiene, Controlling Time and Temperature During Preparation and Preventing Contamination at Food Bars.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	Per the SFA's Financial Report, the SFA has 6.26 month's worth of operational costs in the nutrition account. To date the SFA has not submitted a spend down plan to the State Agency.	Develop and attach a spend down plan to work toward only having 3 months of operational costs in the nutrition account. Also, submit the plan to Patti Harding at patti.harding@iowa.gov for approval.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA's non-program food revenue in school year 2018-2019 did not contribute adequately to total revenue.	Describe how you will bring in additional non-program revenue and/or describe steps you have already taken to bring in additional non-program revenue in school year 2019-2020.	

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RMCR - Revenue From Nonprogram Foods	V-RMCR	Those directly involved in the operation and administration of the school nutrition program may be furnished meals at no charge and can be paid for with nutrition funds. For individuals who are not involved in the operation and administration of the school nutrition program who are receiving free meals (custodian, Superintendent, Principals, etc.), these meals should be tracked and then these meals should be paid back to the nutrition fund from the General account.	State your intentions to track meals served for free to adults that are not directly involved in the operation and administration of the school meal program and that you will then credit the nutrition account for the cost of these meals or state your intentions to discontinue furnishing free meals to individuals who are not directly involved in the operation and administration of the school nutrition program.	
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Site - Level Findings: GMG Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA does not have breakfast signage explaining what constitutes a reimbursable breakfast. TA provided that the signage needs to inform students and cashiers how many items each food counts as.	Complete and attach 1 weeks' worth of breakfast signage.	
400 - Meal Components and Quantities - Lunch	V-0400	The Elementary School's Food Production Records (FPR) for lunch are missing the school name, if they use offer vs. serve, grades served, if seconds/a la carte is served, planned meal counts, serving size, the planned servings for each grade group, and the total adult meals/a la carte sold. Also milk needs to be added to each daily FPR and amounts used documented. TA provided on how to correctly fill out a FPR. Provided the Food Service Director with an updated State Agency FPR template for breakfast, lunch and food bars. Also provided a checklist of what should be completed on every FPR. Encouraged the Food Service Director to listen to the State Agency's webcast on FPRs. The school's FPR for their salad bar is also not complete. Some days there is an amount listed under leftovers but no amount prepared documented. Incomplete Food Production Records is a repeat finding. Also, for the week of menus used to complete the menu certification worksheets, the State Agency had to use invoices to determine if some of the vegetables were served. Per the food production records, invoices and the salad bar food production records it was found that during this week no dark green vegetable was served. TA provided that the Food Service Director should have recipe(s) for the salad bar to assure that all vegetable sub-groups are met each week (dark green/red-orange and other vegetables as legumes and starchy vegetables are planned on the regular menu). TA also provided on finding	Complete and attach one week's worth of lunch Food Production Records with all required information documented along with each day's completed salad bar production records. Also attach salad bar recipe(s) showing that dark green, red/orange and other vegetables will be served on the salad bar each week. State your intentions to send at least one individual to the State Agency's School Meal Pattern Essentials Short Course on August 5, 2020 in Ankeny, Iowa.	

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		the USDA Food Buying Guide and how to search for food items. Also encouraged the Food Service Director to attend the State Agency Healthy Meals workshop.	
900 - SFA On Site Monitoring	V-0900	The SFA was not aware that they needed to complete on-site monitoring. TA provided that the form can be found on IowaCNP under download forms. Explained that monitoring must be completed annually for 100% of their sites for lunch and 50% of their sites for breakfast. Reviewed with the Food Service Director how to complete the form.	Complete and attach the on-site monitoring form for the Elementary with breakfast and lunch completed.

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	111 What is the SFA's procedure for extending free school meal eligibility to all children who are members of a household in which one person in that household is receiving SNAP, TANF, or FDIPIR benefits?	TA provided that a student's eligibility status extends to other siblings in the household for Food Assistance, FIP, Other free and Other Reduced. If a student is on the direct certification list as Foster Care the free status does not extend to other students in the household.
100 - Certification and Benefit Issuance	117 How are eligibility status updates made to the point of service and benefit issuance document(s)?	TA provided that when the SFA is processing applications and entering students found on the direct certification list, the reason a student is granted benefits and the date their status changes should be put into JMC. This way when the SFA runs a report, they will have the correct status and an accurate date that the transaction occurred.
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	TA provided that when a household lists more than one frequency of income the annual or more than one frequency tab should be used on ICAVES Web to determine eligibility.
200 - Verification	209 Based on the review of verified applications:	On one of the applications that were verified, the SFA received pay stubs from the household and used the net income to determine their eligibility status. TA provided that gross wages must always be used when determining eligibility.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	TA provided that the SFA's meal charge policy is to be distributed to households each year at or before the start of the school year. Students who transfer into the school district are to be provided with the policy. Also discussed that the policy must state that students who qualify for free meals shall never be denied a reimbursable meal.
300 - Meal Counting and Claiming	306 What procedures are used as internal controls to ensure the meal counts do not exceed enrollment or attendance adjusted enrollment?	The SFA has been completing the Edit Check Report manually each month using the State Agency prototype Edit Check Report form. TA provided that JMC has an edit check report that should be run and printed at the end of each month. This report will show the number of students eligible for free, reduced price and paid meals and also give an attendance adjusted factor. Assisted the SFA in finding this report. The edit check report off of JMC should be used when completing each month's claim.
700 - Resource Management		Procurement:

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		<ul style="list-style-type: none">• 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 purchasing method.• 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.• 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.• 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. Referred the SFA to the state-prototype templates posted on IA_CNP. Reviewed each page of the small purchase template. Also provided the Vendor No Bid form.• When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." Referred the SFA to the Micro-purchase log and reviewed how to use the log.• When procuring milk and bread, along with specifications (descriptions) for all items to be procured, the estimated annual usage for each item should be provided. To ensure the district selects a responsive vendor with the overall lowest price (bottom line), the cost of each item on price quotation request should be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template that calculates extended cost for milk was provided.• For milk, other things to consider when requesting prices 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.• 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
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		<p>increase. Food items procured by the SFA not on the GPO solicitation must be procured using appropriate procurement methods.</p> <ul style="list-style-type: none"> • 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 and reviewed how to use. • 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. <p>* There is a template on IowaCNP under download forms for formal purchases. It is recommended that the SFA use this template if they do a formal procurement for dairy. TA provided that currently the SFA's local purchasing threshold is \$25,000 and in school year 2018-2019 the SFA spent \$28,884.15 so should have used the Formal method of procurement or the policy needs to be changed and approved by the board to a higher threshold. The SFA should either increase their formal purchase threshold or for school year 2019-2020 or re-bid their milk using the formal procurement method.</p>
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	Provided the current USDA nondiscrimination statement. TA provided that on the SFA's menus due to space limitations the SFA should use the short statement which is "This institution is an equal opportunity provider."
800 - Civil Rights	802 What services does the SFA provide to households comprised of persons with Limited English Proficiency (LEP)?	TA provided that the State Agency has Spanish free and reduced price applications, parent letter and instructions on IowaCNP under download forms. USDA also has these materials in 49 different languages at http://www.fns.usda.gov/school-meals/translated-applications .
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: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
1200 - Professional Standards	1203 a. Did the new School Nutrition Program Director complete food safety training within 30 days of being hired?	If the SFA needs to hire a new Food Service Director in the future, the new director must already have a food safety training certificate or obtain one within 30 days of being hired. The current Food Service Director was hired in 2015 and did not obtain food safety training until 2019.
1600 - School Breakfast and SFSP Outreach	1600 Did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	TA provided that at a minimum the SFA needs to promote their breakfast program twice a year. This can be done by putting information in a school newsletter, putting up posters, and/or sending flyers home with students. Promotional materials can be found on the Bureau website under School Breakfast. https://www.educateiowa.gov/pk-12/nutrition-programs/school-meals/school-breakfast-program
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 even if the SFA does not offer a Summer Food Service Program they still must inform eligible families about the availability and location of sites that offer the program. Promotional materials are available on IowaCNP under download forms (posters, flyers, bookmarks, etc.).
RMCR - Nonprofit School Food Srvc 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?	TA provided that equipment repair/maintenance, office supplies, and cafeteria tables cannot be charged directly to the nutrition account. These charges totaled \$9,123.06 in school year 2018-2019. These expenses

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		should be billed as indirect cost to the nutrition department. Provided the Business Manager with several handouts regarding indirect cost. TA provided that the SFA should use an unrestricted indirect cost rate which can be found on the Department of Education website. In the future, be sure the nutrition account is charged for these items using an indirect charge. It is recommended that the unallowable costs be paid back to the nutrition account.
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Site - Level Technical Assistance GMG Elementary School (0409)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch		Students are not being offered some fresh fruits (example: bananas, apples and oranges) as per the Food Service Director some students smash the bananas and leave cores and peels on the floor. TA provided that if a few select students are exhibiting poor behavior that this should be addressed with these students and not take away healthy, popular fruit items from all students.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	The menu contributions were not always correct on the current recipes that the SFA is using. TA provided on finding recipes with contributions and vegetable sub-groups identified. Directed the Food Service Director to the Iowa Gold Star Recipes, Healthier Kansas Recipes and the Institute of Child Nutrition Recipes.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	At lunch all students were being given the tenderloin on a bun and the fries. TA provided that with offer vs. serve, students should be given the opportunity to decline meal components. Each student must select 3 components with one of the items being 1/2 cup of fruit and/or vegetable. Emailed the Food Service Director the Offer vs. Serve manual to have as a reference. Also reviewed that if a student takes just a milk, fruit and vegetable the student must take 3/4 cup of the vegetable.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	TA provided that cafeteria staff should be trained yearly on offer vs. serve. Emailed the Food Service Director the Offer vs. Serve manual to use as a tool to plan trainings.
500 - Offer versus Serve	502 Is there signage explaining what constitutes a reimbursable meal to students including the requirement to select at least 1/2 cup fruit or vegetable?	The SFA has "My Plate" poster, nutrition related posters and a sign at the salad bar that informs students that they must take 1/2 cup of fruit and/or vegetable. State Agency will send the Food Service Director "Build A Healthy Lunch Posters" to post as well. TA provided that signage is needed that explains what constitutes a reimbursable meal.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	TA provided that each year the Food Service Director should request a second inspection food safety inspection once they have received their first inspection. A second inspection may or may not be completed, which is OK as long as there is documentation that the second inspection was requested.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	TA provided that the most recent food safety inspection must be posted in a publicly visible location. Currently the inspection was posted in the kitchen. The Cook determined a new publicly visible location to move the inspection to while the State Agency was on-site.

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1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	TA provided that all opened food items should be labeled with what the food product is and be dated.
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Org - Level Commendations

Description
Certification and Benefit Issuance: Benefit documents were well organized. The current application for free and reduced price meals/milk and income guidelines were used, direct certification is downloaded twice a month as required, and benefits are accurately and frequently transferred to the Point Of Service (POS) system. All applications are confirmed after the initial determination is made by a second individual. All applications were correctly determined, signed and dated by the household member and the SFA, and all applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income except in one instance. 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. Annual civil rights training was provided for food service staff, staff with duties related to the nutrition program and is documented. The SFA submitted the annual Public Release to the local media (Gladbrook Northern Sun and Marshalltown Times Republic). Students with special dietary needs are accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed.
Fiscal Action: Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for November seem to be needed.
Local Meal Charge Policy; The SFA developed and approved a meal charge policy on August 15, 2017. Staff needing to know were informed of the policy.
Procurement: The Authorized Representative attended the Regional Procurement Training in Brooklyn-Guernsey-Malcom. 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. The SFA is a part of the AEA purchasing group and has a signed agreement for food, small wares and chemicals.
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. The Non-Program Revenue tool was completed. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for USDA Foods. In school year 2018-2019 the SFA utilized 101.83% of their allotted PAL dollars using Direct Distribution and Diverted Foods programs. In school year 2019-2020 the SFA has utilized about 50% of their allotted PAL dollars to date using Direct Distribution and Diverted Foods program.
School Breakfast Program Outreach: School Breakfast Program outreach is done by posting the breakfast menu on the district's web page and in the cafeteria.
Verification: The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification. The verification report was completed accurately and on time.
Wellness Policy: The public is made aware of the SFA's wellness policy via the district's web site. 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 GMG Elementary School (0409)

Description
Food Safety: Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Food temperatures are documented on the food production records. Dishwasher temperatures are taken and documented. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. The Food Service Director passed the test for a Food Manager Certification through ANSI.
Meal Components and Quantities: The Food Service Director has developed 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 menus met weekly and daily meal pattern requirements for the Pre-K through 6th grade students. CN labels and Manufacturer's Statements were on file. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals.

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Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. JMC is used as the school's POS system. The POS was organized and orderly. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. The cashiers appeared aware of what constitutes a reimbursable meal. Edit checks are performed.

Nutritional Quality of School Meals: Menu certification worksheets were completed for the week of November 18-22, 2019 for breakfast and lunch at the Elementary School. The worksheets showed that at breakfast and lunch all meal components were offered. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Elementary 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, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats. A nutrient analysis was not required.

Offer vs. Serve: All students observed selected 1/2 cup of fruit and/or vegetable.

Water: Free potable water is available to all students for breakfast and lunch via a water cooler with cups.