

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Paton-Churdan Community School District (51390000)
Dates of Review: 11.22.2019 and 12.5.2019

Program Year: 2020
Month of Review: October
Lead Reviewer: Jean Easley
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Denied applications must be notified in writing. Directly Certified households must have the opportunity to decline benefits. Technical Assistance given to use state agency prototype "Notification of Eligibility" in Download Forms.	For your response, describe your procedure you will use moving forward to notify households who are directly certified and/or denied.	
700 - Resource Management	V-0700	A local Unpaid Meal Policy has not been developed. It is required to have a local policy and to provide policy in writing to households annually. Include the statement that "students who qualify for free meals shall never be denied a reimbursable meal."	For your response, state your plan and timeline for developing a local "Meal Charge Policy. Describe how the policy will be provided to households in writing.	
700 - Resource Management	V-0700	Paid Assistance Level (PAL) of USDA food usage was under- utilized at 70% last school year SY18-19.	Describe your plan you have put into place to better utilize USDA food entitlement funds.	
800 - Civil Rights	V-0800	Almond Milk is being offered as a milk substitute which is not an acceptable milk substitute because it is not nutritionally equivalent to cows milk. Diet Modification Request Forms have not been completed by the medical provider authorized by state law to write medical prescriptions.	Describe your plan to 1) offer a milk substitute that is nutritionally equivalent to cow's milk. 2) make the Diet Modification Request Form available to households.	

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1000 - Local School Wellness Policy	V-1000	WELLNESS POLICY and ASSESSMENT: Policy has not been reviewed every three years as required. The last date of review was 12/2013. A review of local wellness policy goals have not been completed as required, also required every three years. Wellness Policy and Assessment has not been made available to the public. Compliance with Wellness is a repeat finding.	At least every three years, goals of the local wellness policy must be assessed and provided to the school community. Suggestions where to post or how to provide the assessment were discussed. For your response, indicate: 1) the date when the assessment of goals will be completed 2) who will take the lead on wellness to ensure compliance 3) where will policy and assessment be posted or how it will be provided to community.	
1400 - Food Safety	V-1400	HACCP PLAN: a written food safety plan is not in place. SFAs are required to have a written Hazard Analysis Critical Control Points (HACCP) food safety plan. The SFA is not familiar with having access to a HACCP plan. Share Table with time temperature controlled (TTC) items may not be in place without obtaining a waiver from the state agency. MILK observed to be returned to cooler by non-nutrition staff.	For your response, 1) describe your timeline for developing a local HACCP plan. 2) Describe your plan moving forward for SHARE TABLE items which are not consumed by students. 3) Describe how will you plan to prevent milk from being returned to cooler.	
RMCR - Revenue From Nonprogram	V-RMCR	It is an unallowable expense to Nutrition Fund to pay for adult meals not directly involved in meal service.	Describe what action has been taken regarding adult meals.	

Site - Level Findings: Paton-Churdan Jr-Sr High School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
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400 - Meal Components and Quantities - Lunch	V-0400	Salad Bar menu option offered for middle school students must meet weekly minimums for grain and all vegetable subgroups.	Describe how you will ensure the salad bar meals will meet weekly minimums of grain and vegetable subgroups. Attach a recipe or modified production record.	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance		APPLICATION with FILLABLE CELLS: there is a free and reduced application which has all fillable cells except for signature line. SFAs can post this application on their web site and households can complete the entire form electronically, print the completed form, sign it & turn it in to school.
100 - Certification and Benefit Issuance		ICAVES is still available in the non-web based format. You can find it posted under Download Forms in CNP.
200 - Verification		DIRECT VERIFICATION: when a household submits an application with a case number on it or if an application with a case number is selected for verification, the SFA should try to locate students on E Look up. If found, this student is "directly verified". The household does not need to be sent a letter if selected for verification.
700 - Resource Management		PROCUREMENT: Technical Assistance was given to correct completed Procurement Plan. "An informal Small Purchase" or "3 Bids and a Buy" can be used for both Dairy and Bread. *Review and complete plan annually. *Organize and maintain all documentation so there is a detailed history of each procurement. *Include Buy American Clause in all Small and Formal Purchase

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		<p>agreements.</p> <p>*Agreements valued at \$10,000 or more should have a termination for cause clause.</p> <p>*Use State Agency template for Small Purchase for terms and conditions.</p> <p>*Maintain current debarment statements for all vendors.</p> <p>*Nutrition Director to maintain an annual Micro Purchases log and a Buy American Exception Log.</p>
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	NUTRITION WEB PAGE: technical assistance given to update outdated information found on nutrition web page. Post current eligibility application. Additionally, post Diet Modification Request Form, link to USDA Non Discrimination Statement, Meal Charge Policy, and Wellness Policy and Assessment.
800 - Civil Rights	810 Review program materials.	MENU: The correct abbreviated non-discrimination statement is "This institution is an equal opportunity provider."
1000 - Local School Wellness Policy	1006 How does the public know about the results of the most recent assessment on the implementation of the Local School Wellness Policy?	WELLNESS POLICY: technical assistance given: recommend using the template developed by the state agency for your wellness assessment or "progress report". Template provided and Final Rule. Best practice: post the policy and assessment on your district website to meet requirement of making policy available to the public. Also include in student/parent handbook.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	TRAINING: seek out opportunities for training to keep abreast of nutrition regulation. Examples: News to Know webinar on Diet Modifications in November. News to Know is the 4th Monday monthly at 2 pm. Staff training webcasts to utilize https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts . AEA Purchasing offers a Back to School training annually.

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1400 - Food Safety		HACCP: Technical Assistance given: The plan must contain the process approach for menu items and standard operating procedures (SOP) for personal hygiene, facility and equipment, flow of food, consumer communications, employee orientation, training and HACCP training. Include a monitoring and record keeping system to ensure all SOPs are followed. Sample SOPs can be found on the ISU Extension and Outreach site: https://www.extension.iastate.edu/foodsafety/haccpschool-foodservice
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Site - Level Technical Assistance Paton-Churdan Jr-Sr High School (0172)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	409 Review production records and other supporting documentation.	FOOD PRODUCTION RECORDS: technical assistance given to more consistently include total quantity, leftovers, and both "planned" and "actual" numbers consistently on FPRs. Provided the Breakfast FPR template which includes a column for "leftovers". FPR Checklist provided.
Dietary Specifications Assessment Tool - Lunch	25 Larger portions and/or bonus items and/or seconds are offered (offering portion sizes that are inconsistent with the planned menu). Entrées sold a la carte are exempt.	LEFTOVERS: entrees should not be "given out" to students. It is unfair that some students may receive and others would not. Recommend making extras available as a la carte. Entrée items are an allowable a la carte item when sold the day of or the day following for "Smart Snack" regulation.

Org - Level Commendations

Description
CIVIL RIGHTS: Civil Rights training records confirm that all staff working in Nutrition receive civil rights training annually. Civil Rights slides are maintained in the Eligibility binder.
ELIGIBILITY APPLICATIONS: All applications were completed correctly. No errors were found in determining eligibility. Benefit Issuance, and all accompanying documents, are well organized. ICAVES reports are maintained with each application verifying eligibility.
Fiscal action is not required as result of this review.

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<p>MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. Point of Service, POS, counts and filed claims appear accurate. There is a POS for all students, and the POS is orderly. No overt identification of students who receive benefits was observed. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period.</p>
<p>NON PROFIT NUTRITION ACCOUNT: school food authority (SFA) has a plan in place to spend down > 3 months operating balance which includes purchasing new food service equipment along with a remodel of kitchen (district funds).</p>
<p>PROCUREMENT: a written Procurement Plan has been developed with includes federal and local thresholds. The SFA has a written Code of Conduct which includes conflicts of interests, accepting items of monetary value, disciplinary actions and checks and balances. Review and update your plan annually. Continue efforts to organize documentation of procurement events; continue to log and maintain documentation for micro purchases and small purchases made for nutrition program. The SFA has an agreement with AEA Purchasing (northwest zone) for Prime Vendor, Small Wares and Ware Wash. Cost Reimbursable contract is being monitored ensuring discounts, credits, rebates are deposited to Nutrition Fund. Business Manager and Nutrition Director attended state agency procurement training.</p>
<p>VERIFICATION: 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.</p>

Site - Level Commendations Paton-Churdan Jr-Sr High School (0172)

Description
<p>ENVIRONMENT: Nutrition staff and cashier are helpful and encouraging to student customers. Signage is posted showing how to build a reimbursable meal, as required. Students are observed to have adequate time to eat.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: 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. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch—including many fresh fruits and vegetables. The SFA offers daily choices of fruits and vegetables. Water was available as required. Offer vs. Serve, OVS, was correctly implemented. At least two types of milk are offered. Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch.</p>
<p>BREAKFAST: excellent breakfast participation.</p>