

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Centerville Comm School District (10710000)**  
**SNP - Review ID: 5887**

**Program Year:** 2020  
**Month of Review:** December  
**Lead Reviewer:** Shea Cook  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	Documentation does not indicate that a confirmation review was conducted prior to verification.	For your response please identify your confirming official and state how you will document that a confirmation review is conducted in the future.	
900 - SFA On Site Monitoring	V-0900	Although on-site monitoring was not yet due at the date of this administrative review, there is no documentation to confirm that on-site monitoring was conducted during the previous school year.	For your response please upload completed on-site monitoring forms for each building for the current school year. The deadline to complete on site monitoring is Feb. 1.	
1000 - Local School Wellness Policy	V-1000	Completed assessment results are not available to the public as required.	For your response please provide a link to where the assessment results have been posted on the district website.	
1200 - Professional Standards	V-1200	SFA does not have a system for tracking training hours. SFAs must have a system to track training that includes the following information: employees name, position, title/subject of training, date training is completed, and number of creditable training hours.	Please attach a copy of a completed training tracking tool for all of the hours that have been completed for the current year so far.	
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: Lakeview Elementary 4-5-6 School (0412)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
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400 - Meal Components and Quantities - Breakfast	V-0400	Although a daily menu is posted, signage is not available at or near the beginning of the service line to identify the components of a reimbursable meal.	For your response please obtain correct signage, indicate where the signage will be posted, and identify who is responsible at the site for daily updates.	
400 - Meal Components and Quantities - Lunch	V-0400	Although there is a menu posted, there is no signage available at the beginning of the service line explaining the components of a reimbursable lunch.	For your response please obtain the correct signage, indicate where that signage will be posted, and identify who will be responsible at the site for daily updates.	
400 - Meal Components and Quantities - Lunch	V-0400	Food production records are incomplete and do not include the information needed to determine if all meals were reimbursable. There are no production record kept for the daily salad bar offering. Additionally, condiments are not tracked, the actual amounts planned and prepared are not documented, leftovers are not documented, and number of adult meals/seconds are not tracked.	For your response please submit one week's worth of completed lunch food production records, including completed production records for the daily food bar if you do not plan to document the items offered in detail on the daily food production records.	
400 - Meal Components and Quantities - Lunch	V-0400	Menu certification worksheets were not completed for the review week prior to the on-site visit as required.	For your response please submit completed menu certification worksheets for both breakfast and lunch for the review week.	
400 - Meal Components and Quantities - Lunch	V-0400	Standardized recipe and lack of product information evaluated from the review period for the lunchmeat offered in the Stromboli do not clearly indicate that portion sizes offered meet the daily minimum meal pattern requirements for M/MA for 9-12 grade groups. SFA indicated that they use 2 oz. by weight, which would make the lunch short of the requirement.	For your response please submit your plan for making sure that the M/MA used in the stromboli meet the 2 oz. minimum crediting requirement for the 9-12 age groups. Identify the product that will be used and identify how much will be required to credit as 2 oz. M/MA for the recipe.	
500 - Offer versus Serve	V-0500	There were no OVS errors observed during lunch. However, during breakfast 13 unallowable meals were observed. Students only took two of the required three items.	For your response please describe your plan and timeline for OVS training.	

**Site - Level Findings: Central Elementary School (0409)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	110 Does the SFA use the direct certification notification letter provided by the State agency?	SFA's POS does have template letters that can be used for notification. SA discussed that any documents generated by a POS system need to be pre-approved through the SA before use.
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	During review of application SA noted one application with an incorrect case number. Case numbers must be 10 digits long. Error did not impact determination as application was also free by income.

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200 - Verification	208 When a confirmation review was conducted:	SA explained the purpose of the confirmation review and how they should be documented.
700 - Resource Management		<p>PROCUREMENT</p> <ul style="list-style-type: none"> <li>• Technical assistance provided to include all anticipated procurement events on the Written Procurement Plan. The written procurement plan should be reviewed annually prior to conducting procurement decisions. It is recommended to review procurement plan annually in February/March.</li> <li>• The vendor paid list from SY19 showed a number of purchases that are no longer allowed as a direct charge to the nutrition fund including fuel and repair charges. Both charges should only be charges as an indirect cost to the school nutrition fund. SA shared resource with Business Official and School Finance has issued guidance on indirect costs.  <a href="https://educateiowa.gov/sites/files/ed/documents/Nutrition%20Programs%20and%20Indirect%20Costs%20-%20Calculation%20and%20Coding.pdf">https://educateiowa.gov/sites/files/ed/documents/Nutrition%20Programs%20and%20Indirect%20Costs%20-%20Calculation%20and%20Coding.pdf</a></li> <li>• During SY19 tables were purchased using the nutrition fund. Per school finance tables are not an allowable charge to the nutrition program and must be paid for out of PPEL funds</li> <li>• The school district has many formal contracts due to the board purchasing policy. Policy does not for small purchases and instead required formal purchasing for anything over \$10,000. Formal contracts are labor intensive as they require many terms and conditions that are not required for a small purchase. Additionally, public notification in a major circulating newspaper in the school district's service area is required when using the formal methods of procurement which creates an expense for each formal contract. SA strongly recommends that the school board consider revising the purchasing policy for school meals program.</li> <li>• SFA should include estimated annual usage in request for pricing in order to get best pricing. SA shared electronic resource Three Bids and a Buy document developed for evaluating bottom line pricing based on estimated annual usage.</li> <li>• It is best practice to allow vendors a minimum of five-six weeks from date vendor is contacted to the due date for pricing/bids to be returned. This is to allow the vendor adequate time to respond.</li> <li>• 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.</li> <li>• Guidance was given on writing more specific product specifications in price request documents including but not limited to size, nutritional information, delivery expectations, etc. For example, bread price requests were missing specific descriptions such as whether sandwich bread should be sliced or whole and specific unit size.</li> <li>• All documents, including price comparison documents, price request documents/letters, advertisements for bidding opportunities, contracts, price lists, etc. should be kept on file.</li> </ul> <p>Micro Purchase:</p> <ul style="list-style-type: none"> <li>• SA gave clarification on spreading the wealth for micro purchases. Clarification was also given on documenting reasons for not spreading the wealth (e.g. significant difference in price between vendors, distance to travel to another vendor).</li> </ul>

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		<p>Formal Purchase:</p> <ul style="list-style-type: none"> <li>The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and the specifications of the product solicited. Price on the invoice should match bid pricing. SFA should check pricing for a variety of food and non-food items in contract monitoring.</li> <li>SFA has a signed agreement with the GPO to purchase food and supplies, however food and supplies were also being purchased from an additional vendor. SA advised SFA that the contract with the GPO requires that SFA purchase no less than 60% of food and supplies from prime vendor. SA suggested comparing pricing before an extension with second vendor is signed for the next school year to see if it is in their best interest to continue to use the additional vendor. Additionally, SFA should make sure that they are purchasing the minimum quality required by contract.</li> </ul>
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	If parents wish to file a complaint about any child nutrition programs, this is the process that should be used: <a href="http://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer">www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer</a> .
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	SA provided instruction on completing racial/ethnic form correctly.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	Each year, schools with more than one building must conduct a monitor of meal counting and claiming in all buildings by February 1. Additionally, on site monitoring for breakfast is required in 50% of the buildings.
1000 - Local School Wellness Policy	1000 Provide a copy or appropriate web address of the current Local School Wellness Policy.	Current wellness policy has outdated language that references SMI reviews. SMI reviews are no longer conducted and haven't been for a number of years. SA recommends updating wellness policy.
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	SA advised SFA to keep a copy of wellness committee meeting minutes and a listing of current committee members on file for documentation to show that the committee is meeting as required. Additionally, documentation announcing meetings and informing the public of their ability to participate should be kept on file to demonstrate that the opportunity to participate was advertised.
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	SFA is currently not using any centralized tracking method. SA shared electronic resources for tracking professional standards hours.
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?	SA discussed civil rights training for those who have duties in school nutrition but do not work in the 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?	SA encouraged additional summer outreach at the end of the school year. Free outreach materials can be found at <a href="http://bestpractices.nokidhungry.org/programs/summer-meals/promote-summer-meals#summer-meals-outreach-resource-toolkit">http://bestpractices.nokidhungry.org/programs/summer-meals/promote-summer-meals#summer-meals-outreach-resource-toolkit</a>

**Site - Level Technical Assistance Central Elementary School (0409)**

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	SA recommended OVS refresher training. 1/2 c. of fruit, 1/4 c. of cauliflower, and 1/2 c tater tots were offered as the fruit and vegetable offerings for lunch on the day of review. If a students did not want to take the fruit or the tater tots they would need to be served more than the planned 1/4 c. of cauliflower for the meal to be reimbursable.

**Site - Level Technical Assistance Lakeview Elementary 4-5-6 School (0412)**

Area	Question	Comments
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400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Because there are no production records for the daily food bar, it is impossible to determine if students had access to sufficient amounts of red orange and dark green vegetable subgroups. Observing the daily offerings it is likely that the SFA is meeting the minimum weekly requirements, but the production records should reflect that. SA discussed keeping food bar production records for all foods used to meet the meal pattern, including the salad bar. Additionally, SA discussed the components of complete food production records. SA completed template FPR showing all of the fields that must be completed. Additionally SA recommends that the SFA review the food production record webcast and suggests using it for training those individuals responsible for completing FPRs. Webcast can be located at the following website under the Food Production Records heading near the bottom of the page: <a href="https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts">https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts</a>
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	The standardized recipe for the Stromboli is not up to date and the crediting information on the recipe does not agree with the crediting information noted on the food production record. Notes attached to the recipe suggest it is not being followed. Additionally, there is no product formulation statement for the ham used in the recipe and the SFA is likely short on minimum M/MMA for 9-12 grade. SA advised the SFA that 2 oz of lunchmeat does not credit as 2 oz of M/MMA due to water and fillers. SA advised SFA to use CN labeled lunchmeat or obtain product formulation statements to verify the amount of creditable M/MMA. There are numerous standardized recipes for Stromboli available for child nutrition, including one from the USDA. SA suggests SFA look at other standardized recipes for comparison to the one they are using.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	SA discussed differences between offer versus serve during lunch and breakfast. Additional OVS resources can be found on the Bureau website under the Menu Planning and Recipes heading: <a href="https://educateiowa.gov/pk-12/nutrition-programs/learning-tools-schools">https://educateiowa.gov/pk-12/nutrition-programs/learning-tools-schools</a>
1100 - Smart Snacks in School	1104. Are students able to purchase foods during the school day?	While most a la carte items were compliance with Smart Snack requirements, there were no calculator printouts for some of the beverages offered. Documentation, including calculator print outs for all items sold as a la carte items, should be kept on file. You can find the Smart Snack calculator at the following website: <a href="https://foodplanner.healthiergeneration.org/calculator/">https://foodplanner.healthiergeneration.org/calculator/</a> .
1400 - Food Safety	1404 Is a copy of the written food safety plan site specific and available at each school?	HACCP Plan indicates that the last update was 2006. SA recommends that HACCP plan be updated to reflect current procedures and practices. It is the expectation that an updated HACCP Plan will be in place at the next Administrative Review. A number of HACCP resources for schools can be found at the following website: <a href="https://www.extension.iastate.edu/foodsafety/haccp-school-foodservice">https://www.extension.iastate.edu/foodsafety/haccp-school-foodservice</a>
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	SA explained the requirement that SFA must request two health inspections per year and keep documentation of that request on file.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	Latest inspection report was hanging on a bulletin board in the kitchen. Report was moved to publicly visible location while SA was on site and no further action is needed. SFA should make sure that reports in all buildings are in a publicly visible location and not in the kitchen.
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	During observation a member of the teaching staff was seen entering the kitchen with personal food to reheat. Only kitchen staff who are wearing the appropriate attire should be allowed in the kitchen.

**Org - Level Commendations**

Description
CERTIFICATION AND BENEFIT ISSUANCE: 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. • There were no certification or benefits errors noted during this review.

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<b>CIVIL RIGHTS:</b> The correct public release was sent to a local media outlet and published. • 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. An approved milk alternate is made available for students with a dairy intolerance. • All staff with responsibilities in the school nutrition program received civil rights training. Documentation is on file. • The “And Justice For All” poster is on display in all cafeterias. • The racial ethnic form was completed and shows that students were not discriminated against when applying for free or reduce price meals.
<b>COMPETITIVE FOODS:</b> Nutrition calculator printouts are on file for all a la carte foods sold. • All competitive foods sold during the on-site review meet the Smart Snack requirements.
<b>FISCAL ACTION:</b> There are no errors resulting in fiscal action for this review.
<b>FOOD SAFETY:</b> The temperatures for hot foods are monitored. • Temperatures are monitored and recorded for the refrigerators, freezers and milk coolers. The temperatures for the dishwasher are also monitored and recorded. • The food service director is ServSafe certified. • Good food safety practices were observed while SA was on-site. • Foods are stored properly.
<b>MEAL COUNTING AND CLAIMING:</b> The point of service line for breakfast and lunch is organized and orderly which allows staff to ensure all students receive a reimbursable meal. • All students at the selected sites had a reimbursable meal at the lunch meals observed. • The edit check reports matched the claim. • The day of review meal counts were reasonable with the review period counts.
<b>MEAL PATTERN AND NUTRITION QUALITY:</b> • The menu offers a daily salad bar and hot vegetable options to provide many options to students. • The menu offers a variety of vegetables, fruits and entrees. • The cafeteria has many posters encouraging healthy foods and activity. • The breakfast menu provided during the review period met the daily and weekly meal pattern requirements for all grade groups. • Condiments are proportioned and limited to control calories and sodium. • The SFA purchases many low or reduced fat, low sodium products. • The SFA offers 3 different and approved types of milk to students. • Foods found in storage met the Buy American provision.
<b>PROCUREMENT:</b> The SFA completed the off-site procurement questionnaire. • 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.
<b>RESOURCE MANAGEMENT:</b> The SFA charges the correct paid student lunch price according to the required PLE tool and the correct adult lunch price. • The SFA has a negative balance policy to address negative student lunch accounts. • Records are kept for 3 years plus the current year.
<b>SCHOOL WELLNESS POLICY:</b> The wellness policy contains all of the required elements as required. • The wellness policy is posted on the district website and available to members of the public. • An assessment of the wellness policy has been completed within the past three years as required.
<b>VERIFICATION:</b> 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.

**Site - Level Commendations Central Elementary School (0409)**

Description
Civil Rights: The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.
Food Safety: 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.
Meal Components and Quantities: All meal components were available at the beginning of meal service on the day 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 grade groups. • At least two types of milk are offered. • Students had sufficient of time to eat after receiving meals.
Meal Counting and Claiming: The Point of Service is at the end of the line where students turn in a lunch ticket with their account number which is entered by staff. • Meal counts during the on-site review were reasonable when compared to the review month counts. • Meal count totals for the month of December were accurate and complete. • Point of Service counts and filed claims appear accurate. • Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. • Cashiers are trained and appeared aware of what constitutes a reimbursable meal. • Edit checks are performed.
Offer vs. Serve: Offer vs. Serve is being implemented properly. • All students observed selected 1/2 cup of fruit and/or vegetable. • Cafeteria staff have been trained on offer vs. serve.

**Site - Level Commendations Lakeview Elementary 4-5-6 School (0412)**

Description
Civil Rights: The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.

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Food Safety: 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.

Meal Components and Quantities: Students have a large number of fruit and vegetable selections to choose from daily. • All meal components were available at the beginning of meal service on the day 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 grade groups. • At least two types of milk are offered. • Students had sufficient of time to eat after receiving meals.

Meal Counting and Claiming: The Point of Service is at the end of the line and students punch their unique number into a key pad. • Meal counts during the on-site review were reasonable when compared to the review month counts. • Meal count totals for the month of December were accurate and complete. • Point of Service counts and filed claims appear accurate. • Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. • Cashiers are trained and appeared aware of what constitutes a reimbursable meal. • Edit checks are performed.

Offer vs. Serve: Offer vs. Serve is being implemented properly. • All students observed selected 1/2 cup of fruit and/or vegetable. • Cafeteria staff have been trained on offer vs. serve.

Water: Free potable water is available to all students for lunch and breakfast.