

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Greene County Community School District (31950000)
Dates of Review: 11/18 – 11/19 and 11/22/2019

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	The SFA's notification letter used for directly certified households has not been approved by the State Agency.	State your intentions to have all notification letters from your point of service system approved by the State Agency when not using the state agency prototype letters.	
200 - Verification	V-0200	Supporting documentation for verification was not maintained; it appears several errors were made: 1) the SFA did not choose the correct sample size according to verification collection report. 2) applications selected for verification must be confirmed before beginning the verification process. 3) maintain all documentation: a copy of letters sent to households, application, income documentation provided, and proof of at least one attempt to contact household if no response, and final letter. It is also helpful to include a printout of ICAVES showing how income was checked 4) Final result letter to households must give 10 calendar days to appeal. 5) the contact person listed on IowaCNP is not the verifying official.	For your response, make these corrections in IowaCNP on the Verification Collection Report: 1) name of verifying official 2) review report to correctly reflect number of applications verified; take note that if 4 is correct, you reviewed too many. Additionally, 1) describe your commitment the verifying official will participate with annual verification training and verification collection report training. 2) describe your understanding of what documents will be maintained.	
600 - Dietary Specifications and Nutrition Analysis	V-0600	MEAL PATTERN CREDITING: Chicken Lo Mein, Breakfast Sandwich on Biscuit, Sugar and Crunch Cookies were served during targeted week in October. The state agency recognizes that standardized recipes are being used which is excellent, however, some recipes were observed to have errors in meal pattern crediting and others did not include meal pattern crediting information.	1) Please correct meal pattern crediting on Chicken Lo Mein recipe which does not credit for 2 M/MA. 2.47 oz of fajita strips credit for 2 M/MA, so either revise recipe to include more fajita strips OR change crediting. 2) List Meal Pattern Crediting on recipe. 3) Sugar Cookies credit for 1 grain/Crunch Cookies for ½ grain according to production record. Please describe how this was determined. List Meal Pattern Crediting on recipe.	

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700 - Resource Management	V-0700	BUY AMERICAN: There must be a procedure in place for documenting non-domestic purchases. SFA is to maintain a "Buy American Exception Log" of products if not produced or manufactured in the US in sufficient or reasonably available quantity or quality; OR that competitive bids show the cost is significantly higher than non-domestic.	Describe how you will implement a Buy American Exception Log. Refer to written technical assistance.	
1200 - Professional Standards	V-1200	All school nutrition staff need to be provided with training to do their job. A Tracking Tool has been implemented as required; however, there are no targeted number of training hours for staff and no training provided for cashiers with exception of civil rights. Determining Official did not attend eligibility webinar training. Findings and documentation reviewed do not confirm that nutrition staff are adequately trained.	For your response 1) update your tracking tool to include number of targeted training hours for all staff involved with nutrition duties, including Authorized Representative. 2) describe how training plan will ensure all will receive the annual training they require and who will take charge of training and documentation. 3) describe your understanding of Determining Official training priorities should include 3 annual webinar trainings on Eligibility, Verification, and Verification Collection Report.	
RMCR - Indirect Costs	V-RMCR	School Nutrition Program was charged directly for online transaction fees and postage. These charges should have been recouped by applying the Indirect Cost Rate per Iowa school finance guidance.	For your response, confirm your understanding of how to apply indirect costs to School Nutrition.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	NON-PROGRAM FOODS: Revenue from sale of non-program foods must generate at least the same proportion of SFA revenue as they contribute to food costs. According to the non program revenue tool in the financial report in IowaCNP which comes from the Certified Annual Report, the SFA's revenue ratio (6%) is less than the food cost revenue ratio (10%). ADULT MEALS: It is not an allowable cost for the Nutrition Program to pay for adults substitute teachers. It was observed that substitute teachers may be given a school lunch at no charge.	For your response, 1) state how SFA will ensure nutrition fund will only allow free meals to food service support staff only. Describe how the general fund will reimburse nutrition fund for substitute teacher meals. Submit documentation showing how meals will be documented and reimbursed by general fund. 2) Describe the process you will use to set prices of a la carte and head start meals high enough to cover per serving and labor cost to improve non program revenue trend towards compliance.	

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Site - Level Findings: Greene County Elementary School (0412)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Three breakfast meals planned during the targeted week were insufficient in offering 1 cup fruit. October 21, 22 and 24 offered .75 orange or 1/2 pear crediting for less than 1/2 cup required since 1/2 cup 100% juice is offered. Technical Assistance given regarding 1 orange(113 ct) = 5/8 cup fruit, so .75 does not meet requirement. 1/2 pear = 3/8 cup fruit	For your response, submit a revised production record showing 1 cup total fruit was offered at breakfast for one week of your cycle menu.	
400 - Meal Components and Quantities - Lunch	V-0400	The week of observation did not plan any Dark Green vegetable subgroup. Refer to technical assistance provided and note correction was made during site review.	For your response, submit either USDA certification worksheets, state agency spreadsheet, or handwritten Menu Planning Tool of your six-week menu cycle verifying cycle has been revised to be compliant with the meal pattern, including all required vegetable subgroups and serving sizes.	

Area	Question	Comments
100 - Certification and Benefit Issuance	132 Does the direct certification list utilized by the SFA:	<p>BENEFIT ISSUANCE ORGANIZATION: Maintain and organize benefit issuance documentation.</p> <p>1) All DC lists are required to be maintained. SFA was missing the first (and largest) July download. This was corrected during review.</p> <p>2) Households who are denied benefits must be notified in writing to be certain households are provided all required information: reason for denial, right to appeal, how to appeal, or the right to reapply at any time. Maintain copies of letters.</p> <p>3) Maintain documentation of letter informing Directly Certified households of eligibility; they must be given an opportunity to decline.</p> <p>4) Maintain ALL verification documentation including letters to households, application and income statements provided.</p>

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600 - Dietary Specifications and Nutrition Analysis	601 How will the SA proceed with the targeted menu review?	<p>MEAL PATTERN DOCUMENTATION: Continue collecting CN labels and Product Formulation Statements for all products served in cycle menu to correctly verify how all products credit in meal pattern. A Product Formulation Statement is an alternative for crediting information when you cannot get a CN label. This is not the specification sheet from your distributor.</p> <p>EXHIBIT A GRAIN CHART: reminder to use for crediting bread and grain items without documentation.</p> <p>STANDARDIZED RECIPES: all should include accurate meal pattern crediting.</p>
700 - Resource Management		<p>BUY AMERICAN EXCEPTION LOG: SFA is to keep a log reporting any nondomestic agriculture products purchased with CN dollars. The Exemption Log should state date, product accepted and reason why they accepted it, i.e. domestic product was not available or significantly higher priced than the non-domestic product.</p>
700 - Resource Management		<p>PROCUREMENT: A Procurement Plan for school nutrition has been developed. Plan to review and update plan annually. Documentation is to be available to show SFA confirmed vendors are in good standing to do business with federal government. You must have a Debarment form on file for each vendor. Or, a printout from sam.gov page. (Go to quick search - enter name of vendor) Continue efforts to organize and track documentation of procurement events, divided into areas of – micro purchases, small purchases and formal. Bread and Milk "Bids" may be a Small Purchase instead of Formal as the amount is under the local threshold. Solicitation documents should use the language of "price quotations" if this is the case. Use the state agency's Small Purchase Template for use of both required and optional terms and conditions.</p> <p>1) Dairy and bread as using a formal procurement method when a small purchased is actually used. 2) SFA should include AEA contracts for Smallwares and Warewash as separate procurement on written plan.</p>
700 - Resource Management		<p>PROCUREMENT: Sound documented justification must be maintained if SFA does not award the contract to the vendor with lowest overall cost. This was presented and discussed at the Exit Meeting with Superintendent and two food service directors all of whom are involved in food service decisions.</p>

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700 – Resource Management	700 Did the SFA have the ability to accurately track all revenues and expenditures for the nonprofit school food service separately from all other transactions?	SUMMER FOOD SERVICE PROGRAM: SFSP should be coded separately so that all expenses and revenue for the SFSP is separate from National School Lunch Program and School Breakfast Program.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	NON DISCRIMINATION STATEMENT: federal and Iowa non-discrimination statements provided to Authorized Representative who is the Superintendent of school. Reminder that for school meal program you must always include both USDA Non Discrimination Statement and the Iowa Statement.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	ON SITE MONITORING: reports are completed before February 1st as required; however, reports from last year did not include a review of meal counts. Technical Assistance given to include meal counts as part of on- site monitoring for current school year. Use On Site Monitoring as an opportunity to notice and resolve any issues regarding meal counting and claiming of meals.
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.)	PROFESSIONAL STANDARDS and TRAINING: plan training so all staff who work in nutrition adequately understand their job, particularly meal pattern and benefit issuance and verification. During the on-site review, it was recommended to plan a "Back to School" training, or a monthly training, or a daily short training conducted by directors to ensure the entire staff has understanding of the reimbursable meal.

Site - Level Technical Assistance Greene County Elementary School (0412)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	321 a. Are total meal counts, by category, for the review period reasonable compared to meal counts for the day of review?	OCTOBER CLAIM: Technical Assistance given for lunch claim was entered incorrectly for Greene Co Elementary for month of the review. Edit check report shows 3384 Paid, 655 Reduced, 3885 Free meals. The numbers submitted in the claim were 262, 48, 282. Claim was corrected and revised.
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	STAFF TRAINING on MEAL PATTERN: technical assistance provided that staff training on meal pattern and your menu cycle is necessary for compliance. Plan staff training "back to school" on your menu and meal pattern and offer versus serve annually. Technical Assistance given to Kay Sesker. A link to staff training webcasts was shared. https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts

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400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	<p>Lunch Observations Meal Pattern Errors: Technical Assistance on the following:</p> <ul style="list-style-type: none"> · Short Vegetable. ½ cup lettuce mix was the only vegetable offered which credits for ¼ cup. 90 meals were served. If this error is repeated at an upcoming review, the meals will be disallowed. Consultant provided TA and the menu was corrected on site by offering ½ cup carrots for remaining lunches. · Short DG vegetable. There were no Dark Green vegetable planned during the week with exception of lettuce mix which not considered to be Dark Green. (1/2 cup mix = ¼ cup vegetable = 1/8 DG) Consultant offered TA and broccoli is to be offered instead of green beans on Tuesday. Corrected during site review. · Production Records errors: ½ orange was shown to credit for ½ cup fruit. 1 (113 ct) orange credits for 5/8 cup fruit per the Food Buying Guide, therefore, 1/2 orange credits for less than 1/2 cup. (1/3 cup). TA provided. Additionally, it was listed that ½ cup lettuce credited for ½ cup vegetable which is incorrect and should be 1/4 cup. TA provided.
600 - Dietary Specifications and Nutrient Analysis	604 If Option 1 is selected to complete the targeted menu review (i.e. completed the Off-site portion of the Dietary Specifications Assessment Tool), what was the On-site validation of the risk determination?	<p>NUTRITIONAL STANDARDS: Cup of frosting for graham crackers. Suggest not serving this as many students did not know what to do with it. Some students ate the frosting alone instead of on the graham cracker. Not necessary item and contributes to sugar and unnecessary calories. Students eat graham crackers fine without the frosting.</p>
1400 - Food Safety		<p>HEALTH INSPECTION REPORTS: reports are to be posted so they are visible to the public. The report was moved from inside the serving area to the outside door where other signs are posted. Technical Assistance provided that this is a requirement and to be sure this is done at all school sites. Corrected on site, so no additional action is necessary.</p>

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Org - Level Commendations

Description
CIVIL RIGHTS: Civil Rights training is provided to all staff. Non Discrimination Statement is appropriately included on all reference materials and on nutrition/menu web page. No discrimination observed.
NUTRITION and MENUS: students and families have access to a digital menu program to easily check menus and follow nutrition information of menu and menu items. This is a helpful tool to promote school meals as well as enabling families to discuss menu items and empower students to make decisions including managing special diet issues.
PROCUREMENT: There is a written procurement plan in place which includes federal and local thresholds. 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. Authorized Representative who is the Superintendent and two food service directors attended regional training provided by the state agency to learn requirements of child nutrition program procurement procedures. SFA has used greater than 100% of USDA entitlement funds or Paid Assistance Level (PAL). SFA participates with Department of Defense (DoD) for produce as part of these funds providing quality fresh fruits and vegetables.
WEB BASED APPLICATIONS: household applications are now available for Green Co families. Online applications are convenient for families and fewer errors due to the program ensures the last four digits of the SSN and signatures are in place.
WELLNESS: wellness policy and progress report is posted for the public to see as required; it can be found appropriately on the nurse web page. Potential stakeholders are made aware of their ability to participate on the wellness committee. Invitation to participate with wellness was observed to be included on district newsletter.

Site - Level Commendations Greene County Elementary School (0412)

Description
BREAKFAST: Breakfast participation is excellent at the elementary school. Breakfast signage is posted as required. Nutrition Staff do a nice job of implementing Offer versus Serve at breakfast. All meals observed were reimbursable. Fresh and canned fruit observed to be offered most meals.
ENVIRONMENT: students were observed to have adequate time to eat. There were a number of teachers and adults assisting and encouraging students in the lunch room on the day of observation. The principal encouraged student's eating and cleaned up spilled milk.
FOOD SAFETY: Staff are observed to have safe food handling practices. Two cooks have Serve Safe Certification. Temperatures are documented with corrective action as required. Coolers and freezers were tidy and well organized.
MEAL COUNTING and CLAIMS: Students entered their own personal numbers into a keypad at the Point of Service (POS); cashier was helpful and encouraging. Student eligibility information was confidential.
OFFER vs SERVE: is offered allowing students to decline items they do not intend to eat. Signs are posted at the beginning of the line communicating how to build a reimbursable meal.