

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
South Page Comm School District (60970000)
SNP - Review ID: 5865

Program Year: 2020
Month of Review: January
Lead Reviewer: Brenda Windmuller
Org Representative(s):

Org - Level Findings

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|--------------------|--|--|-----------------------------------|
| 100 - Certification and Benefit Issuance | V-0100 | One household with three children was receiving reduced benefits and qualified for free benefits as of 9-4-2020. | The SFA made the change in the POS and sent the family a letter of the changes during the on-site visit. No further action is required at this time. | |
| 300 - Meal Counting and Claiming | V-0300 | The January 2020 claim reported 723 paid lunches. The software's Lunch Claims Edit Check report identified 606 paid lunches for the month of January. An over claim of 117 paid lunches for the month. | The SFA will modify the January claim and submit the date that this correction was made. | |
| 700 - Resource Management | V-0700 | The SFA did not include the buy American clause or any of the required terms and conditions in the small bid solicitations. | The SFA will submit a draft of the milk bid to be sent out for the 2020-2021 school year. The bid must be complete with all terms and conditions, buy American clause, and other requirements for the procurement event value. | |
| 700 - Resource Management | V-0700 | The SFA is expected to utilize the USDA Foods (commodities) funds provided to them as this is a portion of the financial support provided to the SFA to operate a successful lunch program. In SY 2018-2019, the SFA only spent 65.18% of those funds. | The SFA will submit a report from the USDA Foods web site showing their spending in the 2019-2020 school year. | |
| 800 - Civil Rights | V-0800 | Two students have diet modification forms on file, stating that they cannot have milk. The SFA must supply a | The SFA will submit: 1. An invoice showing the purchase of a milk alternative. 2. A picture of the product being | |

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| | | compliant milk alternative (see TA) to those students. | provided. 3. The nutrition label for the product. | |
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Site - Level Findings: South Page Elementary School (0409)

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
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Org - Level Technical Assistance

| Area | Question | Comments |
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| 100 - Certification and Benefit Issuance | 101 Who is the determining official for certifying household applications (Names and/or position titles)? | The determining official neglected to sign one application upon processing. The SFA must ensure that all applications are signed and dated. |
| 100 - Certification and Benefit Issuance | 140 Did the SFA update benefit issuance documents accurately and in a timely manner upon receipt of Direct Certification updates? | One household had been included on the DC list on 7-2-2019 as reduced, the 9-4-2019 DC list had one member of the household listed as Free. All members of the household should have been changed to Free status. This was corrected on 2-18-2020. This was an error rate of 4.05%. |
| 300 - Meal Counting and Claiming | 316 All Schools for the Review Period | CLAIM ERROR: An error was found when comparing JMC records (SFA counts) to the review month claim. TA was given to use care when entering claims to ensure accuracy, especially as PK-4 and 5-12th grades are consolidated. 723 paid lunches were claimed for January 2020, JMC Reports indicate 606 lunch meals were served. The claim will be revised upon re-opening of the Claim tab by the SA. |
| 700 - Resource Management | | PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. Bid solicitations did not include all terms and conditions required. Bid solicitations did not include the Buy American Clause. The SFA may only purchase items listed on the solicitations. Meyer Laboratories was not secured competitively, no |

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| | | <p>written agreement is in place and the SFA is not spreading the wealth among comparable vendors.</p> <p>Procurement Plan and Code of Conduct must be completed annually. The SFA should add board policy #413.4 to the Code of Conduct addressing disciplinary action.</p> <p>Must have signed debarment certifications kept on file when applicable.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Agreements valued at \$10,000 or more should have a termination for cause clause.</p> <p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p> <p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none"><input type="checkbox"/> All price adjustments throughout the year<input type="checkbox"/> All invoices<input type="checkbox"/> All contracts and agreements<input type="checkbox"/> All bids solicited<input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)<input type="checkbox"/> Documentation of why you selected a specific vendor (Selection Rubrics) |
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| | | <ul style="list-style-type: none"><input type="checkbox"/> Copies of bid solicitation<input type="checkbox"/> Debarment statements<input type="checkbox"/> CD provided by the AEA (if applicable) <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.<input type="checkbox"/> Purchases should be distributed around community, not just one store. <p>Small Purchases- Purchases that are under \$250,000 (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none"><input type="checkbox"/> Include all terms and conditions<input type="checkbox"/> Include terms: Buy American and Equal Opportunity<input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more<input type="checkbox"/> Attain Signed Debarment Statements<input type="checkbox"/> Awarded on lowest price (unless written documentation to justify)<input type="checkbox"/> Maintain documentation <p>Formal Purchase- Purchases equal to and exceeding \$250,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> |
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| | | <input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised. <input type="checkbox"/> Include all requirements of a small purchase <input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. <input type="checkbox"/> Everything must be in writing. |
| 700 - Resource Management | | The SFA spent only 65.18% of the USDA Foods (commodities) funds allotted to them in 2018-2019. The SFA should try to spend at least 95% of these funds annually. TA was given on strategies to accomplish this goal. |
| 1200 - Professional Standards | 1215 Validate the SFA's response to Question 1205 on the Off-site Assessment Tool, if applicable. | <p>ANNUAL TRAINING: Food Service Director was advised to maintain a spreadsheet with all staff, tracking training classes attended, date attended and length of time for each class. A template was provided by the SA. All Food Service staff and SFA employees working with the School Lunch Program are required to take Civil Rights annually. Training hours should meet the following guidelines:</p> <p>Director- 12 hours annually Manager- 10 hours annually Full-Time Staff- 6 hours annually Part-time Staff- 4 hours annually</p> |

Site - Level Technical Assistance South Page Elementary School (0409)

| Area | Question | Comments |
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| 400 - Meal Components and Quantities - Breakfast | 401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components? | The SA provided TA that all students must take three items at breakfast, one of which must be at least 1/2 cup fruit or 100% fruit juice. One student was observed during breakfast service without fruit. The SA reviewed all OvS regulations with the Site Manager. |

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| 400 - Meal Components and Quantities - Breakfast | 403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines? | The SFA has dietary modification forms on file for two students with allergies to milk. A milk substitute was not being provided. Students must be offered the milk component at breakfast and lunch. Students unable to consume cow's milk should be offered a milk substitute with the same nutritional value as cow's milk. The SA provided a list of pre-approved milk substitutions and nutrition requirements. |
| 400 - Meal Components and Quantities - Lunch | 404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups? | The SFA should have a sign posted communicating the daily menu at lunch and breakfast. The SFA had one posted on day two of the review. |

Org - Level Commendations

| Description |
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| APPLICATIONS/BENEFIT ISSUANCE (100): Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were correctly determined, applications were complete with SSN's and case numbers, and all applications were determined within ten days. Access to benefit information is correctly limited. Free meals are extended to all members in the household. |
| BREAKFAST & SUMMER PROMOTION (1600): Breakfast- The SFA does a good job of promoting breakfast with reminder signs, daily announcements. Summer Food Service Program -outreach for the SFSP program state-wide is shared via websites and flyers. The SFA is a SFSP sponsor. |
| CIVIL RIGHTS (800): The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided food service staff and documented. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. Ethnic/racial information is collected and the form is completed. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements even though it is not required for them. |
| LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years and is available on the web site. The policy has nutrition education, physical activity and other wellness goals included. An assessment has been completed. A wellness committee is in place to set goals and help assess the completion of the goals. The committee is made up of faculty, staff, parents, and community members. The SFA has some innovative wellness initiatives including: food tastings at lunch, use of hydroponics to grow tomatoes and lettuce, and "walk to school day". |
| MEAL PATTERN: All students observed at lunch on the on-site visit had a reimbursable meal, the menu was complete with all food groups represented and served in their proper quantity. Offer vs. Serve was implemented properly and staff was monitoring food items on trays. Water was available to all students during meal times. Menus for the month of review contained all required components. |
| PROCUREMENT: 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, and specifications were well-written and comprehensive. 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. |

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RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed, indicated appropriate and allowable expenditures. The SFA completed the Non-program Revenue Tool, which accurately depicts the purchases and expenditures related to non-program foods. Reports are filed on time, and all records are maintained for at least three years plus the current year. Fiscal Action is not expected to exceed the \$600 disregard.

VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification.

Site - Level Commendations South Page Elementary School (0409)

| Description |
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| <p>HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes the required elements. The format was well organized and made it easy to find what you are looking for. Each employee has signed off that they have read each policy. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers, and food served. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Food Service workers practiced good gloving procedures.</p> <p>The site supervisor is extremely organized and pays attention to details. She has learned the program basics very quickly and is eager to learn more. She appears to take pride in her work and maintains a clean working space. She is friendly and respectful to students.</p> |