

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**St Malachy School (15038101)**  
**Week of Review: 4/17/2020 – 5/5/2020**

**Program Year:** 2020  
**Month of Review:** February  
**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	BENEFIT ISSUANCE: errors were greater than 8%. Fiscal action is to be applied when errors are greater than 3%. Technical Assistance given that SFAs should have a backup individual for determining benefits (who can function as "Confirming Official".)	Greater than 8% errors result in SFA being required to do an "Independent Review of Applications" next school year. For your response, state your understanding of this.	
200 - Verification	V-0200	<p>VERIFICATION ERRORS:</p> <p>1) application selected for verification was not subject to verification because it was received after October 1st.</p> <p>2) student determined to be reduced was found to be directly certified as "other free".</p> <p>3) application was not "confirmed".</p> <p>4) Verification Collection Report was not completed correctly - indicates Free Student Responded No Change.</p> <p>5) Technical Assistance to always check E Look Up prior to beginning the verification process. This is called "Direct Verification".</p> <p>6) SFA is to refund reduced students for meals consumed during October 7 - end of the school year.</p>	For your response, 1) describe the process for verification and how this situation should have been handled. 2) state who will be the confirming official and describe what this individual's responsibilities will include. 3) describe who will attend Verification and Verification Collection webinars annually. 4) verify the reduced students accounts are refunded as described.	
300 - Meal Counting and Claiming	V-0300	EDIT CHECK REPORT: there is not an Edit Check completed daily or monthly to support the monthly claim. Before submitting the monthly reimbursement claim, the SFA is required to compare each school's daily counts of paid, reduced price and free meals to those students eligible and in attendance. The Edit Check assists in identifying and correcting errors for each meal category prior to submission of the reimbursement claim.	For your response, 1) provide a completed Edit Check report for the month of February. 2) state your understanding the expectation is to complete an Edit Check report to support the monthly claim. Recommend checking with your point of service provider to determine if there is an Edit Check electronic report available.	

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700 - Resource Management	V-0700	USDA FOODS: SFA does not effectively utilize PAL (Paid Assistance Level) or entitlement funds from USDA. 60% of funds in SY19 was not utilized (\$4249.) Technical Assistance provided that exploring DIVERTED FOODS and DoD are two options to study and consider for helping to effectively spend funds. Additionally, DD food delivery will be provided by another vendor which may help with receiving and storing USDA foods.	For your response, describe your plan to better utilize USDA entitlement or "PAL" (Paid Assistance Level) Funds.	
1200 - Professional Standards	V-1200	PROFESSIONAL STANDARDS: Documentation of training is insufficient. Annual training is required as follows: 12 hours Director, 6 hours for FT >20 hours, 4 hours PT < 20 hours - including Authorized Representative. Additionally, SFA's must have a mechanism to track training that includes: trainee name and title, key area (learning objectives), topic, participants, training time and completion date.	For your response, 1) develop and submit a Training Tracker for School Year 2020 - 21 with all employees who work in some aspect of school nutrition: Include target number of hours on the training tracker spreadsheet required for each employee. 2) describe training plans for Director and Authorized Representative. 3) who will be the keeper of the Training Tracker?	

**Site - Level Findings: St Malachy School (8101)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
500 - Offer versus Serve	V-0500	OFFER versus SERVE: application in IowaCNP does not match practice. Your application in IowaCNP states OvS is practiced for grades 3 - 8 for lunch and not practiced at breakfast. This is not consistent with the menu, production records nor food service director. Technical Assistance reminder that OvS is not allowed as part of preschool meal pattern. (unless they are co-mingled at breakfast.) The Meal Pattern for Breakfast and Lunch and Offer versus Serve is an appropriate topic which can be incorporated into your annual training plan for all nutrition staff.	For your response, 1) clarify which grades practice of Offer versus Serve at Breakfast and Lunch 2) state your understanding that this must match the annual application in IowaCNP. 3) describe how meal pattern and Offer versus Serve will be incorporated into annual training.	
1400 - Food Safety	V-1400	STANDARD OPERATING PROCEDURE: describe your plan to update HACCP to	For your response, include the SOP which has been revised for St. Malachy.	

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		include a SOP for transporting food to preschool students for family style meals. Include procedure for preschool teachers to properly count at the point of service.		
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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance		E LOOK UP: Always strive to check E Look Up regularly. Two households with a case number were found to be directly certified as well as the application selected for verification. The benefit of Direct Certification is there is less paperwork - no applications are required and are not subject to verification.
100 - Certification and Benefit Issuance	103 At the beginning of the school year, how is benefit status handled for children who have not submitted an application for the current school year?	DATE RECEIVED on APPLICATIONS: always include the date received on applications to verify that applications are approved within 10 days are required.
200 - Verification		VERIFICATION: the confirming official should review and sign application(s) selected for verification prior to beginning the process. The Confirming Official can be the Determining Official's back up and should understand the entire process and be included in training. Begin by running student's names through E Look Up to "directly verify". Reminder that Verification begins in October 1, so any applications received after this date are not subject to verification. Technical Assistance given to review the process.
200 - Verification	202 Who serves as the confirming official? (Name and/or position title or software used is acceptable)	OFFICIALS: WHO DOES WHAT: The <b>determining official</b> is the employee who originally determines whether a student is eligible for free or reduced benefits. The <b>confirming official</b> is the employee who rechecks the certification of benefits made by the determining official before verification is conducted to ensure that the original determination was correct. <b>The verifying official</b> is the employee who conducts the verification process where selected applicants are asked to submit verification

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		<p>eligibility for free and reduced price meals. The <b>Hearing Official</b> may not be the Determining, Confirming or Verifying Official and is generally a position of higher authority.</p>
700 - Resource Management		<p>PROCUREMENT: three types of purchases: 1) Micro-purchase: under or equal to \$10,000 can be made without a quotation. Maintain documentation of micro purchases annually - what purchased when and dollar amount. Purchases should be distributed around community, not just one store "spread the wealth" 2) Small Purchases- under \$250,000 can be made by requesting a quotation (3 bids and a buy) which is an informal method. · Include all terms and conditions · Buy American and Equal Opportunity. Maintain all documentation of Small Purchases annually. Documentation that a vendor did not reply to bid (if applicable) · Documentation of why you selected a specific vendor (Selection Rubrics) · Copies of bid solicitation · Maintain on file for all vendors: Debarment statements 3) Formal - greater than \$250,000. It is highly recommended Authorized Representative and Food Service Director include procurement training annually to keep abreast of child nutrition guidance.</p>
700 - Resource Management		<p>PROCUREMENT - MICROPURCHASE  DOCUMENTATION: Micro from local grocery must have specific items listed to ensure it is allowable for school nutrition. If receipts do not indicate this, you will need to better document by using a "grocery list" with items and specification/descriptions. Begin annual tracking:  MICROPURCHASE and SMALL PURCHASE LOGS templates can be found in Download Forms in CNP.</p>
700 - Resource Management		<p>PROCUREMENT TEMPLATES: reference and utilize Small Purchase Templates available under Download Forms in CNP. Templates are especially helpful for all federally required terms and conditions such as Buy American, Equal Opportunity and Suspension and Debarment.</p>

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700 - Resource Management	701 At the end of the SFA's RM review period, did the food service have net cash resources that exceeded three months' average expenditures?	Excess money is to be spent on allowable costs. One option is to not raise lunch prices next school year.
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	PUBLIC RELEASE: WHAT IS REQUIRED? A sample public release is available in the "Download Forms" in IowaCNP. SFA must provide the public release annually to the local media. Keep on file: a copy of the media release, the date the release was sent to the media, and media outlets the release was sent to.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	Complaints regarding school nutrition discrimination are to be directed to USDA. The process and the form is found here: <a href="http://www.fns.usda.gov/civil-rights">http://www.fns.usda.gov/civil-rights</a>
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	CIVIL RIGHTS TRAINING: strive to conduct annual civil rights training annually at the beginning of the year instead of January. Civil Rights Training must be provided to all employees involved in Nutrition and is to be included on annual training tracker.
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 ASSESSMENT: please post the completed triennial assessment on the website along with the policy as it is required to make available to the public.
1200 - Professional Standards	1206 a. Have the school nutrition staff met the annual training requirements for the current school year including part-time, full-time and any staff hired after January 1?	TRAINING: seek out opportunities for training to keep abreast of nutrition regulation. Examples: News to Know webinars are offered monthly. News to Know is the 4th Monday monthly at 2 pm. Staff training webcasts to utilize <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> . SFA is a member of AEA Purchasing Group - are you aware they offer a Back to School 4 hour training annually.
RMCR - Revenue From Nonprogram Foods	11 After assessing its compliance with the nonprogram foods revenue/cost ratio, an SFA that sells a limited number of nonprogram foods with an identifiable per-serving cost (i.e. milk) may find that it must still add funds to its nonprofit school food service account despite selling its nonprogram foods at prices that cover its full costs. State agencies may review these SFAs to determine if the compliance assessment does not fully represent the SFA's pricing practices for nonprogram foods and if it does not, the SA may instead base compliance on whether or not the SFA is recovering more than	NON PROGRAM REVENUE: St Malachy appears to fall into this category: it is a very small school with limited a la carte and few adults who eat. No additional revenue from catering. Non Program Revenue appears to be close to being in compliance. Therefore, an SFA that sells a limited number of non program foods with an identifiable per-serving cost (i.e. milk, a la carte snacks, second entree) must recover more than the per-serving food cost of these

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	the per-serving food cost of these nonprogram food items (See Q&A #3 in FNS Policy Memo 20-2016).	non program food items (See Q&A #3 in FNS Policy Memo 20-2016).
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**Site - Level Technical Assistance St Malachy School (8101)**

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	FOOD PRODUCTION RECORDS: 1) Quantity prepared should include total amount prepared in lbs, #10 cans, cases so it can be a helpful tool for forecasting and other staff 2) use volume and weight when appropriate. For example, 4 oz of Juice is appropriate; 4 oz of fruit should really be 1/2 cup to be consistent with meal pattern. 3) always document leftovers - how much was leftover and how it will be used or tossed, etc. 4) be specific - FRUIT should always indicate what was served 5) no need to type production records for review - handwritten is acceptable.
1400 - Food Safety		ON-SITE VISIT: Bureau of Nutrition Consultant plans an on-site visit is for SY21. Observations and technical assistance regarding Food Safety, Procurement, and overall Nutrition Program.
Dietary Specifications Assessment Tool - Breakfast	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.	MENU TECHNICAL ASSISTANCE: Documentation from distributor is not acceptable - CN, Product Formulation Statement from the manufacturer, Food Buying Guide or Exhibit A Grain Chart should be maintained as official documentation for meal pattern crediting. SFA answered off site question that larger portions and/or bonus items and/or seconds are offered (offering portion sizes that are inconsistent with the planned menu). This may not be acceptable - consider fairness, civil rights and what may be made available to all students.

**Org - Level Commendations**

Description
CIVIL RIGHTS: annual civil rights training was provided food service staff and documented. The USDA and Iowa Non Discrimination Statements are including on documentation as required. And Justice For All poster is displayed in cafeteria - photo.

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No fiscal action will be required as result of Administrative Review.
NUTRITION and MEAL PATTERN: February Menu meets daily and weekly meal pattern requirements. Documentation is in place for CN labels, Product Formulation Statements and Standardized Recipes confirming SFA is aware of how items credit towards the meal pattern. Food Production Records are completed as required. The menu offers variety - including fresh fruits and vegetables as well as "kid favorite" entrees. Offer versus Serve is practiced helping to reduce waste and encourage students to select foods they plan to eat.
PROCUREMENT: A Procurement Plan has been developed. Technical Assistance given to ensure this is updated annually. SFA is a member of SW region of the AEA Purchasing Group for Food, Smallwares and Chemicals. Cost Reimbursable contract is being monitored ensuring discounts, credits, rebates are deposited to Nutrition Fund.
RESOURCE MANAGEMENT: Nutrition Program has a positive balance. All purchases reviewed appear to appropriate and allowable. SFA is tracking program versus non program food expenses appropriately. A Meal Charge Policy is in place and is communicated in writing annually with households via the Student Handbook.
Thank you to the Food Service Director (FSD) for sending documentation prior to the onsite visit as this greatly expedited the Administrative Review (AR). The FSD was responsive to emails and quick to submit needed documentation and clarification.
WELLNESS: St Malachy's Wellness Policy is complete and up-to-date and nicely posted on the website for households and community to see and to become involved with. The Wellness Assessment has been completed which should also be made available to the public - therefore this could also be posted under the Policy.

**Site - Level Commendations St Malachy School (8101)**

Description
MENUS are complete and graphically appealing - menus are posted on the website for households and the public to see, information on "offer versus serve" and what makes a reimbursable meal.
SCHOOL NUTRITION ENVIRONMENT: director strives to make the nutrition program a welcoming environment; photos attached of menu signage, a variety of nutrition and physical activity posters, student designed "My Plate" coloring sheets, "God's Kids Café" gives the lunchroom a name.