

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Boyer Valley Comm School District (19170000)**  
**SNP - Review ID: 5853**

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

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	The SFA is required to have a Code of Conduct with the Procurement Plan which addresses disciplinary action to be taken, should the Code of Conduct be violated. The Code of Conduct should be updated annually.	The SFA will update the Code of Conduct and submit it to the SA. The SFA will also submit the policy or policies referenced in the Code of Conduct.	

**Site - Level Findings: Boyer Valley High School (0172)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		Code of Conduct: The District's Code of Conduct must reference disciplinary action to be taken should someone violate the code. This was found in Board Policy 413.4 and 413.3. These two policy numbers should be added to the Procurement Plan's Code of Conduct.  Formal Procurement: Off-Site Procurement Tool indicates only one formal procurement event- Martin Brothers. The on-site review shows that the SFA has all three AEA contracts. SA and SFA worked through the plan together to correct minor errors.

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		<p>Discussed changing Martin Brothers small wares purchase to a small or micro method if these items are not purchased through Rapids Wholesale (vendor with the contract). These items are not in the Martin Brothers market basket. When making this change on the plan, be sure to follow the appropriate process.</p> <p>Small Procurement: The template for terms and conditions for small purchases has been updated, be sure to review it prior to writing bid solicitations for 2020-2021 and include all required terms and conditions based on the dollar amount. The SFA should use the small bid matrix to determine which vendor has the lowest price.</p> <p>The bread vendor who was awarded the contract did not offer product at the specification level identified on the solicitation. The SFA requested 53% whole grain, the bid quoted 51% wg. Specifications may be written “minimum of 51%” or a range of “51%-53%” in an effort to open competition.</p> <p>Training: A Regional Procurement Workshop will be offered on March 10, 2020. It will focus on writing the procurement plan. The SFA is encouraged to attend.</p> <p>Procurement Overview:</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>
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		<p>SFA should keep on file:</p> <ul style="list-style-type: none"><li>• All price adjustments throughout the year</li><li>• All invoices</li><li>• All contracts and agreements</li><li>• All bids solicited</li><li>• Documentation that a vendor did not reply to bid (if applicable)</li><li>• Documentation of why you selected a specific vendor (Selection Rubrics)</li><li>• Copies of bid solicitation</li><li>• Debarment statements</li><li>• CD provided by the AEA (if applicable)</li></ul> <p>Three types of purchases, (Federal Thresholds):</p> <p><b>Micro-purchase-</b> under or equal to <b>\$10,000</b>(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><li>• Track micro purchases, what purchased when and dollar amount.</li><li>• Purchases should be distributed around community, not just one store.</li></ul> <p><b>Small Purchases-</b> Purchases that are <b>under \$250,000</b> (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"><li>• Include all terms and conditions</li><li>• Include terms: Buy American and Equal Opportunity</li><li>• Include Termination for Cause and Convenience if \$10,000 or more</li><li>• Attain Signed Debarment Statements</li><li>• Awarded on lowest price (unless written documentation to justify)</li><li>• Maintain documentation</li></ul>
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		<p><b>Formal Purchase-</b> Purchases equal to and <b>exceeding \$250,000</b> (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> <ul style="list-style-type: none"> <li>• Notice of accepting all types of formal purchase must be advertised.</li> <li>• Include all requirements of a small purchase</li> <li>• If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</li> <li>• Everything must be in writing.</li> </ul>
700 - Resource Management	712 Were indirect costs* charged to the SFA's nonprofit school food service account?	The Nutrition account was charged for items in 2017-2018 which are considered not allowed. Items such as equipment repairs and maintenance and computer/office supplies may not be directly charged to the Nutrition account. Charges in these areas during the current school year should be re-coded by the end of the fiscal year. Information about direct and indirect charges was shared with the SFA.
1200 - Professional Standards	1215 Validate the SFA's response to Question 1205 on the Off-site Assessment Tool, if applicable.	<p>ANNUAL TRAINING: All Food Service staff and SFA employees working with the School Lunch Program are required to take Civil Rights training annually. Training hours should meet the following guidelines:</p> <p>Director- 12 hours annually</p> <p>Manager- 10 hours annually</p> <p>Full-Time Staff- 6 hours annually</p> <p>Part-time Staff- 4 hours annually</p>
RMCR - Nonprofit School Food Srvc Acct	4 If Yes, did the SFA develop a spend down plan approved by the State agency?	TA was provided that the nutrition account cannot exceed three months operating expenses at any given time. The SFA was advised to monitor the account and to think about ways that surplus could be spent.

**Site - Level Technical Assistance Boyer Valley High School (0172)**

Area	Question	Comments
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?	One child has been identified as not able to consume milk/dairy. The SFA must provide an alternate for the fluid milk meal component. The alternate

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		product must have the same nutritional value as cow's milk. A list of pre-approved products was sent to the FSD. The diet modification form was missing for this student. The school nurse is working to get this document completed.
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	When serving ready to eat foods, food handlers are required to wear gloves or use a utensil to serve the food per Iowa Health Code. During the on-site review, a single person was serving a la carte items and taking money without washing hands and changing gloves between tasks, creating cross-contact. Possible solutions include: use tongs to serve pretzels or individually wrap the pretzels before service.
Dietary Specifications Assessment Tool - Lunch	22 Portion sizes for condiments (e.g. hot sauce, ketchup, mustard, salad dressing) are controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal.	Ketchup, mustard and other condiments are available at a self-serve condiment station. Students are allowed to take as much as they want. While most students were observed taking a reasonable amount, a handful of students did have an excessive amount of ketchup on their trays. One tablespoon of ketchup has 154 mg of sodium. High school students are allowed 740 mg total of sodium at lunch and middle school is allowed 710 mg total of sodium at lunch. Three tablespoons can easily consume more than 50% of the allotted sodium amount, before other food items are calculated in.

**Org - Level Commendations**

Description
APPLICATIONS/BENEFIT ISSUANCE (100): Benefit documents, as well as all paperwork, were extremely well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, 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. Income was only converted to annual when there was more than one frequency of income. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Free meals are extended to all members in the household.
BREAKFAST & SUMMER PROMOTION (1600): The SFA does an excellent job of promoting breakfast through flyers and posters. Menus are posted in each cafeteria as well as the website. Summer Food Service Program, SFSP, outreach for the SFSP program state-wide is shared via websites and flyers.
CIVIL RIGHTS (800): The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided to 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.
LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years. The policy has nutrition education, physical activity and other wellness goals included. An assessment has been completed and is posted on the school's website. 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, and community members. The SFA has taken a creative approach to meetings by emailing agenda items and compiling responses from the larger committee for a smaller group of 2-3 to review and share with the masses.
MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the (October) review month counts. Meal count totals for the month of October appeared accurate and complete. There was a point of service, POS, at the point where meals are served for all students observed. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period.
MEAL PATTERN: All students observed 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. All bids include a Buy American Provision. Two staff members have attended Regional Procurement training multiple times.

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PROFESSIONAL STANDARDS (1200): Tracking was provided that documents the director received the required 8 hours of annual training, the manager has already completed 7 of 10 hours, and all other staff have received at least 4 hours of annual training. (Or on-track to complete hours by the end of the year.) There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.
The FSD spent 103.15% of the USDA (Commodities) money allocated to them in school year 2018-2019. This is an effective use of resources.
Fiscal Action: Errors fell below the \$600 disregard, no fiscal action is required at this time.
The SFA has a well-organized web site with all program information including monthly menus, wellness policy, applications, and nutrition information. It is laid out well, attractive, and easy to navigate.
VERIFICATION (200): The correct number of applications were verified. 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. The SFA had at least one person attend training. The verification report was completed accurately and on time.

**Site - Level Commendations Boyer Valley High School (0172)**

Description
COMPETITIVE FOODS & SMART SNACKS (1100): Students may purchase snack items after they have eaten their lunch at the high school. Documentation was available to show that all foods and beverages sold to students by the food service department during the school day met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte by the food service department.
HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes most required elements. The latest Health Inspection Report was posted in a publicly visible location at all three sites. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled.
There is great signage at the high school/middle school explaining what makes a reimbursable meal. There is a flavor station with several salt free seasoning options. Lunch service was very efficient. The cashier welcomed each student by name. There was a high participation (83%) at lunch on the day of review. Minimal waste was observed.