

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Edmond Catholic School (23138104)
Dates of Review: October 15-17, 2019

Program Year: 2020
Month of Review: September
Lead Reviewer: Deb Linderblood
Org Representative(s): Tonya Lawler

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	There is currently no back-up individual for the Determining Official. Explained that it is important to have someone else trained that is able to make eligibility determinations in the event that the Determining Official is unable to fulfill these duties.	Identify who will be trained to be a back-up for the Determining Official. Also state how they will be trained to fulfill these duties.	
100 - Certification and Benefit Issuance	V-0100	Three students were determined to be eligible for free meal benefits via a case number being written onto the application however the case number was not a valid number. When using income figures provided, the household was to be denied.	Send the household a notice of adverse action informing them that their meal status will change to paid. TA provided that in the letter the SFA must give the household 10 calendar days in which to appeal and then within 10 operating days following the appeal period, the SFA must change the student's status to paid. The SFA completed this while the State Agency was on-site. No further action is needed.	
700 - Resource Management	V-0700	On 9/15/19 a new template document for advisory committee meeting minutes was emailed to all SFA's who utilize FSMC services. During the review the SA asked for advisory committee minutes for SY19. Minutes for the meetings indicated as held on 11/27/18 and 3/4/2019 were provided on the new template document. This would indicate that meeting minutes were not documented on the dates of the meetings but were re-created after 9/15/2019 using the new template to satisfy document requirements for the administrative review. Prior to 9/15/2019, the SA did not have a recommended template to document advisory committee meetings. While the minutes were complete and indicated that parents, students, and teachers participated and discussed menu items and preferences, they were not original documents. Minutes should be taken during the advisory committee meetings as important information may be unintentionally omitted.	For your response please hold an advisory committee meeting that includes a representative from the FSMC and submit signed and dated meeting minutes on template document previously provided.	

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		Additionally, the FSMC should be invited to participate in the advisory committee meetings and documents provided do not reflect FSMC participation.		
800 - Civil Rights	V-0800	The Determining Official and Hearing Official have not had Civil Rights training for school year 2019-2020.	Attach a sign-in sheet showing that the Determining Official and Hearing Official have completed Civil Rights training.	
1200 - Professional Standards	V-1200	The SFA's Program Director is required to meet the same professional standards requirements as the Food Service Director employed by the FSMC. For SY19 only 8 of the required 12 hours of training was complete. Thus far in SY20, only 4 of the 12 hours of required yearly training have been met.	For your response please indicate your plan for completing the remaining 8 hours of professional standards training, including approximate timeline for completion and topics.	
1200 - Professional Standards	V-1200	Review of school year 2018-2019 showed that Full time and part-time food service workers had not completed the required training. Also, not all training was documented. The Food Service Director has a training tracker.	Develop a completed training tracker showing to date the training completed so far for school year 2019-2020 for all nutrition staff and non-nutrition staff who have duties related to the nutrition program. This was completed while the State Agency was on-site. No further action is needed.	
1600 - School Breakfast and SFSP Outreach	V-1600	The SFA has not done outreach for the Summer Food Service Program (SFSP). TA provided that even though the school does not offer a SFSP, the school is still required to do outreach so that students know about the program and how to find a site where the program is being offered. Showed the Food Service Director where to find promotional materials on IowaCNP under download forms.	Describe how you will do outreach for the Summer Food Service Program.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA completed the Financial Report on IowaCNP however upon discussing it appears that not all non-program food costs were captured. Also, the Non-program revenue did not include the revenue from adult meals. TA provided that non-program foods include adult meals, 2nd milks, a la carte and catering. Discussed that the SFA can either: 1. calculate the average cost of a meal (breakfast and lunch) and take this times the number of reimbursable meals that were served and add on the average cost of program milks (Special Milk Program) and take this times the number of program milks that were served to obtain their program food costs. This total would then be subtracted from the Total Food Cost to get the cost of non-program foods. 2. determine their non-program food costs by keeping track of the cost of a la carte foods, catering foods and add on the food cost of adult meals (determine an average cost of a meal and take times the number of adult meals sold for	Revise and correct the Financial Report on IowaCNP. Indicate below the date it is corrected. If the tool indicates that additional non-program revenue is needed, describe non-program foods that the price was recently increased and describe any other ways you plan to bring in additional non-program revenue.	

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		breakfast and for lunch), add on food cost of 2nd milks and 2nd entrees (determine an average cost of an entrée and take times number of 2nd entrees sold).	
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Site - Level Findings: St Edmond Middle/High (8104)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA does not have breakfast signage explaining what constitutes a reimbursable breakfast. TA provided on where to find the State Agency prototype breakfast signage. Explained that the menu planner needs to determine how many items each food will contribute.	Complete and attach 5 days' worth of breakfast signage that will be used at breakfast.	
400 - Meal Components and Quantities - Lunch	V-0400	The SFA is currently using the 9-12th grade meat and bread meal pattern for all grade groups.	Describe how you will alter the menus so that the K-5 and 6-8th graders do not receive 2 oz. eq. of meat and 2 oz. eq. of grain every day of the week.	
400 - Meal Components and Quantities - Lunch	V-0400	During the week selected to complete the menu certification worksheets, the menu was short grain on Monday, September 12th, 2019 and short meat on Friday, September 13th, 2019. The tortilla that was being served only counted as 1.5 oz. eq. of grain. The fish sandwich only had 1.75 oz. eq. of meat and cheese. TA provided that for 9-12th graders they need 2 oz. eq. of meat and grain daily. Discussed that the 9-12th grade meal pattern contains more food than the K-5 and 6-8 meal pattern. Also recommended that the SFA complete separate food production records for K-5th grade, 6-8th grade and 9-12th grade instead of having 6-12th on one production record.	Describe how you will change these two days menus so that the 9-12th grade students are served 2 oz. eq. of meat and 2 oz. eq. of grain on these two days of your cycle menu.	
1400 - Food Safety	V-1400	During the month of September, there were numerous days when the temperature of the refrigerators and freezer were not documented.	Take refrigerator and freezer temperature daily and record. Attach your documentation showing that temperatures were taken consistently for two weeks. TA provided that on the spreadsheet used to take temperatures, the SFA should add the month. Encouraged to use one spreadsheet per month.	
2000 - Supplemental Special Milk Program (SMP)	V-2000	An accurate count at the Point of Service is required for all Child Nutrition Programs. Claims must be based on what is actually served at the time of service, which the SFA is doing. However, the milk roster is divided into a.m. preschool counts and p.m. preschool counts and the form captures milk served and snacks served. Also, counts from more than one month are on the same meal count roster making it harder to capture just the month needed to file an accurate claim. In the month of September an overclaim of 3 milks was found, which was	Revise and attach your milk count roster so that a.m. and p.m. milk counts are clearly separate and only a single month of counts are included on one page of rosters. State your intentions to only track milk counts on this roster and to not try to capture snacks served on the same form.	

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		probably due to the complexity of the form.	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	105 How long does the application's approval take from the date the SFA receives the application from the household?	TA provided that on each application that is received by the school the received date should be documented on the application. This is needed to confirm that the application was approved within 10 operating days after receiving the application.
100 - Certification and Benefit Issuance	134 Does the SFA perform Direct Certification matches according to the required timeframes?	TA provided that the Determining Official should use ELookp before school starts. This would allow for households to be sent a notification letter informing them that they are directly certified and that they do not need to submit an application. This would cut down on the number of applications the SFA is receiving.
200 - Verification	208 When a confirmation review was conducted:	TA provided that once the SFA selected the household(s) to be verified the application should be confirmed that the determination was made correctly. If it was not determined correctly, referred the SFA to the Eligibility Manual for the proper steps to take. Explained that the Confirming Official should sign and date the Free and Reduced Price Application where indicated at the bottom of page one.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	TA provided that when a household is selected for verification, the SFA should attempt to find the student(s) using Elookup. If found, the household is directly verified and the household does not need to be contacted or submit any documentation.
200 - Verification	212 Did the SFA meet the follow-up requirements if the household failed to respond to the request for verification?	TA provided that when the SFA makes the one required follow-up attempt when completing Verification the bottom of the Free and Reduced Price Application should be signed and dated at the bottom of page one.
200 - Verification	214 If a student's eligibility changed due to verification,	The SFA only gave the verified household six days in which to appeal. TA provided that if a household's benefits are decreased due to verification, the household must be given 10 calendar days in which to appeal.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	E-mailed the Food Service Director a sample policy for Sack Lunches. Also provided a sample food production record which can be used when sack lunches are provided.
700 - Resource Management		<p>Procurement:</p> <ul style="list-style-type: none"> • The written procurement plan should be completed yearly (around February) to reflect the upcoming school year's procurement events, correct procurement methods and contract award type. It is best practice to keep a separate procurement event page for each school year. This practice will help ensure that the correct procurement method is identified based on the estimated value of a particular purchase. • When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." Referred the SFA to the Micro-purchase log and reviewed how to use the log.

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		<ul style="list-style-type: none"> • Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-domestic agricultural commodity is accepted. Referred the SFA to the State Agency prototype exception log and reviewed how to use. • The prime vendor must get prior approval to substitute a product.
700 - Resource Management		Reviewed the current diverted foods usage report with the Food Service Director. Pointed out products that have not been ordered much to date. Provided a handout on how to review diverted foods request form.
700 - Resource Management		SA explained how to reconcile administrative costs in FSMC contract with invoices. SA also advised SFA of their responsibility to monitor food and labor costs and what documents should be received from the FSMC in order to do so. Going forward FSMC personnel will share monthly food and labor reports with SFA so that food costs and labor can be monitored.
700 - Resource Management		SA strongly encouraged LEA to bid a Fixed Price contract when issuing the next RFP for FSMC services. Lack of proper financial oversight due to repeated turnover in the business office means that many of the oversight responsibilities like monitoring food and labor costs are not being met sufficiently. SA explained the advantages of a Fixed Price contract to LEA officials and the difference in contract monitoring.
700 - Resource Management	703 Excluding the purchase of equipment using equipment grant funds, if the SFA used food service funds to buy equipment* during the school year under review, did it receive prior approval from the State agency either directly or via the State's pre-approved equipment list?	Provided the Food Service Director with the Iowa Pre-approved Equipment List handout. Equipment not on this list, needs State Agency approval to purchase prior to procuring the item.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The link for the USDA complaint process/form which should be used if parents wish to file a complaint about any child nutrition program is: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	The SFA currently does not use the State Agency on-site monitoring form. Since it is only one site they are not required to complete. SFA shared an interest so TA provided on where to find the State Agency monitoring form on IowaCNP under download forms.
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	TA provided that the SFA should include students on their Wellness Committee. Also recommended that the SFA invite board members to be on the committee.
1200 - Professional Standards	1203 a. Did the new School Nutrition Program Director complete food safety training within 30 days of being hired?	TA provided that when a new Food Service Director is hired they are to have had food safety training in the past 5 years or obtain training within 30 days of being hired.
1400 - Food Safety	1403 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	While on-site red peppers which were produced in Canada were found in the refrigerator. The SFA was unaware that the product was not made in the US. TA provided that if the SFA does receive and accept a non-domestic product they should log it on an exception log. Discussed that the exception log can be found on IowaCNP under download forms and also gave the Food Service Director a hard copy and reviewed how to complete the form.
1600 - School Breakfast and SFSP Outreach	1600 Did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the	The Food Service Director currently promotes breakfast by talking to students and visiting the classroom to explain what is available and how to

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	availability of the School Breakfast Program throughout the school year?	make a reimbursable meal. TA provided that it is required that outreach be done twice a year to promote the breakfast program. Discussed that putting a description of the breakfast program in the school's newsletter would be one possible way to promote breakfast.
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Site - Level Technical Assistance St Edmond Middle/High (8104)

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?	TA provided that if the SFA should have a student who needs a milk substitute the substitute must be nutritionally equivalent to cow's milk. Provided the Food Service Director with a list of milk substitutes that are allowable.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	SFA has a variety of signage but none that specifically explain that the students must take 1/2 cup of fruit or vegetable to have a reimbursable meal. Provided the SFA with the State Agency's "Build A Healthy Lunch" poster.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	TA provided that cafeteria staff should be trained on Offer vs. Serve annually and that the training should be documented. E-mailed the Food Service Director a copy of the current Offer vs. Serve manual.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	In school year 2018-2019 the SFA only had one health inspection. Per the Food Service Director a second one was requested verbally. There is no documentation of a second inspection being requested. TA provided that the SFA needs to have documentation showing that a second inspection was requested. Recommended that the SFA use e-mail to request the second inspection.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	TA provided that the SFA's most recent food safety inspection must be posted in a publicly visible location.
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	The SFA had food and beverages sitting on the floor. TA provided that all foods and beverages need to be a minimum of six inches off of the floor. Suggested getting some pallets. Food Service Director corrected the issue while the State Agency was on-site so no further action is required.

Org - Level Commendations

Description
<p>Certification and Benefit Issuance: Benefit documents were organized. The current application for free and reduced price meals/milk and income guidelines were used, Elookup is used to directly certify some students, benefits are accurately and frequently transferred to the Point Of Service (POS) system, and denied applications were correctly determined. All but 1 application were correctly determined. All applications were signed and dated by the household member and the SFA, and were complete with Social Security Numbers. 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. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system. The State Agency prototype notification letter is used. The Determining Official participated in the State Agency Application Approval and Direct Certification webinar.</p> <p>Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria, services are offered for Limited English Proficient households, annual civil rights training was provided for food service staff and documented. The SFA submitted the annual Public Release to the local media. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The correct state and federal non-discrimination statements are provided on all material including letters and menus.</p>

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Customer Service: The Food Service Director has exceptional customer service skills. He knows most student's names and greets them by name when he sees them or when they come through the Point of Sale station. It is also obvious that he has trained his staff to practice good customer service.
Fiscal Action: Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for September seem to be needed.
Food Safety: The SFA has a written Food Safety plan that includes all required elements. Temperature logs are maintained for all coolers. Food temperatures are documented on the Food Production Records. Dishwasher temperatures are taken and documented and thermometers are calibrated. 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. The following individuals at the site reviewed are ServeSafe Certified: Lonnie Bacon, Food Service Director and Donna Frsythe, Cook.
Local Meal Charge Policy: The SFA developed and approved a meal charge policy on October 24, 2018. The policy is provided in writing to all households at or before the beginning of the school year, to families that transfer into the school and staff responsible for enforcing any aspect of the policy. The policy states that students who qualify for free meals shall never be denied a reimbursable meal
Meal Components and Quantities: The Food Service Director does a god job of menu planning. A ten-week cycle menu is utilized. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. All meals observed met at least the minimum daily requirements. The menus met weekly and daily components. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month for breakfast and lunch—including many fresh fruits and vegetables. 6-12th graders are offered a fruit and vegetable bar. Standardized recipes are used for food production. Four types of milk are offered. Students had sufficient of time to eat after receiving meals.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of September were accurate and complete. Point of Service (POS), counts and filed claims appear accurate. Infinite Campus is used as the school's POS system. At lunch there are two POS for high school/middle school students and one for the elementary side, and the POS was organized and orderly. 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. Cashiers are trained and appeared aware of what constitutes a reimbursable meal. Edit checks are performed.
Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of September 9-13, 2019 for breakfast and lunch for K-5, 6-8 and 9-12 grade groups. The worksheets showed that all meal components were offered. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the school is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, controlling the portion sizes of condiments, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats. A nutrient analysis was not required.
Offer vs. Serve: Offer vs. Serve is being implemented properly. All students observed selected 1/2 cup of fruit and/or vegetable at breakfast and lunch.
Procurement: The SFA has a written Procurement Plan that includes federal thresholds (SFA does not have local thresholds), procurement methods and documentation for all purchases. The plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA also has a written Code of Ethics/Conduct. The President, Food Service Director and Book Keeper attended the State Agency Regional Procurement Training.
Professional Standards: The Food Service Director meet the hiring standards when hired. All nutrition staff have started to meet the required training for Professional Standards in school year 2019-2020. An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours. The Food Service Director has completed 35 hours of the required 12 so far in school year 2019-2020.
Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.
Resource Management: There were no unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate financial account for the nonprofit school food service and net cash resources do not exceed three operating months. The Non-Program Revenue (NPR) tool was completed. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for USDA Foods. In school year 2018-2019 the SFA utilized 96.97% of their allotted PAL dollars through utilizing the DoD, Diverted Foods and Direct Distribution programs. In school year 2019-2020 the SFA is participating in all three programs again and has started to use up their allotted PAL dollars in each program.
School Breakfast Outreach: School Breakfast Program (SBP) outreach currently is provided through the Food Service Director going to classrooms and explaining to students that breakfast is available and going over what a reimbursable meal is. The breakfast menu is also posted on the school's web-site.
Smart Snacks: Students are able to purchase foods via a la carte sales. All foods sold meet the Smart Snack standards for nutrition content. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte. Exempt leftover National School Lunch Program entrees are only sold the same day, or the day after, they are initially offered. Beverages sold meet the standards for the various age groups of students-a la carte beverages are only sold to the 9-12th grade students.
Special Milk Program: Milk counts for the day of review were comparable to milk counts the past five days. Milk counts are taken at the Point of Service. Milk is stored in a refrigerator in the classroom.
Verification: The correct number of applications were verified and were correctly selected from error prone applications. The process was completed on time. The Determining Official participated in the State Agency Verification and Verification Reporting webinars. The verification report was completed accurately and on time.
Water: Free potable water is available to all students for lunch and for breakfast via a water fountain in each cafeteria.

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Wellness Policy: The SFA's wellness policy was reviewed and revised on April 24, 2019. The public is made aware of the SFA's wellness policy and assessments via the school's web site and the policy is emailed to parents and teachers. The following individuals are involved in reviewing and updating the LWP: Administration, PE Teacher, Nurse, Parent, Teacher and Food Service Director. Potential stakeholders are made aware of their ability to participate in the Wellness Committee. The SFA completed an assessment of their wellness policy on April 2, 2019. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.