Iowa Department of Education Bureau of Nutrition and Health Services State Review Summary Report Woodbine Comm School District (70920000) SNP - Review ID: 6346

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

# Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	<b>Corrective Action Response</b>
100 - Certification and Benefit Issuance	V-0100	The SFA had one student reported on the POS report indicating they received reduced meals. This individual did not have a benefit application on file and was not found on the DC list or E- lookup.	The SFA must change the benefit status from reduced to paid in their system. The SFA will submit a statement that this task has been completed.	
1000 - Local School Wellness Policy	V-1000		The SFA will submit a date of when they plan to complete the wellness assessment.	
700- Resource Management		The SFA is required to follow procurement regulations outlined by the USDA. Bid solicitations using the small procurement method must contain the Buy American Provision, Non- discrimination, and all terms and conditions required for the value of the procurement event.		

# Site - Level Findings: Woodbine Elementary School (0409)

Area	Findings ID	Finding Description	<b>Required Corrective Action</b>	Corrective Action Response
300 - Meal Counting and Claiming - Lunch			The SFA will revise the February Claim to reflect the accurate numbers.	

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Area	Question	Comments
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	One student was recorded as "reduced" and should be "paid." The SA spoke to the SFA on the phone about the error. It was corrected immediately.
200 - Verification	209 Based on the review of verified applications:	Free/Reduced application should report gross income. Calculations should be based on the gross income and not the net income.
700 - Resource Management		USDA FOODS: SFA is currently not utilizing USDA Foods (commodities) to the fullest of their ability; spending only 41.27% of their funds in 2018/2019. This program is in place to help off-set some of the expenses associated with the School Lunch Program. It is advised that the FSD watches the SA's USDA foods webinar and reach out to the USDA Foods Consultant to aid in creating a plan for spending these funds in SY 2020-2021. The SA provided a link to the webinar and contact information for our USDA Foods Consultant.
700 - Resource Management		PROCUREMENT: The SA shared resources on IowaCNP to assist in the procurement process.
		Procurement Plan and Code of Conduct must be completed annually. The Code of Conduct must include the board policy on disciplinary action.
		The SA has revised the Procurement Plan template for SY 2020-2021 and the SFA should plan to use the revised version.
		The SFA should review their purchasing policy to determine the local micro, small, and formal purchase thresholds for the school lunch program.
		Small bids should be awarded to the low bid, a matrix

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	should be used to determine the low bid. All bid responses must be kept on file for review.
	The prime vendor will not be a micro- purchase, AEA Purchasing is a formal-RFP. Prime vendor is listed on your plan twice.
	Farner Bocken- not identified on your procurement plan. Did not bid competitively. Products purchased there are available through your prime vendor. The SFA must stop purchasing from Farner Bocken. If a second vendor is wanted, the SFA must bid competitively to determine that vendor.
	Foodland- bread, no contract in place. Foodland invoices simply say "grocery" the SFA must have itemized invoices or receipts to demonstrate what was purchased.
	The SFA made several purchases from Central Restaurant Products. The SFA should be utilizing the AEA Purchasing contract already in place for small wares or if choosing to do a micro-purchase, the SFA must spread the wealth by purchasing items from the same category from multiple vendors.
	Maintenance and repairs are not allowable expenses.
	The SFA should include the Buy American Clause in all Small and Formal Purchase agreements. This was missing from the bread and milk solicitations.
	All terms and conditions appropriate for the procurement value must be included in small purchase solicitations. These were not included in the bread and milk solicitations.

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A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate. A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor. Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?
<ul> <li>SFA should keep on file:</li> <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>
<ul> <li>Three types of purchases, (Federal Thresholds):</li> <li>Micro-purchase- under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.</li> <li>Track micro purchases, what purchased when and dollar amount.</li> <li>Purchases should be distributed around community, not just one store.</li> <li>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.</li> </ul>

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		<ul> <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> 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. Notice of accepting all types of formal purchase must be advertised. Include all requirements of a small purchase If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. Everything must be in writing.
1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements?	The wellness policy and assessment must be reviewed by the SFA at least once every three years. The policy was last reviewed in 2017 and no assessment is on file. Both the policy and assessment must be made available to the public. The SFS should have a wellness committee who reviews the policy, submits recommendations to the board, completes the assessment and otherwise steers wellness initiatives in the school. The SFA shared the wellness final rule and assessment template.
1100 - Smart Snacks	1102 How does the SFA account for accompaniments when determining whether food items meet the Smart Snack standards?	The SFA must run food items through the Smart Snacks Calculator to confirm compliance. The calculator may be found at <u>https://foodplanner.healthiergeneration.org/calculator/</u>
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.)	ANNUAL TRAINING: The SFA was advised to maintain a spreadsheet with all staff, tracking training classes attended, date attended and length of time for each class. A tracking template was provided by the SA. All Food Service staff and SFA employees working with the School Lunch

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		Program are required to take Civil Rights annually. Training hours should meet the following guidelines:
		Director- 12 hours annually
		Manager- 10 hours annually
		Full-Time Staff- 6 hours annually
		Part-time Staff- 4 hours annually
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	The SFA is required to inform families of the summer feeding programs statewide regardless of their participation in the program. The SA shared resources with the SFA.

### Site - Level Technical Assistance Woodbine Elementary School (0409)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch		The SFA made an error when adding and recording numbers in the February 2020 claim. The SFA claimed 4318 Paid lunches, should be 4314. The SFA claimed 2297 Free lunches, should be 2301. The SFA was advised per phone call to make corrections to the claim.
500 - Offer versus Serve		Offer vs. Serve is required for grades 9-12. The SFA indicated on the off-site questions that they are not doing Offer vs Serve. Training is available on the SA's web site. A link was provided. The SFA should also have signage displayed which communicates to students what they need to choose to make a reimbursable meal.

### **Org - Level Commendations**

Description

Certification and Benefit Issuance: All applications were correctly determined, signed and dated by the household member and the SFA, 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. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Waivers are provided to applicants and indicate specific fees.

PROCUREMENT: The SFA has a written Procurement plan and Code of Conduct in place. This will be updated annually and used to make purchasing decisions.

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PROFESSIONAL STANDARDS (1200): Tracking was provided that documents that the director received the required 12 hours of annual training, and that the Hot Lunch Coordinator has completed the require 4 hours of training. The remaining staff is well on their way to completing the required training by June 30, 2020.

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 maintains a healthy balance in the lunch account without exceeding the three month operating expenses. Reports are filed on time, and all records are maintained for at least three years plus the current year. Errors are expected to fall below the \$600 disregard, no fiscal actin is expected at this time.

VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. The verification process was completed on time. One member of the staff completed the verification training.

### Site - Level Commendations Woodbine Elementary School (0409)

Description

HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes most required elements. Temperature logs are maintained for food. The FSD is ServSafe Certified.

MEAL PATTERN: Menus for the month of review contained all required components and vegetable subgroups in their proper quantity.