

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Whiting Comm School District (70020000)
SNP - Review ID: 5852

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

Site - Level Findings: Whiting Senior High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Daily entree portions nearly double recommended serving sizes which exceed allowed calorie, fat, and sodium allowances.	The SFA will submit a plan on how the new FSD will be trained to follow the prescribed meal pattern. Training should include the following trainings found on the SA's website: Build a Healthy Lunch- webcast Build a Healthy Breakfast- webcast New Director Webinar- Meal Pattern Review New Director Webinar- Menus & Food Production	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	The SFA is required to include terms and conditions in all small and formal purchase solicitations based on contract value. These terms and conditions include but are not limited to: Buy American, Termination for Cause, Termination for Convenience, Equal Employment, Targeted Small Business, and Suspension and Debarment Certification. The required terms and conditions were	The SFA will submit a draft of the milk solicitation to be sent out for the 2020/2021 school year.	

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		not included in the solicitations reviewed by the SA.		
700 - Resource Management	V-0700	The SFS must have a code of conduct which includes a reference to board policy outlining disciplinary action.	The SFS will submit 1. The board policy which addresses disciplinary action. 2. The revised code of conduct with the appropriate policy number inserted.	

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	209 Based on the review of verified applications:	The household's pay stub indicated that overtime pay is consistently received. This should be included as wages in the ICAVES calculator. These additional wages may change the free/reduced status of the household.
700 - Resource Management		<p>PROCUREMENT: The SA shared resources on IowaCNP to assist in the procurement process.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>The Code of Conduct must include the board policy on disciplinary action. The 2019-2020 Code of conduct does not reference a specific board or district policy addressing disciplinary action. The two policies cited do not address disciplinary action. This should be added to the Code of Conduct. The SFA did locate board policy 413.3 and 413.4 which address disciplinary action. This should be added to the SFA's Code of Conduct.</p> <p>The SA has revised the Procurement Plan template for SY 2020-2021 and the SFA should plan to use the revised version.</p> <p>Small bids should be awarded to the low bid, a matrix should be used to determine the low bid. A template was shared with the SFA.</p>

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		<p>The SFA should include the Buy American Clause in all Small and Formal Purchase agreements.</p> <p>All terms and conditions appropriate for the procurement value must be included in small purchase solicitations.</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>SFA should keep on file:</p> <ul style="list-style-type: none">All price adjustments throughout the yearAll invoicesAll contracts and agreementsAll bids solicitedDocumentation that a vendor did not reply to bid (if applicable)Documentation of why you selected a specific vendor (Selection Rubrics)Copies of bid solicitationDebarment statementsCD 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>
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		<p>Track micro purchases, what purchased when and dollar amount.</p> <p>Purchases should be distributed around community, not just one store.</p> <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> <p>Include all terms and conditions</p> <p>Include terms: Buy American and Equal Opportunity</p> <p>Include Termination for Cause and Convenience if \$10,000 or more</p> <p>Attain Signed Debarment Statements</p> <p>Awarded on lowest price (unless written documentation to justify)</p> <p>Maintain documentation</p> <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> <p>Notice of accepting all types of formal purchase must be advertised.</p> <p>Include all requirements of a small purchase</p> <p>If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</p> <p>Everything must be in writing.</p>
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 Assessment was not dated. The assessment must be updated at a minimum, once every three years.

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		The assessment must be made available to the public. The SA shared the Wellness Final Rule.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The HACCP manual is missing blood borne and body fluid clean up procedures. The SA provided links to resources with SOPs.
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	The SFA did not initially provided evidence of evaluation of pricing to ensure all non-program items are priced at a rate which covers all expenses. The SA provided a copy of the non-program revenue tool and instructions for completion. The SFA completed the document during the AR. The SFA should assess pricing of non-program foods on an annual basis.

Site - Level Technical Assistance Whiting Senior High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	<p>The SFA must maintain copies of CN labels or product formulation statements for all products served which outline product crediting in different meal components. These statements are certified for accuracy. This information should be used when menu planning to ensure compliance with the prescribed meal pattern. A CN label for the breaded Pollock sticks was not provided, only a nutrition label. An example of a CN label was provided to the SFA.</p> <p>Production records should identify a standardized unit of measure of the quantity being served. (Example: 1 cup, 2 ounces, 1 each)</p> <p>The SFA is encouraged to incorporate more variety of vegetables into the menu. The review week menu was very heavy on starch and relied on the salad bar to fulfill the vegetable sub-group requirements. While this is an acceptable practice, very little variety was offered on the salad bar as well.</p>
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Production records indicate that the SFA is serving portion sizes that are too large. 3-2-2020 students were given two beef and bean burritos which doubled the daily recommendations for high school students. 3-4-2020 students were given two corn dogs which doubled the daily recommendations for high school students. In addition, the

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		<p>SFA indicated that high school students are allowed to take extra entrees as they are available. All additional servings of entrees should be paid for as an a la carte item. The SFA is exceeding daily and weekly allowances of calorie, fat, and sodium. The SA sent the SFA a copy of the meal pattern requirements.</p> <p>The FSD resigned prior to the conclusion of this review. The SA will visit the SFA in SY2020-2021 to ensure the new FSD understands the meal pattern requirements.</p>
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	The SFA is required to request a second health inspection each year. A record of the request should be kept on file.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	All temperature sheets should be labeled to identify which cooler/freezer is recorded on that form. When issues with cooler and freezer temperatures are identified, corrective action should be taken and documented. (Examples: March 2, the freezer temperature was 6° and on March 3 the milk cooler was at 58°) Staff should have taken step to monitor or repair the unit.
Dietary Specifications Assessment Tool - Breakfast	18 Is butter or margarine added to breads and/or vegetables prior to serving?	The SFA should limit the amount of saturated fat and sodium served to the students. This may be done by substituting herbs and spices for salt, incorporating a flavor station, limiting the frequency of serving items like bacon bits and hot dogs, and purchasing low sodium foods. Saturated fat can be reduced by using oils instead of butter in cooking, not adding butter to foods after cooking, draining fat from all meats after cooking, limiting the serving size of items like cheese, and purchasing low fat products.

Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE (100): 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. Access to benefit information is correctly limited. Free meals are extended to all members in the household.</p>

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BREAKFAST & SUMMER PROMOTION (1600): The SFA does a good job of promoting breakfast with reminder signs and daily announcements. Menus are posted in each cafeteria as well as available to take home. Summer Food Service Program outreach for the SFSP program state-wide is shared via websites. The SFA promotes the SFSP site at the Whiting library.
CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. Ethnic/racial information is collected and the form is completed. The "And Justice for All" poster is visible to program participants.
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.
MEAL COUNTING & CLAIMING: Meal count totals for the month of March appeared accurate and complete. Food Production Records, were on file for all meals claimed for reimbursement for the review period.
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. Staff has attended regional procurement training.
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. All records are maintained for at least three years plus the current year. No fiscal action is anticipated as a result of the review.
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.

Site - Level Commendations Whiting Senior High School (0109)

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 all coolers-including milk coolers, freezers, and food served. The FSD is ServSafe Certified.
SMART SNACKS (1100): Students are able to purchase foods via a la carte sales and vending machines. All foods sold meet the Smart Snack standards for nutrition content for high school. Documentation was available to show that all a la carte sold to students during the meals met Smart Snack and Healthy Kids Act standards.
WATER (1300): Water is available to all students at breakfast and lunch in the cafeteria. Food Service staff fill a portable water container daily. It is clearly labeled and cups are provided.