

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Benton Community School District (06090000)
November 18-20, 2019

Program Year: 2020
Month of Review:
Lead Reviewer: Christine Crow
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	<p>There was one household that contained 3 students who were on the DC list who should have been receiving reduced benefits and were provided with free benefits. The SFA also received an application that was initially determined to be denied and when the parent was notified, proceeded to provide 2 income statements. The determining official did not take the overtime and incentive pay into consideration and claimed the 2 students as reduced price. When considering the overtime and incentive pay, the family qualifies as paid and not reduced.</p> <p>There was also one student who was mistakenly believed to have been on the direct certification list and provided free benefits when they should have been paid. TA provided.</p>	<p>The determining official sent the above families a letter of notification to inform them that their benefits will be decreased to the correct eligibility status according to the required timeframes documented on the letter. The benefit change is scheduled to occur on 12/14/2019. Send documentation from the point of service to show that the students' eligibility status changed.</p>	

Iowa Department of Education
 Bureau of Nutrition and Health Services
 State Review Summary Report
 Benton Community School District (06090000)
 November 18-20, 2019

1000 - Local School Wellness Policy	V-1000	<p>The wellness policy requirements meet some but not all of USDA's requirements. The local wellness policy provides many of the required elements but does not provide a policy for food and beverage marketing, as required by USDA. · The wellness policy has a policy on foods sold outside of the reimbursable meal. The policy lists the beverages that are allowed at the middle and high school but the beverages do not meet the USDA Smart Snack requirements. Middle school students are only allowed to have plain water, milk and 100% juice and the policy states that they can also have flavored water. · The assessment of the wellness policy goals must be completed every 3 years and made available to the public. The assessment is due to be completed again and is currently not available to the public. TA provided on Smart Snack beverage requirements, wellness policy assessments, and making wellness documents available to the public, and policy requirements.</p>	<p>Describe when the SFA will complete the assessment of the wellness policy goals and how it will be made available to the public. Describe when the policy will be updated to include all required elements and the correct Smart Snack information.</p>	
1100 - Smart Snacks	V-1100	<p>The vending machine located in the junior high/high school contains Sparkling Ice flavored water. This vending machine is on during the school day and all 7-12th grade</p>	<p>Provide written confirmation that the flavored water is removed from the vending machine and describe the beverage that replaced it.</p>	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Benton Community School District (06090000)
November 18-20, 2019

		students have access to the machine. Smart Snack approved beverages for 7-8th grade students include plain water, 100% juice, or milk. Therefore, the flavored water in the vending machine does not meet the USDA requirements. TA provided to the FSD.		
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Site - Level Findings: Norway Elementary School (0454)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The SFA strives to meet the needs of students who need a special diet. They work with the families of these students and have the appropriate documentation on file. One student has a diet modification request form that is signed by a prescribing official that requests almond milk. Per the food service director, almond milk has not been offered to this student. Unless the diet request would fundamentally alter the nature of the nutrition program, it is not appropriate for an SFA to decline to provide a meal modification. TA provided.	Contact the family of the student who has requested almond milk and offer to provide the milk if needed. Describe the result of the conversation.	

Org - Level Technical Assistance

Area	Question	Comments
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Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Benton Community School District (06090000)
November 18-20, 2019

<p>100 - Certification and Benefit Issuance</p>	<p>105 How long does the application's approval take from the date the SFA receives the application from the household?</p>	<p>The date the application is received should be indicated on the application to ensure that all applications are processed within 10 operating days.</p>
<p>700 - Resource Management</p>		<p>Procurement:</p> <ul style="list-style-type: none"> · The local and school food service micro-purchase threshold was incorrectly identified on the written procurement plan. Technical assistance was provided on identifying the correct micro-purchase threshold. This information will be corrected on the written procurement plan. · The written procurement plan should be reviewed annually preferably in February when decisions are being made on school budgets and always prior to conducting any purchases using school nutrition funds. · Clear and accurate specifications should be provided to vendors for all products purchased. When a vendor provides specifications for a product including equipment, that vendor then cannot respond to a solicitation. This is because the vendor would have a competitive advantage. It is understood that writing equipment specifications is difficult. An excellent resource to get started is the National Food Service Management Institute resource - Equipment Purchasing and Facility Design for School Nutrition Programs. · The school district must use a formal method of procurement either Invitation for Bid (IFB) or Request for Proposal (RFP) when procuring milk and dairy products. Based on last year's records, the annual amount spent for milk and dairy products exceeds the

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Benton Community School District (06090000)
November 18-20, 2019

		<p>district's local small purchase threshold of \$25,000.</p> <ul style="list-style-type: none">· If the school district would prefer to continue using the small purchase (3 Bids and a Buy)/price quotation method for procuring milk, the superintendent and the school board would need to consider increasing the local competitive bid threshold.· A public notification in a major circulating newspaper in the school district's service area is required when using either of the formal methods of procurement - Invitation for Bid (IFB) or Request for Proposal (RFP). A copy of the printed advertisement must be retained with the procurement documentation. Alternately, the district can now post the solicitation on the State of Iowa Bid Opportunity website. In public schools, both the superintendent and business manager have the authority to post.· Required federal terms and conditions must be included when procurement is conducted using small purchase and formal methods of procurement. Please refer to the state-prototype templates posted on IA_CNP.· When using the micro-purchase method, purchases must be equitably distributed among vendors to "spread the wealth." Last SY, purchases of gluten free products were made at a particular store in Cedar Rapids as this store allows opening of a charge account. The food service director prefers business that allow charge accounts. Based on past experience, the food service director is hesitant to use the district's credit card for concerns that food purchases for activities outside of school meals may be incorrectly coded to school nutrition. The food service director would prefer a credit card for school meal program use only. This would be a local decision.
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Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Benton Community School District (06090000)
November 18-20, 2019

		<ul style="list-style-type: none">· Recommend use the micro-purchase log and share on Google drive to make sure purchases are spread equitably among qualified vendors.· When procuring milk and bread, along with specifications for all items to be procured, the estimated annual usage for each item should be provided. To ensure the district selects a responsive vendor with the overall lowest price, the cost of each item on price quotation request or bid must be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template to calculate extended cost for milk is available on IowaCNP and was shown to the food service director. A similar process should be used for bread products.· It is best practice to include the school calendar when requesting pricing from vendors to ensure deliveries are not made during holidays, snow days, etc.· In the milk solicitation, other things to consider when requesting price from vendors are: HACCP plan to ensure clean crates and milk cartons, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons.· Allow vendors a minimum of four weeks from date vendor is contacted to the due date for milk and bread procurement. Depending on the complexity of a formal procurement, it is best practice to allow the vendor adequate time to respond.· Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-
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Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Benton Community School District (06090000)
November 18-20, 2019

		domestic agricultural commodity is accepted.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	The SFA offers water as a milk alternative for students who report having a lactose or milk allergy. Although the documentation provided has not been deemed to be a disability or to alter any major life activities by a prescribing official, the SFA is encouraged to offer non-dairy milk alternatives that are nutritionally equivalent to cow's milk (some soy milks and lactose free milk) for these students. See handout NSLP 036 in Download Forms. TA provided.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Although the food service director has a HACCP plan onsite at the targeted review site, it is not the most updated version. All sites within the district must have a HACCP plan (including the service site) that provides the most up to date Standard Operating Procedures needed for their site. TA provided.
RMCR - Nonprofit School Food Svc Acct	13 Did all recorded expenses represent an activity or function recognized as reasonable, necessary, allocable and otherwise compliant with the provisions of 2 CFR 200 Subpart E?	While reviewing the SFA's 2018-2019 vendor paid list, SA discovered that unallowable expenses were charged to the school food service account. Expenses including equipment repair, an air conditioner, office supplies, and online payment fees are not allowed to be charged directly to the school food service account and must be paid for with general funds. If the general fund wants to recover those costs, they can do so by applying the unrestricted indirect cost rate to the direct cost base of food service salary and benefits, food service supply costs (not including food), and food service travel expenses. TA provided.
RMCR - Revenue From Nonprogram Foods	8 Did the SFA:	The nonprogram food cost and revenue calculation did not include the cost or revenue of the preschool snacks or the catering events. The food service director proved that the catering events and preschool snacks are being billed and adequate revenue is being collected to cover the cost of the food and labor. The nonprogram food revenue tool shows that the nonprogram food revenue adequately covers the cost. TA provided to the FSD on including all nonprogram

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Benton Community School District (06090000)
November 18-20, 2019

		food revenue and cost going forward.
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Site - Level Technical Assistance Norway Elementary School (0454)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Although the SFA met the meal pattern requirement that states at least 50% of the grains served during the week are whole grain rich, the bread served is not whole grain rich as the first grain ingredient is not a whole grain. The amount of whole grain rich grain items for the week of the review period was 51.2%. SA encourages the SFA to consider purchasing whole grain rich bread. TA provided and the food service director found a whole grain rich bread option to use while SA was onsite.
1400 - Food Safety	1411 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?	SFAs must maintain a Buy American exception log to document any items that they receive that do not meet the Buy American provision. In addition to documenting the item received, SFAs must include the country of origin and why it was accepted. Since food items are delivered at each site, staff at every site must be able to add items to the log if needed. TA provided to the food service director.

Org - Level Commendations

Description
CERTIFICATION AND BENEFIT ISSUANCE: • The SFA offers the 30 day carryover of eligibility status to students who received benefits in the previous school year. • The SFA sends families the State Agency template letter of notification of eligibility status to inform them that they are either denied benefits or will begin receiving benefits through Direct Certification. • The applications reviewed contained all required information including social security numbers, all household member names, income, adult signatures, and dates. • Benefits are correctly transferred from the application or DC list to the point of service. • The determining official downloads the DC list twice monthly and keeps the lists on file. • There are two trained individuals responsible for determining eligibility status. • Eligibility status information is kept confidential. • All applications were processed within 10 operating days. • All denied applications were correctly determined.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Benton Community School District (06090000)
November 18-20, 2019

CIVIL RIGHTS: • Civil rights training was provided to all staff with responsibilities in the school nutrition program as evidenced by documentation. • The public release was sent to a local media outlet prior to school starting. • The SFA uses translation services to communicate with their families who have limited English proficiency. • The SFA uses the USDA complaint procedure to handle any civil rights complaints. • The ethnic racial form is completed annually and shows that no discrimination has been made in providing meal benefits. • No discrimination was observed while the SA was onsite. • Documentation is on file from the prescribing official to provide detail on what can and/or cannot be offered for students that have a special dietary need. The food service director and managers work with the school nurse and families to ensure that students who have a special diet receive menu items that meet their needs. • The “And Justice For All” poster is on display in a public location. The correct nondiscrimination statement is found on the menus and letter of notification of eligibility.

FOOD SAFETY: • The health inspection report is on display in a public location. • Food is being stored safely and temperatures are monitored and recorded for the milk coolers, refrigerators, and freezers. • Hot and cold food temperatures are also recorded daily along with any corrective action that was taken. • The HACCP plan is available onsite and contains all appropriate standard operating procedures. • The food service director trains staff annually on the HACCP plan and appropriate standard operating procedures.

MEAL COUNTING AND CLAIMING: • The cashiers are trained yearly on their counting and claiming responsibilities. • The SFA has a backup procedure in place in case their point of service computer system does not work. • Edit checks are conducted to ensure that the meal count does not exceed the number of enrolled students. • The edit check matches the number of meals claimed during the review period. • The breakfast and lunch meals claimed during the observed meal are reasonable when compared to the average meal count during the review period. Offer versus serve is implemented accurately.

NUTRITION AND MEAL PATTERN REQUIREMENTS: • The breakfast menu, food production records, and labels reviewed for the week of the review period shows that all daily and weekly meal pattern requirements are being met. • The food service director offers a variety of breakfast and lunch entrees throughout the month. • The lunch menu, food production records and labels reviewed for the week of the review period shows that all daily and weekly meal pattern requirements are being met. • Two different types of milk are being offered for breakfast and lunch. • CN labels, product formulation statements and standardized recipes are on file for all foods served during the review period. • At least 50% of grains served at breakfast and lunch are whole grain rich. • All students who took a breakfast and lunch during the observed meal had a reimbursable meal and offer versus serve was implemented correctly. • The breakfast and lunch menu offered to students during the observed meals met the daily meal pattern requirements. • Signage was on display to inform students how the menu constituted a reimbursable meal. • Free, potable water is available to all students at both breakfast and lunch. • Condiment portions are controlled.

ONSITE MONITORING: • The onsite monitoring has been conducted for breakfast and lunch at all sites within the district by February 1 of this school year.

PROCUREMENT: The School Food Authority (SFA) has a comprehensive written Procurement Plan that includes federal and local thresholds, have listed procurement events and procurement methods for each event. There is a Code of Conduct Policy which references Board Policies related to gifts, conflicts of interest, and disciplinary action for violating job duties. The SFA is part of the Iowa City Rural Food Service Purchasing Group (ICRFSPG) lead by Iowa City CSD. This allows the district to leverage better pricing for quality goods and services. A review of invoices from the Prime Vendor showed the district was purchasing products from products specified in the bid. The food service director checks all invoices carefully from the all vendors to ensure products delivered match the order and the description of the product solicited by GPO. The FSD has a file folder with all rebates submitted. This allows her to track that all rebates are received. The food service director receives weekly produce market updates that allows her to adjust the menu based on the produce available and meet budget goals. The food service director is a member of the USDA Foods Advisory Council. This voluntary position allows her excellent networking with her peers at the same time she gets to share her wealth of experience in school food

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Benton Community School District (06090000)
November 18-20, 2019

service. Last SY, the SFA did an excellent job in utilizing their USDA Foods Planned Assistance Level (PAL). The utilization was 100 percent of PAL exceeding the goal of 95 percent utilization set by the state agency. This SY the SFA is continuing utilizing their PAL allocation efficiently.

PROFESSIONAL STANDARDS: • The food service director, manager, full and part time nutrition staff received the required number of professional standard training hours in school year 2018-2019 as evidenced by documentation on file. • The food service director and food service manager at the review site are both ServSafe certified. • The food service director tracks all the training on a tracking tool to ensure that all staff receive the required number of training hours.

RESOURCE MANAGEMENT: • The school nutrition fund is tracked separately from the SFA's other funds. • The SFA purchased equipment that was on the State Agency pre-approved equipment list. • Internal controls are in place to ensure that only allowable costs are charged to the nonprofit school food service account and all revenue is deposited into the account. • The SFA had a positive balance as of 12/31/2018 and did not have to complete the PLE tool or increase student lunch prices. • The correct adult lunch price was charged to staff based on USDA requirements. • The SFA used 99.53% of their USDA Paid Assistance Level (PAL) dollars in SY 2018-19. • Documents are saved for 3 years plus the current year. • The SFA has a negative balance policy and provides all families annually with this policy. • The nonprofit school food service account has less than 3 months of operating costs in the account. As the account balance has increased to almost 2.5 months of operating costs, the FSD is planning on purchasing more equipment.

SCHOOL BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM OUTREACH: • The SFA informs their families about the school breakfast program through flyers at registration, district newsletters, emails, and they announce breakfast options in the daily announcements. - The nutrition program team also worked together to identify and overcome barriers that prevented students from participating in breakfast and promoted their breakfast program to families and students throughout the district. Updates to the breakfast program included improved signage, communication with other school staff regarding the timing of their activities and the breakfast service, and student taste testing to offer a greater variety of entrée items. • The SFA informs their families about the availability of the Summer Food Service Program by sending out district wide emails and posting promotional posters in all school buildings.

VERIFICATION: • Applications selected for verification were selected from error prone applications first. • The verifying official followed up with families who were selected for verification and did not respond to the initial verification notification. • The applications selected for verification were confirmed by a confirming official to ensure that the correct eligibility status was initially determined. • The verification official processed the verification results accurately and decreased benefits within the correct timeframe. • The State Agency template letter of verification selection and results were sent to families. • The correct number of applications (2) were selected for verification in SY2019. • The verification process and report were completed on time.

WELLNESS POLICY AND COMPETATIVE FOODS: • The SFA invited members of the school community and public to participate in their wellness committee by putting information regarding upcoming meetings on their social media site. • The wellness policy is made available to members of the public as it's on the SFA's website. • The wellness policy is updated every 3 years. • The competitive foods that are sold during the school day have nutrition calculator printouts on hand to provide proof that they meet the Smart Snack requirements.