

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Belle Plaine Community School District (05760000)**  
**March 10-12, 2020**

**Program Year:** 2020  
**Month of Review:** March  
**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	The determining official found 7 students on elookup and provided them the benefits as stated even though the birth dates and State IDs did not match the students enrolled at the school. These students had also turned in an income application. The eligibility status did not change for 2 of these students but the eligibility status changed from free to reduced price for 5 of the students. Therefore, the students had been inaccurately receiving free benefits instead of reduced price benefits all year. Fiscal action may be taken. TA provided to the determining official who sent letters of notification of eligibility to all families to inform them of their eligibility change. The correct amount of time to appeal was provided.	No further action required.	
900 - SFA On Site Monitoring	V-0900	The food service director completed the onsite monitoring form for lunch at both sites but has not completed the form for breakfast at either site. SFAs with more than one site must complete the onsite monitoring form found in Download Forms for lunch at all sites and at breakfast for 50% of sites that serve breakfast. TA provided.	Complete onsite monitoring for breakfast at the elementary and submit the onsite monitoring form. The form must contain the date and site reviewed.	
1000 - Local School Wellness Policy	V-1000	Although the local wellness policy contains most required elements it does not contain elements on food and beverage marketing or foods sold to students during the school day such as Smart Snack, a la carte, or vending items. The SFA's wellness	1. Describe when the SFA will hold its next wellness committee meeting and when they will assess how the goals written within the policy are being implemented at each site. 2. Describe how the assessment of goals	

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		committee must also assess the progress of how the goals written within the policy are being implemented. This assessment must be conducted at least once every 3 years for each site, be documented, and made available to the public. TA provided.	will be made available to the public. 3. Describe when the wellness policy will be revised to include all required elements.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	According to the 2018-2019 financial report, the nonprogram food revenue does not adequately cover the cost of the nonprogram foods. Nonprogram foods include catering for staff meetings, a la carte items, preschool and kindergarten snack milk, adult meals, 2nd entrees, and extra milks. The 2018-2019 nonprogram food revenue and costs were possibly calculated in error. SA suggests calculating the program food cost and subtracting it from the total food cost to determine nonprogram food costs. Handouts and TA provided to the business manager and food service director.	Calculate the nonprogram food cost and revenue to show that the revenue adequately covers the nonprogram food cost as a percentage of total food cost and total revenue. If the revenue still does not cover the cost, describe steps that will be taken to ensure the revenue covers the cost of nonprogram foods going forward.	

**Site - Level Findings: Belle Plaine Senior High School (0109)**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
400 - Meal Components and Quantities - Breakfast	V-0400	During the observed breakfast the SFA offered three types of juice including 100% orange juice, 100% apple juice, and cranberry juice cocktail. All juice sold as a part of the reimbursable meal or as a Smart Snack a la carte item must be 100% juice. TA provided.	Provide written confirmation that the cranberry juice cocktail will no longer be served as part of the reimbursable meal and that the SFA will only serve 100% juice.	

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400 - Meal Components and Quantities - Lunch	V-0400	<p>The school nutrition program currently serves Subway sandwiches once a month to the 7-12th grade students. The SFA doesn't not have adequate CN labels or product formulation statements to show how the sandwiches credit towards the meal pattern. The SFA must either obtain this information for the sandwiches served or stop selling these sandwiches as a part of the reimbursable meal. TA provided on documentation required for all reimbursable menu items.</p>	<p>Provide an approved CN label or product formulation statement for the meat and cheese, used for the sandwiches sold. If these labels are not able available, provide written confirmation that the sandwiches will no longer be sold and describe what will be sold instead, as of school year 2020 – 2021.</p>	
400 - Meal Components and Quantities - Lunch	V-0400	<p>1. The grilled ham and cheese recipe does not provide enough meat/meat alternate to meet the daily requirements for 9-12th grade students. Currently, the sandwich provides 1.75 oz. meat/meat alternate when 2 oz. is the daily requirement for 9-12th grade students. The SFA could increase the amount of turkey ham on the sandwich or serve the sandwich with ¼ cup cottage cheese, yogurt, or hummus. The chicken and rice soup with cheese bread served during the review period did not meet the daily meat/meat alternate for 9-12th grade students. The SFA may consider serving a larger, 1 cup serving of the chicken and rice soup and using an additional 5 pounds of cheese in the cheese bread recipe to increase the amount of meat/meat alternate. If the SFA decides not to use cheese bread, they may consider serving the soup with a small deli sandwich, grilled cheese sandwich, or cheese stuffed breadstick in order to meet the meat/meat alternate requirements.</p> <p>2. The items on the fruit and vegetable bar are not documented to clearly describe the amount of each item served and the intended serving size. All items served as part of the reimbursable meal must be included on a food production record. A fruit and vegetable bar record was provided to the food service director.</p> <p>3. During the observed meal, cottage cheese was</p>	<p>1. Revise the recipe for the grilled ham and cheese sandwich to show that it meets the grain and meat/meat alternate requirements for 9-12th grade students. Provide CN labels or PFS for the bun, meat, and cheese used in the recipe.</p> <p>2. Describe how the SFA will modify their menu and/or recipe on the day the chicken and rice soup with cheese bread is served so that the meat/meat alternate requirements are met. If the recipe is revised, please submit the revised recipe and any CN labels if new products are included in the menu for that day.</p> <p>3. Send 2 days of the fruit and vegetable bar food production records to show what and how much was offered.</p>	

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		<p>on the fruit and vegetable bar without any portion control, making the day's menu over on the sodium restrictions. The items on a fruit and vegetable bar must have portion control if they are calorie or sodium dense to ensure that the menu doesn't go over on the calorie or sodium restrictions. All items must be included when calculating the total calorie and sodium amounts. Alternatively, these items should be taken off the fruit and vegetable bar and be portioned behind the serving line by staff. TA provided.</p>		
1100 - Smart Snacks in School	V-1100	<p>All items sold to students during the school day that are not a part of the reimbursable meal, must meet Smart Snack requirements. This includes all items sold on the a la carte line and in the vending machine. In order to determine if the items meet requirements, SFAs must enter the nutrition information for all food and beverage items sold into a Smart Snack nutrition calculator provided by the Alliance for a Healthier Generation. TA provided to the food service director who had nutrition calculator print outs available for some but not all of the a la carte items sold. Therefore, the SA was not able to determine if they were allowable.</p> <p>The vending machine also contained beverages which were not allowed for 7-8th grade students. Since the vending machine is available for all students, its' contents must meet the requirements for the lowest grade group that has access to the machine. Junior high students may only be sold 100% juice (with or without carbonation), milk and plain water. The vending machine contains flavored water and low calorie sports drinks that are not approved for 7-8th grade students. TA provided on Smart Snack approved beverages.</p>	<p>1. Provide the nutrition calculator printouts for the popcorn chicken, 2 chicken strips, 2 cheese sticks served with marinara sauce, and corn dogs. If these are not Smart Snack approved, provide written confirmation that they will no longer be sold as a la carte items.</p> <p>2. Provide written confirmation that the low calorie sports drinks and flavored water will no longer be sold in the vending machine. Describe what the SFA will put in the vending machine instead.</p>	
1100 - Smart Snacks in School	V-1100	<p>During the observed meal, leftover breadsticks were given away for free to students. All foods provided for free must be included as part of the reimbursable meal. Therefore, the free breadsticks would also have to be included in the calorie count, thus putting the</p>	<p>Provide written confirmation that leftovers will not be given away for free. Describe how the SFA will begin using leftover foods and if the SFA decides to sell them, the</p>	

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	menu over on calories. Leftovers must be documented on food production records which can be used for planning amounts needed in future menus. Leftovers can be stored properly and sold the next day if possible. TA provided on calorie and sodium restrictions, leftovers, and food production records.	price that they will be sold for.	
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**Org - Level Technical Assistance**

Area	Question	Comments
300 - Meal Counting and Claiming	306 What procedures are used as internal controls to ensure the meal counts do not exceed enrollment or attendance adjusted enrollment?	The SFA must use their point of service edit check report to ensure that there aren't more meals claimed than students enrolled in each eligibility group. The point of service edit check report must also be used to submit their claim for breakfast and lunch meals. TA provided to the individual responsible for preparing the claim.
700 - Resource Management		The SFA has a negative balance policy that is provided to all families and staff annually. The policy must be updated as it does not accurately reflect the process of handling negative lunch accounts. The policy must be given to all families at least once a year.
700 - Resource Management		If a SFA uses nutrition funds to purchase equipment that costs more than \$5000, the equipment must be on the SA's pre-approved equipment list. If they are interested in purchasing equipment that is not on the list, they must get SA approval. The approved equipment list and TA provided.
700 - Resource Management		<p>PROCUREMENT:</p> <p>Small Purchase:</p> <ul style="list-style-type: none"> <li>- The bid sent out for sandwiches was only sent to one vendor. Going forward, if the SFA wants to purchase pre-made sandwiches they must send bids to at least 2 different vendors. Although the bid states that all sandwiches provided must meet specific nutrition requirements, the vendor has not provided proper documentation such as a CN label, PFS, labels, or recipes provided to show that requirements are being met. In order for the SFA to ensure that sandwiches are meeting the USDA meal pattern requirements, CN labels, PFS, bread nutrition facts labels, ingredient lists, and recipes are needed.</li> <li>- All small purchase bids must be sent to at least 2 vendors. Bids</li> </ul>

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		<p>must also contain all required terms and conditions including Buy American provision, equal employment opportunity provision, targeted small business and other terms depending on the amount the SFA intends on spending. See the SA's Small Purchase (3 Bids and a Buy) template located in Download Forms.</p> <ul style="list-style-type: none"> <li>- When preparing small purchase bid documents, the SFA must include the products needed, the amount they intend on using (which can be obtained from the current vendor's usage report), and other product specifications including fat content, flavors, or other specifications as available.</li> </ul> <p>Formal Procurement:</p> <ul style="list-style-type: none"> <li>- The SFA is a member of the EIPG purchasing group but does not have the current agreement on file or any price lists available to conduct contract management. SFAs must compare prices on the invoice to prices on price lists to ensure they are being charged the agreed upon price. TA provided to the FSD who agrees to contact the purchasing group leader to obtain more information on locating these items.</li> <li>· The procurement plan is an annual requirement that must be done before the SFA sends bids to potential vendors.</li> <li>· A Buy American exception log must be kept on file to document any agricultural commodity items that are purchased or received that don't meet the Buy American Provision. A template is available in Download Forms.</li> <li>· Although the SFA did not make any micropurchases in the previous school year, a micropurchase log must be kept going forward if a micropurchase is made. A template form is available in Download Forms.</li> </ul>
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 USDA requires specific procedures for SFAs to follow in the event that they receive a civil rights complaint. TA provided to the SFA on USDA complaint procedures and a form to complete if a complaint is made.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The SFA has a HACCP Plan that is individualized for their needs and contains most of the required elements including an SOP for transporting food, sharing tables, preparing, holding, cooking, and cooling food, calibrating and using thermometers, washing fruits and vegetables, personal hygiene etc. The HACCP plan does not contain an SOP for the

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		control and cleanup of blood and bodily fluids, manual ware washing, or use of a dishwasher. Iowa State University Extension and Outreach site contains sample SOPs that can be used as a guide. TA provided.
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?	SFAs must follow the Buy American provision when purchasing or receiving all agricultural commodity products. In the event that a product is purchased or received that violates the Buy American provision, the SFA must document the item and the reason why they purchased it, in a Buy American exception log. A template log is available in Download Forms. TA provided.

**Site - Level Technical Assistance Belle Plaine Senior High School (0109)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	409 Review production records and other supporting documentation.	The food production records must specify the type of fruit offered and must include the total quantity prepared for each menu item in a measurable amount, the planned number of servings, and the actual number of servings per grade group. TA provided on complete food production records.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	An approved CN label is a CN label that comes directly from the box or is a picture or copy of the CN label on the box. If a CN label is not available, an approved product formulation statement is allowable. TA provided.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Although the SFA does not serve more than 2 ounces of grain based desserts per week, the SFA does put other types of dessert items on the menu throughout the week which puts them slightly over on their calorie restriction. TA provided to the FSD on other menu items or larger servings of some menu items served throughout the week of review to meet grain and meat/meat alternate requirements without providing as much sugar. The FSD agrees to decrease the amount of dessert items and increase amount of meat/meat alternate provided in some recipes.

**Org - Level Commendations**

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Description
<p><b>CERTIFICATION &amp; BENEFIT ISSUANCE:</b> • The SFA provides 30 carryover days of benefits if students received benefits in the previous school year. • Paper and electronic income applications are saved and backed up for at least 3 years plus the current year. • Applications are processed within 10 days of being turned in. • Households are notified of their eligibility status with the SA template letter of notification if they turn in an application and are denied or if they are on the DC list. • Benefits are extended to all children in the household. • The applications contained all the correct information including the social security numbers, household names, income, and signatures. Applications were processed accurately and signed by determining official. • Benefits were accurately transferred into the point of service system. • The income application is available online and the determining official received approval from Deb Linderblood before making it available to families. • Denied applications were determined accurately. • The determining official downloads the DC list twice monthly and keeps all lists on file.</p>
<p><b>CIVIL RIGHTS:</b> • The USDA and Iowa nondiscrimination statements are on program materials including the SFA’s website and menu. • The public release was sent to the local newspaper prior to school starting. • Translators are available to help families who have Limited English Proficiency. • Civil rights training was provided to all staff with school nutrition responsibilities. • The ethnic racial form has been completed to show that no discrimination was made in distributing meal benefits. • Although the SFA does not currently have any students with special dietary needs, they make diet modification statements available for families and agrees to accommodate any needs that they receive in the future. • The “And Justice For All” poster is on display in a public location.</p>
<p><b>FOOD SAFETY:</b> - The food safety inspection report is on display in a public location. - The food service director requested a 2nd inspection from their health inspector. - The HACCP Plan is available at both sites. - Temperature logs are available for all cooling equipment, dishwasher, and hot foods served. - Foods are being stored safely as they are at least 6” off the floor and all open containers are labeled and dated. - Good food safety practices were observed as the staff washed hands, wore gloves, had their hair pulled back and wore clean aprons. - Documentation is on file to show that the SFA is approved to have a share table.</p>
<p><b>MEAL COUNTING &amp; CLAIMING:</b> - The point of service line at breakfast and lunch are organized and orderly so staff can ensure all students have a reimbursable meal. - All students had a reimbursable meal during the day of observation. - The edit check matches the claim submitted for the review period. - The edit check from the day of review is reasonable when compared to the edit check during the review period. Offer versus serve is properly implemented.</p>
<p><b>MEAL PATTERN REQUIREMENTS AND NUTRITION QUALITY:</b> - The breakfast and lunch menu served on the day of observation met all the daily meal pattern requirements. - Food production records were available for all days during the review period and contained information on all menu items served including milk and condiments, serving sizes, planned number of servings, and leftover amounts. - CN labels, product formulation statements, and labels are available for all menu items served during the week of review and day of review. - The SFA serves a variety of homemade menu items. - The SFA offers a variety of different fruits and vegetables daily, making it easy for students to select a reimbursable meal. - During the week of review, the SFA met the daily and weekly lunch meal pattern requirements for milk, fruit, grains, and all vegetable subgroups for the 9-12th grade students. The SFA met the daily and weekly lunch meal pattern requirements for milk, fruit, total vegetables, vegetable subgroups, grains, and meat/meat alternate for the 7-8th grade students. - During the week of review the SFA met the daily and weekly breakfast meal pattern requirements for grains, fruit, and milk for 7-12th grade students. - At least 50% of grains served are whole grain rich. - Two approved, different types of milk are offered to students. - Free, potable water is available at lunch and breakfast. - A flavor station that contains sodium free seasonings, is available for students at lunch and condiment portions are controlled. - Signage is on display to inform students and staff how the menu constitutes a reimbursable meal. - Signage is on display to promote healthy eating.</p>
<p><b>ONSITE MONITORING:</b> The onsite monitoring was done for lunch at both sites.</p>
<p><b>PROCUREMENT:</b> - Although the SFA described the milk and bread purchases as formal procurement methods, they were done as a small purchase. These purchases, as well as the premade deli sandwich purchase, were made within the SFA's local purchasing policy. Bid documents contained a list of the products they wanted to purchase, delivery specifications, and the year of service that they were interested in procuring for. - The SFA has a procurement plan that contains all required elements including items to procure, estimated amount to be spent, the correct type of procurement method based on the small purchase threshold, the correct type of contract, and information regarding contract management. - The SFAs code of conduct contains all required elements. - The SFA has all procurement documents on file including the bid documents, procurement plan, code of conduct, and invoices.</p>
<p><b>PROFESSIONAL STANDARDS:</b> - The FSD is ServSafe certified (7/22/2019 – 2023) - The food service director met her professional standards training requirements as</p>



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evidenced by certificates and attendance log documentation. - The full time and part time food service staff met their annual professional standard training requirements of 6 hours and 4 hours respectively, as evidenced by attendance logs and tracking tools. - The FSD tracks the training for all employees with school nutrition responsibilities to ensure that everyone has their training needs met. - The food service director was recently hired and met hiring standards.

**RESOURCE MANAGEMENT:** • The correct paid student lunch price is charged based on the PLE tool requirements. • The school nutrition fund is tracked separately. • The correct adult lunch price is charged for all adult meals. • Per the 2018-2019 financial report, the school nutrition fund has less than 3 months operating costs. • The food service director uses their USDA commodity food dollars efficiently. • Per the 2018-2019 vendor paid list, the school nutrition dollars are being spent on allowable expenses. • The SFA has a negative balance policy that is provided to families. • Documents are saved for 3 years plus the current year.

**SCHOOL BREAKFAST AND SUMMER FOOD SERVICE PROGRAM OUTREACH:**- The SFA notifies families of their school's breakfast program by putting information on the website. - The SFA notifies families of the Summer Food Service Program by sending letters home with students, posting information on the school's website and posting SFSP signs throughout the community.

**VERIFICATION:** • The SFA selected the correct number of applications to verify. • The verification process and report were completed on time. • The SFA sent the correct letter of notification of verification and the correct letter of notification results to the family selected for verification. The letter of verification results contained the correct dates to appeal and the correct date of when benefits would be decreased. • Benefits were decreased within the correct time-frame. • The family selected for benefits did not respond and the verifying official followed up with the family again before decreasing benefits.

**WELLNESS POLICY:** - The wellness policy is available to the public as it's on the school's website and has been updated within the past 3 years. - The wellness committee has a leader and invites a variety of stakeholders to participate.