Bureau of Nutrition and Health Services

State Review Summary Report

Ft Dodge Comm School District (23130000)

Dates of Review: November 18 - 22, 2019

Program Year: 2020
Month of Review: October

Lead Reviewer:Deb LinderbloodOrg Representative(s):Ursuala Roberts

Site - Level Findings: Fort Dodge Middle School (0227)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	The SFA has been adding Chef Nick's lunches onto the monthly claim numbers obtained from the Transaction Report. It was found that these meals were already captured on the Transaction Summary Report and thus should not be added onto the numbers. Per conversation with Infinite Campus, because of students served at Arey instead of using the Edit Check report to obtain claim numbers the SFA should continue to use the transaction summary report numbers to complete their claim. Also, the SFA has not been doing an edit check since they use the Transaction Summary Report to file claims. TA provided that this can be done manually each month prior to submitting the claim. Fiscal action was applied to the review month and the month of review.	State your intentions to use the number of meals served that are on the transaction report for filing claims and that Chef Nick meals will no longer be added onto these numbers. Also, attach a copy of one month's edit check report.	
400 - Meal Components and Quantities - Breakfast	V-0400	Breakfast signage does not explain what constitutes a reimbursable breakfast. SFA posts the breakfast menu but it does not indicate how many items each food contributes. TA provided on where to find the State Agency breakfast signage template. https://educateiowa.gov/documents/teamnutrition/2018/07/build-healthy-breakfast-signage	Complete and attach one week's worth of breakfast signage.	
400 - Meal Components and Quantities - Lunch	V-0400	1 7	State the milk substitute that you will offer students who are unable to consume cow's milk and do not have a doctor's order specifying what to substitute.	

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	must have 8 grams of protein or more.		
1900 - Fresh Fruit and Vegetable Program (FFVP)	documented. When claiming employee hours for FFVP, there must be time logs for each day FFVP snacks are served or an annual time study to document FFVP hours if set hours are claimed each month. A time study documents accuracy of personnel costs on monthly FFVP claims. The SFA should complete a time study for the van driver (mileage, drop off points for time study) and a time study for the	Time study will be completed for the positions listed for the month of December. Copies of these time logs will be provided to ensure there is correct and accurate time study documentation completed for SY 2019-2020. State who will be responsible to ensure labor hour documentation would be completed should the SFA continue to receive FFVP grant funds in	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	Prior to the on-site review the state agency reviewer received a call from Judy Cameron, Senior Vice President of Taher, the FSMC contracted to operate the school meal programs at the SFA. The reviewer clearly indicated the documents Taher would make available at the on-site review to validate the food and non-food supply charges billed by the vendor to the SFA each month to validate the charges on the FSMC invoice. The reviewer selected three months from prior SY to review - December 2018, January 2019, and February 2019. Following review of December 2018 FSMC monthly invoice it was clear that adequate documentation was not available to ensure all rebates, discounts, and applicable credits are passed to the SFA. None of the documentation requested during the phone call was available at the on-site review. The management fee is not calculated using the meal equivalent rates agreed upon in the FSMC contract. The general accounting fee is not calculated using the rate per FSMC contract.	the FSMC invoice are accurate, the SFA will obtain the following documentation from the FSMC: all manufacturer price lists, SFA monthly usage report from the distributor, price list generated by the distributor that shows the cost of the product to the distributor (this should be the same cost on the manufacturer price list), the rebate or discount the	

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		A student reimbursable breakfast is incorrectly counted as one meal equivalent. Per FSMC contract, one breakfast should be 0.66 meal equivalent. A review of the December FSMC invoice, the SFA is charged a set amount of management and general fee for eight months and then fees are reconciled in the ninth month of the contract. This is not in accordance to the FSMC contract. The reviewer did not continue to validate January 2019 and February 2019 FSMC invoices as charges on the December invoice could not be validated.	applicable discounts or credits, as applicable. The SFA will submit to the state agency all documentation above along with distributor invoice for the month of October 2019 along with a copy of the FSMC invoice(s) for the month of October 2019. The SFA will submit how the management, general and administrative fee is calculated to validate the October 2019 charges on the FSMC invoice. TA was provided to the Program Director on how this should be calculated. The SFA will submit documentation to show validation of the labor charges on the FSMC invoice for October 2019. The state agency may request the same information for additional months of the SY. Failure of the FSMC to provide the documentation to validate charges on October 2019 invoice may result in the state agency withholding school meals payment to the SFA and the review will remain open.	
700 - Resource Management	V-0700	Fiscal Action is pending based on PS1 errors. The State Agency will be adjusting August/September and October claims. No Action required by the SFA.	No action required by the SFA.	
1000 - Local School Wellness Policy	V-1000	Currently the SFA's Wellness Committee does not have any parents, general public, students or school board members. Also, an assessment of the Wellness policy has not been completed at the following sites: High School, St. Paul Lutheran and Arey Education Center. Lastly, the site assessments of the Local Wellness Policy are not made available to the public.	The SFA will: 1.) attach an invitation to the members of the Wellness Committee for the next meeting which will be held during school year 2019-2020. The invitation needs to include all stakeholders listed in the finding, the date and time of the next meeting and the agenda that will be discussed. 2.) state the month in school year 2019-2020 that you expect to complete the wellness assessment at the high school, St. Paul Lutheran and Arey Education Center. 3.) state how you will communicate the assessments to the households.	
1600 - School Breakfast and SFSP Outreach	V-1600	Whether a SFA participates in the Summer Food Service Program or not, the district must conduct outreach to households at the end of the school year. TA provided that there are promotional materials on IowaCNP under download forms. This is a repeat finding.	For your response, indicate how Summer Food Service Program outreach will be conducted at the end of the school year.	
RMCR - Indirect Costs	V-RMCR	The SFA charged the nutrition account for equipment repair and maintenance; postage; pest control; and audit services as a direct cost and also charged an indirect cost. These are unallowable direct costs to the School Nutrition Program. TA provided that the Nutrition Department needs to track these costs and be sure they are coded as indirect cost at the end of the year.	State which position will track indirect costs and be sure they are coded as indirect cost at the end of the year to the Nutrition account. State that you will not charge repairs and maintenance; pest control, postage and audit services directly to the Nutrition account and that instead these will be captured by charging nutrition an indirect cost rate.	

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RMCR -	V-RMCR	The SFA did not correctly calculate its		
Revenue From		nonprogram food costs for the Certified Annual	Determine your nonprogram food cost for school year	
Nonprogram		Report that is used to populate the Financial	2018-2019. Complete the USDA nonprogram revenue	
Foods			tool using the determined nonprogram food cost. If the	
		lowaCNP the nonprogram revenue is the exact	USDA nonprogram revenue tool shows that you are	
		same amount as the nonprogram food cost.	not bringing in adequate revenue state how you will	
		Also, the Food Service Management Company	increase the amount of revenue you will bring in.	
			State the process you will use to ensure that the	
			amount of nonprogram revenue and nonprogram food	
			costs that the Food Service Management Company	
			calculates matches what the SFA calculates.	
		SFA has for nonprogram revenue.		

Site - Level Findings: Duncombe Elementary School (0454)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	133 Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified?	TA provided that when the homeless liaison emails the nutrition department that a student is homeless/runaway the liaison should state the student's name and the effective date. Also discussed that if a homeless student is found on the Direct Certification list, the SFA should change the student in their POS system to directly certified as this takes precedence.
200 - Verification	213 If applicable, did the SFA's notice of adverse action contain all required information, including notification of appeal rights?	Provided clarification on the number of calendar days and operating days to follow when a decrease in benefits occurs. The District must give the household 10 calendar days to appeal if there is a decrease in benefit status. The district has 10 operating days following the appeal period to change the eligibility status when a decrease in benefits occur and 3 operating days for an increase in benefits.
700 - Resource Management		The written procurement plan should be completed annually (around February when board meets to make decision on budget for following SY). The plan should, to the extent practicable, reflect the upcoming school year's purchases, correct procurement methods, contract award type and evaluation method for each purchase. The most recent version of the written procurement plan template will be posted on lowaCNP download forms in January. It is best practice to keep a separate procurement plan 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. On the plan the School Food Authority (SFA) should identify if vendor award will be based on line item or bottom line when using either small or formal

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		procurement method.
		TA provided that the SFA needs to have debarment certification statement signed by vendors when using small or formal procurement methods when the purchase is \$25,000 or over.
		Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a Buy) and formal methods of procurement. Reviewed the state-prototype templates posted on IowaCNP.
		The Buy American provision should be included in solicitation documents when food is procured. The vendor should have a process in place to inform the SFA when the domestic product ordered is not available. The vendor process should first suggest an alternate domestic product. The SFA would approve use of an alternate domestic product. Use of the non-domestic product should be limited to instances when the domestic product is not available in sufficient quantity or is not of superior quality and price is cost prohibitive. An Exception to Buy American Provision log should be maintained. A template is available on IowaCNP.
		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.
		The SFA Program Director will complete eight (8) hours of food safety training. The food safety training is valid for five (5) years. The Program Director should complete a total of twelve (12) credit hours of continuing education annually to meet school meal programs professional standards requirement.
		The SFA should have a written description for product(s) to be purchased using the small purchase method including equipment - small or large. Equipment resource developed by NFSMI (now ICN) shared with the SFA.
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.
1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	TA provided that the staff person who oversees the After School Snack Program needs to have civil rights training. This staff person's completed training should be tracked on the training tracker tool. Per Administrative Assistant this staff person has had food safety training and training related to her job responsibilities.
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 availability of the School Breakfast Program throughout the school year?	TA provided that in order to increase breakfast participation the SFA could consider one or more of the following: Grab and Go Breakfast, 2nd Chance Breakfast or Breakfast in the Classroom. Discussed advantages of each and disadvantages, such as getting custodians, teachers, etc. to buy into these offerings.
RMCR - Nonprofit School Food Srvc Acct	11 If Yes, was the equipment included on an approved State agency equipment list or did the SFA otherwise secure prior approval from the State agency before purchasing the equipment (per FNS Policy Memo SP 31-2014)?	In school year 2018-2019 the SFA purchased some equipment that is not on the State Agency pre-approved equipment list (for example: Electric Can Opener, Garbage Disposal). TA provided that the Stage Agency has

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		a pre-approved equipment list (provided a copy). If the SFA wants to purchase a piece of equipment that is on this list, prior approval is not needed. If the equipment is not on this list, then prior approval is needed from the Bureau.
RMCR - Nonprofit School Food Srvc Acct	12 If the SFA disposed of equipment during the RM review period, did the SFA deposit any proceeds from the sale of the equipment into the nonprofit school food service account?	TA provided that any future sales of nutrition disposed of equipment, the funds need to be deposed into the nutrition account.
RMCR - Nonprofit School Food Srvc Acct	5 If Yes, is the SFA on track to spend down its excess cash resources so that it is in compliance with the three month net cash resource limit?	TA provided on ways that the SFA could spend down some of the money that is in the Nutrition Account as they currently have more than 3 months operating funds. Discussed CEP pros and cons and discussed that the SFA could consider providing free breakfast to all students. This would allow for the SFA to spend down some of the money and also increase breakfast participation.
RMCR - Indirect Costs		TA provided that the SFA incorrectly directly billed the nutrition account \$47,180.12 for equipment repair/maintenance, audit services and pest control. The maximum allowable indirect cost is \$139,424.22. An adjustment of \$20,897.90 should have been made from the General Fund to the nutrition account. In the future, be sure indirect costs are correctly billed.

Site - Level Technical Assistance Fort Dodge Middle School (0227)

Area	Question	Comments
1400 - Food Safety	location?	The food safety inspection was not posted in a publicly visible location. TA provided. SFA moved the inspection to a publicly visible location while the State Agency was on-site.

Site - Level Technical Assistance Duncombe Elementary School (0454)

Area	Question	Comments
500 - Offer versus Serve		TA provided clarification that a student can select two 1/2 cups of fruit and milk for a reimbursable breakfast. The menu planner must offer each 1/2 cup of fruit as a separate food item. Emailed the Food Service Secretary the most current Offer vs. Serve Manual.

Org - Level Commendations

Description

Certification and Benefit Issuance: Applications were organized. The current application for free and reduced price meals/milk and income guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the Point Of Service (POS) system, and denied applications were correctly determined. All applications were correctly determined, signed and dated by the household member and the SFA, were complete with Social Security Numbers 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. 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

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meals are extended to all members in the household. Waivers are provided to applicants. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.

Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria at the site(s) reviewed, 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 (Fort Dodge Messenger). 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 describing the program including letters and the school's website.

Food Safety: The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the sites reviewed. Good food safety procedures were observed at both sites. The kitchens and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Fifteen individuals in the district are ServeSafe Certified

Local Meal Charge Policy; The SFA developed and approved a meal charge policy on June 1, 2017 and it was revised on June 28, 2018. The policy was placed in the Elementary and High School Student Handbook and is mailed to all households who have a negative balance. The policy is also in the Food Service Newsletter. Staff were informed of the policy. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.

On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and at least 50% were completed for breakfast prior to February 1st.

Procurement: The business manager, administrative assistant, and FSMC food service director attended regional procurement training in Webster City. The SFA corrected their written Procurement Plan following the training. The SFA correctly identified the federal and local thresholds, procurement methods and evaluation methods for purchases. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. This is the School Food Authority's (SFA) base year with a Food Service Management Company (FSMC) following issuance of Request for Proposals (RFP). The contract with the FSMC is a cost reimbursable contract. The SFA had a contract with the same FSMC that began in SY 2013-2014 and was subsequently renewed for an additional four - one year renewal periods. The SFA retains signature authority. The SFA program director completed the first of two monitoring reviews of the FSMC and plans to complete the second monitoring review prior to the state agency's required March 1st deadline. The FSMC advisory group consisting of parents, students, and teachers. The group met in October 2019 to discuss menu planning. Sign-in attendance identified each member of the advisory group by title, agenda. Meeting minutes were available for the October 2019 meeting. The SFA checks the lowa Department of Education (IDOE) USDA Foods page on the portal as well as FFAVORS, ProcessorLink and K-12 Foodservice to track USDA Foods usage. At the end of the School Year (SY), the SFA program director will make sure the SFA is credited with all USDA Foods received. Per USDA requirement and criteria, vendors were selected to review SFA compliance with procurement methods used. Three vendors were selected for assessing compliance with micro-purchase and one vendor for small purchase method. Each transaction with the vendor was below the local thresholds for each method. The procurement with each vendor was in compliance with regulations.

Professional Standards: The Authorized Representative/Program Manager/Determining Official has completed 17 hours of Professional Training in school year 2019-2020 of her required 12 hours. The Food Service Director has 20+ hours of Professional Training in school year 2019-2020 of her required 12 hours. All other nutrition staff except staff hired in October have started to obtain required training for Professional Standards in school year 2019-2020. There is training planned for the remainder of the school year. An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours.

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: All expenditures that were reviewed appeared allowable. 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. The Non-Program Revenue (NPR) tool was completed. Indirect costs are charged to the food service program using the correct unrestricted indirect cost rate. 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 95.31% of their allotted PAL dollars utilizing DoD, Direct Distribution and Diverted Foods programs. In school year 2019-2020, the SFA is again utilizing DoD, Direct Distribution and the Diverted Foods program. To date they have spent \$95,389.58 of their allotted \$176,769.50.

School Breakfast Outreach: School Breakfast Program (SBP) outreach consists of posting information on the district's website regarding breakfast, having a bulletin board in each school promoting breakfast and there is information about breakfast in a food service newsletter that is distributed at the beginning of each school year.

Verification: The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income and the process was completed on time. The applications selected for verification were confirmed prior to verification. The Determining Official participated in the Verification and Verification Reporting webinars in 2019. The verification report was completed accurately and on time.

Wellness Policy: The SFA's wellness policy was last reviewed on 09/23/19 and was revised on 11/13/17. The public is made aware of the SFA's wellness policy via the district's website. The following individuals are involved in reviewing and updating the LWP: Director of Food Service, Food Service Secretary, Director of Finance, Elementary and Secondary Director of Curriculum and the Superintendent. Potential stake holders are made aware of their ability to participate in the Wellness Committee. The SFA completed an assessment of their wellness policy in October of 2019 for most of their sites. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.

Site - Level Commendations Fort Dodge Middle School (0227)

Description

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Food Safety: Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Food temperatures are documented. Dishwasher temperatures are taken and documented and thermometers are calibrated. Chemicals are stored in a separate room from food items. Opened foods were labeled and dated.

Fresh Fruit and Vegetable Program (FFVP): The school is on track to spend no more than 10% of its total grant on administrative costs. Cost documentation was available to validate October 2019 claims for reimbursement for fruits and vegetables and supplies. FFVP outreach to parents is conducted at the beginning of the school year. A menu for October FFVP was available. A good variety of fruits were served. The district has a partnership with the local health department who use the "Pick a Better Snack" materials for nutrition education in two of the building receiving the FFVP grant. Chef Nick does activities around food including starting a hydroponic garden.

Meal Components and Quantities: The Food Service Director does a god job of menu planning for the Middle School. Students have a variety of entrée selections to choose from. 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 meal pattern requirements. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. A variety of fruits, and vegetables are offered throughout the month for breakfast and lunch—including many fresh fruits and vegetables. Standardized recipes are used for food production. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals. The school has a hydroponic garden which is growing leaf lettuce, collards and herbs which are used for student consumption on the fruit/vegetable bar and on the build your own burger menu item.

Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Infinite Campus is used as the school's POS system. The POS station 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, appeared aware of what constitutes a reimbursable meal and interact with each student. All students selected a reimbursable meal.

Nutritional Quality of School Meals: The Food Service Secretary completed the USDA menu worksheets for the week of October 7-11, 2019 for breakfast and lunch at the Middle School. The worksheets showed that all meal components and vegetable subgroups were offered in the correct quantity at lunch and all meal components were offered at breakfast. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Middle 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, using frozen vegetables in place of canned, 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. Cafeteria staff have been trained on offer vs. serve. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at breakfast and lunch.

Signage: The SFA has signage explaining what constitutes a reimbursable meal-Color Your Tray. They also have signage at the fruit/vegetable bar telling students that they must take 1/2 cup of fruit and/or vegetable. In addition, there are numerous posters showing colorful, healthy foods.

Smart Snacks: Students are able to purchase foods via a la carte sales. All foods sold meet the Smart Snack standards for nutrition content. Exempt leftover National School Lunch Program entrees are only sold the same day. Documentation was available to show that all a la carte sold to students during the meals met Smart Snack standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.

Water: Free potable water is available to all students for lunch and for breakfast via a water fountain just off of the cafeteria. At lunch the SFA also has a hydration station where students can get flavored water.

Site - Level Commendations Duncombe Elementary School (0454)

Description

Food Safety: The SFA has a Standard Operating Procedure for transporting of food. Duncombe receives some of its food products from the Middle School. Food temperatures are taken at the Middle School before the food leaves the building and are taken when the food is received at Duncombe. Water temperatures and sanitation concentration is taken and recorded for the three compartment sink. Freezer, refrigerator and milk cooler temperatures are taken. Opened food items are labeled and dated. The latest Food Safety Inspection was posted in a visible location.

Meal Components and Quantities: The Food Service Director does a god job of menu planning at Duncombe Elementary. All meal components were available at the beginning of meal service on the day of observation and throughout meal service. All meals observed met at least the minimum daily requirements. The menus met weekly and daily meal pattern requirements. 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 lunch—including many fresh fruits and vegetables. At least two 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 October were accurate and complete. Point of Service (POS), counts and filed claims appear accurate. Infinite Campus is used as the school's POS system. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records 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. All students selected a reimbursable meal without having a prompt to select a ½ cup of fruit or vegetable as one of the three required components.

Nutritional Quality of School Meals: The Food Service Director completed the Dietary Specifications Assessment tool for lunch which indicated that the Duncombe Elementary 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, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned

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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. Cafeteria staff have been trained on offer vs. serve. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable.

Signage: Duncombe Elementary has lunch signage - Color Your Tray. They also post the monthly menus. In addition numerous pictures and posters are hanging on the walls promoting good nutrition.

Water: Free potable water is available to all students for lunch and for breakfast via a water fountain in the cafeteria.