

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Galva-Holstein Comm School District (23760000)**  
**SNP - Review ID: 5867**

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

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One application error was identified. It was determined as reduced and should have been free.	Notification was sent to household and benefit status was updated in the POS. No further action required.	
700 - Resource Management	V-0700	The SFA is required to follow procurement regulations outlined by the USDA. Bid solicitations using the small procurement method must contain the Buy American Provision, Non-discrimination, and all terms and conditions required for the value of the procurement event.	The SFA will submit a draft of the 2020/2021 school year milk solicitation which includes all required elements.	

**Site - Level Findings: Galva Holstein Upper Elementary (0418)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Org - Level Technical Assistance**

Area	Question	Comments

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Galva-Holstein Comm School District (23760000)**  
**SNP - Review ID: 5867**

100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	One application was processed incorrectly. The wrong income was entered into the ICAVES calculator resulting in a determination of reduced benefit status. The household is actually eligible for free benefits based on the income level. The SFA was advised to correct the benefit level in the POS and send the household notification of the change.
700 - Resource Management		USDA FOODS: SFA is currently not utilizing USDA Foods (commodities) to the fullest of their ability; spending only 87.04% of their funds in 2018/2019. This program is in place to help offset some of the expenses associated with the School Lunch Program. The SFA should make it a goal to spend 95% or greater of the USDA funds allocated to them annually. The SA offers a webinar each year on this topic and is available to work one on one to develop spending strategies.
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. The SA shared resources on IowaCNP to assist in the procurement process.</p> <p>Procurement Code of Conduct must be completed annually. The Code of Conduct must include the board policy on disciplinary action. The policies that should be included on the Code of Conduct are #402.4, 413.3, and 413.4. The new Code of Conduct template for 2020-2021 will add a gift policy dollar amount. The SA has revised the Procurement Plan template for SY 2020-2021 and the SFA should plan to use the revised version.</p> <p>The Procurement plan submitted is dated 2/1/2019 and says 18-19 plan. This document should be updated every year.</p> <p>The milk/dairy procurement event was identified as a Formal-IFB on the procurement plan. A small purchase (3 bids and a buy) was actually done. The SFA should update the plan to reflect this.</p>

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Galva-Holstein Comm School District (23760000)**  
**SNP - Review ID: 5867**

		<p>Small bids should be awarded to the low bid, a matrix should be used to determine the low bid. Documentation of all responses should be kept on file and provided for reviews.</p> <p>Micro purchases require that you spread the wealth around. Other options are available in Holstein such as the Dollar Store. A log should be kept to track micro-purchases.</p> <p>Software updates should be listed as a sole source if being paid for from the school lunch account.</p> <p>The SFA may only purchase items from a vendor which were included in the solicitation.</p> <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>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none"><li>• All price adjustments throughout the year</li><li>• All invoices</li><li>• All contracts and agreements</li><li>• All bids solicited</li><li>• Documentation that a vendor did not reply to bid (if applicable)</li></ul>
--	--	---

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Galva-Holstein Comm School District (23760000)**  
**SNP - Review ID: 5867**

		<ul style="list-style-type: none"><li>• Documentation of why you selected a specific vendor (Selection Rubrics)</li><li>• Copies of bid solicitation</li><li>• Debarment statements</li><li>• CD provided by the AEA (if applicable)</li></ul> <p>Three types of purchases, (Federal Thresholds):</p> <p><b>Micro-purchase-</b> under or equal to <b>\$10,000</b>(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><li>• Track micro purchases, what purchased when and dollar amount.</li><li>• Purchases should be distributed around community, not just one store.</li></ul> <p><b>Small Purchases-</b> Purchases that are <b>under \$250,000</b> (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> <ul style="list-style-type: none"><li>• Include all terms and conditions</li><li>• Include terms: Buy American and Equal Opportunity</li><li>• Include Termination for Cause and Convenience if \$10,000 or more</li><li>• Attain Signed Debarment Statements</li><li>• Awarded on lowest price (unless written documentation to justify)</li><li>• Maintain documentation</li></ul> <p><b>Formal Purchase-</b> Purchases equal to and <b>exceeding \$250,000</b> (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> <ul style="list-style-type: none"><li>• Notice of accepting all types of formal purchase must be advertised.</li><li>• Include all requirements of a small purchase</li></ul>
--	--	--

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Galva-Holstein Comm School District (23760000)**  
**SNP - Review ID: 5867**

		<ul style="list-style-type: none"> <li>• If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</li> <li>• Everything must be in writing.</li> </ul>
1200 - Professional Standards	1205 a. Did the School Nutrition Program Managers meet the training requirements?	The lead at the Galva building should be identified as a manager when tracking professional development and should receive 10 hours of professional development each year. This individual has received 14 hours year to date.

**Site - Level Technical Assistance Galva Holstein Upper Elementary (0418)**

Area	Question	Comments
900 - SFA On Site Monitoring	902 a. Was corrective action of the meal counting and claiming procedure required?	The on-site monitoring indicated the need to re-train one staff member on identifying reimbursable meals. The SFA should record the date that this training occurred. The SFA should then conduct a follow-up review within 45 days to ensure understanding of the requirements.

**Org - Level Commendations**

Description
APPLICATIONS/BENEFIT ISSUANCE (100): Benefit documents, as well as all paperwork, were extremely well organized. 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. Income was only converted to annual when there was more than one frequency of income. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential.
BREAKFAST & SUMMER PROMOTION (1600): The SFA does an excellent job of promoting breakfast with reminder signs, daily announcements, and emails sent directly to students. Menus are posted in each cafeteria as well as the website. The FSD implements fun activities to help drive breakfast participation numbers. Example: She puts a sticker on the bottom of one tray each day, the winner gets a prize. Summer Food Service Program, SFSP, outreach for the SFSP program state-wide is shared via websites, lunch menus, newsletters, and flyers.
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.

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Galva-Holstein Comm School District (23760000)**  
**SNP - Review ID: 5867**

**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. An assessment has been completed and is posted on the school’s website. A wellness committee is in place to set goals and help assess the completion of the goals. The committee is made up of students, faculty, staff, and community members. The committee meets annually and minutes are kept.

**MEAL COUNTING & CLAIMING:** Meal count totals for the month of February 2020 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. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, and disciplinary actions.

**PROFESSIONAL STANDARDS (1200):** The SFA followed regulations for the district’s size category when hiring a new director. Tracking was provided that documents that the director received the required 12 hours of annual training, managers received the required 10 hours of training, and all other staff have received at least 4 hours of annual 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. The SFA has had a positive balance, not requiring an increase in lunch prices. The SFA monitors pricing of a la carte and other non-program foods to ensure items are sold at prices which covers costs. Reports are filed on time, and all records are maintained for at least three years plus the current year.

The patients and flexibility of the SFA has been greatly appreciated as we all worked to complete the Administrative Review in the midst of the COVID-19 pandemic. The FSD was incredibly responsive in submitting additional documents to IowaCNP and via email and phone calls in an effort to complete the review off site.

**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. The application(s) selected for verification were confirmed prior to verification.

**Site - Level Commendations Galva Holstein Upper Elementary (0418)**

Description
<b>HACCP/FOOD SAFETY (1400):</b> The SFA has a district-wide written Food Safety plan that includes the required elements. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. The FSD is current with ServSafe certification.
<b>MEAL PATTERN:</b> Menus for the month of review contained all required components in the proper quantity for the age group. Vegetable sub-groups were planned in proper quantity. CN labels and manufacturer's statements were available for review.
<b>SMART SNACKS (1100):</b> The SFA does not allow elementary school students the option to purchase a la care items other than milk.