

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Lewis Central Comm School District (36450000)
SNP - Review ID: 5866

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	The Confirming Official did not sign/date the application upon completion of the confirmation review.	The SFA will state their intent to sign and date each verified application upon completion of the confirmation review.	

Site - Level Findings: Lewis Central Senior High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	208 When a confirmation review was conducted:	VERIFICATION: The confirming official and the determining official must be two different individuals. Technical assistance was provided on Confirmation Reviews. Prior to any other verification activity, a determining official, other than the official who made the initial eligibility determination, must review each approved application selected for verification to ensure that the initial determination was accurate. (page 71 Eligibility Manual) The confirming official then signs and dates the application(s)

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Bureau of Nutrition and Health Services
State Review Summary Report
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700 - Resource Management

PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. Omaha Steaks is identified as a micro purchase, but multiple purchases are being made there annually and other equivalent vendors are not being used. (not spreading wealth)

The milk, bread, chemicals, paper, and pizza are all identified as small bids and following that procedure, however, these procurement events all exceed the local small purchase threshold.

US Bank is listed on off-site procurement tool as a micro purchase. US Bank is the credit card used to purchase from several vendors. The actual vendor should be listed on the off-site tool, not the credit card.

The SFA is going out to bid using the formal-RFP method for the prime vendor for the 2020-2021 school year, the SA shared the SA's Bid web site.

The SA will be offering procurement training in March and June 2020.

Procurement Plan and Code of Conduct must be completed annually.

Include Buy American Clause in all Small and Formal Purchase agreements.

All terms and conditions appropriate for contract value should be included in bid solicitations. (see small bid document on download forms)

A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.

A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.

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Bureau of Nutrition and Health Services
State Review Summary Report
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SNP - Review ID: 5866

		<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">• All price adjustments throughout the year• All invoices• All contracts and agreements• All bids solicited• Documentation that a vendor did not reply to bid (if applicable)• Documentation of why you selected a specific vendor (Selection Rubrics)• Copies of bid solicitation• Debarment statements• CD provided by the AEA (if applicable) <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none">• Track micro purchases, what purchased when and dollar amount.• Purchases should be distributed around community, not just one store. <p>Small Purchases- Purchases that are under \$250,000 (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none">• Include all terms and conditions
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		<ul style="list-style-type: none"> • Include terms: Buy American and Equal Opportunity • Include Termination for Cause and Convenience if \$10,000 or more • Attain Signed Debarment Statements • Awarded on lowest price (unless written documentation to justify) • Maintain documentation <p>Formal Purchase- Purchases equal to and exceeding \$250,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <ul style="list-style-type: none"> • Notice of accepting all types of formal purchase must be advertised. • Include all requirements of a small purchase • If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. • Everything must be in writing.
700 - Resource Management		<p>The SA provided TA on the subject of negative balances. The SFA must follow their local policy as well as state and federal guidelines. A la carte items should never be removed from trays as a result of a negative balance. Likewise, cashiers should not be telling students that they need to bring money per Iowa HF2467. We discussed different methods to communicate with parents including texting.</p>
1000 - Local School Wellness Policy		<p>WELLNESS POLICY: Provided the Local Wellness Policy folder from Team Nutrition that includes the handout on the Summary of the LWP Final Rule, the "Does Your Wellness Policy Measure Up?" handout and the school Building Progress Report form. The Wellness Policy was last reviewed on 8-21-2017, the SFA should be preparing to</p>

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		<p>have the policy reviewed again by August 2020. The Wellness Assessment did not have a date on it. Assessments should be completed at least once every three years and should be dated. The Wellness policy uses some outdated language which should be revised (on page 2, C. Monitoring b.). The term SMI is no longer used. The SFA is having issues gathering the Wellness Committee regularly, we discussed some possible strategies to better engage them. The SFA should consider adding some students to the Wellness Committee.</p>
<p>1200 - Professional Standards</p>	<p>1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)</p>	<p>PROFESSIONAL DEVELOPMENT: Technical assistance was given to create a single spreadsheet to track all continued education hours completed by all employees working with the school lunch program. Include: date, name, subject, length of class. A template was provided by the SA. We discussed that this could be a google doc that each manager could enter and track the hours of their staff.</p>

Site - Level Technical Assistance Lewis Central SeniorHigh School (0109)

Area	Question	Comments
<p>400 - Meal Components and Quantities - Breakfast</p>	<p>401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?</p>	<p>The SA observed the cashiers sending several students back for fruits and or vegetables to make a reimbursable meal. Due to the large volume of students going through the line, this was a cumbersome task. The SA suggested having a basket of fresh fruit or boxes of raisins at the register to help with the flow.</p>
<p>400 - Meal Components and Quantities - Lunch</p>	<p>406 If the school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?</p>	<p>The sandwich station must provide a reimbursable meal should a student want a sandwich only. Sandwiches contain a grain, meat/meat, alternate, and vegetables which classifies it as a reimbursable meal, provided that there is at least 1/2 cup of vegetables on the sandwich. It is recommended that the SFA develops a plan to mark the</p>

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Lewis Central Comm School District (36450000)
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		sandwiches that do not independently qualify as a reimbursable meal as an indicator to the cashiers.
500 - Offer versus Serve	502 Is there signage explaining what constitutes a reimbursable meal to students including the requirement to select at least 1/2 cup fruit or vegetable?	The SFA has signs at each serving station outlining a reimbursable meal. Additional signage is recommended which conveys the requirements under Offer vs. Serve. Templates were sent to the SFA. Additional ideas such as a monitor at the silverware station displaying the menu were discussed.
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	The Site had the new 2020 version of the USDA "And Justice for All" poster hanging. They also had the old version posted. The SFA was advised to remove the old version of the poster and dispose of it. Additional posters, if needed may be ordered online. The SA sent the link to the order form.

Org - Level Commendations

Description
APPLICATIONS/BENEFIT ISSUANCE (100): Benefit documents, as well as all paperwork, were 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. The SFA has implemented an online application process which has streamlined the process as well as made applications available to families 24/7. 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 flyers and special promotions such as Dr. Seuss' Birthday and Trivia contests at breakfast. Menus are posted in each cafeteria as well as the website. Summer Food Service Program, SFSP, outreach for the SFSP program state-wide is shared with families. The SFA has become a SFSP sponsor and is continuously looking for ways to reach more kids.
CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. Ethnic/Racial information is collected and the form is completed. No discrimination was observed. The "And Justice for All" poster is visible to program participants. The On-Site Monitoring is completed for every site each year. The FSD reviews the operation beyond what is required by the USDA. This allows the FSD to catch issues before they become an issue, stay connected to the specific needs of each site, and identify areas for potential training.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Lewis Central Comm School District (36450000)
SNP - Review ID: 5866

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.

MARKETING: The SFA has found creative, no cost methods of adding age appropriate posters to the HS cafeteria. The FSD has developed a flyer that is distributed to students as an orientation to the program outlining the offerings and what makes a reimbursable meal. The SFA's web site has all meal options as well as a detailed report of all nutritional information for all students, school nurses, and families to see.

MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the (December) review month counts. Meal count totals for the month of December appeared accurate and complete. There was a point of service (POS) at the point where meals are served for all students observed at lunch. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.

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, and specifications were well-written and comprehensive. 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. The FSD has attended regional procurement training and has made improvements in the processes and documentation over the past three years.

PROFESSIONAL STANDARDS (1200): The FSD conducts an all-staff training at the beginning of each school year. All Food Service Staff are also required to take Blood borne Pathogen training annually. All Managers attend a monthly meeting/training. All trainings are documented with a sign-in sheet and/or certificate of completion. The FSD and staff have recently attended ANC and SNAI. The staff is on target to complete the required training hours by June 30, 2020.

RESOURCE MANAGEMENT (700): Errors fell below the \$600 disregard, no fiscal action is anticipated. The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed, indicated appropriate and allowable expenditures. Reports are filed on time, and all records are maintained for at least three years plus the current year. The FSD does a good job of monitoring and spending USDA Foods (Commodities) money, and spent 101.3% of allotted funds in School Year 2018/2019.

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. Gross income was reported, changes to benefit levels were made as appropriate.

Site - Level Commendations Lewis Central Senior High School (0109)

Description
COMPETITIVE FOODS & SMART SNACKS (1100): Students may purchase a second entrée and other a la carte items at the high school. Documentation was available to show that all foods and beverages sold to students by the food service department during the school day met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte by the food service department.
HACCP/FOOD SAFETY: 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 kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Food Service workers practiced good gloving procedures.

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State Review Summary Report
Lewis Central Comm School District (36450000)
SNP - Review ID: 5866

MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, does an excellent job of menu planning and offering choices. Students have numerous choices which increases participation and provides opportunities for each student to find meal components for lunch that they will eat. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Production records are on file and indicated foods contain the required components and quantities. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file and well organized. Standardized recipes are used for food production. Many low fat and low sodium food items were observed in storage. Signage was posted at each serving station explaining what constitutes a reimbursable meal.

Offer vs. Serve: All students observed on the on-site visit had a reimbursable meal, the menu was complete with all food groups represented and served in their proper quantity. Offer vs. Serve was implemented properly and staff was monitoring food items on trays. Staff were aware of the contents of each menu selection and how they credit. Water was available to all students during meal times. Menus for the month of review contained all required components.