

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Theresa School (17378113)
Week of Review: 1/13/2020 – 1/16/2020

Program Year: 2020
Month of Review: November
Lead Reviewer: Jean Easley
Org Representative(s):

Org - Level Findings

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|---|---|----------------------------|
| 100 - Certification and Benefit Issuance | V-0100 | Two applications were not given benefits within the required 10 day time frame. | For your response, state your understanding of the requirement to approve applications within ten days. Additionally, describe your process for providing applications to households at the beginning of the school year as it was observed there were no applications submitted prior to October 1 st . | |
| 300 - Meal Counting and Claiming | V-0300 | NOVEMBER CLAIM: an error was discovered during review where SFA made a mistake in entering paid student number in November, resulting in an under claim. | For your response, state your understanding to use a monthly Edit Check report and describe how you will follow up with your point of service provider. SFA may revise this claim. | |
| 700 - Resource Management | V-0700 | MEAL CHARGE POLICY: a local Meal Charge Policy has not been developed as required. Technical Assistance given that the SFA is required to have implemented such a policy by 2017. The policy must be provided in writing to all households annually. The policy is to state that students who qualify for free meals shall never be denied a reimbursable meal. | For your response, please submit your local Meal Charge Policy and how it will be provided to all St. Theresa households annually. | |
| 700 - Resource Management | V-0700 | PROCUREMENT REVIEW: 1) SY2019-20 Procurement Plan and Code of Conduct is incomplete. 2) SFA did not effectively use PAL of USDA foods in SY19 - 73% not utilized. SFA is currently on track to utilize current year PAL with DoD participation. Recommend allocating additional dollars to DoD if DD entitlement is not going to be used. | For your response, 1) update and attach Procurement Plan and Code of Conduct. 2) describe your plan to utilize USDA entitlement funds. | |

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| 1000 - Local School Wellness Policy | V-1000 | SFA could not provide documentation to show review and update process of the Local School Wellness Program. This is a repeat finding. | At least every three years, the local Wellness Policy and goals of the local wellness policy must be assessed and provided to the school community. Information on what is involved with the assessment and suggestions on where to post or how to provide the assessment were discussed. For your response, 1) attached Wellness Policy 2) state when the assessment of goals will be completed (a date) 3) who will be involved in the process (names or titles) 4) where will Policy and Assessment be posted or how it will be provided to community. | |
| 1200 - Professional Standards | V-1200 | PROFESSIONAL STANDARDS: Training is not being documented with the exception of civil rights. Meeting Professional Standards requirements is a repeat finding. SFA's must have a mechanism to track training that includes: trainee name and title, key area (learning objectives), topic, participants, training time and completion date. Director is required to have 12 hours training annually and part time employees (< 20 hours per week) are required to have 4 hours training annually. | For your response, please 1) submit the training tracker spreadsheet you will use. Include director and three PT staff names included for school year 2019 - 2020. You may include the civil right training provided as there is a sign in sheet. 2) state your understanding of annual training required. Describe your training plan for yourself and PT staff for the remainder of the school year. | |
| RMCR - Revenue From Nonprogram Foods | V-RMCR | FINANCIAL REPORT: the financial report has not been completed in IowaCNP. The state agency requires non-public school food authorities (SFAs) to complete this report annually by September 15. The nonprogram revenue information can be determined using this report. | For your response, please complete the financial report in IowaCNP for SY2018-2019 and state your understanding this is an annual requirement in September. | |

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Site - Level Findings: St Theresa School (8113)

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|---|---|----------------------------|
| 400 - Meal Components and Quantities - Breakfast | V-0400 | Breakfast Menu Item offered on Wednesday, November 20 "Jimmy Dean Sausage Egg & Cheese on a Biscuit" is not an allowable breakfast item. There is no meal pattern crediting available from manufacturer. Nutritionally, the sodium is very high (1240 mg) to be offered as a weekly item. Technical Assistance was provided to always obtain CN or PFS prior to purchasing an item for the child nutrition program. Breakfast Production Records are missing required documentation including quantity prepared, number of planned meals, leftovers. Refer to Food Production Checklist for all required documentation. | For your response, submit revised: 1) breakfast menu cycle 2) breakfast production record 3) completed USDA breakfast certification worksheet confirming meal pattern compliance (which had not been completed prior to review.) | |
| 400 - Meal Components and Quantities - Lunch | V-0400 | Production records evaluated from the review period do not indicate that portion sizes available meet the minimum meal pattern requirements for the age/grade group(s) being served. On 11.18 and 11.22 there was an insufficient amount of vegetable offered (1/2 cup broccoli) and (1/2 cup carrots). Technical Assistance given to offer 3/4 cup total vegetable daily. | For your response, state your understanding of the 3/4 cup vegetable daily requirement and submit your revised menu cycle. Complete USDA certification worksheet for this revised week which had not been submitted prior to the review as requested. | |
| 1400 - Food Safety | V-1400 | Food temperatures are observed to be taken, however, there is no documentation of food temperature history. Please follow your HACCP Standard Operating Procedures to determine how you will document temperatures moving forward. Technical Assistance recommend the importance to have documentation in the event of any question of food safety. | For your response, describe the practice you put into place and an example of documentation. | |

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| Infant and Pre-K Meal Pattern Checklist - Lunch | V-IMPCL | PRESCHOOL MEAL PATTERN: preschoolers are being served the preschool meal pattern; improvements have been made since previous review; however, they are allowed to have chocolate milk on Fridays. The preschool meal pattern allows unflavored milk only. | For your response, explain the changes made with preschool lunch meals to meet the preschool meal pattern. | |
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Org - Level Technical Assistance

| Area | Question | Comments |
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| 100 - Certification and Benefit Issuance | 103 At the beginning of the school year, how is benefit status handled for children who have not submitted an application for the current school year? | APPLICATION with FILLABLE CELLS: there is a free and reduced application which has all fillable cells except for signature line. SFAs can post this application on their web site and households can complete the entire form electronically, print the completed form, sign it & turn it in to school. |
| 200 - Verification | 215 a. Did the SFA complete verification by November 15? | VERIFICATION was not completed because no applications were submitted prior to October 1st. This is highly unusual. State agency to review school procedures and give technical assistance in providing benefit applications to all families at the beginning of the school year. Iowa HR2467 requires school food authorities to notify households of availability twice during school year. Eligibility Manual on page 16 states informational letter must be distributed to households of children attending the school. Letters may be distributed by postal service, emailed to parents, or included in registration packet provided to all. |
| 600 - Dietary Specifications and Nutrition Analysis | | NUTRITION DOCUMENTATION: Continue collecting CN labels and Product Formulation Statements for all products served in cycle menu to correctly verify how all products credit in meal pattern. A Product Formulation Statement from the manufacturer is an acceptable alternative for |

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| | | crediting information when you cannot get a CN label. This is not the specification sheet from your distributor. |
| 700 - Resource Management | | BUY AMERICAN EXCEPTION LOG: SFA is to keep a log reporting any nondomestic agriculture products purchased with CN dollars. The exception log should state date, product accepted and reason why it was accepted ie: domestic product was not available, or significantly higher prices than non-domestic product. |
| 700 - Resource Management | | PROCUREMENT TRAINING: highly recommend SFA attend regional procurement training. An opportunity has been scheduled in Des Moines in the past and one is being planned for April. State Agency will extend an invitation once a date is determined. |
| 700 - Resource Management | | PROCUREMENT: Technical Assistance was given to correct completed Procurement Plan and Code of Conduct. Review and complete plan annually. All Solicitations and agreements need to be maintained in writing. It appears prime vendor, dairy and bread can all be informal using the small purchase method (three bids and a buy) Include Buy American Clause even in informal, Small Purchase agreements. Agreements valued at \$10,000 or more should have a termination for cause clause. Use the Small Purchase Template found under Download Forms in CNP. A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate. |
| 800 - Civil Rights | 803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs? | CIVIL RIGHTS: Complaints regarding school nutrition discrimination are to be directed to USDA. The process and the form is found here: http://www.fns.usda.gov/civil-rights |

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| 1000 - Local School Wellness Policy | 1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements? | WELLNESS: Technical Assistance provided with the written final rule, sample of an assessment template, invitation to wellness webinar and reminder to review previous AR finding. |
| 1200 - Professional Standards | 1208 Is the SFA tracking training hours on an annual basis? | PROFESSIONAL STANDARDS: Training is not being documented with the exception of civil rights. Meeting Professional Standards requirements is a repeat finding. SFA's must have a mechanism to track training that includes: trainee name and title, key area (learning objectives), topic, participants, training time and completion date. Director is required to have 12 hours training annually and part time employees < 20 hours are required to have 4 hours annually. |
| 1600 - School Breakfast and SFSP Outreach | 1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements? | OUTREACH: reminder to maintain documentation showing how breakfast and Summer Food Service Program in area locations are promoted at St. Theresa. |

Site - Level Technical Assistance St Theresa School (8113)

| Area | Question | Comments |
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| Meal Component and Quantities - Breakfast | 1 If option 1 has been selected for the targeted menu review, provide one week of menu documentation from the review period. | USDA certification worksheets must be completed for the targeted week of review 11.18 - 11.22. |
| 400 - Meal Components and Quantities - Breakfast | | BREAKFAST PRODUCTION: Technical Assistance given that production records could better reflect that all students receive the same breakfast meal pattern (including preK), therefore, they can be listed altogether on the record. Please continue to separate them at lunch because they are offered a different meal pattern. |
| 400 - Meal Components and Quantities - Breakfast | 405 If the school has elected to serve meals using the Family Style Method, is the school implementing method as specified in FNS Instruction 783-9? | SFA interested in learning more about family style meal service for preschool meals. Technical Assistance provided. |

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| 600 - Dietary Specifications and Nutrient Analysis | 603 Were any areas identified during the Off-site review requiring technical assistance or corrective action prior to the beginning of the On-site portion of the review? | Clementines are offered on the day of observation as the only fruit for breakfast. One clementine credits 3/8 cup per Food Buying Guide (FBG), therefore is insufficient for a reimbursable meal if a student selected only one. Gave TA prior to breakfast service. FSD offered 3 clementines to meet 1 cup requirement; students were required to take 2 to be a reimbursable meal. |
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Org - Level Commendations

| Description |
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| BENEFIT ISSUANCE: determining official works hard to ensure students who are directly certified receive benefits. The state agency notification prototype is used to communicate eligibility and is correctly sent to those denied. Applications are determined correctly, all signed and dated by both household and determining official as required. All information is kept confidential. |
| CIVIL RIGHTS: USDA civil rights training is conducted as required. "And Justice For All" poster displayed. Diet Modifications are provided and documentation is maintained. All meals are observed to be provided without discrimination. |
| MEAL PATTERN and NUTRITION: A cycle menu is used, fresh fruit if offered on menu daily at breakfast and lunch, standardized recipes are used - including Iowa Gold Star Recipes. Director does an excellent job of planning foods in which students enjoy and eat well. SFA is participating with DoD for produce which is a good way to utilize USDA entitlement funds. On the days of observation, fresh clementines, pears and cucumbers are offered. |

Site - Level Commendations St Theresa School (8113)

| Description |
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| DOCUMENTATION: Director completes and maintains daily production records as required. Standardized Recipes are used. There is a solid understanding of meal pattern crediting - even homemade cookies served credit for one grain. |
| ENVIRONMENT: director and all staff are friendly and encouraging to student customers. All practice safe food handling procedures. Appropriate signage is displayed at breakfast and lunch. Offer versus Serve is practiced to limit food waste. Students are observed to have adequate time to eat. Lunch is observed to be an enjoyable part of the students day. Students have access to free water during meals. |