

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Woodbury Central Comm School District (70980000)
On-Site Review Dates: February 11-12, 14, 2020

Program Year: 2020
Month of Review: January
Lead Reviewer: Deann Murphy
Org Representative(s): Doug Glackin

Site - Level Findings: Woodbury Central High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
500 - Offer versus Serve	V-0500	Staff is not following and does not seem to understand Offer vs. Serve (OVS) rules. Students are being told they have to have a minimum of 3/4 -1 cup fruits or vegetables on their tray for a reimbursable meal at lunch. They are told they must have a grain option on their tray for a reimbursable meal at breakfast. Much food is being thrown away by students. Staff has not had OVS training this year.	The FSD and kitchen staff will complete a training on OVS regulations for both breakfast and for lunch. They will submit to the State Agency documentation of what training they completed and a sign-in sheet or certificates showing that all staff completed it.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	PROCUREMENT: The SFA only spent 59% of their allotted USDA Foods entitlement in SY18-19. In SY19-20, the SFA has only spent 41% of their entitlement money so far. The State Agency expects SFAs to spend at least 85% of their USDA Foods entitlement each year.	The SFA signed up for DoD 2/14/20 for SY20-21 and is considering using some diverted foods as a way to spend down their SY19-20 USDA Foods funds. This was verified by the USDA Foods Consultant. No further action is required.	

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	208 When a confirmation review was conducted:	After an application has been chosen for verification, there needs to be a confirmation review of the application to make sure it was complete and determined correctly. The confirming official then needs to sign and date the application in the appropriate area. Once that happens, then verification can proceed by checking e-lookup for the student's name or sending out a letter to the household, etc. The confirming official needs to

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		be a different person than the hearing official.
200 - Verification	209 Based on the review of verified applications:	When verifying self-employment based on tax forms, only use lines 12, 13, 14, 17 and 18. If W-2 information is reported, ask for current pay stubs for verification.
700 - Resource Management		<p>PROCUREMENT: Discussed with the FSD and Superintendent's Secretary specific changes to make their written procurement plan more accurate for SY20-21. The policy linked to Accepting Gifts of Nominal Value needs to be changed as the current linked policy 401.2 Employee Conflict of Interest, does not address this topic. Both of the written procurement plan and the Code of Conduct will need to be attached to the NSLP Application packet for SY20-21. The Written Procurement plan needs to be updated annually. Micropurchases: Overall, micropurchase prices were not out of line, but when compared to AEA Purchasing prices, the SFA's Prime Vendor, many prices were higher and the micropurchase vendor charged an extra drop fee with each delivery. The SFA did not spread the wealth equitably among qualified sources. Purchases ranged from \$84 with one vendor to \$14,600 with another vendor. Micropurchases should be used for emergency purposes only (if possible) since the SFA cannot control what the vendor charges and often pays much more than when they go with their contracted vendor. Softener salt is not an allowed direct expense from the Nutrition Fund. Rather it is an indirect cost that should be paid for out of the school's general fund. Best practice is for the SFA to reimburse the nutrition fund for this expense. Small Purchases: There was inadequate documentation to show if the correct vendor had been chosen by the SFA for the bread bid. If the SFA received a response from more than one vendor, they did not keep that information on file. All procurement documents must be on file for a minimum of 3 years + the current year. Specs sent to the milk vendor were out of date and asked for 2% milk which is not allowed on the nutrition program. Cottage cheese did not list a percent fat so the vendor bid the 4% cottage cheese which was higher priced than the 2% cottage cheese. Specs should be specific and reflect everything the SFA wants to order for the entire year. Federal and local terms and conditions need to be included in all small purchases, including Buy American for all agriculture products. Also, for bread and milk, extended pricing is needed to calculate the actual cost of the contract so that you can choose the lowest priced vendor. We discussed using the Small Purchase template found in IowaCNP Download Forms when specs are sent out in the future. The template includes all verbiage needed along with the extended pricing. The SFA used a second Prime Vendor as a line item small purchase method. They need to keep all documentation showing price comparisons between their costs and the SFA's main Prime Vendor costs with the fuel surcharge added into the cost. These price comparisons need to be kept on file for 3 years + current year as well. Formal Procurement: In SY18-19, multiple purchases were made with other vendors besides the AEA Purchasing vendor. The contract with AEA Purchasing states that you must purchase at least 60% of your goods with them. The price lists sent out weekly and monthly need to be kept on file for the SFA for 3 years + current year. The FSD should spot check invoice prices against bid prices regularly to ensure correct pricing is being given. USDA Foods: An e-mail was sent to the Superintendent and the FSD prior to the on-site review discussing the need to increase the use of USDA Foods entitlement from their current levels. Encouragement was given</p>

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Woodbury Central Comm School District (70980000)
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		to them to sign up for the DoD program which provides weekly deliveries of fresh produce as part of their entitlement funds and no extra cost to 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?	A copy of the USDA complaint procedure and form were given to the SFA during the on-site review. This procedure should be followed and form filled out for any discrimination complaints made regarding the school meals program.
800 - Civil Rights	810 Review program materials.	The electronic menu in the cafeteria needs to show the shortened non-discrimination statement.
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?	The Local Wellness Policy located on the school website is dated 2012 and is out of compliance. The SFA does have an updated policy. The SFA should post the updated policy on their website.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	Recommend all staff be trained annually on food safety and on OVS. Also the tracker the SFA uses should list the number of training hours each employee is required to have each year beside their name.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Recommend reviewing the Standard Operating Procedures (SOPs) in the HACCP manual annually with kitchen staff as part of their training. When reviewing the HACCP manual, take out or revise SOPs or forms as needed so that the policies included in the manual reflect actual practice in the kitchen.
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?	The USDA requires that SFAs promote breakfast to households at least twice annually. Promotion should include the menu, times available, price and reasons why breakfast is important, i.e fewer health complaints and trips to the nurses office, fewer behavior problems, better attention in class, etc. Promotion can be done on the school website, e-mail/text blast to households, newsletter, National Breakfast week, parent-teacher conferences, etc. More information is available on breakfast at https://educateiowa.gov/pk-12/nutrition-programs/school-meals/school-breakfast-program .

Site - Level Technical Assistance Woodbury Central High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	Recommend using designated breakfast signage that identifies food items at the beginning of the meal service line so that both staff and students understand what they must take to make a reimbursable breakfast. The FSD can decide if a food item that credits as 2 oz. eq. grains is 1 item or 2 items.
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The Food Production Records (FPR) do not list cereal bars that are offered at breakfast. They also do not list many of the vegetables listed on the fruit/veggie bar at lunch or extras like Scooby Snacks served with Mini Tacos, etc. All foods offered to students must be listed on FPR each day. Also, the review week shows that between 9.75 oz. eq. and 13.5 oz. eq. grains were offered to K-12 students at abreakfast. The recommended number of grains for this age group is 9-10 oz. eq. weekly. Exceeding the recommendation increases the risk of exceeding the calorie limit. Recommend cutting back on grains offered at breakfast.

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State Review Summary Report
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400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Entrees that have 2 different serving sizes based on different age groups need 2 separate standardized recipes showing how many total portions each serving size provides and how each portion size credits. Recommend finding standardized recipes that meet the required minimum component contributions so that you don't need to add additional foods to the menu. This increases food waste. Also, the review week menus for grades 6-8 and 9-12 show that excess meat/meat alternate and grains were offered during the week. (See on-site lunch worksheets e-mailed to the FSD during the Administrative Review). Providing excess servings of these items increases the risk of exceeding calorie, sodium and saturated fat limits.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	The Offer vs. Serve (OVS) manual was e-mailed to the FSD to review with her staff. In OVS, all grades must be offered all required meal components/items. However, students may choose to take a minimum of 3 components at lunch or 3 items at breakfast with one of those components/items being 1/2 cup fruit or vegetable. Staff does not need to serve all students their full requirement of fruits/vegetables. Also, students are not required to take the entrée or the milk unless they need them to have the 3 required components/items on their tray to make a reimbursable meal.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	Crystal Light flavor packets are only allowed at the HS level. They need to be removed for the a la carte choices for the MS students. In the vending machine, the Special K Fruit crisps are not whole grain rich (first ingredient is wheat flour) and so are not compliant with Smart Snacks. They need to be removed. The Superintendent's secretary was e-mailed a copy of the Smart Snacks information so the SFA is aware of product compliance. Since this SFA is a K-12 building, all beverages need to be compliant with elementary regulations.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	Even though the health inspector is only coming once annually now, the USDA still requires that the SFA requests 2 inspections annually. The SFA should e-mail the health inspector requesting their 2 inspections each year and keep the request on file.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	The FSD states that the dish machine is a high temperature machine, which must reach 180 degrees in order to sanitize dishes. Recorded dish machine temperatures do not routinely show that temperatures reach 180 degrees F. Recommend the SFA record rinse temperatures. If the thermometer does not reach 180 degrees F, recommend discussing this with the manufacturer and/or health inspector.

Org - Level Commendations

Description
All staff involved with the Child Nutrition Program have met their professional standards minimum training hours for SY19-20. Training is tracked as required and certificates/sign-in sheets are on file showing which training was received.
Benefit documents were 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 all applications, both accepted and denied, were correctly determined within 10 days. They were complete with SSN's and adult signatures. Income was only converted to annual when

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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. Waivers are provided to applicants. Eligibility is kept confidential.
One application was correctly verified and was selected from error prone applications. All income sources were verified, and the process was completed on time. The verifying official did try to directly verify the application before sending the request for income documentation to the household. The SFA had at least one person attend training.
PROCUREMENT: The SFA does have a current procurement plan and code of conduct on file for SY19-20. Micropurchase: All purchases made with this method were under the local threshold. The SFA used 3 vendors for micropurchases in SY18-19. Small Purchases: Small purchases all used the appropriate local threshold. Invoices for bread and milk show that vendor contract prices were honored during the year. The SFA did send specs to at least 2 vendors for both bread and milk. Formal Procurement: The SFA has their AEA Purchasing disk on file as well as all their invoices. The FSD checks in her orders to ensure she got what she ordered at the price she wanted. She spot checks invoices against bid prices. No price discrepancies were found when comparing Prime vendor bid prices against invoice prices. The FSD keeps a Buy American log for non-domestic foods.
The And Justice for All civil rights poster was posted in a public place. Annual civil rights training was provided to all staff involved in the program. Ethnic/racial information is collected and the summary form is complete and on file. No discrimination was observed. The current state and federal non-discrimination statements are listed on household notification letters and the shortened statement is on the posted paper menu.
The district has a current wellness policy. Goals are set for nutrition promotion, nutrition education, physical activity and other, school based wellness activities. The latest assessment of the policy was available and both have been made available to the public.
The FSD offers at least 3 entrée choices at breakfast for all students and at lunch for 6-12 graders. Menus met all daily and weekly minimum component and quantity requirements. There were many fresh vegetables on the fruit and veggie bar available for students to choose from. Students seemed to have sufficient time to eat lunch. Free water was available at each meal and cups were provided. Many low sodium vegetables were noted in storage and fruits were either unsweetened or packed in extra light syrup to decrease sodium and sugar content. CN labels and Product formulation statements were available for most entrees served. Food Production Records are on file for all meals served. Standardized recipes were on file for homemade foods. A monthly menu is posted and there is signage telling students what they must take to make a reimbursable meal. Students and staff were polite and respectful of each other during meal observation.
The SFA did promote the summer foods program in June as required even though they do not participate in the program.
There was no fiscal action for this review so no claim adjustments will be needed.

Site - Level Commendations Woodbury Central High School (0109)

Description
Meal counts during the on-site review were reasonable when compared to the (January) review month counts. Meal count totals for the month of January appeared accurate and complete. There was a point of service, POS, at the beginning of the line for PK-5 grade and at the end of the line for 6-12 grade as approved on the SFA application. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
Students in grades 6-12 can purchase a la carte foods at the end of the lunch line daily. Documentation was available showing that most foods offered a la carte through the food service are compliant. There is a vending machine available which is turned off during lunch hour where students can purchase Smart Snack compliant foods. Documentation was available which showed that most foods stocked in the machine were compliant.
The SFA has a district-wide written Food Safety plan that includes most required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures.