

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Easton Valley Comm School District (19650000)**  
**SNP - Review ID: 5927**

**Program Year:** 2020  
**Month of Review:** September  
**Lead Reviewer:** Sandra Fiegen  
**Org Representative(s):**

**Org - Level Findings**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
200 - Verification	V-0200	Verification report for 2018-19 was reviewed because the report for 2019-20 is not completed yet. FSD did not report the correct number of applications with case number written on them because she did not know that SNAP is Food Assistance.	In your verification report in the future, be sure that the definition of all terms in the report are understood, and double check the report prior to filing. It may be helpful to request assistance in understanding definitions. No further corrective action response needed.	
300 - Meal Counting and Claiming	V-0300	Visiting Adult and non-student meal prices were incorrect in the point of service system. System not updated annually. There is a large number of student meal accounts negative and over the school district approved negative balance policy. The policy adopted by the district is not being followed.	In your corrective action plan, please indicate your plan for reviewing the negative balance policy and revising if necessary. The policy must be shared with the district families annually and consistent application of the district-developed policy needs to happen. Also, in the point of service system, please update all prices, and you are also encouraged to organize the 4 a la carte lists so that the same item is given the same number on the list, so that cashier error is less likely.	
300 - Meal Counting and Claiming	V-0300	As noted in previous review, daily and monthly edit checks are required to be completed. A corrective action response was given in previous review and accepted, but is not being followed.	In your corrective action response, please indicate who will complete the daily edit check. Please be specific as to who and when this will be completed, and documented each day.	
700 - Resource Management	V-0700	In review period, several unallowable costs were paid with foodservice funds. The list of items and explanation was discussed at the time of the review.	The foodservice fund will not be required to repay the unallowable costs from last year. In the current year some of the same expenses are being paid with foodservice funds and the fund must be repaid. In your corrective action plan, please indicate the expenses that will no longer be assessed against foodservice, and indicate how you will review current information on allowable vs unallowable costs.	

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1100 - Smart Snacks	V-1100	Smart Snack calculator readouts were not found for any food items sold in the cafeteria or in the vending machine in lobby. All food and beverage items sold a la carte, by a club or classroom, or in the vending that are not part of reimbursable meals must be acceptable through using the calculator and results maintained on hand.	As corrective action, complete and scan all smart snack calculator results for all food and beverage items. In the vending machine in the lobby, larger size bottles of flavored drinks do not meet the requirements in this building that is 7-12 grade and must be removed. Please list the items and size in ounces of the beverages that will be sold in the vending machine and in the cafeteria as well as the calculator results. Food items that are used as alternate entrees must be listed on daily menu and signage in service case. All other food items that are only available for a la carte must be approved through the calculator. For wraps, sandwiches, etc that are prepared through using a recipe, the recipe must be entered into a nutrition calculator, then those results entered into the smart snack calculator.	
1400 - Food Safety	V-1400	This is a repeat finding. The district HACCP plan is not complete. The SOP's included are not updated. A copy of the guidance was left with the FSD. This was shared at the last review also.	A corrective action plan that was accepted at the previous review was not implemented. For corrective action for this review, attach: The plan index, the description of the facilities, the description and list of all equipment, the flow of food, the list of food items prepared or served according to Process, a list of the SOP's included (not the actual SOP's), a sample of each monitoring log that will be used, a plan for food safety training and monitoring. In addition, please respond as to how you will train all foodservice staff on implementation of SOP's, where the full plan will be maintained, plans for review and updating in the future.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	We discussed the unpaid student meal account activity, and solutions for restoring the operating losses. As indicated in the NSLP regulations memo SP23-2017, only allowable non-federal revenues can be used to restore the foodservice losses.	As corrective action, please indicate the timeline for implementing the steps you will take for restoring the operating loss and steps to prevent operating loss from occurring in the future. Please be specific.	

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**Site - Level Findings: Easton Valley High School (0118)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	no signage indicating all parts of a reimbursable meal including entrée alternates and the requirement to choose at least 1/2 cup of fruit or vegetable, was available at the service line.	In your corrective action response, please indicate how you will ensure that signage is posted each day that identifies all parts of a reimbursable meal including entrée options and the requirement to take at least 1/2 cup of fruit or vegetable.	
400 - Meal Components and Quantities - Lunch	V-0400	Scalloped potatoes as an entrée was served in the review week. The recipe for this item indicated that less than 1 oz equivalent of ham was available in each serving. Also, no recipe for sub sandwiches was available. Product formulation statements were not available for donuts and the johnny pop. The johnny pop was credited as a 1/2 cup serving of juice, but the literature indicated only 1/8 cup of fruit in each serving.	Obtain the product formulation statement for the donut and the johnny pop, and attach in this corrective action response. If the statements are not available, stop serving these items as part of reimbursable meals. Revise the scalloped potato recipe, obtain the crediting information for the ham, and check to be sure that all recipes contain correct crediting information using the food buying guide. You are also encouraged to use established standardized recipes as opposed to making your own. Attach the recipe that will be used for scalloped potatoes in the future.	
1400 - Food Safety	V-1400	Dishwashing machine is not being monitored daily.	In your corrective action plan, please attach the monitoring log that will be used daily for the high-temperature dishwasher.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	106 Within the SFA, who has access to the applications within the system?	Access to eligibility documents are a 'need to know' basis. The Business Manager who is named as the hearing official, should not have access to eligibility documents unless the family requests a hearing.
100 - Certification and Benefit Issuance	112 Does the benefit issuance system identify how eligibility was determined?	As explained at the time of the review, the benefit issuance system must be able to identify how eligibility was determined. The FSD is encouraged to learn as much as possible about the point of service data system that she is using.

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Area	Question	Comments
700 - Resource Management		The SFA has a written Procurement Plan that includes federal and local thresholds, but procurement procedures and definitions are not fully understood. We discussed what micropurchasing, small purchases and formal purchases are, and documentation required. We discussed what elements must be included in contracting, and how to monitor contracts that are awarded currently. We also discussed amending the board policy with regard to thresholds so that formal contracting is not required for as many procurement events.
700 - Resource Management	704 Did the SFA have any financial findings related to unallowable costs or financial mismanagement in the child nutrition programs on a previous administrative review or as part of an audit (for example, OIG, Single Audit (previously called A-133 audits), other state audits) within the past three years?	In previous year, SFA was required to indicate plan to collect student meal debt. We discussed several methods and the negative balance policy adopted by the district.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	While onsite we discussed where to find the civil rights complaint procedure, and the fact that the Board Policy is not the USDA civil rights procedure.
1000 - Local School Wellness Policy	1000 Provide a copy or appropriate web address of the current Local School Wellness Policy.	We discussed what a goal and an element is in the wellness policy, and how that is different from specific activities completed. Assessing the policy means assessing goal attainment, not listing activities.
1000 - Local School Wellness Policy	1005 <i>Provide a copy of the most recent assessment on the implementation of the local school wellness policy.</i>	When looking at the wellness policy assessment, goals are not assessed. The school is encouraged to assess goals in the next assessment completed.
RMCR - Nonprofit School Food Srvc Acct	7 Did the SFA provide nonreimbursable meals free of charge to students?	We discussed why the school should still claim the reimbursable meals that are provided free of charge to students who exceed the negative balance policy thresholds. A system must be in place to be able to claim the meal according to student account even with no payment of the meal so it can be traced to the student.

**Site - Level Technical Assistance Easton Valley High School (0118)**

Area	Question	Comments
Dietary Specifications Assessment Tool - Breakfast	4 Cheese (all varieties including reduced fat) is controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal. This includes cheese offered on salad bars.	Cheese, meat and hardboiled eggs are not portion controlled in the salad bar area. You are encouraged to do so.
Dietary Specifications Assessment Tool - Breakfast	5 Are non-creditable cheese products offered as part of a reimbursable meal? (Non-creditable cheese includes: cheese sauce without a CN label or product formulation statement, cheese product, imitation cheese and powdered cheese).	the 'canned' cheese sauce that is used for nachos is a non-creditable cheese product. You are encouraged to use a creditable cheese sauce instead and limit use of non-creditable items.

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**Site - Level Technical Assistance Easton Valley High School (0118)**

Area	Question	Comments
Infant and Pre-K Meal Pattern Checklist - Lunch	6 Were there any grain based desserts served as part of the reimbursable meal?	The Pre-K meal pattern must be followed and documented for the children who have meals sent over to the other building, because they are served separately and are not co-mingled with older students. Please ensure that serving sizes and the meal pattern is being followed. Resources for the Pre-K meal pattern were emailed to the food service director.

**Org - Level Commendations**

Description
A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption. The SFA provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal.
Free meals are extended to all members in the household.
Income was only converted to annual when there was more than one frequency of income.
Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of September were accurate and complete.
Menu planning provides many choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat.
Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided food service staff and documented.
The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined.
The district has good breakfast participation on the day of review. The students really enjoyed the coffeecake and it smelled delicious when walking into the building.
The SFA effectively utilizes its USDA entitlement for commodities.
Water was available as required.