

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Francis Xavier School (69618003)
January 7-8, 2020

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Of the 55 benefit issuance determinations examined, income applications for two students (2 applications) did not contain the required SSN information. The error rate is 3.6% and does not trigger an independent review of applications. If the SSN information is obtained and attached to the CA section before 30 days, there will be no fiscal action for the missing information.	In your corrective action (CA) response, please indicate how you will ensure that each eligibility determination is correctly made according to a full and complete application submission. The names of the two students who were incorrectly determined were communicated to the proper personnel at the time of the review. Your response should include steps taken to learn about the application determination process. Additionally, the person who completes eligibility determination needs to view the benefit issuance tutorial and attach the certificate of completion of this training to this CA. The resolution of the missing information has been attached to this CA, so no further work is required for the two applications.	
200 - Verification	V-0200	The application chosen to be verified was correctly chosen from error prone applications. The requests for information were made in a timely manner and the response was made in a timely manner; however, only two week's income (one pay stub) was included in the response. Explanation of the need to receive a full month's information plus reference to the instructions was given.	One full month of income is required to be supplied for verification purposes. In your corrective action response, please indicate how you will review the steps on verification including viewing the verification training prior to the next year's verification activity.	
800 - Civil Rights	V-0800	The Iowa Civil Rights Commission complaint form is not the USDA Civil rights complaint form. The form is found on the main Nutrition Programs webpage, https://educateiowa.gov/pk-12/nutrition-programs , under USDA nondiscrimination statement section. A hard copy of the complaint form was also given to the FSD at the time of the review.	In your corrective action response, please indicate how you will train staff on how to receive a civil rights complaint from a participant and the correct form to use. Please indicate when you completed this training.	
1400 - Food Safety	V-1400	A full complete HACCP plan must be created that indicates the flow of food in the facility, includes all SOP's that are pertinent, indicates and categorizes food items by process, contains a	In your corrective action plan, please indicate when a full complete HACCP plan will be implemented. Please attach the following: an index of all SOP's you will modify and adapt for your use, a list of all food items	

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		plan for monitoring and sample monitoring logs, indicates how CCP's will be noted and followed, and a plan for training on food safety. A sample HACCP guidance manual was given to the FSD at the time of the review, and is also attached in this CA. This is a repeated finding.	separated into Process category, and an overall index of the plan. A sample plan can be found in the guidance manual. Additionally, please indicate the date when (prior to the beginning of the next school year) a full and complete HACCP plan will be implemented and available on file.	
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Site - Level Findings: St Francis Xavier School (8103)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	As part of the AR planning, one week within the test month was chosen as the test week. All labels, recipes, food production records and other documentation was requested to support the portion size and component crediting that was planned for reimbursable meals. Some labels used by the SFA to determine component contributions were not adequate, or were not consistent with the food production records or meal planning tool information, leading to weekly minimum meat/meat alternate planning in error. This is a repeat finding. In the review month, 180 meals were served with an entrée that was correct for meeting daily meat/meat alternate requirements, but not meeting weekly requirements. The fiscal action error totals \$147.34, which will not be recovered in this review. technical assistance was given. The alternate entrees and additional vegetable items are not part of meal planning template used.	Consistency within meal planning and documentation records is essential to claiming reimbursable meals served to students. As corrective action, the following is requested: 1) the lunch and breakfast menu planning tools used to document all meal items, alternate entrees, all fruit or vegetable items planned, for two full weeks in February. A template was emailed to the FSD during the review for the lunch meals, and the breakfast template is attached to this corrective action request. 2) all CN labels, product formulation statements, ingredient statements, nutrition facts, recipes or any other documentation used to substantiate the claim of crediting for all grain and meat/meat alternate items. 3) food production records for the two weeks. the food production records need to indicate the serving size and crediting information for each item served as part of reimbursable meals. If the information is submitted prior to the service of the meals, the food production records might not have actual number of servings planned or served but can still show the serving size and crediting information. 4) the breakfast and lunch menus for the two weeks. Based on the consistency, completeness, clarity and compliance with the meal patterns, additional weeks may be requested until all meals, daily and weekly, meet meal pattern requirements. preschool alterations in serving size for lunch will also be noted in the food production records.	

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	Verification collection report indicated that there were no error prone applications, but the one chosen for verification was error prone. The SFA

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		is encouraged to be sure the information in the verification collection report is accurate.
700 - Resource Management		Procurement review documentation was examined, and several suggestions were made concerning what to include in an informal contract for bread and milk. Several resources are available in the download form section of IowaCNP. We also reviewed the procurement plan on file for this year, and discussed the 'method' indicated in the plan for each type of vendor. The school is encouraged to update the plan in the next month or so, to more clearly identify the correct method, and to review contract information prior to sending out inquiries for the upcoming year.
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	We discussed how to identify and how to claim indirect costs, and resources to use to determine what costs are allowed in school food service operations. The school has not applied indirect cost rate to allowed indirect costs so far. We also discussed the financial report in IowaCNP and resources available for assisting the school to complete the report.
1000 - Local School Wellness Policy	1001 How does the public know about the Local School Wellness Policy?	The school has met on a regular basis and revised the wellness policy. The policy is now separated into two portions--policy and regulation. An assessment was completed, but did not assess goals; rather, it assessed activities. Additionally the assessment needs to be shared with the school community and you are encouraged to post the assessments completed on a school website where the policy is also located. For more information on school wellness policies, samples of policies and samples of assessments, go to https://educateiowa.gov/pk-12/nutrition-programs/school-wellness .
1200 - Professional Standards	1206 a. Have the school nutrition staff met the annual training requirements for the current school year including part-time, full-time and any staff hired after January 1?	We discussed the training that is included in the training tracker to date for this year. The June 2019 training will not count toward the 19-20 year training, since July 1 is the start of the school year. Also, the SFA is encouraged to note the training topic when logging workshop or extended time events, such as in-service days, food shows or SNA workshops, since not all hours for in-service or food shows can be counted toward training.
1400 - Food Safety	1402 The number of agricultural food components to review will be determined based on the SFA storage facility practices used.	In order to monitor 'Buy American' compliance, a log needs to be maintained of food items received from countries other than the US. The log can be found in download forms in IowaCNP.

Site - Level Technical Assistance St Francis Xavier School (8103)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	The cashier was reminding students to be sure to take a 1/2 cup serving of fruit or fruit juice; however, two students needed to return to the service area to receive a reimbursable meal that included this requirement. You

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		are encouraged to continue to remind students that they need to take a serving of fruit or juice for a meal.
400 - Meal Components and Quantities - Breakfast	409 Review production records and other supporting documentation.	Some grain based meal items were incorrectly credited as far as serving size and ounce equivalents. As part of the lunch corrective action required, additional followup will occur. You are encouraged to maintain product formulation statements, ingredient statements, child nutrition labels, and recipes that support the meal planning completed.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	The menu is neatly and attractively displayed but does not include all food items available as a reimbursable meal (alternate entrees not listed, and milk not listed).
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	food production records and label, product formulation statements and other supporting documentation not always consistent or complete. we discussed several examples where more information is needed.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	We discussed the type of logs that need to be maintained for a dishwashing system. Please determine the type of dishwasher you are using (chemical or hot rinse sanitizing), and choose the appropriate log to use for documentation. Maintain the log with other food safety logs.

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.
Access to benefit information is correctly limited. Free meals are extended to all members in the household.
All students selected a reimbursable meal without having a prompt to select a ½ cup of fruit or vegetable as one of the three required components.
Benefit documents, as well as all paperwork, were very well organized.
Point of service cashiers receive annual training on meal counting.
Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. The signage is neat, colorful and easy to read.
Since the previous review, a student ID card system has been implemented so that each child has a medium of exchange to provide at the point of service for lunch; for breakfast, students use a roster.
The And Justice for All civil rights poster was posted in the cafeteria. The school has taken reasonable steps to ensure access to services are offered for Limited English Proficient households, and has translators available if needed, Annual civil rights training was provided food service staff and documented.
The correct number of applications were verified and were correctly selected from error prone applications, and the process was completed on time.
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 Food Service Director, FSD, does a superior job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat.

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The food service staff were positive, happy and eager to visit with the students, and displayed pride in the important work that they are completing each day.
The SFA effectively utilizes its USDA entitlement for commodities, including DoD funds for fresh fruit and vegetables.
The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. The Uniform Code of Accounts is used to categorize expenses in the school.
The wellness policy has been recently updated and meeting minutes are maintained on file.

Site - Level Commendations St Francis Xavier School (8103)

Description
please see the organization level comments area.