

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Zion Lutheran School-Denison (17018000)
SNP - Review ID: 5869

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	There was a laps in time during the 2019-2020 when Direct Certification lists were not being downloaded and changes made to student accounts.	The SFA will 1. Explain their process to download the Direct Certification twice per month. 2. Submit the second March DC list.	
100 - Certification and Benefit Issuance	V-0100	Two errors were identified on the benefit issuance list. One was determined free and should be paid, one was determined reduced and should be paid.	The SFA will complete the Application Approval and Direct Certification training, part 1 and part 2 posted on the SA's web site. Submit the date and time completed.	
700 - Resource Management	V-0700	The SFA did not include the Buy American Clause or any of the required terms and conditions to the small bid solicitations for 2018-2019.	The SFA will submit the milk solicitation that will be sent out for the 2020-2021 school year demonstrating compliance with all required elements.	
700 - Resource Management	V-0700	The SFA spent only 83.13% of the USDA Foods funds allocated to them in SY 2018-2019.	The SFA will outline their plan to spend the USDA Foods money in 2020-2021.	
1000 - Local School Wellness Policy	V-1000	The Wellness Policy and assessment must be made available to the public. The SFA reported that they were posted on Sycamore. The SA and SFA were unable to find them on the web site or Sycamore.	The SFA will: 1. Describe how the wellness policy and assessment will be made available to the public. 2. Submit a link or a screenshot of the posting.	
1200 - Professional Standards	V-1200	The food service employees are not completing and recording professional development hours. See TA for requirements.	The SFA will submit a plan to complete the required professional development hours by June 30, 2020. Include a list of each person requiring the training, the topic they	

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			plan to training on, and the estimated date of completion.	
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Site - Level Findings: Zion Lutheran School (8201)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	134 Does the SFA perform Direct Certification matches according to the required timeframes?	The SFA must download the Direct Certification list when they are released, twice per month. Student benefit information should be updated at this time as applicable. The SFA must keep a copy of the list of students that qualify on file for three years plus the current year.
100 - Certification and Benefit Issuance	137 Did the SFA accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document?	Two students were recorded on the January benefit list as receiving free or reduced benefits. No application was on file for these two students, nor were they found on the Direct Certification list. One was listed as free and should be paid. One was listed as reduced and should be paid. This was corrected during the on-site review.
300 - Meal Counting and Claiming	314 Is the SFA following their approved SFA-SA Agreement/application (including POS)?	The SFA made modifications to their lunch program mid-year and did not modify their operation application. The SA worked with the SFA to make these revisions on site.
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. The SA shared resources on IowaCNP to assist in the procurement process.</p> <p>Procurement Plan and Code of Conduct must be completed annually. The Code of Conduct must include the board policy number(s) on disciplinary action. The 2019-2020 Code of conduct does not reference a specific board or district policy addressing disciplinary action. This should be added to the Code of Conduct. The SA has revised the Procurement Plan template for SY 2020-2021 and the SFA should plan to use the revised version. Small bids should be awarded to the low bid, a matrix should be</p>

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		<p>used to determine the low bid. A template was provided by the SA.</p> <p>Vendors such as Hy-Vee and Farner Bocken were used several times over the course of the year. They were not secured competitively. Micro purchase require that you spread the wealth around.</p> <p>Software updates should be listed as a sole source.</p> <p>The SFA may only purchase items from a vendor which were included in the solicitation.</p> <p>The Code of Conduct policy should be revised to include the disciplinary action policy outlined in the employee handbook.</p> <p>No local thresholds were identified on the procurement plan, upon investigation, there is a policy which outlines \$200 as the local micro purchase threshold. The Principal asked about adding a purchasing policy specific to the lunch program to the board policy.</p> <p>Bread was treated as a micro purchase, no bids on file. The SFA purchased all bread from the local HY-Vee. Because it was not procured properly with specifications, the SFA was not able to document if the bread meat whole grain requirements.</p> <p>Micro purchases should be spread equitably around the community.</p> <p>When making micro-purchases other program requirements must also be followed such as whole grain requirements and meal pattern. (Several micro purchase were made for items such as cookie an all purpose flour.)</p> <p>Company Kitchen was awarded the food vending contract in 2020, no solicitation documentation is on file, no evidence of bids from other companies is on file, required terms and conditions are not included, the contract refers to the CACFP program which is a separate program with different meal pattern requirements, should be the NSLP.</p> <p>The SFA should include the Buy American Clause in all Small and Formal Purchase agreements.</p> <p>All terms and conditions appropriate for the procurement value must be included in small purchase solicitations.</p>
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		<p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p> <p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <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 <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</p>
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		<p>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 • 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 SFA spent only 83.13% of the USDA (commodities) funds allocated to them in school year 2018-2019. The expectation is that the SFA spend at least 95% of those funds to help maintain a healthy balance. We discussed strategies to increase that spending with their current situation and the unique circumstances making it difficult to spend those funds in SY2019-2020.</p>
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	<p>The SA shared the approved non-discrimination statement with the SFA. The full statement or the provided abbreviated statement must be on all program materials.</p>
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?	<p>The wellness assessment does not have dates of the last review. Both the Wellness Policy and assessment must be reviewed at least once every three years. Both the policy and assessment must be made available to the public.</p>

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1200 - Professional Standards	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>ANNUAL TRAINING: The SFA was advised to maintain a spreadsheet with all staff, tracking training classes attended, date attended and length of time for each class. Documentation should be kept on file supporting the completion of training, this could include certificates, sign in sheets, or screenshots of training. The name of the attendee(s), date and length of the class should be recorded.</p> <p>All Food Service staff and SFA employees working with the School Lunch Program are required to take Civil Rights annually.</p> <p>Training hours should meet the following guidelines:</p> <p>Director- 12 hours annually</p> <p>Manager- 10 hours annually</p> <p>Full-Time Staff- 6 hours annually</p> <p>Part-time Staff- 4 hours annually</p>
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The HACCP plan should be updated to reflect the most current needs of the SFA. The current HACCP plan has information referencing the 2005 health code, Iowa uses the 2013 health code. The SFA has changed to vended meals; the SFA should consider adding a standard operating procedure for receiving and serving vended meals.
1500 - Reporting and Recordkeeping	1500 Are reports submitted to the State Agency as required?	January and February 2020 original claims were filed late by the SFA. TA was provided to ensure that they know how to file the claims, and have the calendar with deadlines.
1500 - Reporting and Recordkeeping	1500 Are reports submitted to the State Agency as required?	TA was provided in deadlines and program requirements. The SA worked with the SFA to gain access to IowaCNP and showed the SFA how to navigate the system.
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 SFA is required to promote the Summer Feeding Program every year to all of the families that it serves. This may be done through flyers, poster, face book, the school's website or any other forms of communication. Information should be shared on where families can go to find SFSPs. It appears that it has been

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		done in the past, however, new staff was not aware of the requirement.
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Site - Level Technical Assistance Zion Lutheran School (8201)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Production records should include: serving sizes, amount prepared, number of planned servings, total number served, and amount of leftovers. The production records provided by the vending company include most of the required information. TA was provided to the SFA to add the remaining information.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The SFA did not have CN labels or recipes available from the food vending company at the start of the on-site review. The SA was initially unable to determine if the meal pattern is met with the limited information provided. The SFA must maintain these records for a period of three years plus the current year or have the ability to access it from the food vending company upon request within the prescribed period. It is the responsibility of the SFA to monitor the food provided by the vendor to ensure that the meals sent meet the meal pattern. That cannot be done without the CN labels and recipes.
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	The SFA should have the "And Justice for All" poster in the area where meals are served each day. The SFA was serving from an alternate location on the day of review due to a funeral lunch occupying the cafeteria space. The poster was relocated to the menu board so that it would move with the lunch with a prompt from the SA.
1400 - Food Safety	1411 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	The food vendor brought peaches from China on March 4, 2020 for lunch service. The SFA must include the Buy American clause on the contract for vended food service. All food purchased with USDA funds should be sourced from the United States with the exception of items which cannot be produced in the quantity needed such as tropical fruit. Items accepted by the SFA not meeting this standard should be logged.

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Dietary Specifications Assessment Tool - Lunch	25 Larger portions and/or bonus items and/or seconds are offered (offering portion sizes that are inconsistent with the planned menu). Entrées sold a la carte are exempt.	Students should not receive second servings of entrees unless purchased as an a la carte item. Second servings will cause students to exceed the daily allowed calories, sodium, and fat.
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Org - Level Commendations

Description
APPLICATIONS/BENEFIT ISSUANCE (100): The current application form and guidelines were used. All applications were correctly determined, applications were complete with SSN's and case numbers, and all applications were determined within ten days. Free meals are extended to all members in the household.
CIVIL RIGHTS (800): The And Justice for All civil rights poster was posted in the serving area. Annual civil rights training was provided and documented. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. Ethnic/racial information is collected and the form is completed. No discrimination was observed.
Errors fell below the \$600 disregard and no fiscal action is expected at this time.
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.
MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of January appeared accurate and complete. Food Service Staff ensured each student received the required meal components, another staff member recorded the names of students eating the meal.
MEAL PATTERN: 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. Water was available to all students during meal times. Menus for the month of review contained all required components.
PROCUREMENT: The SFA has a completed written Procurement Plan. The SFA had one representative attend Procurement training and are signed up to attend training in March 2020.
SMART SNACKS (1100): The SFA does not allow students the option to purchase a la care items other than milk. There are no vending machines present.
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. The application(s) selected for verification were confirmed prior to verification. The SFA had at least one person attend training.

Site - Level Commendations Zion Lutheran School (8201)

Description
HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained. Food Service workers wore proper hair restraints and practiced good gloving procedures. Lunches brought in by the vending company were kept hot, temperatures were taken and logged upon delivery.