

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Rock Valley Comm School Dist (56070000)
On-site Review Dates: January 7-9, 2020

Program Year: 2020
Month of Review: December
Lead Reviewer: Deann Murphy
Org Representative(s): Chad Janzen

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The SFA had 3 student benefit issuance errors. One was found on E-Lookup and the other 2 students status' were not changed after verification.	All benefit issuance errors were corrected on-site. No further corrective action is needed.	
1000 - Local School Wellness Policy	V-1000	The assessment of the wellness policy goals has not been made public as is required.	The SFA will explain how and when they will make the assessment available to the public. If they plan to put it on the school website, please include the web address where it can be found.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The SFA has an excess balance in their non-profit school nutrition account and does not have an approved spend down plan by the state agency. USDA regulations require that the SFAs cash balance be no more than 3 months worth of average monthly expenses.	The SFA will provide the State Agency with their plan to spend down their cash balance to no more than 3 months average monthly expenses.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	Based on the discussion with the Business manager, non-program food costs were calculated incorrectly making it appear that the SFA needs to significantly raise non-program food revenue.	The SFA will re-calculate their non-program food revenue tool using a 5 day reference period from SY2018-19 and will submit their corrected tool to the State Agency. If the tool shows that the SFA has non-program food costs that are higher than their non-program food revenues, they will explain how they plan to fix that.	

Site - Level Findings: Rock Valley Jr-Sr High School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
600 - Dietary Specifications and Nutrient Analysis	V-0600	The planned breakfast menu shows 12-15 oz. eq. grain foods offered each week. This increases the risk of exceeding the calorie limit of 450-550 calories on average daily.	The SFA will explain how they intend to limit grain options at breakfast so that the calorie requirements are met on average each day.	
1100 - Smart Snacks in School	V-1100	The vending machine in the cafeteria contains Vita Ice and La Croix that are not allowed in a MS building.	The SFA will state what specific beverages they plan to put in the vending machine that are compliant at the Middle school level.	

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Org - Level Technical Assistance

Area	Question	Comments
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	<p>Field trip meals must contain all 5 components, i.e. for K-8 graders, 1 oz. eq. M/MA, 1 oz. eq. grain, 3/4 cup vegetable, 1/2 cup fruit, 1 cup milk.</p> <p>The current meal charge policy states that students who have -\$10.00 in their lunch account are not allowed further meals or a la carte. This policy is not being followed since all students are allowed a meal. Recommend the SFA re-evaluate their policy/practices so that they match.</p>
700 - Resource Management		<p>PROCUREMENT: Micropurchases: The SFA should try to spread the wealth more evenly between micropurchase vendors. Discussed using the micropurchase log with the FSD. Small Purchase: The SFA need to include federal and local terms and conditions in their original solicitation. They should extend the bid pricing for milk and bread bids as recommended. The SFA must accept the lowest bid price with small purchases. The SFA needs to include all the items they planned to purchase in their original solicitation. Formal Procurement: The FSD needs to spot check vendor invoices to ensure bid prices and invoice prices match. If the invoice prices are higher than the bid prices, the FSD should contact the company for a credit. Discussed with the FSD the need to communicate with the Business manager any credits or problems needing to be dealt with prior to having the business manager pay the vendor. Code of Conduct: instead of "debarring" the staff member who violates the Code of Conduct, the SFA may wish to consider suspension/termination. Also, they should include the policy name that is being linked in the Code of Conduct - not just the policy number. Procurement Plan: We discussed ways to improve their procurement plan. A new plan should be completed this spring for SY2020-21.</p>
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	<p>The written USDA procedure and complaint form was given to the Superintendent's secretary. If the SFA ever receives a discrimination complaint related to the school meals program, they should follow this procedure.</p>
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	<p>Students who need a special dietary accommodation must be provided this by the SFA. Parents should not be required to bring in special foods unless they want to. The SFA should contact parents who are supplying their students special foods and let them know. If the parent wishes to provide the special food, they should sign the diet modification form stating that this is their wish.</p>
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	<p>The Final Wellness Policy states that the SFA permits participation by the general public and the school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in</p>

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		the wellness policy process.
1400 - Food Safety	1403 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?	All purchased food items that are accepted by the SFA, whether fresh, frozen or canned, and are non-domestic must be recorded in the Buy American log. Food items that the SFA routinely accepts, i.e. bananas, mandarin oranges, pineapple, etc. can be logged once annually with a note that it is purchased regularly.
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?	Both the breakfast promotion and summer promotion materials need to go out to all households. They can be placed on the school website, sent home in student bags, sent out electronically through e-mail or text blasts, etc. Summer promotion should go out close to the end of each school year. Breakfast promotion needs to be done at least 2 times annually.
RMCR - Nonprofit School Food Srvc Acct	4 If Yes, did the SFA develop a spend down plan approved by the State agency?	Discussed with the Superintendent and Business Manager ways they may wish to spend down their non-profit school nutrition account including purchasing equipment, providing uniforms as a benefit to kitchen staff, increasing staff wages/number of staff, improving the quality of food provided, offering a universal free breakfast to students, or eliminating the reduced meal price for students who qualify for reduced benefits.
RMCR - Revenue From Nonprogram Foods	9 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	A written example was emailed to the Business manager and FSD and oral instructions were given to both on how to properly calculate non-program food costs. These seem to have been miscalculated on the tool completed.

Site - Level Technical Assistance Rock Valley Jr-Sr High School (0172)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Planned review week menus allow for 2.5-3 oz. eq. grains which equals 12-15 oz. eq. grains weekly. The recommended maximum grains for the week is 10 oz. eq. for all grade levels. While there is no specific penalty for planning excess grains, breakfasts need to fit into the required calorie requirement of 450-550 calories on average daily for 6-12 graders. Serving excess grains increases the risk that calorie requirements will be exceeded. The FSD should reassess breakfast menus to stay closer to the 10 oz. eq. grains each week.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Staff were confused as to what should be counted as a reimbursable breakfast. Students must take 3 items at breakfast, one item must be 1/2 cup fruit or juice. Recommend reviewing the Offer Vs. Serve manual with all serving staff annually and as needed. The Offer vs. Serve manual was e-mailed to the FSD.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	The only beverages allowed at the Middle School level is plain water of any size, up to 12 oz. fat free or 1% milk and up to 12 oz. 100% fruit juice. A la carte snacks sold as a pair or with an accompaniment, i.e. 2 cheese sticks or bagel with cream cheese, need to have documentation showing that the pair or the food item with the accompaniment are allowable as a Smart Snack. The Smart Snack calculator was sent to the FSD for her

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Org - Level Commendations

Description
All meal components were available at the beginning of meal service on the days of observation and throughout meal service. Menus met weekly and daily meal pattern requirements for each age/grade group reviewed. Documentation indicated that foods purchased and food production ensured meals contained the required components and minimum quantities. CN labels and Product Formulation Statements, as well as nutrition facts and ingredient labels used for producing meals were on file and were organized. Standardized recipes are used for food production. Free water was available as required. Signage was posted explaining what constitutes a reimbursable meal. Food service staff was polite and respectful to students, other staff, and each other. All students were observed to have a reimbursable meal during the day of the review.
Benefit documents, as well as all paperwork, were extremely well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, and denied applications were correctly determined. Applications were correctly determined, they were complete with SSN's and adult signatures, and all applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Carry over applications were removed if the household did not apply within thirty days of the school year. 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.
December receipts that were reviewed indicated appropriate and allowable expenditures. The SFA did not need to increase their paid lunch prices this year since they had a positive balance in their nutrition fund. The SFA used 99% of their USDA Foods entitlement for commodities in SY2018-19. In this school year, they take advantage of both DoD for fresh fruits and vegetables and Diverted Foods (DF) for processed food items. Reports are filed on time, and all records are maintained for at least three years plus the current year.
PROCUREMENT: The SFA had a Procurement Plan completed in both SY2018-19 and in SY2019-20 that lists their major purchases. They also have a Code of Conduct in place. Micro-purchase: All micropurchases were made under the micropurchase threshold and prices were reasonable. Small Purchase: The SFA did send bids to 2 vendors for milk. The solicitations did not restrict competition in any way. Formal Purchase: The SFA has a copy of the AEA Purchasing disk that contains the RFP, Public Notice, and original bid prices. The FSD does check in products for quality and quantity.
The And Justice for All civil rights poster was posted in the cafeteria. The district has taken reasonable steps to ensure access to services are offered to Limited English Proficient households. Annual civil rights training was provided to all staff involved in the program. The district has proper documentation for special diets on file. Ethnic/racial information is collected and the summary form is complete and on file. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. The current state and federal non-discrimination statements are listed on household notification letters and the shortened statement is on the posted menu.
The correct number of applications were verified and were correctly selected from the error prone applications available and then randomly. All income sources were verified, and the process was completed on time. The applications selected for verification were confirmed prior to verification. The SFA had at least one person attend training.
The district has a current wellness policy on file. Goals are set for nutrition promotion, nutrition education, and physical activity. The latest assessment of the policy was available. The SFA has a wellness committee that meets to review the policy.
The SFA followed regulations for the district's size category when hiring a new FSD. She has attended multiple state agency trainings to help her know and understand the numerous regulations involved in the program. Professional Standards tracking was provided that documents that the director received the required 12 hours of annual training, FT kitchen staff received the required 6 hours of training and PT and non-nutrition staff have received or are on track to receive 4 hours of annual training. There was a comprehensive list of all employees involved in child nutrition programs in the district and training was correctly documented on sign-in sheets or with individual certificates. The district Superintendent, Business Manager, Secretary and FSD all work together to ensure a well run child nutrition program.
The SFA has a district-wide written Food Safety plan that includes the required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezer, food served, and dishwasher. The kitchen and storage areas were orderly and clean.
The SFA promotes breakfast to district households with information about why students should eat breakfast, times served and the menu is posted on the school's website.

Site - Level Commendations Rock Valley Jr-Sr High School (0172)

Description
Meal counts during the on-site review were reasonable when compared to the (December) review month counts. Meal count totals for the month of December appeared accurate and complete. There was a point of service, POS, at the end of the line 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.

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Students are able to purchase a second entrée, second milk or a la carte snacks during lunch. Most items met Smart Snacks requirements and documentation is on hand showing that.