

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

Des Moines Independent Community School District (17370000)

Dates of Review: 11/4/2019 – 11/14/2019

Program Year: 2020
 Month of Review: October
 Lead Reviewer: Jean Easley
 Org Representative(s):

Site - Level Findings: Des Moines Central Campus (0185)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1100 - Smart Snacks in School	V-1100	<p>The vending machine in the section of the Central building that serves middle school students contains beverages that do not meet Smart Snack regulations for that grade group of students. The vending machine contained Kick Start beverages, diet green tea, sparkling water, and Vita Ice. Middle school students are allowed to up to 12 oz. of unflavored or flavored low fat or skim milk, 100% fruit or vegetable juice and 100% fruit or vegetable juice diluted with water (with our without carbonation). They may also have any size of plain water.</p> <p>The Central HS also has a student run coffee shop (Step Program) that sells various coffees, cappuccino, apple cider, chai latte, tea, and hot chocolate to students and staff. There was no nutritional information available to ensure that these beverages met the Smart Snack requirements for high school students. High school students can have beverages with 40 calories or less per 8 fluid ounces or 60 calories or less per 12 fluid ounces. All beverages and food sold to students on campus, during the defined school day, must meet the Smart Snack requirements.</p> <p>TA provided to the coffee shop staff and food service manager at that site.</p>	<p>Describe the process that will take place to ensure beverages sold to the middle school students in the vending machine meet Smart Snack requirements going forward. Enter the nutrition information for all beverages sold at the coffee shop. Describe how the school nutrition staff will work with the coffee shop staff to ensure that beverages meet Smart Snack requirements.</p>	

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Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
RMCR - Revenue From Nonprogram Foods	V-RMCR	NON PROGRAM REVENUE: the Financial Report from IowaCNP reflects that non program revenue does not meet the requirement of total revenue generated from non program food sales is to be equal to or greater than the percent of total food costs attributable to SFAs purchase of non program foods.	The state agency recognizes the SFA has a unique situation of offering primarily reimbursable meals as majority of sites are CEP and therefore a relative small number of non program foods are offered. The state agency recognizes the tool may overestimate the required increase. For your response, describe your procedure in setting prices for non program foods including a la carte, vended and adult meals to ensure costs are recovered more than the per serving food cost.	

Site - Level Findings: Lincoln High School (0118)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Scavo High School (0194)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Brody Middle School (0205)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Capitol View Elementary (0427)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: EDMUNDS ACADEMY (0490)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Phillips Elementary School (0778)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

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Site - Level Findings: Studebaker Elementary (0863)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Walnut Street School (0984)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance		APPLICATIONS: On two applications where the household was free the prior year and went to reduced price status in the current year, the SFA gave the household a 10 day grace period in which they continued the free meal benefits. TA provided that when a new eligibility determination is made in the current school year, the SFA should not give a 10 day grace period. Once a new application is processed, the status should be effective that day.
200 - Verification	211 Does the SFA's verification notification letter include all required information?	VERIFICATION: TA provided that SFA should update their Verification Notification letter so that it clearly informs households they have 10 calendar days in which to appeal. The SFA made the change while State Agency was on-site.
700 - Resource Management		DAIRY SOLICITATION: was a sealed bid solicitation which stated vendors were to provide milk samples for taste testing to Food and Nutrition office. There was no language stating the next steps taken by the SFA should staff find milk taste test resulted in staff not wanting to procure milk from a particular vendor. Since solicitation was a sealed bid, there was no evaluation criteria. The correct milk vendor was selected for a firm fixed-price contract with economic adjustment based on bottom line evaluation. It is recommended to consider issuing an RFP if taste tests continue to be part of the solicitation process. Recommended to be more detailed on evaluation criteria for RFP.

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700 - Resource Management		GEOGRAPHIC PREFERENCE: per USDA Procuring Local Foods for Child Nutrition Programs manual, a geographic preference is allowed for the procurement of unprocessed or minimally processed local foods. See p 67 for a list. Pork Chorizo and/or Pork Breakfast Sausage are not included because the inherent character of the local food has been altered. Therefore, if micro-purchase method is used to procure the processed product from a local producer, the SFA should ensure purchases are equally distributed among qualified vendors, including commercial vendors if there are no other local producers for similar products.
700 - Resource Management		PROCUREMENT TERMS and CONDITIONS: solicitations are to include required federal terms and conditions. Sample template with language provided. The procurement specialist is aware and as new solicitations are issued will ensure all required Federal terms and conditions are included, depending on the value of contract.
700 - Resource Management		PROCUREMENT: PRODUCT SPECIFICATIONS: always allow for "an equal" for brand name products. Both prime vendor and fresh produce solicitations specified brand name products and were not clear on approval process for "an equal" product. COUNTRY OF ORIGIN: Product specifications asked for the "country of origin" for specific canned products and not for others. The SFA should state how vendors will ensure providing a domestic alternative prior to offering the SFA a non-domestic product.
700 - Resource Management		SMALL PURCHASE PROCUREMENT: When using small purchase method, using either an informal (email, phone call) or formal (written) process, the SFA should have a description of product(s) or service(s) to be procured including local produce.
1100 - Smart Snacks	1103 Who is responsible for tracking Smart Snacks compliance at the:	VENDING MACHINES: managed by Activities Department should have calculator printouts to show compliance. There were not non-compliant items were observed. Director communicates with vending company to ensure compliance.

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RMCR - Indirect Costs	7 If indirect costs were charged to the nonprofit school food service account but had not been charged in previous years, did a loan agreement exist and did accounting records support the implementation of a loan agreement?	<p>VEHICLE PURCHASE: In SY 2018-2019, the SFA purchased three new trucks for transportation of food from Central Nutrition Commissary (CNC) to school sites. Per School Finance guidance, vehicle purchases are not allowable as a direct cost. The state agency continues to work with School Finance to research the issue of vehicles as well as allowable and unallowable costs.</p> <p>These purchases classify as capital assets. Per Indirect Cost Guidance for the Certified Annual Report (CAR) the capital asset threshold is \$500. Per 2 CFR 200.33, the federal equipment threshold is \$5,000. Any purchase of capital assets either above \$5,000 or the SFA capitalization threshold of \$500 must receive pre-approval from the state agency. Refer to the Iowa Approved Equipment List.</p> <p>ARMORED CAR FOR TRANSPORT OF CASH: These vehicles are currently not an allowable direct cost.</p>
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Site - Level Technical Assistance Lincoln High School (0118)

Area	Question	Comments
1100 - Smart Snacks in School	1106. Does the school hold fundraisers during the school day where students may purchase food or beverages?	<p>FUND RAISERS: signs were observed to be displayed in the Lincoln High School cafeteria by a student group selling chocolate. There was not a fundraiser observed so it is presumed the sign was from the previous week. Who manages student groups fundraising? Continue to communicate Smart Snack regulations with administration working with student groups.</p> <p>VENDING: Vending items appear to meet smart snack standards however documentation is not maintained on site to verify this. Documentation must be maintained to verify compliance.</p>
Dietary Specifications Assessment Tool - Lunch	1 Are specifications considered when purchasing menu items and condiments to limit the following?	SODIUM SOURCES: Louisiana Hot Sauce, Pizza Seasoning, Sriracha Seasoning contain sodium and are offered as self-service condiments daily. Replace these items with salt free alternatives OR do not offer daily.

Site - Level Technical Assistance Brody Middle School (0205)

Area	Question	Comments
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400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	Although all students selected a reimbursable breakfast meal, the breakfast signage that was posted did not provide information to students on all food items being served that day and how they constitute a reimbursable breakfast meal. TA provided to the food service manager who posted signage that provided information on food items being served and how they constitute a reimbursable meal.
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Site - Level Technical Assistance EDMUNDS ACADEMY (0490)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	318 At the selected school(s), does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	TALLY COUNT: elementary meal counts are taken by a tally system. No errors were observed, however, it is recommended to study the elementary procedures further, as they may be at systemic risk of inaccurate meal counts. If the tally counting procedure continues, it is recommended to develop a SOP for monitoring so students only go through the line one time. Recommend using the electronic POS when possible such as when line speed is not affected.
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	Thermometer calibration was not being checked and documented weekly per HACCP SOP. Technical Assistance with given to research current thermometer guidance and revise HACCP SOP accordingly.

Site - Level Technical Assistance Studebaker Elementary (0863)

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?	Signage at breakfast is minimal. Only a single sign hangs at the end of the 8 foot serving table as students take their bag to start filling it. While the space used for meal service is used for multiple functions, the addition of signage to inform students of what is being served before they reach the serving line would help them in the decision making process and help them to better understand what makes a reimbursable meal.
1400 - Food Safety	1404 Is a copy of the written food safety plan site specific and available at each school?	The SFA's HACCP plan includes a body fluid clean up SOP. The SOP includes barricading of the affected area. On the day of review, an incident occurred where a student became ill in the dining room. Staff were not confident in their next steps, other than to contact the janitorial staff. The SA provided TA to review this policy

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		with staff and to have a plan in place of what they will do. There were several cones in the room for PE classes which could have been used to barricade the area. This was a good reminder to refresh staff on the SOP as cold and flu season is approaching.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1910 Did the FFVP meal service follow HAACP principles and applicable sanitation and health standards, including the handling of any left overs?	Studebaker has a Standard Operating Procedure addressing food safety and sanitation within the FFVP. Observation on the day of review did not demonstrate compliance with the policy. Individuals picking up the snack and distributing the snack did not wash their hands prior to handling food. Students in the classroom did not wash their hands prior to consuming the snack (5th grade and 1st grade). In the first grade room, the teacher used a random pair of craft scissors to cut each bag of carrots open for the students without properly sanitizing. She also dropped a bag of carrots on the floor and served it to a student saying "oh, it's OK". 5th grade students were allowed to count out and deliver snacks to the classroom and distribute snacks in the classroom without washing hands first. The classroom teachers need additional training on proper food handling.

Site - Level Technical Assistance Walnut Street School (0984)

Area	Question	Comments
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	During lunch service an administrator was seen putting a child's milk back into the milk cooler after the student was seated at a table. Food items, to include pre-packaged foods like milk should never be returned to service areas for re-sale. This poses a food safety concern.

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Org - Level Commendations

Description
<p>BENEFIT ISSUANCE: The SFA has a web-based application which showed a high degree of reliability. Direct certification is downloaded twice a month as required and kept electronically; benefits are accurately and frequently transferred to the Point Of Service (POS) system; and denied applications were correctly determined. All applications were complete with Social Security Numbers and case numbers, and all applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Rollover 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. Eligibility is kept confidential. The SFA has a back-up system for their web-based applications. Six Food and Nutrition staff members participated in the State Agency's Application Approval and Direct Certification webinar.</p>
<p>COMMUNITY ELIGIBILITY PROGRAM (CEP): Fifty-five school sites participate in CEP. SFA has worked very hard to organize a vast amount of documentation - each site has a completed worksheet on file with all supporting data to ensure ISP has been calculated correctly. State agency reviewed documentation, ISP calculation, and corresponding claiming percentages to be correct.</p>
<p>DIET MODIFICATIONS: There is an organized procedure in place for students to receive special diets as ordered by a prescribing medical authority. Registered Dietitian specialist organizes documentation and provides assistance and training to site leaders.</p>
<p>FFVP: The district does a great job with this program by offering a variety of both fruits and vegetables! Teachers are supportive and see the value of the program. Documentation of costs was organized and matched October claim.</p>
<p>PROCUREMENT: Food and Nutrition procurement specialist attended 2019 summer short course procurement training. The Food and Nutrition written procurement plan for SY 2019-2020 was completed. The micro- and small purchase threshold was correctly determined. Procurement events were identified as well as the estimated value of the procurement and the procurement method to be used. Cost analysis is completed at time of contract renewal. To review compliance with procurement requirements vendors were selected per USDA selection criteria. The district has an online requisition process. The purchasing department reviews purchase requests to ensure compliance with purchase method. For any purchase under \$3,000 an informal quote ensures price is reasonable. A review of invoices showed prices were reasonable and each transaction was below \$3,000 (the SFA's micro-purchase threshold). The SFA complied with district gift policy for purchase of employee recognition items. Vendors selected for compliance with small purchase method included a food hub used to procure local foods - a variety of produce, eggs, and meat products and a vendor for small wares. A review of food hub invoices showed the farms from where the local produce was sourced, quantity purchased and unit price. A review of small wares invoices showed items purchased were allowable and prices were reasonable. To ensure compliance with formal purchase method, five vendors were selected - dairy, bread, uniform rentals and laundry services, fresh produce, and prime vendor for food. The Request for Proposal (RFP) was issued for prime vendor and Sealed Bids/Invitation for Bid (IFB) for procurement of dairy, fresh produce, and bread. Public notification was sent to the Des Moines Register for all formal procurement events. A copy of printed advertisement with a signature of notary public is available. An evaluation criteria was included in RFP with price weighted as the primary factor. The dairy bid included the market vendors would track to comply with escalator pricing. All RFP/IFB documents reviewed state clearly that the contract will be awarded to the most responsive and responsible vendor whose proposal is most advantageous to the program. Contractual and administrative requirements are clearly stated in the solicitation. The solicitation allows for competition, fairness and transparency. All contracts are monitored prior to payment to ensure contractors meet the terms and conditions. A review of selected SFA/vendor documents including invoices showed detailed and sufficient procurement records are retained and the products solicited are purchased. The SFA did an excellent job in utilization of Planned Assistance Level (PAL). The SFA utilized PAL through Direct Distribution, DoD Fresh, and Diverted Foods and exceeded the goal of 95 percent utilization set for SFAs.</p>
<p>PROFESSIONAL STANDARDS: Nutrition Staff receive training offered in a variety of ways. Each employee receives a letter which outlines an individualized training expectation. A Training Tracker is an organized excel document which captures annual training for all 398 food and nutrition employees + 164 non-nutrition staff who work with early childhood.</p>
<p>There is no fiscal action as result of the review.</p>

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VERIFICATION: The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was completed on time. The SFA had three Food and Nutrition staff participate in the State Agency's Verification training and one person participated in the Verification Reporting training. The verification report was completed accurately and on time.

WELLNESS: The district has a current wellness policy in place. The policy is posted on the Food & Nutrition webpage along with an invitation for stakeholders to participate. The assessment was reviewed and completed by Action for Healthy Kids as part of an urban school wellness coalition.

Site - Level Commendations Lincoln High School (0118)

Description

MENU: Breakfast and Lunch meals observed were reimbursable. Offer versus Serve is in place as required. Several signs displayed around the serving area communicates how to build a reimbursable meal. A second chance breakfast is available.

POINT of SERVICE: Point of Service lines were orderly and efficient ensuring meal counts are accurate. Students entered personal account numbers and information was confidential. Excellent participation. Cashiers were efficient and the lines were not long.

STAFF: Nutrition staff demonstrated solid understanding of meal pattern requirements, were friendly and helpful to all student customers, and observed to practice safe food handling procedures.

Site - Level Commendations Des Moines Central Campus (0185)

Description

FOOD SAFETY: Temperatures are monitored and recorded for all coolers, freezers, refrigerators, milk coolers, dishwashers, and hot foods. Food is stored properly and good food safety practices were observed while SA was onsite.

MEAL COUNTS: The point of service line was organized and orderly to ensure that all students were counted and claimed properly. Cashiers were knowledgeable on what constitutes a reimbursable meal and all staff did an excellent job of getting their large number of participating students through the line quickly.

MENU: A variety of entree, fruit, and vegetable options are available for students to make it easy to select a reimbursable meal. Signage was posted to inform students how the menu constituted a reimbursable meal. All meals observed were reimbursable.

Site - Level Commendations Scavo High School (0194)

Description

SCAVO students eat at the Central High School location; refer to notes under Central.

Site - Level Commendations Brody Middle School (0205)

Description

BREAKFAST: The breakfast menu on the day of observation provided a variety of entree options and the SFA allows students to take their breakfast into the classroom if they don't have time to eat breakfast in the cafeteria.

MEAL PATTERN: Breakfast and Lunch menu met requirements for a reimbursable meal.

Modified diet is provided to students with special diet needs. There is a cycle menu for each student to ensure dietary needs are met.

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Site - Level Commendations Capitol View Elementary (0427)

Description
Meals were not observed at Capitol View; refer to Fresh Fruit and Vegetable Program (FFVP) for notes.

Site - Level Commendations EDMUNDS ACADEMY (0490)

Description
MEAL PATTERN: All meals were observed to be reimbursable. Staff have a good understanding of the meal pattern and offer versus serve. Staff are friendly and encouraging to students.
SELF SERVICE BAR: Fresh kiwi, romaine salad and applesauce were offered on day of observation. Students may select fruits and vegetables from a self service bar. Students were observed to eat what they selected. A seasoning station offers student an opportunity to sample a variety of seasonings.
TIME to EAT: Students were observed to have adequate time to eat.

Site - Level Commendations Phillips Elementary School (0778)

Description
ENVIRONMENT: School lunch was observed to be a positive environment for students. The cafeteria is small, but plenty of natural light with a huge windows. The line moved quickly and so students had adequate time to eat. Both Nutrition Staff and School Staff - assisted students with meals and were helpful and encouraging.
SCHOOL LUNCH: all meals met reimbursable requirements. Offer versus Serve is correctly implemented. The menu of the day was appealing - including fresh fruits and vegetables and a homemade roll offered. Overall, students were observed to eat what they selected. There are signs posted showing how to build a reimbursable meal.
STAFF: Nutrition staff demonstrated solid understanding of meal pattern requirements, were friendly and helpful to all student customers, and observed to practice safe food handling procedures. Documentation such as production records and temperature logs are completed as required.

Site - Level Commendations Studebaker Elementary (0863)

Description
AFTERSCHOOL SNACK PROGRAM- The SFA does a good job of administering the Afterschool Snack Program. Students have activities available to them such as crafts, games and homework assistance. Records indicate meal pattern compliance and consistent attendance. Staff supervisors do an excellent job of monitoring students to ensure they each receive a reimbursable snack and has an accurate counting procedure in place. The Self Monitoring was completed.
FRESH FRUITS AND VEGETABLES PROGRAM- The SFA participates in the Pick a Better Snack Program and has a school garden. Food items served in the FFVP are also seen by students as part of the school garden and Pick a Better Snack Program as well as in the cafeteria. This holistic approach has a more meaningful impact and is evidenced by the choices made at the fruit and vegetable bar.
STUDEBAKER FOOD SAFETY-Staff at Studebaker has a good understanding of food safety and sanitation. They did an excellent job of monitoring self service areas, changing out tongs and spoodles as they became soiled, wiping down salad bar surfaces between meal groups. The Site does have one person, Charity Kahl who is ServeSafe Certified on staff and is working to certify additional personnel. Production records and Temperature records are thorough and include corrective action when necessary.

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STUDEBAKER STAFF- Staff is well trained on the meal pattern and Offer vs Serve. Staff at the end of the serving line were documenting reimbursable meals and do an excellent job of monitoring and sending students back for additional fruits and vegetables when necessary. Staff remained calm in adverse situations such as a student getting ill in the lunch room and running short on one entrée choice towards the end of the last meal period on the day of review. All staff were observed to be knowledgeable and respectful.

Site - Level Commendations Walnut Street School (0984)

Description
WALNUT STREET SCHOOL 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.
WALNUT STREET SCHOOL, CIVIL RIGHTS- The And Justice for All civil rights poster was posted in the cafeteria. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. All students were treated with kindness and respect, the clerk is bilingual and greeted many students in Spanish.
WALNUT STREET SCHOOL, HACCP/FOOD SAFETY - 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-including milk coolers, and freezers. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Food Service workers wore proper hair restraints and practiced good gloving procedures.