

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Eagle Grove Comm School District (19440000)
Dates of Review: Desk Review Completed in May of 2020

Program Year: 2020
Month of Review: March
Lead Reviewer: Deb Linderblood
Org Representative(s): Valerie Hanson

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The following benefit issuance errors were found: 1.) Three applications did not have an adult signature. 2.) One application was not determined correctly as the money received every two weeks and the child's income was not included in the calculation. 3.) One student received free meal benefits due to her sibling's migrant status date of 7/2/19 and should not have received free meal benefits until 12/2/19 when she appeared on the migrant list. 4. Three students received benefits on a date earlier than the date in which the application was approved. 5. One student received free meal benefits via a sibling's migrant status.	The following corrective action is needed: 1.) For the three applications that did not have an adult signature, no corrective action is required as all three households have limited cursive skills and due to COVID-19 school is no longer in session so would be difficult to obtain a signature (each application had a name under printed name so this was accepted). 2.) For the one application that was not determined correctly as the money received every two weeks and the child's income was not included in the calculation, send the household a notification letter stating that their status will change from reduced to paid and then attach a copy of the notification letter. 3.) For the one student who received free meal benefits due to her sibling's migrant status date of 7/2/19 and should not have received free meal benefits until 12/2/19 when she appeared on the migrant list there is no corrective action needed. 4. For the three students who received benefits on a date earlier than the date in which the application was approved there is no corrective action required. 5. For the one student who received free meal benefits via a sibling's migrant status, send the household a notification letter stating that her status will change from free to paid and then attach a copy of the notification letter.	
700 - Resource Management	V-0700	The nutrition department has been utilizing beverages from the Atlantic Coca-Cola Bottling Company contract which was not procured correctly. The school district should exclude all school cafeterias from the definition of "campus" in all future beverage provider agreements that are not procured competitively. Any purchases from a commercial beverage provider paid from the nutrition funds must be	State your intentions to eliminate having the nutrition department from future beverage contracts or state that beverages will be procured correctly. Also, if you do continue to include nutrition in the beverage contract and procure correctly, state that a portion of the commissions or rebates received by the school district from the beverage provider will accrue to the nutrition fund.	

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		competitively procured. A portion of the commissions or rebates received by the school district from a beverage provider must accrue to nutrition funds. The specific amount accrued to nutrition funds should follow the percentage commission on a sale of specific product(s) as per beverage provider agreement.		
700 - Resource Management	V-0700	In school year 2018-2019 the SFA only utilized 70.89% of their allotted PAL dollars and only participated in Direct Distribution.	State action you have already done and/or state your plan for how you will spend 95% or greater of your allotted PAL dollars each school year.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	Per the 2018-2019 Financial Report Tool the SFA's nonprogram food costs percent of total cost is 15% and their nonprogram food revenue percent of total revenue is only 10%. Thus their revenue ratio is less than their food cost ratio.	Describe steps you will take to increase nonprogram revenue or steps you will take to decrease nonprogram food costs.	

Site - Level Findings: Eagle Grove Elementary (0418)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	During the week used to complete the menu certification worksheets, the menus were found to be .25 oz. eq. short on grain. (Monday's 4 chicken nugget and 1 slice bread = 1.75, Tuesday's flour tortilla = 1.5, Wednesday's Mandarin Orange Chicken with 1/2 cup rice = 1.25, Thursday's Crispito = 1.25 and Friday's Pollock with 1 slice of bread = 2 grain). This makes a total of 7.75 oz. eq. and a minimum of 8 oz. eq. are needed. Also, the Food Production Records do not indicate the planned number of serving for each food item and for each grade group. TA was provided that giving 5 chicken nuggets instead of 4 would give the SFA the 8 oz. eq. of grain needed. Also, explained that instead of writing OVS under planned servings the SFA needs to put an estimate of how many servings of each food items each grade group will select and also needs to be sure to complete the planned and actual meal counts for each grade group.	Complete and attach Food Production Templates for the same week of menus as was used to complete the menu certification worksheets showing that 5 chicken nuggets will be served or that some other additional grain will be added. Also show the planned meal counts for each grade group and show the planned number of servings for each food item for each grade group.	
1900 - Fresh Fruit and Vegetable Program (FFVP)	V-1900	Cost and menu documentation provided did not support the school's March FFVP claim for reimbursement. The last day of school operations prior to the COVID-19 unanticipated closures was March 13th. The cantaloupe, honeydew, and sweet peppers planned for service on March 16-18 were included on the March claim for reimbursement even though not provided as part of a FFVP snack service. The	The following corrective action is needed: The March FFVP claim has been revised to deny payment of the unallowed costs identified during the review, in the amount of \$321.06. Identify plan to repay costs not allowed for reimbursement by the FFVP grant award.	

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		timesheet provided identified 1/2 hour of Administrative time for the month but the claim identified 1 hour.		
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	The SFA had a household that actually put \$24,030 every two weeks but thought this was in error and used \$2403 every two weeks on application. TA provided that the SFA needs to call the household in these situations and clarify. They then should correct the error and initial beside the correction.
100 - Certification and Benefit Issuance	129 Is household notification of eligibility consistent with the responses provided on the Off-Site Assessment Tool?	TA provided that on the SFA's notification letter their waiver statement should be added so that directly certified households are given the opportunity to sign. Then the SFA can use their free or reduced status to waive items specified in the statement.
100 - Certification and Benefit Issuance	133 Were all direct certifications (SNAP, TANF, FDIPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified?	TA provided that if a student is migrant or foster the benefit status does not extend to other siblings in the household. Provided the SFA with a document that will help them with when they should and should not extend benefits. The SFA needs to be sure that a letter is received from the homeless liaison qualifying a student for free meal benefits prior to starting the benefits. Also, the letter needs to have the month, day and year. Also, if a student is found as SNAP and then found as free Medicaid, the SFA should leave the student as free by SNAP for the remainder of the year.
100 - Certification and Benefit Issuance	138 Did the SFA update the benefit issuance document(s) accurately and in a timely manner, including those students that are new, transferred, or withdrawn?	Provided TA that students who are directly certified need to have their benefit status implemented within 10 calendar days from the date the list is received or it can be as far back as the date of the match which is the date on the direct certification list. TA also provided that the SFA needs to be sure that a student's eligibility status in their Point of Sale system is not dated prior to the actual date that the application was approved.
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	On the SFA's 2019-2020 Verification Report they reported that one household was free and was changed to paid. It should have been that the household was free and was changed to reduced price.
200 - Verification	203 Describe the SFA's verification process (including SFA's verification for cause process, deadlines, due dates, selection procedures, etc.).	TA provided that when completing verification, the SFA needs to get one month's worth of income documentation from the household. On the application that was reviewed only one week's worth of documentation was provided.
200 - Verification	213 If applicable, did the SFA's notice of adverse action contain all required information, including notification of appeal rights?	The Notification letter sent to the household that was verified and reviewed was dated October 9th and the SFA gave the household

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		<p>until October 23rd to appeal which is 15 days. The appeal period should be 10 calendar days from the date of the letter which would have been October 18th. The SFA then has 10 operating days in which to change the eligibility status which would have been Nov 1st.</p>
<p>700 - Resource Management</p>		<p>Procurement:</p> <ul style="list-style-type: none"> • The written procurement plan should be completed yearly (around February) to reflect the upcoming school year's procurement events, correct procurement methods and contract award type. It is best practice to keep a separate procurement event page for each school year. This practice will help ensure that the correct procurement method is identified based on the estimated value of a particular purchase. On the plan the SFA should identify if they will award based on line item or bottom line for any purchasing event using small or formal purchasing method. Pointed out that at their current thresholds, the SFA needs to use the Formal method for future dairy procurement. • TA provided that for equipment repair and preventive maintenance the SFA needs to use an unrestricted indirect cost rate to charge the nutrition account for these services if they want to recoup any of these expenses. The indirect cost rate can be found on the Department of Education webpage by putting "indirect cost" into the search box. These expenses will not be listed on the Procurement Plan. • TA also provided that the SFA needs to have debarment statements from vendors when using small or formal procurement methods if the purchase is over \$25,000. • TA provided that on the SFA's Code of Conduct they should insert the dollar value that is considered to be of nominal value. The 2020-2021 template has a space for this. The SFA's gift policy should also be referenced in the policy. • Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a Buy) and formal methods of procurement, including Buy American language. Referred the SFA to the state-prototype templates posted on IA_CNP under download forms. • When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." Referred the SFA to the Micro-purchase log and reviewed how to use the log. • When procuring milk and bread, along with specifications (descriptions) for all items to be procured, the estimated annual usage for each item should be provided. To ensure the district selects a responsive vendor with the overall lowest price (bottom line), the cost of each item on price quotation request should be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template

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		<p>that calculates extended cost for milk was provided.</p> <ul style="list-style-type: none"> • For milk, other things to consider when requesting price from vendors are: is pricing requested for paper cartons or plastic bottles, coolers to be provided at no charge. Analysis Critical Control Plan (HACCP) plan to ensure clean crates and milk cartons are delivered, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should inform vendors whether a firm, fixed price or a fixed price with economic adjustment (escalator clause) is requested. • For bread, provide vendors with a package count/package weight/weight per serving for each bread product. Review current school year bread product purchases to include any regularly purchased items when requesting price quotes. • The food service director should spot check invoices from the vendor to ensure products delivered match the order and the description of the product solicited. Prices on the invoice should match bid pricing or be lower unless SFA was given advance written notification per solicitation of any price increase. Food items procured by the SFA not on the GPO solicitation must be procured using appropriate procurement methods. • TA provided the SFA is required to purchase, to the maximum extent practicable, domestic commodity or product. If the SFA has to accept delivery of a non-domestic product the SFA should document the date, product, country of origin and reason for the exception on a Buy American Exception Log. Emailed the FSD a copy of the State Agency Buy American exception log template. • The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification and be at equal or lesser price. * TA provided that if something would break in another department on a weekend and there is a charge for weekend service and the General fund pays for this then when something breaks in the nutrition department the General fund should pay then as well.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	On the off-site questions where it asks for the nondiscrimination statement, the SFA put the Iowa nondiscrimination statement. All materials related to the nutrition program must have USDA statement and if the material pertains to eligibility it must also have the Iowa statement. SFA stated they have access to the correct USDA statement. It is also available on IowaCNP under download forms.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The link for the USDA complaint process/form which should be used if parents wish to file a complaint about any child nutrition program is: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
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?	TA provided on the timeline of various wellness requirements: Review and update the school wellness policy every 3 years at a minimum, Public notification about the content/updates to the

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		<p>policy - annually, School Building Progress report annually (include with public notification), Public notification about opportunity to participate on committee- Annually, School Wellness Committee Meetings- Annually at a minimum and School Wellness Triennial Assessment-every 3 years. More information about the triennial assessment can be found at the following link: https://educateiowa.gov/pk-12/nutrition-programs/school-wellness. I recommended watching the School Wellness Triennial Assessment webinar and provided the Triennial Assessment tool and that the deadline for completion has moved to June 30, 2021. If schools want to use this extended deadline there is a survey that must be completed on the Bureau's Wellness page website.</p>
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Site - Level Technical Assistance Eagle Grove Elementary (0418)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	Emailed the Food Service Director a list of approved milk substitutes to have if needed.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	TA provided that once the SFA has one food safety inspection in a school year, a second inspection should be requested. The second inspection may not be done, but the SFA should keep documentation that the second inspection was requested.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	SFA is currently taking the temperature of the dish machine rinse tank. TA provided that the temperature of the wash tank should also be taken and documented.

Org - Level Commendations

Description
<p>Certification and Benefit Issuance: All of the Determining Officials participated in the Application Approval and Direct Certification webinar. The current application for free and reduced price meals/milk and income guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the Point Of Service (POS) system, and denied applications were correctly determined. All applications were signed and dated by the SFA, were complete with Social Security 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. Waivers are provided to applicants who use a free and reduced price applications. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.</p>
<p>Civil Rights: Services are offered for Limited English Proficient households, annual civil rights training was provided for cafeteria staff, determining officials, and the cashier and documented. The SFA submitted the annual Public Release to the local media (Eagle Grove Eagle). Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. The correct state and federal non-discrimination statements are provided on all material describing the program and the USDA short version is posted on menus.</p>
<p>Fiscal Action: Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for April seem to be needed.</p>

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Local Meal Charge Policy: The SFA developed and approved a meal charge policy. The policy was distributed to students during the first week of school and a second notification was sent home in conference folders. Staff were informed of the policy via an all-staff email. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.
On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and at least 50% were completed for breakfast prior to February 1st.
Procurement: The Food Service Director and Authorized Representative attended Regional Procurement Training in Webster City, Iowa. The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. The SFA is a part of the AEA purchasing group and has a signed agreement for food, smallwares and chemicals.
Professional Standards: One Co-Food Service Director has completed 16 hours and the other 18 hours of Professional training in school year 2019-2020 of the required 12 hours. All nutrition staff and determining officials have met the required training for Professional Standards in school year 2019-2020. An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours. A variety of training is provided, including webinars, webcasts and in-person training.
Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.
Resource Management: All expenditures that were reviewed appeared allowable. There were no unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate financial account for the nonprofit school food service and net cash resources do not exceed three operating months. The Paid Lunch Equity tool was not completed because the SFA had a positive balance and was not required to complete the tool. The Non-Program Revenue (NPR) tool was completed. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs.
School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach consists of encouraging students when they come through the door to go for breakfast, flyers being posted, the breakfast menu being posted on the district's website and via information during announcements. Summer Food Service Program (SFSP) outreach included Information letters being sent home with students which included a summer breakfast/lunch menu. An article was printed in the local newspaper about the SFSP and the district website also has information about the Summer Food Service Program.
Verification: The Verifying Official participated in the Verification webinar in September. 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 selected for verification was confirmed prior to verification. The verification report was completed on time.
Wellness Policy: The SFA's wellness policy was reviewed and revised on October 2, 2019 per committee minutes. The public is made aware of the SFA's wellness policy via a letter of invitation and an announcement in the Eagle Grove Eagle newspaper. The wellness policy is posted on the Eagle Grove School webpage with a link on the home page. The following individuals are involved in reviewing and updating the LWP: Superintendent, principals, teachers, school nurses, food service directors, community leaders, health service providers, parents, student, government officials, and local citizens. The SFA completed an assessment of their wellness policy on May 4, 2020. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.

Site - Level Commendations Eagle Grove Elementary (0418)

Description
Food Safety: The SFA has a district-wide written Food Safety plan that includes all required elements. Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Food temperatures and the dishwasher rinse temperatures are taken and documented. Angie O'Donnell and Julie Hinz are ServSafe Certified.
Fresh Fruit & Vegetable Program (FFVP): The FFVP is available to all enrolled children in the elementary school building. A nice variety of fresh produce items are offered each month. Limited dollars are allocated to labor and administrative costs, allowing the majority of the funds to be utilized for the fresh produce provided. Cost documentation was available to validate the March 2020 claim. The school has good procedures in place for the safe preparation and distribution of the FFVP snack.
Meal Components and Quantities: The Food Service Director does a god job of menu planning. The menus met weekly and daily meal pattern component requirements for the K-4th graders. CN labels and Manufacturer's Statements, as well as nutrition facts labels used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month. At least two types of milk are offered.
Meal Counting and Claiming: Meal count totals for the month of March appeared to be accurate and complete. Point of Service (POS) counts and filed claims appear accurate. Infinite Campus is used as the school's POS system. Food Production Records (FPRs) were on file for all meals claimed for reimbursement for the review period. Cashiers are trained on what constitutes a reimbursable meal. Edit checks are performed.
Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of March 9-13, 2020 for breakfast and lunch at the Elementary School. The worksheets showed that all meal components were offered. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Elementary school is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen or fresh vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats. A nutrient analysis was not required.

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Offer vs. Serve: Seven cafeteria staff had offer vs. serve training in school year 2019-2020.

Smart Snacks: Students are able to purchase foods via a la carte sales and vending machines at the middle and high school. Foods sold meet the Smart Snack standards for nutrition content. Exempt leftover National School Lunch Program entrees are only sold the same day, or the day after, they are initially offered. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.