

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Youth Shelter Care Nci (23138602)
Review Dates: October 8-10, 2019

Program Year: 2020
Month of Review: September
Lead Reviewer: Deb Linderblood
Org Representative(s): Patricia Cirks

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Site - Level Findings: Youth Shelter Care Nci (8602)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA does not have breakfast signage explaining what constitutes a reimbursable breakfast. The SA breakfast template is hung on the wall but is not filled out with the daily menu and does not inform students how many items each food components counts as.	Complete and attach 5 days' worth of breakfast signage.	
400 - Meal Components and Quantities - Lunch	V-0400	SFA has a planned cycle menu, but for the week of review the menu was not followed. Review of what was actually served showed that the meal pattern was not being met for lunch. On 9/7/19 the SFA did not have crediting information for the vegetable soup that was served and thus did not have a vegetable on that day for all grade groups. On 9/4/19 the SFA did not offer a grain for all grade groups. For the week, the SFA did not offer any dark green vegetable or any legumes. A review of all of September's food production records showed that substituting foods for the planned foods was a systemic issue and resulted in the meal pattern not being followed. TA provided which included: review of the meal pattern (discussed vegetable sub-groups and provided handout of vegetables in each group) and provided a copy of the meal pattern for 7 day menus, discussed the meal pattern differences for K-8 vs. 9-12 residents. Informed the RCCI that if having different portions sizes for the different age groups causes behavioral issues the SFA can request a waiver from the Bureau Chief to offer the 9-12 portion sizes to all residents. TA provided that if substitutions are made the meal pattern still must be met. Discussed that for all combination items the SFA must have a "CN" label or a Product Formulation Statement to show the crediting of these items so that they are able to determine if they are	SFA needs to review their current cycle menu and revise so that foods are planned that meet the meal pattern, the SFA can prepare and that has crediting information and recipes that have the contributions available. Once revised and all documents are obtained, the SFA needs to begin to use these cycle menus. SFA also needs to select one week from the cycle menu and complete and attach lunch menu certification worksheets for this week showing that the meal pattern is met. A different week should be used than was used to complete the menu certification worksheets for the review and a different week than is being used for the nutrient analysis. Also attach CN labels, Product Formulation Statements, recipes and Food Production Records that correspond with the week selected. In addition, nutrition fact labels will need to be attached for the grains. The SFA will also need to provide the State Agency with documents needed for completing a Nutrient Analysis for breakfast and lunch. A list was provided while on-site. Additional information may be needed. The review will remain open until the nutrient analysis is complete. Lastly, state your intentions to send at least one individual to the State Agency's Healthy School Meals short course next summer.	

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		meeting the meal pattern requirements. TA provided that there will be some foods which are purchased at the Food Bank that will not be able to be used at lunch if there is no crediting information available. Recommended that these food items be used at supper. Provided a link to USDA recipes that are for 6 servings and have the meal contributions. Also reviewed the Bread/Grain chart and how to use as well as showed the SFA the Food Buying Guide and how to search for foods. Provided the SFA with the State Agency prototype Food Production Records in hard copy and electronically. Due to missing components, missing vegetable sub-groups and other menu errors a nutrient analysis will be conducted for breakfast and lunch. Assisted the SFA with modifying their planned lunch cycle menu to meet the meal pattern, obtain standardized recipes and provided a list of nutrition fact labels that will be needed in order to complete a nutrient analysis. The SFA's .07 cent performance reimbursement will be shut off starting in October until the SFA can show compliance with the meal pattern.		
1400 - Food Safety	V-1400	The most recent food safety inspection (DIA license) is not posted in a publicly visible location.	State your intentions to post the most recent food safety inspection (DIA license) in a publicly visible location.	
1700 - Afterschool Snack	V-1700	Review of After School Program Snack Program (ASCP) production records showed that the SFA was short on the quantity served for several items. For example only 2 pecan cookies (30 grams) were served and they should have served 5. Also, only 1 granola bar (35 grams) was served and should have been 2. TA provided on the snack meal pattern and reviewed grain chart. Provided the SFA with the ASCP guidance manual. TA provided that the SFA should use the food production record that comes with the ASCP guidance manual. Also discussed that students cannot decline one of the two snack items offered.	Complete and attach one week's worth of After School Snack Program production records showing that the meal pattern was met. Attach nutrition labels for grain products showing the weight of the serving.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	The SFA has specific wellness goals on their Building Progress Report however the goals are not stated in the Wellness Policy. A sample Wellness Policy with goals was provided to the Authorized Representative.	Develop and attach a Wellness policy that has specific goals identified within the policy for Nutrition Education and Promotion, Physical Education and Physical Activity and Other School Based Activities.	
1200 -	V-1200	The hiring standards were not met when the new	Complete and attach a new Food Service Director	

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Professional Standards		Food Service Director was hired. New director has limited food service experience.	Training Plan. List all currently completed training and training that is planned.	
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Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		<p>Procurement:</p> <ul style="list-style-type: none"> • The written code of conduct should identify the specific board policies that make a reference to ethics, gifts, suspension and dismissal action. Write in the policy numbers and titles on the school food service code of conduct that would apply to officers and employees who violate procurement procedures. • Referred the SFA to the state-prototype small purchase templates posted on IA_CNP. Explained that the SFA could use the matrix to document prices from three different vendors, select the lowest price vendor and then purchase those products from that vendor for the duration of the year. At the beginning of each year, the SFA would need to compare prices again and select the lowest price vendor for the subsequent school year. • 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 using the small purchase method (for example: 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 RCCI 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). • Food service director or designated individual should check the items they plan to purchase to ensure Buy American provisions are met. A log should be maintained when a non-domestic agricultural commodity is accepted. Referred the SFA to the State Agency prototype exception log and reviewed how to use. <p>* TA provided that if you have a receipt and the description of what was purchased is not clear we recommend that you either write a note beside the product giving a brief description or attach a grocery list to the receipt which lists the items purchased. For example, on the Wal-Mart receipt on 12/31/18 GV 33G DS UN was purchased. I do not know what this would be so putting a description beside this or attaching a grocery list would clarify.</p>

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800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	TA provided that the USDA nondiscrimination statement should be on nutrition program materials. Provided a copy of the current USDA nondiscrimination statement.
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 or residents wish to file a complaint about any child nutrition program is: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	TA provided that the racial/ethnic form should have the ethnic identities recorded and the racial identities. The total of each of these should be the same. SFA should keep the racial/ethnic form on file for 3 years plus the current year and make available during Administrative Reviews.
1200 - Professional Standards	1203 a. Did the new School Nutrition Program Director complete food safety training within 30 days of being hired?	TA provided that if a new Food Service Director is hired they must complete at least 8 hours of food safety training either not more than 5 years prior to their start date or complete within 30 days of the employee's hire date.
1200 - Professional Standards	1208 Is the SFA tracking training hours on an annual basis?	TA provided that the training tracker form should have the title of the course, date taken, number of hours, type of training and the training category. E-mailed the Authorized Representative Iowa's training tracker tool.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	TA provided that if the RCCI has a discharge packet, information about the Summer Food Service Program could be put into this packet so that all residents leaving the facility know about the program.

Site - Level Technical Assistance Youth Shelter Care Nci (8602)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	322 a. Were there any days when the free, reduced price or paid meal counts exceeded the number of free, reduced price, or paid eligible students?	TA provided that on their meal count spreadsheet the SFA should have a breakfast, lunch and snack column for recording meal/snack counts and then 3 columns to record the number of enrolled residents at breakfast, lunch and snack. The SFA can then make sure they are not claiming more meals/snacks than there are enrolled residents.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	TA provided that the SFA must have signage at lunch which explains to residents what constitutes a reimbursable lunch. SA provided the SFA with several "Build A Healthy Lunch" posters.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Prior to meal service a meal tray was made up with all components except the milk. TA provided that with Offer vs. Serve the residents must be allowed to decline items being placed on their tray. Also discussed that each resident must select at least 1/2 cup of fruit or vegetable along with two other components.

Org - Level Commendations

Description

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After School Care Program: Counts the day of observation were reasonable when compared to test month counts. The SFA is maintaining production records and conducting on-site monitoring within the first 4 weeks of school and one other time during the year. There are enrichment activities attached to the snack. The And Justice for All poster was visible at the location of the snack.
Certification and Benefit Issuance: Each resident that is admitted to the RCCI is listed on a roster which includes the resident's entrance and exit date, as well as their race and ethnicity. With this information the SFA completes the racial/ethnic form as required.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria, annual civil rights training was provided to all staff and documented. No discrimination was observed.
Fiscal Action: Fiscal Action appears to be below the USDA allowed disregard for this review so no claim adjustments for September seem to be needed.
Food Safety: The SFA has a written Food Safety plan that was effective 9/18/19. Temperature logs are maintained for the freezer and refrigerators. Food temperatures are documented on the food production record. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. The Cook practiced good gloving procedures. The Food Service Director and Cook are ServeSafe Certified:
Meal Components and Quantities: All meal components were available at the beginning of meal service on the days of observation and throughout meal service at breakfast and lunch. All meals observed met at least the minimum daily requirements. Some low fat and low sodium food items were observed in storage. Residents had sufficient time to eat after receiving meals.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts for breakfast and for lunch. Meal count totals for the month of September were accurate and complete. Filed claims appear accurate. Food Production Records (FPRs) were on file for all meals claimed for reimbursement for the review period.
Nutritional Quality of School Meals: The Cook completed the USDA menu worksheets for the week of 9/2/19 to 9/8/19 for breakfast and lunch. The Dietary Specifications Assessment tool was completed for breakfast and lunch which indicated that the RCCI 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, controlling the portion sizes of condiments, and draining fat from browned meats.
Offer vs. Serve: All students observed selected 1/2 cup of fruit and/or vegetable. The cook has had some training on Offer vs. Serve.
Procurement: 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 and accepting items of monetary value, disciplinary actions, and checks and balances. The Authorized Representative attended the State Agency Regional Procurement Training in Dakota City.
Professional Standards: All nutrition staff met the required training for Professional Standards in school year 2018-2019 and the SFA has a training plan for school year 2019-2020. An organized annual Training Spreadsheet is maintained for each individual showing at a glance their training and annual hours.
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 Non-Program Revenue (NPR) tool was completed via the Financial Report however the SFA does not take in any non-program revenue. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for USDA Foods. In school year 2018-2019 the SFA utilized 196.59% of their allotted PAL dollars through utilizing the Direct Distribution Program. The SFA is on track to use their allotted PAL dollars in school year 2019-2020.
School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach was conducted by putting up a poster encouraging residents to participate in breakfast. Summer Food Service Program (SFSP) outreach was done by putting information on the facilities face book page.
Smart Snacks: Students are not able to purchase foods via a la carte sales, vending machines, or any other avenue so no Smart Snack regulations were reviewed.
Verification: The RCCI does not conduct verification as they do not have any day students. They did complete the verification report accurately and on time.
Water: Free potable water is available to all students for lunch and for breakfast via a water pitcher set out with glasses.
Wellness Policy: The SFA's wellness policy was reviewed and revised on May 28, 2019. The public is made aware of the SFA's wellness policy and assessments via it being posted in the facility waiting room. The following individuals are involved in reviewing and updating the Local Wellness Policy: SFA staff, the YSC management team, the YSC Executive Director and the YSC Board of Directors. An assessment of the policy is completed by staff, teachers and youth. The SFA completed an assessment of their wellness policy on 9/25/19.