

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Mental Health Institute-Independence (31058000)**  
**Date of Review: May 12<sup>th</sup> – June 15<sup>th</sup>, 2020**

**Program Year:** 2020  
**Month of Review:** March  
**Lead Reviewer:** Donna Matlock  
**Org Representative(s):** Corrine Corkery

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	<p>Per 2 CFR 200.323(d) Cost plus percentage of cost must not be used. The Prime Vendor contract is a cost plus percentage of cost contract. This is the fifth and final renewal year for the Prime Vendor.</p> <p>Per USDA memo SP 04-2018 <i>Market Basket Analysis when Procuring Goods and Modifying Contracted-for Product Lists</i> issued on January 17, 2018, market basket analysis evaluation and scoring for contract award is allowed when using an established, “representative sample” of goods. USDA recommends that the “representative sample” have an aggregate value of 75% or more of the estimated value of the contract to be awarded.</p>	State what type of contract award (fixed price or cost reimbursable) will be issued and how the contract will be evaluated to meet USDA requirements.	

**Site - Level Findings: Cromwell Children’s Unit (8601)**

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Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		<p>PROCUREMENT TECHNICAL ASSISTANCE:</p> <p>Repair and maintenance to kitchen equipment, if possible, should be accounted for on the annual Procurement Plan.</p> <p>Purchase of supplies and small equipment such as mops, pitchers and test strips, purchased from vendors other than the Master Agreements negotiated through DAS should be recorded in the annual school food service procurement plan if school nutrition funds will be used to make these purchases.</p> <p>As a reminder, all records must be retained by the DAS-CPB and the operating facility for a period of three (3) years after submission of the final claim for reimbursement for the fiscal year (July 1, 20XX- June 30, 20XX) when purchases are made using school nutrition funds. If an audit is not resolved, records shall be retained beyond the 3-year period as long as required for the resolution of issues identified by the audit. (7 CFR 210.23(c)).</p> <p>For facilities operating school nutrition programs, the following federal terms and conditions must be included in solicitation documents and contracts:</p>

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		<p><b>Buy American Provisions (7 CFR 210.21(d)):</b> As per NSLP regulations, all entities participating in the school meal programs require compliance with Buy American provisions, to the maximum extent practicable. The Buy American statement must be included in all solicitation and contracts for school meal programs. Further, there should be language for vendors to provide a domestic alternative prior to the facilities accepting a non-domestic product. It is the responsibility of the facility operating the school meals program to document an exception to Buy American. We are aware of the challenge to meet this requirement by state-operated facilities.</p> <p><b>Appendix II to 2 CFR 200</b></p> <p>Termination for Cause and for Convenience (<b>contracts in excess of \$10,000</b>): The solicitation includes a number of reasons for termination of contract for cause. A termination for convenience is required for contracts where federal funds are used such as in school nutrition programs.</p> <p>Equal Employment Opportunity (<b>contracts in excess of \$10,000</b>)</p> <p>Contract Work Hours and Safety Standards (<b>contracts in excess of \$100,000</b>)</p> <p>Byrd Anti-Lobbying Amendment (<b>contracts in excess of \$100,000</b>)</p> <p>Clean Air Act and the Federal Water Pollution Control Act (<b>contracts in excess of \$150,000</b>)</p> <p>Energy Policy and Conservation Act</p>
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1000 - Local School Wellness Policy	1005 <i>Provide a copy of the most recent assessment on the implementation of the local school wellness policy.</i>	<p>The most recent assessment of the LWP (Local Wellness Policy) was not submitted.</p> <p>The RCCI must plan on how it will conduct an assessment on the implementation of the LWP (Local Wellness Policy) goals by June 30, 2020. Due to COVID-19 this requirement has been extended to June 30, 2021. <i>Once completed the assessment must be made available to the public.</i></p> <p>The SFA must assess the policy goals to demonstrate compliance with FNS requirements. USDA requires SFA's to review the policy and conduct an assessment every three (3) years to be compliant.</p> <p>The "School Wellness Policy Progress Report" or assessment, along with a sample action plan can be found at this link: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/school-wellness">https://www.educateiowa.gov/pk-12/nutrition-programs/school-wellness</a>.</p>
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**Site - Level Technical Assistance Cromwell Children's Unit (8601)**

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	<p>SA and FSD observed that two students did not take all the items from all components but the meal was reimbursable. The RCCI has been approved by the SA an exemption from OVS to offer "serve only." The FSD was initially informed by serving staff that students were taking all components and FSD observed during onsite monitoring that all components are taken.</p> <p>SA and FSD discussed options if they choose to switch</p>

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		to OVS for breakfast in the future. This will allow the students to take food and beverage items they know they will eat which will decrease food waste.
600 - Dietary Specifications and Nutrient Analysis	603 Were any areas identified during the Off-site review requiring technical assistance or corrective action prior to the beginning of the On-site portion of the review?	<p>The following was offered as TA (Technical Assistance). SA and FSD walked through and revised breakfast and lunch certification worksheets to match cycle menu. SA uploaded revised worksheets to review attachments for FSD.</p> <p>SA and FSD discussed serving sizes for the After School Care Program (ASCP) as most are high school age and larger portions can be served so long as not to interfere with special dietary needs. Also what is considered extra foods once 2 components have been met.</p>

**Org - Level Commendations**

<b>Description</b>
<ul style="list-style-type: none"> <li>• All meal components were available at the beginning of meal service on the days of observation and throughout meal service. • All meals observed met at least the minimum daily requirements. • Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer’s Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption. • Menus included many homemade entrees, and standardized recipes are used for food production. • Free potable water is available to all students for lunch and breakfast.</li> </ul>
<ul style="list-style-type: none"> <li>• Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of March were accurate and complete. • Point of Service (POS) counts and filed claims appear accurate. • Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. • Cashiers are trained. • All students selected a reimbursable meal.</li> </ul>
<ul style="list-style-type: none"> <li>• The “And Justice for All” civil rights poster was posted in the cafeteria. • Annual civil rights training was provided to food service staff and documented.</li> <li>• The organization 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.</li> </ul>

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• The district has a current wellness policy on file. • The SFA’s wellness policy was reviewed and revised on 2/25/2020. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.

• The Food Service Director completed the USDA menu worksheets for March on breakfast and lunch at the Cromwell Children's Unit. The worksheets showed the serving portions and component contributions meeting the meal pattern. • The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Cromwell Children's Unit is at low risk for (non)compliance 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, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats.

• The Resource Management section of the Off-Site Assessment tool was completed on time. • Financial records that were reviewed, indicated appropriate and allowable expenditures. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. • 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. • No indirect costs are charged to the food service program. • Money is not transferred out of the account to support other programs. • The SFA effectively utilizes its USDA entitlement for commodities. • Reports are filed on time, and all records are maintained for at least three years plus the current year.

• The SFA has a written Food Safety plan that includes all required elements. A copy of the written plan was available at the site(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. • The latest Health Inspection Report was posted in a publicly visible location. • Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Good food safety procedures were observed. • FSD is very organized and training is done annually on SOP’s.

• The staff training agenda covered many important topics and shows a commitment to ensure food program compliance. • All nutrition staff have met required training for Professional Standards in SY 2019. • An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours. • The Food Service Director implements an organized training plan for all working in nutrition. • Creative training is provided, including individuals completing self-directed short lessons to webinars to in-person training.

**PROCUREMENT:** The Iowa Department of Administrative Services, Center for Purchasing Bureau (DAS-CPB) completes the procurement of Prime Vendor, Dairy, Bread Products, Disposal Paper Products for Breakroom and Kitchen, and Disposal Paper Products for state-operated facilities that participate in the school meal programs. DAS-CPB purchasing agent(s) responsible for developing, issuing, evaluating, and awarding new contracts or renewing contracts is very responsive to the Bureaus requests for all documentation and promptly responds to any questions. At the organization, both the authorized representative and food service director were prompt and responsive. They obtained answers or additional documentation as requested from DAS procurement agents. The food service director clearly identified contract monitoring and confirmed items are only purchased included in the specifications in Master Agreements. The solicitations (RFPs and RFBs) issued allow for full and open competition. Public notification of solicitations is posted on the Iowa Department of Administrative Services (DAS) Bid Opportunities website. The solicitation allows for vendor(s) to provide a brand name or “equal” item(s) (2 CFR 200.319) The solicitation is posted on the Targeted Small Business website for forty-eight (48) hours prior to opening it up for all vendors. This process meets the following federal requirements 2 CFR 200.321 Contracting with small and minority businesses, women’s

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business enterprises, and labor surplus area firms. The following federal terms and conditions per Appendix II to 2 CFR 200 are included in solicitations and contracts: Administrative, contractual, and legal requirements. Suspension and Debarment certification statement and non-collusion certification are included in solicitation and contract. Vendor protest procedures are included in solicitation and contracts, and State facilities terms and conditions are included in the solicitations and contracts. The SFA participates in Direct Distribution option for USDA Foods. In SY 18-19, the organization did an excellent job and utilized all the Planned Assistance Level (PAL) allocation. In fact, usage of USDA Foods exceeded the PAL. For SY19-20: maximized USDA Foods usage and exceeded the USDA Foods allocation. Purchases are made at the local grocery store for non-dairy beverages, gluten free items, and snacks. The food items purchased are for both the adult unit and student snacks. The food service director checks prices with two other local stores. Both stores do not generally stock the specialty items such as non-dairy beverages and gluten free items (for the adult unit) that she needs or requires. The food service director has found prices are lower at the local grocery store.