

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report**

Christian Home Association - Childrens Square USA (14768000)

SNP - Review ID: 6010

Program Year: 2020
Month of Review: December
Lead Reviewer: Brenda Windmuller
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
600 - Dietary Specifications and Nutrition Analysis	V-0600	Accurate production records are an important part to show documentation of compliance with the required meal pattern. They communicate to staff what they should be offering to students each day and serves as a record of what was served daily.	The SFA will submit lunch and breakfast production records for February 6-12 which demonstrates compliance with the meal pattern.	
600 - Dietary Specifications and Nutrition Analysis	V-0600	The SFA must keep on file for a period of three years plus the current year all CN labels or Product Formulation Statements as appropriate. None were available at the time of review.	The SFA will submit the CN label or product formulation statement for fish sticks, bean burritos, and hamburgers.	
600 - Dietary Specifications and Nutrition Analysis	V-0600	The SFA must use standardized recipes for any product in which they are combining two or more ingredients. Standardized recipes should include all of the components outlined in the TA.	The SFA will submit a standardized recipe for meat sauce (served with spaghetti) and hamburger pizza.	
700 - Resource Management	V-0700	Vendors identified as "small purchase" on the procurement plan were not procured using proper small purchase methods outlined by the USDA. These purchases exceeded the micro purchase threshold and require the SFA take bids.	The SFA will attend a procurement training and submit the date of the scheduled training and the deliver format (face-to face or online).	

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700 - Resource Management	V-0700	The SFA spent \$0 of the \$4620.66 allocated to them in USDA Foods (Commodities) in 2018/2019. Target spending of this money should be 95-100%.	The SFA will state their plan to spend the USDA funds in 2019/2020 and the steps that they are taking.	
1200 - Professional Standards	V-1200	All members of the staff who work with the NSLP and SBP must complete training as outlined in the TA annually. The SFA does not have a comprehensive list of staff members working with the program. The SFA has not recorded completed training beyond Civil Rights training.	The SFA will: 1. Submit the Training Tracker spreadsheet with the names and required training hours for each person. 2. Submit a written plan for all employees listed to complete the required training including training topics, hours, and estimated completion date.	
1400 - Food Safety	V-1400	The SFA is required to have a HACCP manual at each site which addresses food safety Standard Operating Procedures.	The SFA will 1. Submit SOP for handling blood borne pathogens. 2. Submit SOP on Body Fluid clean up. 3. Submit the table of contents for the newly created HACCP manual.	

Site - Level Findings: Friends and Family Cottage (8610)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Nelson Cottage (8611)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
300 - Meal Counting and Claiming		
600 - Dietary Specifications and Nutrition Analysis		CN LABELS: The SFA must maintain copies of CN labels or Product Formulation Statements for all products to document compliance with the meal pattern. This documentation should be kept on file for three years plus the current year.

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		<p>An example of a CN label and a Product Formulation Statement were sent to the SFA.</p>
<p>600 - Dietary Specifications and Nutrition Analysis</p>		<p>PRODUCTION RECORDS: Production records evaluated from the review period do not indicate that portion sizes offered met the minimum meal pattern requirements for the age/grade group(s) being served. Specifically, only 1/2 cup of fruit juice is recorded as being offered for fruit at breakfast. During the observation, a bowl of fresh fruit was also available for students.</p> <p>Production records do not show planned number of servings and staff does not document changes from the planned menu.</p> <p>Production Records are documentation of compliance with the meal pattern and should include: All food choices, food specifications, quantity prepared, serving size for each age group at the site, planned number of servings, quantity of leftovers, and total number of students and adults who ate and the age group. These records should be kept on file for three years plus the current year.</p> <p>If menu changes are made, they should be recorded on the production record.</p>
<p>600 - Dietary Specifications and Nutrition Analysis</p>		<p>STANDARDIZED RECIPES: Standardized recipes should be used for all menu items that combine two or more ingredients to ensure consistency and compliance with guidelines. Standardized recipes should include recipe name, yield, serving size, number of servings, mixing and cooking instructions, holding instructions, critical control points, and equipment needed for the recipe.</p> <p>The recipes provided for the AR did not include serving sizes, recipe yield, or any instructions. This is intended to provide documentation of compliance with meal pattern requirements. Serving sizes cannot be calculated without</p>

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		<p>yields and serving information.</p> <p>The SFA should follow standardized recipes for all cooking and it is recommended that they compile a recipe book. The SA shared resources on where to find standardized recipes.</p>
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>TA was given on what needs to be included in the small bid solicitation including terms and conditions.</p> <p>TA was given to review local procurement thresholds; the current formal threshold is \$4999.</p> <p>Milk- currently paying \$4.60 per gallon, seems high. No contract is in place for milk, as a micro purchase, the SFA is required to spread the purchases around.</p> <p>SFA has exceed the local policy micro purchase threshold of \$2000 (Hy-Vee, Prima Distribution, Sysco)</p> <p>No agreement is in place with Sysco, no bid solicitation was sent.</p> <p>Micro purchases must be equitably distributed.</p> <p>Discussed the possibility of joining a buying group.</p> <p>The SA will be hosting a procurement training workshop on March 10 and March 11, the SFA is encouraged to attend.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Agreements valued at \$10,000 or more should have a termination for cause clause.</p>

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		<p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p> <p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none"><input type="checkbox"/> All price adjustments throughout the year<input type="checkbox"/> All invoices<input type="checkbox"/> All contracts and agreements<input type="checkbox"/> All bids solicited<input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)<input type="checkbox"/> Documentation of why you selected a specific vendor (Selection Rubrics)<input type="checkbox"/> Copies of bid solicitation<input type="checkbox"/> Debarment statements<input type="checkbox"/> CD provided by the AEA (if applicable) <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.
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		<ul style="list-style-type: none"><input type="checkbox"/> Purchases should be distributed around community, not just one store.Small Purchases- Purchases that are under \$250,000 (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.<input type="checkbox"/> Include all terms and conditions<input type="checkbox"/> Include terms: Buy American and Equal Opportunity<input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more<input type="checkbox"/> Attain Signed Debarment Statements<input type="checkbox"/> Awarded on lowest price (unless written documentation to justify)<input type="checkbox"/> Maintain documentationFormal Purchase- Purchases equal to and exceeding \$250,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.<input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised.<input type="checkbox"/> Include all requirements of a small purchase<input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.<input type="checkbox"/> Everything must be in writing.
700 - Resource Management		The SFA Spent \$0 of the \$4620.66 in USDA (Commodities) money allocated to them in 2018-2019. The expectation is that the SFA utilize 95-100% of the allocated funds. The SA discussed the three options for spending and connected the SFA with the USDA Foods Consultant at the SA.

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1200 - Professional Standards	1203 a. Did the new School Nutrition Program Director complete food safety training within 30 days of being hired?	<p>ANNUAL TRAINING: The SFA was advised to maintain a spreadsheet with all staff, tracking training classes attended, date attended and length of time for each class. All Food Service staff and SFA employees working with the School Lunch Program are required to take Civil Rights annually. This includes program administrators and cottage employees. This is a repeat finding. Training hours should meet the following guidelines:</p> <p>Director- 12 hours annually</p> <p>Manager- 10 hours annually</p> <p>Full-Time Staff- 6 hours annually</p> <p>Part-time Staff- 4 hours annually</p>
1500 - Reporting and Recordkeeping		<p>The SFA notified the SA on December 16, 2019 that several cottages had been closed (including one selected for the review) in 2017 and three new cottages had been opened.</p> <p>The SA worked to make the necessary administrative changes by the January Administrative Review. All claiming and reporting should be done with accuracy. The SFA should contact the SA in a timely fashion with any changes to preserve the integrity of the program.</p> <p>Adjustments to the review sites selected were subsequently made.</p>

Site - Level Technical Assistance Friends and Family Cottage (8610)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	USDA regulation requires that the SFA offers at least two varieties of milk. Only 1% white was available to students.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Vegetable sub-group beans/legumes was not represented on the menu other than as an ingredient in a bean burrito. The SFA was not able to provide a recipe or CN label to support the appropriate quantity of beans served during the week of review.

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		Students must be offered ½ cup of beans/legumes each week.
500 - Offer versus Serve	502 Is there signage explaining what constitutes a reimbursable meal to students including the requirement to select at least 1/2 cup fruit or vegetable?	The SA reviewed the meal pattern and Offer vs Serve with SFA staff. All students must have three items, one of which must be 1/2 cup fruit at breakfast to make a reimbursable meal. When pouring milk, each student should receive the entire 8 oz cup. The daily menu should be posted for the students to see. The SA provided posters to the SFA.
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	Items in the freezer and cooler at Friends & Family were observed with no label or date. A bag of breaded chicken was ripped open in the freezer. The SFA should wrap the open bag. Meat in the freezer was stored above ready to eat items. No HACCP manual was in the building. This is a repeat finding. The SFA provided resources to start a HACCP manual.
Dietary Specifications Assessment Tool - Breakfast	25 Larger portions and/or bonus items and/or seconds are offered (offering portion sizes that are inconsistent with the planned menu). Entrées sold a la carte are exempt.	Meal serving sizes should be consistent with planned meal serving sizes. Students should not be given extra foods other than fruits and vegetables. The SFA indicated on the self-reporting that sometimes larger portions are given. The SA observed larger portions (heaping cups of cereal and extra milk) during the on-site review. This causes inconsistencies from the planned menu which calculates nutrition, calories, sodium, and fat.

Site - Level Technical Assistance Nelson Cottage (8611)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	Nelson Cottage: Initially the SFA was serving 1/2 cup of fruit juice with no other fruit option available. The SFA is required to offer 1 cup of fruit/fruit juice, all students must take at least 1/2 cup. One student was observed refusing the fruit component, therefore must be recorded as a non-reimbursable meal. The SFA got some fruit out of the refrigerator to add to the menu selections.
400 - Meal Components and Quantities - Breakfast	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	The SFA currently does not have students requiring milk substitutions. They reported that they have in the past and provide almond milk for those students. The SA provided

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		TA that all milk substitutions must have equal nutritional value as cow's milk. The SA provided a handout with additional information.
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	Nelson Cottage did not have the "And Justice For All" poster displayed in the cottage. A copy was provided by the SA. The newest version has been printed and will be distributed very soon. The SFA should replace all Civil Rights posters with the newest version as soon as they are received.

Org - Level Commendations

Description
CIVIL RIGHTS COMPLIANCE (800): No discrimination was observed. The "And Justice for All" poster is visible to program participants at Friends and Family Cottage.
ACCESS AND REIMBURSEMENT (100): Benefit documents, as well as all paperwork, were well organized. Information is kept confidential.
MEAL COUNTING & CLAIMING: 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.
On-site Monitoring (900): 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 SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases. Proper documentation is on file for the vended meals agreement and bid solicitation. The SFA properly assessed each bid to determine the lowest bid. 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 had one person attend the Regional Procurement Training.
SMART SNACKS (1100): The SFA does not allow students the option to purchase a la care items. There are no vending machines present.
The SFA has partnered with the local public school district for vending meals at lunch in the Academic Center and walking to one of the SFSP sites in the summer. Errors fell below the \$600 disregard, no fiscal action is expected at this time.
WELLNESS POLICY (1000): The wellness policy has been updated within the past three years. The policy has nutrition education, physical activity and other wellness goals included. The SFA takes a unique approach to the wellness initiatives by imbedding it into the way they live on campus. Staff members routinely gather to discuss strategies for success. Goals are set for individual students as well as the RCCL as a whole. Assessments are likewise completed for individual students.

Site - Level Commendations Friends and Family Cottage (8610)

Description
Staff in Friends & Family Cottage do a good job of orchestrating multiple schedules. Students are polite and follow the rules laid out to them. Students are provided with several breakfast options including fresh whole fruit. All meals served were reimbursable.

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Site - Level Commendations Nelson Cottage (8611)

Description
Staff in Nelson Cottage were observed using good handwashing and glove use. The space was clean and orderly. Students are given several choices and have access to all required meal components. Staff and students interact in a respectful manner.