

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Clarinda Academy (11978601)
SNP - Review ID: 6023

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

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> <p>The current solicitation does not show all the items a facility can purchase rather it shows when a new solicitation is issued.</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.	

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700 - Resource Management	V-0700	The facility did not utilize any of their Planned Assistance Level (PAL) for USDA Foods for SY 2018-2019 or SY 2019-2020. Per conversation with USDA Foods consultant, the facility has not utilized PAL for many years. USDA Foods consultant has been in conversation with the FSD. The Bureau of Nutrition and Health Services expectation is an entity utilize 85% PAL each year. USDA Foods consultant was told that the residential facility has an agreement with the correctional facility. This agreement appears to be a vended meal agreement.	State your plan, in consultation with USDA Foods consultant, on maximizing utilization of USDA Foods.	
1000 - Local School Wellness Policy	V-1000	The SFA is required to complete a wellness assessment at least once every three years. No assessment was submitted.	The SFA will submit a date of when they plan to complete the assessment.	
1200 - Professional Standards	V-1200	The SFA is required to have all employees working with the School Nutrition Programs complete training annually in compliance with the guidelines laid out in the TA.	The SFA will submit a plan on how they intend to complete and track Professional Development hours going forward.	

Site - Level Findings: Clarinda Academy (8601)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1700 - Afterschool Snack	V-1700	The SFA is required to complete on-site monitoring of the Afterschool Snack Program twice per school year. The first must be within the first four weeks of operation.	The SFA will submit a completed on-site monitoring form and state when the monitoring will be completed during the 2020-2021 school year.	

Org - Level Technical Assistance

Area	Question	Comments
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Iowa Department of Education
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State Review Summary Report
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700 - Resource Management		<p>USDA FOODS: SFA is currently not utilizing USDA Foods (commodities) spending \$0 of their funds in 2018-2019. This program is in place to help off-set some of the expenses associated with the School Lunch Program. The SFA should have a conversation with the SA's USDA Foods Consultant on the best approach.</p>
700 - Resource Management		<p>Procurement: Records must be retained by the DAS-CPB and the operating facility for a period of three (3) years after the submission of the final claim for reimbursement for the fiscal year (July 1, 20XX- June 30, 20XX). If an audit is not resolved, the records shall be retained beyond the 3-year period as long as required for the resolution of the 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> <p>Buy American Provisions (7 CFR 210.21(d)): 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>Appendix II to 2 CFR 200</p> <p>Termination for Cause and for Convenience (contracts in excess of \$10,000): 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>

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		<p>Equal Employment Opportunity (contracts in excess of \$10,000)</p> <p>Contract Work Hours and Safety Standards (contracts in excess of \$100,000)</p> <p>Byrd Anti-Lobbying Amendment (contracts in excess of \$100,000)</p> <p>Clean Air Act and the Federal Water Pollution Control Act (contracts in excess of \$150,000)</p> <p>Energy Policy and Conservation Act.</p> <p>The SFA has an obligation to monitoring the contract with the Department of Corrections.</p>
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?	No wellness assessment was provided. The wellness policy and assessment must be reviewed at a minimum once every three years. Both must be made available to the public. The SA provided a copy of the final rule and assessment template.
1200 - Professional Standards		<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. The SA provided a template. All Food Service staff and SFA employees working with the School Lunch Program are required to take Civil Rights annually. The FSD must have 8 hours of food safety training every 5 years. 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>
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The SFA should have a blood borne pathogens and a body fluid clean up standard operating procedure in the HACCP manual. This policy may be in the binder, but was not clear

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		by the table of contents. The table of contents should provide a clear direction and page number to each policy so that staff members can find policies quickly.
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Site - Level Technical Assistance Clarinda Academy (8601)

Area	Question	Comments
1700 - Afterschool Snack	1707 a. Has the program been monitored within the first 4 weeks of operation each year?	<p>AFTERSCHOOL SNACK PROGRAM: All documentation for the Afterschool Snack Program must be maintained for a period of 3 years plus the current year to include: participant counts, menus, production records, on site monitoring, and claim information.</p> <p>On site monitoring must be completed within the first 4 weeks of operating the program each year and a second time during the year. The program must include educational or enrichment activities. The SFA must follow the prescribed meal pattern. Production records must be maintained daily. The “And Justice for All” poster must be present in the location that the snacks are served. And counting must be done at the point of service after staff have verified that the student has a reimbursable snack.</p> <p>The SA provided the FSD with a copy of the Afterschool Snack Program handbook.</p>
Dietary Specifications Assessment Tool - Lunch	24 Students are offered salt:	Access to salt should be minimal and should never be put on a condiment table. The SFA must purchase low sodium products to help in lowering the overall amount of sodium in the student's diet. The SFA should look for alternative sodium free seasonings to flavor food. Breakfast should not have more than 500mg of sodium and lunch should not have more than 740mg of sodium per meal.

Org - Level Commendations

Description
REPORTING AND RECORD KEEPING (1500): Reports are filed on time, and all records are maintained for at least three years plus the current year.

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LOCAL SCHOOL 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.
MEAL COUNTING & CLAIMING: Meal counts during the review month appeared accurate and complete.
Procurement: The Iowa Department of Administrative Services, Center for Purchasing Bureau (DAS-CPB) completes the procurement of Prime Vendor, Dairy, and Bread Products for state-operated facilities that participate in the school meal programs. DAS-CPB purchasing agent 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. The purchasing agent has met with the bureau chief and procurement consultant at least twice to discuss changes required to RFP/RFB to meet school meal procurement regulations. The solicitation 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 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. State facilities terms and conditions are included in the solicitations and contracts.
RESOURCE MANAGEMENT & RECORD KEEPING (700): The Resource Management section of the Off-Site Assessment tool was completed on time. The SFA has several checks and balances in place for monitoring. No fiscal action is anticipated as a result of the Administrative Review.

Site - Level Commendations Clarinda Academy (8601)

Description
Afterschool Snack Program: The SFA does a good job of administering the Afterschool Snack Program. Records indicate meal pattern compliance and consistent attendance.
HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes most required elements. Temperature logs are maintained for food and equipment.
MEAL PATTERN: Menus for the month of review contained all required components in the appropriate quantity.