

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
YOUTH & SHELTER SERVICES (02258000)
Dates of Review: January 28 – 31, 2020

Program Year: 2020
Month of Review: December
Lead Reviewer: Deb Linderblood
Org Representative(s): Anna Andrews

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	The SFA's Verification Collection Report was not completed accurately. Day student applications approved via a case number being submitted and applications approved based on household size and income were not reported on the Verification Collection Report. There is also a zero for number of applications verified and the SFA needed to verify one household. TA provided on how to accurately complete the Verification Collection Report. Discussed that each fall the State Agency presents a Verification Reporting webinar that is recorded and posted on the Bureau's web site under Nutrition, School Meals, and then under Income Eligibility and Verification.	Revise and attach the SFA's corrected Verification Report for school year 2019-2020 showing the number of household applications approved via a case number being submitted and applications submitted based on household size and income. Also report the number of applications that were verified and the results of verification. Lastly, state your intentions to have the Verifying Official listen to the Verification Reporting webinar that is presented each fall and is also recorded.	
200 - Verification	V-0200	The SFA did not complete verification for school year 2019-2020. TA provided on how to complete the verification process. Explained that 3% of their applications must be verified and should be selected from error prone applications, if applicable. If there are no error prone applications then the SFA should randomly select from all applications. Discussed that the application selected for verification must be confirmed by someone other than the Determining Official prior to informing the household that they have been selected for verification. The Confirming Official should then sign the bottom of the application. Referred the SFA to the State Agency prototype selection letter on IowaCNP under download forms. This letter gets sent to the household selected for verification. Also explained that the SFA should try to find the student selected for verification on Elookup prior to informing the household that they had been selected for verification. If the	Attach a copy of the Verification selection letter requesting that the household selected for verification submit documentation supporting the information on the free and reduced price application. Also, state your intentions to have the Verifying Official participate in the Verification Webinar that is presented each fall and is also recorded.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
YOUTH & SHELTER SERVICES (02258000)
Dates of Review: January 28 – 31, 2020

		student is found on Elookup the household is directly verified and a selection letter does not need to be sent. TA also provided that one follow-up attempt must be made if the household does not respond to the initial request for documentation. The application should be signed and dated when the follow-up is completed. Discussed that each fall the State Agency presents a Verification webinar that is recorded and posted on the Bureau's web site under Nutrition, School Meals, and then under Income Eligibility and Verification.		
300 - Meal Counting and Claiming	V-0300	Fiscal Action: Due to the SFA not claiming resident meals on weekends and days in which residents did not attend school an under claim was determined. The SFA has been directed to revise their claims. The State Agency will validate the revised claims and once validated as being corrected will process the revised claims.	The corrective action required is under the site findings under Meal Counting and Claiming. No corrective action needed here.	
300 - Meal Counting and Claiming	V-0300	The SFA has not been completing an Edit Check Report at the end of each month prior to submitting their claim. TA provided on completing the form and that the form is available on IowaCNP under download forms.	Complete and attach an Edit Check Report for the month of January 2020 for FLYS Residential and Youth Shelter.	
700 - Resource Management	V-0700	The SFA has not completed the Financial Report on IowaCNP for 2018-2019. It was also not completed in prior years and is a repeat finding. The report is due each year by September 30th. Provided the Authorized Representative instructions on how to complete the report and suggested they call Patty Harding if assistance is needed.	Complete and attach the 2018-2019 Financial Report. State your intentions to complete this report each year prior to September 30th.	
800 - Civil Rights	V-0800	Numerous staff who interact with program participants have not had Civil Rights training in school year 2019-2020. Provided the SFA with a list of staff who still need training.	Begin to train staff who have not yet had Civil Rights training in school year 2019-2020. Attach a document showing the names of staff who have had the training since January 28, 2020 and the date of their training. On the sign-in sheet staff should print and sign their name indicating that they have had the training. State you plan for making sure all staff who interact with program participants will have civil rights training prior to June 30, 2020.	
900 - SFA On Site Monitoring	V-0900	As of 1/30/20 the SFA has not completed on-site monitoring of breakfast or lunch. This was also not completed in school year 2018-2019. TA provided that the monitoring is due each year by February 1st for 100% of their sites for lunch and 50% of their sites for breakfast. The on-site monitoring form is available on IowaCNP under download forms.	Compete and attach the on-site monitoring form for FLYS Residential for lunch and breakfast.	
1000 - Local School Wellness	V-1000	The SFA currently does not have a Wellness Committee, has not completed the annual	State the following: 1.) Your intentions to include parents and residents as members of your wellness	

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

YOUTH & SHELTER SERVICES (02258000)

Dates of Review: January 28 – 31, 2020

Policy		building progress reports and has not completed a triennial assessment. TA provided that the SFA should listen to the Wellness Policy Triennial Report webinar that was e-mailed to them. Also discussed that parents and residents should be invited to participate on the Wellness Committee. Provided the SFA with a sample RCCI Wellness policy, building progress report and the triennial assessment template. The building progress reports need to be completed annually. A triennial assessment must be completed by June 30, 2020. The Wellness policy, building progress reports and the triennial assessment need to be made available to residents and their parents. Discussed that these documents could be located on the SFA's website. Also provided the SFA with following handouts: 1.) Does your policy measure up? 2.) Summary of rule 3.) Building Progress Report 4.) Triennial assessment form.	committee. 2.) By when you will complete the Building Progress report at each of your six sites. 3.) By when you will complete the Triennial Assessment. 4.) How you will make the Wellness policy, progress reports and triennial assessment available to residents and parents.	
1200 - Professional Standards	V-1200	The SFA currently does not have anyone that has the title of Food Service Director. They have two individuals who are managers. TA provided that the SFA needs to have an individual who is their Food Service Director. This individual would need to complete 12 hours of training per school year.	Describe the process you will go through to designate or hire someone to be the Food Service Director for Youth and Shelter Services.	
1200 - Professional Standards	V-1200	A limited amount of training has been completed by food service staff and staff who have duties related to the nutrition program. TA provided that the Food Service Director needs 12 hours of training, managers 10 hours, full time staff 6 hours, part time staff 4 hours and staff who occasionally assist with serving food on weekends and holidays need training relevant to their duties. The SFA has not been tracking training and does not have an individual who is designated to be responsible for tracking training. TA proved that there is a tracking tool on the Bureau website at https://educateiowa.gov/pk-12/nutrition-programs/school-meals/professional-standards-school-nutrition . TA also provided on where to find webinars, web-casts and tutorials on the Bureau's web site that can be used for training. Also, informed the SFA that the fourth Monday of each month the Bureau has a "News To Know" webinar that covers a variety of topics.	Indicate who will have the responsibility of tracking staff training for nutrition staff, determining official and staff with responsibilities related to the nutrition program. Complete and attach a training tracker document showing training that has been completed so far in school year 2019-2020. Also attach a plan for training the SFA plans to complete yet this school year for the Director, Manager(s), full-time staff, part-time staff and staff with duties related to the nutrition program.	

Site - Level Findings: FLYS Residential (8873)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and	V-0300	The SFA was not claiming breakfast or lunch meals on weekends and days when	Attach the revised breakfast and lunch meal tracking spreadsheets for FLYS Residential and Youth Shelter	

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

YOUTH & SHELTER SERVICES (02258000)

Dates of Review: January 28 – 31, 2020

Claiming - Breakfast		residents were not in school for FLYS Residential and Youth Shelter. TA provided that as an RCCI they can claim breakfast and lunch every day of the year. Instructed the SFA to use the meal count rosters (which have which residents ate each day of the month) and update their meal count spreadsheets to include weekends and days when residents did not have school and then to revise their claims going back to July of 2019. The State Agency has reached out to the Authorized Representative to determine if the SFA's Ames sites are claiming meals on holidays and days in when residents are not in school.	showing that they include meals eaten by residents on weekends and days that they did not have school for July through December 2019. Revise your July through December 2019 claims.	
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA does not have breakfast signage explaining to residents what constitutes a reimbursable breakfast. TA provided on where to find breakfast templates and how to complete the signage.	Develop and attach one week's worth of breakfast signage.	
400 - Meal Components and Quantities - Breakfast	V-0400	At breakfast 8 ounces of juice is being served along with 1/2 cup of fresh fruit. TA provided that no more than half of the fruit or vegetable offerings may be in the form of juice.	Submit one week's worth of Food Production Records showing that no more than half of the fruit or vegetable offerings is in the form of juice.	
400 - Meal Components and Quantities - Lunch	V-0400	Fluid milk was not available in at least two required varieties throughout the serving period at lunch. (skim and 2% milk were being offered). This is a repeat finding. TA provided that the SFA must offer two types of milk and they must be skim, 1%, skim flavored and/or 1% flavored.	State the two types of milk that you will offer to residents at lunch.	
400 - Meal Components and Quantities - Lunch	V-0400	During the week selected to complete the lunch menu certification worksheets for the K-8th graders it was found that: 1.) five of seven days only 1/4 cup of fruit was served 2.) seven of seven days only 1/2 cup of vegetable was offered The following was found on the 9-12th grade menu: 1.) five of seven days only 1/4 cup of fruit was served 2.) seven of seven days only 1/2 cup of vegetable was served 3.) three days only 1 oz. eq. of meat was served 4.) only 13.5 oz. eq. of meat were served over the week 5.) three days the menus were short on grains for the day and only had 13.5 oz. eq. for the week. Provided the Food Service Director and three staff from the Ames location with a copy of the 7 day meal pattern and reviewed. TA provided that K-8th graders must be served 1/2 cup of fruit at lunch and the 9-12th graders must be served 1 cup, K-8th graders must be served 3/4 cup of vegetable and 9-12th graders must be served 1 cup of vegetables. Went over the daily and weekly requirements for meat and grains. Discussed that if serving different serving sizes to K-8th graders than 9-12th graders results in	Using a different week than was used for the menu certification worksheets, complete and attach a Grades 9-12 Lunch Seven Day Menu Certification worksheet. Also attach the menu, recipes, food production records, "CN" labels and Product Formulation Statements for foods served during the week you select. Also attach nutrition facts labels for any grains served that week. State your intentions to send the Food Service Director to either the Orientation to School Nutrition Management or School Meal Pattern Essentials Summer Short Course.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
YOUTH & SHELTER SERVICES (02258000)
Dates of Review: January 28 – 31, 2020

		behavior issues, the SFA can request a waiver from the Bureau Chief to serve the 9-12th grade meal pattern to all age groups. Reviewed how to complete menu certification worksheets. Also went over how to use the bread grain chart, Food Buying Guide and the benefits of using a cycle menu. Referred the SFA to the Institute of Child Nutrition CACFP standardized recipes and the Kansas Healthier Menus for CACFP which can be found for 6 servings. Also, discussed how to complete Food Production Records. Encouraged the SFA to send the Food Service Director to either the 5 day Orientation to School Nutrition Management Summer Short Course or the one day School Meal Pattern Essentials Summer Short Course.		
1400 - Food Safety	V-1400	Food Temperatures are being taken but are not documented. TA provided that there is a column on the food production records where food temperatures can be documented.	Begin to take food temperatures daily and document. Attach one week's worth of documented food temperatures.	

Site - Level Findings: Youth Shelter (8872)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	When an application had a case number written on it and had income information, the SFA was basing eligibility on the income provided. TA provided that if a households lists a valid case number (10-digits) then the SFA should base eligibility on the case number. Recommended that the Determining Official participate in the summer Application Approval and Direct Certification webinar each year.
100 - Certification and Benefit Issuance	127 Are the correct income eligibility guidelines used to certify applications?	Through discussion it was determined that the SFA uses an Excel spreadsheet for determining eligibility that was developed by a previous staff member. The current staff did not update the spreadsheet with the current year's income eligibility guidelines. TA provided that there are new income guidelines released yearly. TA provided on how to use ICIVES web to determine eligibility, which is updated yearly with the new income guidelines. For some students, the SFA did not use the current year's free and reduced price application. TA provided that a new free and reduced price application is posted on IowaCNP each year prior to the start of the new school year.
100 - Certification and Benefit Issuance	132 Does the direct certification list utilized by the SFA:	The SFA has not been using Elookup to attempt to directly certify day

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
YOUTH & SHELTER SERVICES (02258000)
Dates of Review: January 28 – 31, 2020

		<p>students. TA provided that the SFA will need to complete an access request form, which will start the process of being able to get onto the Iowa Education Portal. TA provided on how to get to the web site and how to search for a student using Elookup. Also discussed that when the SFA finds a day student on Elookup they should do a print screen so that they have documentation of finding the student on Elookup.</p>
<p>100 - Certification and Benefit Issuance</p>	<p>141 Does the SFA account for benefits that have been extended to students living in a household that is receiving SNAP, TANF, or FDPIR benefits?</p>	<p>TA provided that if the SFA finds a day student on Elookup and they have a number one under Food Assistance, FIP, Other Free or Other Reduced then the benefit status extends to other siblings in the household. If there is a number one under Foster Care, benefits do not extend to siblings in the household.</p>
<p>300 - Meal Counting and Claiming</p>	<p>305 What are the SFA's meal counting and claiming policies and procedures for the following situations:</p>	<p>Provided the Food Service Director with a sample Food Production Record and Standard Operating Procedure for sack lunches. TA provided that meal counts must be taken at the point of service when sack lunches are served.</p>
<p>700 - Resource Management</p>		<p>Procurement:</p> <ul style="list-style-type: none"> * The SFA needs to determine who will be responsible for completing the Procurement Plan each year. 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. TA provided on the difference between line item and bottom line. • 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. • The written code of conduct should identify the specific organization 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. Also, the value of gifts that staff can accept should be indicated. • 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. Referred the SFA to the state-prototype templates posted on IA_CNP. Reviewed each page of the small purchase template. Encouraged the SFA to compare prices at local vendors using the small purchase template and then purchase from the vendor with the lowest prices. This would then be a small purchase and would not need to be logged on the micro-purchase log. • 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.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
YOUTH & SHELTER SERVICES (02258000)
Dates of Review: January 28 – 31, 2020

		<ul style="list-style-type: none"> When procuring using small purchase method, 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 spreadsheet 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). The food service director should spot check invoices from vendors to ensure products delivered match the order and the description of the product solicited. Prices on the invoice should match order pricing or be lower unless SFA was given advance written notification per solicitation of any price increase. Food service director or designated individual should check deliveries 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. For bananas, pineapple and mandarin oranges which cannot be purchased made in America, these items should be logged on the exception log once a year. * Provided the Food Service Director with the Iowa Pre-approved Equipment List and explained that if a piece of equipment is on this list then State Agency approval is not needed prior to procuring. If not on the list, State Agency approval is needed. * Provided the Food Service Director with the State Agency templates for tracking credits and rebates.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	TA provided that the most current USDA non-discrimination statement can be found on IowaCNP under download forms and should be used on materials regarding the nutrition program and if they develop a nutrition page on their web-site the USDA non-discrimination statement should be posted.
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	TA provided that in Mason City where they have day students, each fall the SFA must submit the Public Release to the local media. A public release is available on IowaCNP under download form.
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	805 What procedures are in place for accommodating students with disabilities?	TA provided that if a resident needs a diet modification, the SFA should have a medical professional complete the Diet Modification form. Explained that the form is available on IowaCNP under download forms.
1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	Staff with duties related to the nutrition program such as staff who do food preparation, service and clean up on weekends, evenings and holidays need to have yearly training on food safety, civil rights and offer vs. serve.
1600 - School Breakfast and SFSP Outreach	1600 Did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	TA provided that since they are an RCCL, rather than informing families of the availability of the School Breakfast Program that they should promote the nutrition benefits of eating breakfast at a minimum two times per year.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
YOUTH & SHELTER SERVICES (02258000)
Dates of Review: January 28 – 31, 2020

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 even though the SFA does not have a Summer Food Service Program they still need to inform eligible families about the availability and location of Summer Food Service sites. Referred the SFA to the Summer Food Service Program flyers on IowaCNP under download forms. Suggested that the SFA consider including a flyer in resident discharge materials.
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Site - Level Technical Assistance Youth Shelter (8872)

Area	Question	Comments
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 receives one food safety inspection they need to request a second inspection. A second inspection may not be done. Documentation requesting the second inspection should be kept on file.

Site - Level Technical Assistance FLYS Residential (8873)

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Two residents did not take 1/2 cup of fruit or vegetable. TA provided that for a meal to be reimbursable residents must take 3 components with one of them being 1/2 cup of fruit or vegetable. Emailed the Food Service Director and Ames Food Service Manager the Offer vs. Serve manual. After TA, staff marked the meal roster with a zero indicating that this resident did not take a reimbursable meal and thus the meal would not be claimed.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	TA provided that staff who serve residents on weekends should have training each year on offer vs. serve. The training should be documented and tracked on a training tracker form.
1700 - Afterschool Snack	1706 Review production records for a minimum of 5 days from the review period.	TA provided that on the Afterschool Care Program (ASCP) Food Production Record the Food Service Director should provide units of measurement for the serving size. For instance, instead of putting 1 piece of bread she should put the weight of 1 piece of bread. Showed her how she then can use the ASCP bread/grain chart to be sure the serving is large enough.
1700 - Afterschool Snack	1707 a. Has the program been monitored within the first 4 weeks of operation each year?	The self-monitoring Afterschool Care Program form was not completed until September 10, 2019. TA provided that the first review needs to be completed within the first four weeks of snack service each year with the new year starting July 1st.
1700 - Afterschool Snack	1710 Is the USDA/FNS approved non-discrimination poster prominently displayed and visible to program participants?	TA provided that the USDA non-discrimination poster must be displayed in the location that residents receive snacks. The State Agency sent additional posters to the SFA.
Dietary Specifications Assessment Tool - Lunch	17 Is a deep fat fryer used on-site to prepare school meal items?	The Food Service Director stated that she gets one product from the Food Bank that she deep fat fries. Recommended that this product not be served at lunch as it contributes a lot of fat and calories.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
YOUTH & SHELTER SERVICES (02258000)
Dates of Review: January 28 – 31, 2020

Org - Level Commendations

Description
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. There are enrichment activities attached to the snack.
Certification and Benefit Issuance: All day school applications in the sample were correctly determined. Residential students that were enrolled on December 5th were not claimed for a meal or snack prior to their entrance date. Access to benefit information is correctly limited and eligibility is kept confidential.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria at the sites reviewed and services are offered for Limited English Proficient households. Residents with special dietary needs are accommodated. Ethnic/racial information is collected and the form was completed. No discrimination was observed.
Food Safety: The SFA has a written Food Safety Plan for their Mason City sites. Sarah Innis, Mike Frohwein, Emily Hansen and Morghan Carney are ServSafe certified.
Procurement: Sarah Innis participated in the State Agency's Regional Procurement Training in Jefferson, Iowa and Emily Krapfl participated in West Des Moines. The SFA has a comprehensive written Procurement Plan that includes procurement methods and documentation for all purchases, 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 accepting items of monetary value and disciplinary actions.
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. 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 USDA Foods. In school year 2018-2019 the SFA utilized 350.90% of their allotted PAL dollars through utilizing the Direct Distribution Program. So far in school year 2019-2020 the SFA has utilized \$3,799.48 of their allotted \$4,108.93, so is on track to spend all of their PAL dollars.
Wellness Policy: The SFA's wellness policy was reviewed in December of 2019. Households are made aware of the SFA's wellness policy during the intake process. The following individuals are involved in reviewing and updating the LWP: Chief Operating Officer, HR and QI Specialist, and HR Director. 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 Youth Shelter (8872)

Description
Food Safety: The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all refrigerators and freezers. Dishwasher temperatures are taken and documented. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Proper hair restraints are worn and there were good gloving procedures.
Meal Components and Quantities: 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. CN labels and Manufacturer's Statements used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month—including many fresh fruits and vegetables. Some low fat and low sodium food items were observed in storage. Residents had sufficient of time to eat after receiving meals.
Nutritional Quality of School Meals: The Food Service Director has developed a five week cycle menu. The USDA menu worksheets for the week of December 8-14, 2019 for breakfast and lunch were completed. 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 Youth Shelter is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: controlling the portion sizes of condiments, using frozen vegetables in place of canned or using low sodium canned vegetables, and draining fat from browned meats. A nutrient analysis was not required.
Offer vs. Serve: All students observed selected 1/2 cup of fruit and/or vegetable or if they didn't the meal was not claimed. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at lunch.
Water: Free potable water is available to all residents for lunch and breakfast via a water pitcher and glasses on the serving line.

Site - Level Commendations FLYS Residential (8873)

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Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
YOUTH & SHELTER SERVICES (02258000)
Dates of Review: January 28 – 31, 2020

Food Safety: The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all refrigerators and freezers. Dishwasher temperatures are taken and documented. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Proper hair restraints are worn and there were good gloving procedures.

Meal Components and Quantities: 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. CN labels and Manufacturer's Statements used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month—including many fresh fruits and vegetables. Some low fat and low sodium food items were observed in storage. Residents had sufficient of time to eat after receiving meals.

Nutritional Quality of School Meals: The Food Service Director has developed a five week cycle menu. The USDA menu worksheets for the week of December 8-14, 2019 for breakfast and lunch were completed. 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 FLYS Residential is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: controlling the portion sizes of condiments, using frozen vegetables in place of canned or using low sodium canned vegetables, and draining fat from browned meats. A nutrient analysis was not required.

Offer vs. Serve: All students observed selected 1/2 cup of fruit and/or vegetable or if they didn't the meal was not claimed. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at lunch.

Water: Free potable water is available to all residents for lunch and breakfast via a water pitcher and glasses on the serving line.