

Iowa Department of Education
 Bureau of Nutrition and Health Services
 State Review Summary Report
 Cedar Falls Community School District (10440000)
 Date of Review: February 17th – 21st, 2020

Program Year: 2020
Month of Review: January
Lead Reviewer: Donna Matlock
Org Representative(s): Denelle Gonnerman

Site - Level Findings: Cedar Heights Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	<p>Meal count totals by category are not combined and recorded correctly.</p> <p>Last year's free, reduced, and paid lunch meal counts were accidentally used in filing Cedar Heights Elementary January claim.</p> <p>SFA must use the "monthly edit check" reports to ensure accurate meal counts are used for claims. This error resulted in "under claims" for free - (869), reduced - (191); and an "over claim" for paid - 1,338.</p>	<p>Describe in a plan moving forward who will ensure the correct reports are used for filing claims.</p> <p>SFA needs to revise January claim for Cedar Heights Elementary using the correct meal counts for free, reduced, and paid.</p>	

Site - Level Findings: Holmes Junior High School (0205)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
900 - SFA On Site	V-0900	The on-site review of the meal counting and claiming procedure	SFA completed the on-site review on February 20th during the AR.	

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Monitoring		<p>was not completed prior to February 1st.</p> <p>An extension was not requested and approved by the State Agency for completion of the on-site review.</p>	<p>In the future if the SFA is unable to complete the on-site review of meal counting and claiming procedures by Feb. 1st, an extension will be requested from the State Agency. State in a plan what your intentions will be to do this step.</p>
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Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1600 - School Breakfast and SFSP Outreach	V-1600	Q1601F: The SFA did not inform eligible families about the availability and location of free meals for students via the Summer Food Service Program.	Q1601C: Describe how you will inform eligible families about the availability and location of free meals for students via the Summer Food Service Program.	
RMCR - Revenue From Non-Program Foods	V-RMCR	<p>SFA did not calculate compliance using the USDA Non-Program Revenue Tool or 5-day reference period to determine whether non-program revenue is adequately covering non-program food costs. Business manager is new to the position this school year.</p> <p>Currently, the districts IowaCNP - Financial Report Tool <i>does not</i> show program food costs to offset the percent of non-program food costs resulting in 100% total of non-program food costs only. Due to this discrepancy, by calculation of revenue, non-program food revenue only captures 19% of food costs,</p>	<p>Complete and attach the USDA Non-Program Revenue Calculator located in Download Forms of IowaCNP, NSLP150, another useful tool to use is the Menu Costing Worksheet, NSLP120.</p> <p>SFA will need to identify all program food costs and non-program food cost, including the program revenue and non-program revenue to determine whether non-program revenue is adequately contributing to non-program food costs.</p> <p>The calculator will indicate if SFA is compliant or whether they will need to increase prices to cover the non-program food costs.</p>	

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		which does not adequately contribute to the non-program food costs.		
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Site - Level Findings: Cedar Falls High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	132 Does the direct certification list utilized by the SFA:	The SFA uses E-trition for the POS (Point of Sale) and benefit issuance list. SFA would benefit and alleviate time in manually identifying students on the DC (Direct Certification) list if they were able to import the DC list into the benefit issuance list. By having the DC imported into E-trition, it would automatically update student benefits, eliminating the need for FS Secretary to manually update student benefits.
700 - Resource Management		Moving forward SFA will follow the "Small Purchase" method using 3 bids and a buy template located in Download Forms of IowaCNP, NSLPPROC008 or the RFP template, NSLPPROC009. For example SFA did not solicit local businesses for pizza that's offered on the menu. FSD is working with the USDA Foods consultant on spending down PAL dollars as these funds have not been fully utilized in previous school years.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	Many part-time food service employees still need additional hours of training before the end of the

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		school year. FSD will be having staff meetings, and have staff participate in online tutorials. Additional resources were shared for training opportunities.
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?	Discussed with SFA about the free training tutorials and webinars to use to help staff get the required hours of training. FSD will working with secretaries to ensure they receive the required training pertaining to their duties of handling eligibility applications, cashier/POS, and other training as necessary.

Site - Level Technical Assistance Holmes Junior High School (0205)

Area	Question	Comments
900 - SFA On Site Monitoring	902 a. Was corrective action of the meal counting and claiming procedure required?	Discussed with FSD that each reviewer needs to date and sign the on-site review form, as well as the person in charge of the kitchen being reviewed. Some on-site review forms were not dated as to when the review was conducted or signed making it unclear whether it was conducted by Feb. 1st as required. Due to the number of buildings in the district, SA recommends starting the on-site review process earlier in the school year. This will allow ample time to complete the process by Feb. 1st and address any error identified during observations by reviewer. Additionally, it's important to document any observations that are not compliant and require corrective action/follow-up within 45 days.

Site - Level Technical Assistance Cedar Heights Elementary School (0409)

Area	Question	Comments
400 - Meal Components and	406 If the school is serving multiple menus and/or age/grade	SFA has a preschool program which eats in the

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Quantities - Lunch	groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	<p>classroom. USDA requires SFA's to follow the early childhood meal pattern when preschool children are not co-mingled with K-6 grade in the cafeteria.</p> <p>SA provided a copy of the early childhood meal pattern during onsite visit. SA provided the "And Justice for All" poster for the preschool room.</p>
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Org - Level Commendations

Description
<ul style="list-style-type: none"> • Benefit documents, as well as all paperwork, were very well organized. • The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. • The correct and current benefit issuance list was available. • All applications were correctly determined, signed and dated by the household member and the SFA and all applications were determined within ten days. • Income was only converted to annual when there was more than one frequency of income. • Rollover applications were removed if the household did not apply within thirty days of the school year. • Access to benefit information is correctly limited. • Free meals are extended to all members in the household. • Waivers are provided to applicants and indicate specific fees. • Eligibility is kept confidential. • The SFA has a back-up system for benefit issuance documents and system.
<ul style="list-style-type: none"> • Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of [month] were accurate and complete. • Point of Service (POS) counts and filed claims appear accurate. • Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. • Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. • Cashiers are trained, and daily edit checks are performed. • All students selected a reimbursable meal without having a prompt to select a ½ cup of fruit or vegetable as one of the three required components.
<ul style="list-style-type: none"> • The “And Justice for All” civil rights poster was posted in the cafeteria. • The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. • Annual civil rights training was provided to food service staff and documented. • A copy of the district’s public release was on file, documenting that it was submitted to local media. • The district 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.
<ul style="list-style-type: none"> • The correct number of applications were verified and were correctly selected from error prone applications. • All income sources were verified with at least one month’s income, and the process was completed on time. • The application(s) selected for verification were confirmed prior to verification. • The SFA had at least one person attend training. • The verification report was completed accurately and on time.

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• The district has a current wellness policy on file. • The SFA's wellness policy was reviewed and revised on 7/8/2019. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. • The wellness policy and the most recent assessment of the policy are available to the public via district website. • The SFA completed an assessment of their wellness policy on 11/5/2019. • The following individuals' principals, FSD, superintendent are involved in reviewing and updating the LWP. • Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.

• The Food Service Director (FSD) does a nice job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat. • 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. The SFA provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal. • Menus included some homemade entrees, and standardized recipes are used for food production. • Free potable water is available to all students for lunch at each location where lunches are served during the meal service and for breakfast. • Offer vs. Serve (OVS) was being implemented properly. All students observed selected ½ cup of fruit and/or vegetable. Students have the option to decline any one or two of the five components. • At least two types of milk are offered. • Many low fat and low sodium food items were observed in storage. • Students had sufficient amount of time to eat after receiving meals. • Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch. A monthly menu is also posted. • Food service staff was polite and respectful to students, other staff, and each other. • Nutrient analysis was not required. • Students may purchase a second entrée and/or a second milk at lunch. Second entrees are correctly documented on production records. • Beverages sold meet the standards for the various age groups of students. Students are able to purchase foods via a la carte sales and vending machines. • The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte. • All foods sold meet the Smart Snack standards for nutrition content. Exempt leftover NSLP entrees are only sold the same day, or the day after, they are initially offered.

• The Food Service Director completed the menu worksheets for the week of Jan. 13th - 17th for breakfast and lunch at the Cedar Falls High School, Holmes Jr. High, & Cedar Heights Elementary. 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 Cedar Falls High School, Holmes Jr. High, & Cedar Heights Elementary 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

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filed on time, and all records are maintained for at least three years plus the current year. • The SFA developed and approved a meal charge policy on June 12, 2017. The policy was mailed (emailed) to all households and staff were informed of the policy. The policy states that students who qualify for free meals shall never be denied a reimbursable meal. • The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events, and specifications were well-written and comprehensive. • 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 invoices from vendors were well-organized. The invoices had a date, vendor name and address, items purchased were clearly identifiable. • The district has a signed agreement with a Group Purchasing Organization for prime vendor to supply food and non-food supplies. • A review of milk, bread, and prime vendor invoices validated the district was receiving the products as bid and prices were charged as bid.

• The SFA has a district-wide 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.