

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Ia Juv Det Cntr (20078607)
Dates of Review: November 5 – 7, 2019

Program Year: 2020
Month of Review: September
Lead Reviewer: Deb Linderblood
Org Representative(s): Scott Huegel

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The SFA has been keeping a roster of residents coming into the institution and exiting but they are not documenting if the resident has any income. Provided the Food Service Director with a copy of the State Agency prototype Resident Roster.	Complete and attach 2 weeks' worth of resident rosters showing the entrance date, exit date, and any income the residents are receiving.	
700 - Resource Management	V-0700	In school year 2018-2019 the SFA did not utilize any of their allotted PAL dollars and has not used any to date this school year. The SFA's allotted amount this school year is \$3,915.00. TA provided that the SFA should consider participating in the Department of Defense Fruit and Vegetable Program to use up some of their PAL dollars. Referred the FSD to Sarah White for more information.	State your plan for how you will spend 95% or greater of your allotted PAL dollars each school year.	
700 - Resource Management	V-0700	The SFA does not have a written Procurement Plan for school year 2019-2020. TA provided by going over each column of the Procurement Plan template. Provided the FSD with written instructions on how to complete the Procurement Plan. This is a repeat finding.	Complete and attached a written Procurement Plan for school year 2019-2020. State your intentions to complete a written Procurement Plan prior to the start of each year.	
700 - Resource Management	V-0700	The SFA has not completed the Financial Report on IowaCNP over the last several years. TA provided that this report is due in September of each year. This year however the due date has been extended to December 20, 2019. The report is found on IowaCNP under Applications and then go to Financial Report.	Complete the Financial Report on IowaCNP under Applications for school year 2018-2019. If assistance is needed Patti Harding should be contacted. Once completed, attach a copy of the report below.	
800 - Civil Rights	V-0800	The SFA has not had civil rights training for staff who interact with program applicants in school year 2019-2020. TA provided that there is a power point presentation and a game that can be used for training on IowaCNP under download forms. This is a repeat finding.	Provide civil rights training for all staff who are involved in the child nutrition program. Have participants document on a sign-in sheet that they have had the training. Attach a copy of the sign-in sheet showing the title of the course, date, start and end time and signature of those that participated.	
800 - Civil Rights	V-0800	The SFA has been collecting racial/ethnic data,	Complete and attach one month's racial/ethnic form.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Ia Juv Det Cntr (20078607)
Dates of Review: November 5 – 7, 2019

		however has not been completing the racial/ethnic form. TA was provided that the racial/ethnic form can be found on IowaCNP under download forms (Form ELIG085). Showed the Food Service Director how to complete the form. TA provided that the form should be completed on a monthly basis as their population changes from month to month.		
1000 - Local School Wellness Policy	V-1000	The SFA currently does not have a Wellness Committee; does not have goals for nutrition education and promotion, physical activity or for other school-based activities; the wellness policy is not dated so it is unknown when the policy was last revised; has not completed an assessment of their Wellness Policy (which is a repeat finding), does not make the policy available to the public and has not designated at least one official who has authority and responsibility to ensure the RCCI complies with the policy. TA provided on who should be included in the RCCI's wellness committee, that specific goals are needed for nutrition promotion and education as well as other school-based activities, that the Wellness policy needs to be reviewed and revised every 3 years and that an assessment of the Wellness policy goals should be completed triennially. Provided the Food Service Director with a sample Wellness Policy template for RCCIs and a sample assessment. Also provided a copy of the Local Wellness Policy Progress Report (assessment), handout summarizing the final rule and handout "Does Your Wellness Policy Measure Up". TA provided that in order to inform households about the Wellness policy and assessment a copy could be included in admission materials or these documents could be posted where they could be seen by households.	The SFA will 1.) Attach an invitation to the members of a formed Wellness Committee for their initial meeting which will be held during school year 2019-2020. The invitation needs to include who are the stakeholders, the date and time of the next meeting and the agenda that will be discussed. 2.) State below who will be responsible and a timeline for writing a Wellness Policy that has goals for nutrition promotion, physical activity and other school-based activities 3.) State below who will complete an assessment of your Wellness Policy and by when 4.) State below who will be designated as the official who has authority and responsibility to ensure the RCCI complies with the policy. 5.) State below how the RCCI will communicate the Wellness Policy and Assessment to the households.	
1200 - Professional Standards	V-1200	The three Managers and 26 part-time nutrition staff have not started to obtain training this school year and the Food Service Director (FSD) has only completed three hours of training. TA provided that the FSD needs to complete 12	Complete and attach a training tracker tool showing that all nutrition staff have started to obtain training in school year 2019-2020. Also, state additional training that is planned for nutrition staff for the remainder of the school year.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Ia Juv Det Cntr (20078607)
Dates of Review: November 5 – 7, 2019

		hours of training, Managers 10 hours and part-time staff 4 hours of training each school year. Emailed the FSD a training tracker tool. TA provided that once a month the State Agency has a webinar titled "News To Know in School Nutrition" which is the 4th Monday of every month at 2:00 p.m. Also, showed the Food Service Director where to find Web Casts and Tutorials that can be used for training himself or his staff. Not tracking training is a repeat finding.		
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Site - Level Findings: Central Ia Juv Det Cntr (8607)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	The SFA has been recording every resident as eating a meal and has not been taking a point of service meal count. TA provided that a roster should be kept with each resident's name and they should be marked as eating when they come through the serving line and take a meal tray.	Explain below how you will begin to take meal counts at the point of service and how this will be monitored to be sure it is done. Attach one weeks' worth of meal count rosters showing the residents who received a reimbursable meal at lunch.	
400 - Meal Components and Quantities - Breakfast	V-0400	During the week used to complete the menu certification worksheets, the breakfast menu was short on fruit three of the seven days. TA provided that at breakfast Residents must be served 1 cup of fruit/juice. Showed the FSD how to use the Food Buying Guide to determine quantities needed to make 1 cup. For example it takes 2 bananas to equal 1 cup of fruit. The menu certification worksheets also showed that over the course of the week the SFA served 24 oz. eq. of grain, which is an excessive amount and would put the SFA over on calories. TA provided that the breakfast menu should be revised to cut down on the oz. eq. of grain/meat/meat alternates that are served each week.	Attach one week's worth of breakfast menus showing that each day residents are served 1 cup of fruit and/or juice daily and that grains have been reduced to be closer to 12.5-14 oz. eq. per week.	
400 - Meal Components and Quantities - Lunch	V-0400	Only one type of milk (skim milk) is available to residents. TA provided that RCCIs that are a juvenile detention facility, serve children in different age/grade groups, and have legitimate safety concerns may meet the requirement to serve more than one type of milk by meeting the requirement over the week rather than daily. Thus 3 days a week the SFA could serve skim milk and 4 days a week they could serve 1% milk. TA provided that if this is a repeat finding on their next review, it would result in fiscal action.	State your plan for how you will begin to offer residents a variety of milk.	
400 - Meal Components and Quantities - Lunch	V-0400	The menu certification worksheets for lunch showed that for K-8 on 9/10/19 only 1/4 cup of fruit was served and should have been 1/2 cup, on 9/8/19 only 1/2 cup of vegetable was served and should have been 3/4 cup. For the 9-12th	Complete and attach a 9-12th grade lunch menu certification worksheet using a week from your 4 week cycle menu that is a different week than was used for the Administrative Review. Also attach "CN" labels, product formulation statements, recipes and	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Ia Juv Det Cntr (20078607)
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		<p>graders, on 9/10/19 only 1/4 cup of fruit was served and should have been 1 cup, on 9/8/19 only 1/2 cup of vegetable was served, on 9/9/19 and 9/11/19 only 3/4 cup of vegetable was served and should have been 1 cup. Also on 9/14/19 only 1.5 oz. eq. of grain and on 9/13/19 only 1.75 oz. eq. of grain was served and should have been 2 oz. eq. On 9/9/19 the SFA does not have a "CN" label or Product Formulation for steak fajita and on 9/13/19 none for sliced turkey. TA provided included 1.) gave the Food Service Director (FSD) a copy of the 7 day meal pattern 2.) gave FSD the bread/grain chart and explained how to use 3.) gave FSD a handout identifying which vegetables belong in each subgroup 4.) explained that 50% of the grains must be whole grain rich 5.) Reviewed how to access and use the USDA Food Buying Guide 6.) on menu fruits and vegetables should be in cups instead of ounces to match the meal pattern 7.) Recommended that instead of giving 1 cup of one vegetable, that residents may eat vegetables better if two 1/2 cup portions of two different vegetables are served. 8.) reviewed how to complete the menu certification worksheets. 8.) Provided the FSD with breakfast and lunch Food Production Records and reviewed how these should be completed each day.</p>	<p>production records that correspond to the week you select. Also, attach a "CN" label or product formulation statement for fajita meat and sliced turkey. If unable to obtain, state the item that will replace these items and attach a "CN" label or product formulation statement for the replacement product. Lastly, request a waiver to use 9-12th grade meal pattern for all age groups at the facility. Attach written approval. If approval is not granted, menu certification worksheets will also need to be completed for K-8th graders.</p>	
1400 - Food Safety	V-1400	<p>The SFA currently does not have a written food safety plan. Provided the Food Service Director with sample Standard Operating Procedures (SOPs). TA provided that the SOPs need to reflect their actual practices and that SOPs that are not pertinent to their facility should be removed. Also provided a sample SOP on Cleaning and Disinfecting Body Fluids.</p>	<p>Develop and attach a table of contents showing the Standard Operating Procedures (SOPs) that are needed for your RCCI. Indicate your intentions to develop these SOPs over the next six months.</p>	
1400 - Food Safety	V-1400	<p>The SFA is not documenting dish machine temperatures. Per FSD they are supposed to be taken three times per day.</p>	<p>Document and attach a log showing that dish machine temperatures are being taken at a minimum at breakfast and lunch.</p>	
1700 - Afterschool Snack	V-1700	<p>Residents are portioning and passing out snacks to other residents and no point-of-service snack counts are being taken. TA provided that snacks need to be portioned out and passed out by staff and a point-of-service meal count be taken as each resident is provided a snack. Provided the Food Service Director with a template for taking point-of-service snack counts.</p>	<p>Complete and attach one weeks' worth of snack counts. State your intentions to have staff portion and pass out snacks and to take snack counts at the point of service.</p>	
1700 - Afterschool Snack	V-1700	<p>Production records are not being kept for the After School Care Program. Provided the Food Service Director with a production record template and explained that an electronic version is available on IowaCNP under download forms.</p>	<p>Complete and attach one week's worth of After School Snack Program Food Production Records that show that the Food Production Records are now being kept and that the proper quantity of each food item is being served.</p>	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Ia Juv Det Cntr (20078607)
Dates of Review: November 5 – 7, 2019

		TA provided on how to complete the Food Production records. TA also provided on the meal pattern and the bread/grain chart and how to use as there were days during the review week that were short on quantities (9/9/19 one pc of apple served and need 3/4 cup, 9/8 & 9/11/19 two cookies served and need 2.25 cookies, 9/10/19 two granola bars served and need 2.25 granola bars).		
1700 - Afterschool Snack	V-1700	The After School Snack Program was not monitored within the first 4 weeks of operation. TA provided that monitoring needs to be done each school year within the first 4 weeks of operation and one other time during the year. Provided the FSD with a monitoring form. This is a repeat finding.	Complete and attach the After School Snack Program monitoring form. State your intentions to complete this form each school year, once within the first 4 weeks of operation and then one other time during the year.	

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		<p>Procurement:</p> <ul style="list-style-type: none"> • 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. Assisted FSD with completing their 2019-2020 plan. • 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. • 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 small purchase templates posted on IA_CNP and provided a copy. Reviewed each page of the small purchase template. • 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. • When procuring using the small purchase method, along with specifications

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Ia Juv Det Cntr (20078607)
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		<p>(descriptions) for all items to be procured, the estimated annual usage for each item should be provided. To ensure the RCCI selects a responsive vendor with the overall lowest price (bottom line), the cost of each item on price quotation request 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).</p> <ul style="list-style-type: none"> • The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and the description of the product solicited by GPO. Prices on the invoice should match bid pricing or be lower unless SFA was given advance written notification per solicitation of any price increase. Monthly and weekly price changes from the vendor should be kept electronically. Food items procured by the SFA not on the GPO solicitation must be procured using appropriate procurement methods. • 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. • The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification and be at equal or lesser price.
700 - Resource Management		Provided the Food Service Director with the State Agency pre-approved equipment list. TA provided that if he purchases items on this list he does not need State Agency approval to do so. If not on this list, State Agency approval is needed prior to purchasing the item(s).
800 - Civil Rights		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?	The SFA currently does not have any residents who need a modified diet. TA provided that if a resident does need a diet modification a Diet Modification Form should be completed by a licensed medical professional stating the foods that need to avoided and which foods to substitute. Provided the Food Service Director with a copy of the Diet Modification Form.
800 - Civil Rights	810 Review program materials.	TA provided that when the Food Service Director begins to post signage for breakfast and lunch (the weekly or monthly menu) that the menu should have the short version of the non-discrimination statement, which is "This institution is an equal opportunity provider."
1200 - Professional Standards	1203 a. Did the new School Nutrition Program Director complete food safety training within 30 days of being hired?	The Food Service Director was hired in May of 2017 and did not become ServSafe Certified until July 16, 2018. TA provided that when a new director is hired, food safety training must be completed within 30 days of being hired or have documentation that training was completed within 5 years prior to being hired.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	For School Breakfast Program outreach TA provided that since they are a RCCI and residents are required to participate in the program, the SFA

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Ia Juv Det Cntr (20078607)
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		should promote the nutrition benefits of consuming breakfast and thus promote that residents actually consume breakfast. For Summer Food Service Program outreach TA provided that the RCCI should include information in resident's discharge packet. Showed the Food Service Director where to find promotional flyers on IowaCNP under download forms.
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Site - Level Technical Assistance Central Ia Juv Det Cntr (8607)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	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 any resident's requiring a milk substitute. TA provided that if they do in the future, the milk substitute that is served must be nutritionally equivalent to cow's milk. Provided the Food Service Director with a list of milk substitutes that are approved to use.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	The SFA is a serve location as they feel that using Offer vs. Serve would cause behavior problems. The SFA has a waiver from the State Agency to use serve with 9-12th graders. TA provided that for signage the Food Service Director should post a weekly or monthly menu showing residents what foods will be served. The posted menu should have the USDA short version of the non-discrimination statement, which is "This institution is an equal opportunity provider."
400 - Meal Components and Quantities - Lunch	406 If the school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	The SFA is currently serving the same portion sizes to 7-8th graders as they do 9-12th graders. Food Service Director stated that it would cause behavior issues to have different serving sizes. TA provided that the SFA needs to request a waiver from the Bureau of Nutrition's Bureau Chief to serve all residents the same serving size.
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	The Food Service Director had the "And Justice for All" poster but it was not displayed in a location visible to residents. TA provided that the poster needed to be located where residents could view it. While the State Agency was on-site the Food Service Director determined a location to put the poster where residents would not pull it off the wall. TA provided that it has been announced that a new poster will be released. When this occurs the State Agency will send out posters to the SFAs.
1300 - Water	1300 Is free potable water available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)?	The male residents eat breakfast and lunch in the central dining area and have access to a water fountain. Female residents eat in a separate room off of the central dining area and are not allowed to go into the central dining area for water. TA provided that a pitcher of water and glasses should be made available for the female residents.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	TA provided that if the RCCI does not receive 2 inspections each year they need to request a second inspection and keep the documentation showing it was requested.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	TA provided that the SFA's most recent food safety inspection needs to be posted in a publicly visible location. This was corrected while the State Agency was on-site.
1400 - Food Safety	1411 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	Broccoli was found that was produced in Mexico. TA provided that the Food Service Director should contact the vendor and determine if broccoli produced in the United States is available and at what price. If the price is significantly higher the Food Service Director may justify using the broccoli

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Ia Juv Det Cntr (20078607)
Dates of Review: November 5 – 7, 2019

		produced in Mexico and should document the higher price on the State Agency Exception Log template which can be found on IowaCNP under download forms.
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Org - Level Commendations

Description
After School Care Program: Counts the day of observation were reasonable when compared to test month counts. There are enrichment activities attached to the snack.
Civil Rights: No discrimination was observed.
Fiscal Action: Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for September seem to be needed.
Food Safety: Temperature logs are maintained for all freezers and refrigerators. Food temperatures are documented on the daily menus. Thermometers are calibrated. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. The Food Service Director is ServeSafe Certified.
Meal Components and Quantities: The Food Service Director has developed a 30 day cycle menu which provides a variety of foods. 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. Residents had sufficient of time to eat after receiving meals.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of September were accurate and complete.
Nutritional Quality of School Meals: The USDA menu certification worksheets were completed for the week of September 8-14, 2019 for breakfast and lunch. The breakfast worksheets showed that all components are offered each day. The Food Service Director completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the RCCI is at low risk for noncompliance 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, using frozen vegetables in place of canned, and limiting grain-based desserts to no more than 2 oz. eq. per week. A nutrient analysis was not required.
Offer vs. Serve: The SFA has a waiver to not use Offer vs. Serve for 9-12th grade residents. Thus, all residents are served four items at a minimum at breakfast and five components at lunch.
Procurement: The Food Service Director attended the State Agency's Regional Procurement Training at BGM. The SFA is a part of the AEA purchasing group and has a signed agreement for food. The SFA has a Nutrition Code of Conduct. A review of a sample of invoices vs. contracted prices showed that the SFA has been charged the correct prices on all items reviewed.
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: The SFA does not have any unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate line item for the nonprofit school food service food expenses and revenue. 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.
Verification: The SFA does not complete verification as they only have residential students. The verification report for 2019-2020 was completed accurately and on time.
Water: Free potable water is available to all male students for lunch and for breakfast via a water fountain in the cafeteria.
Wellness Policy: The SFA has a wellness policy. The following individuals are involved in reviewing and updating the Local Wellness Policy: Executive Director and the Food Service Director.