

Iowa Department of Education
 Bureau of Nutrition and Health Services
 State Review Summary Report
 Clear Lake Community School District (12330000)
 Date of Review: December 3rd, 2019

Program Year: 2020
Month of Review: November
Lead Reviewer: Donna Matlock
Org Representative(s): Misty Binstock

Site - Level Findings: Clear Lake High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
800 - Civil Rights	V-0800	<p>SA observed one cashier removing food from trays due to negative account balance. Discussed with FSD, based on Iowa law Shaming Bill HF2467; that once food is on a tray it cannot be removed.</p> <p>TA: SA shared recommendations on closing off and selling a la carte shortly after all students have gone through the line for the main meal. This will allow students to approach cashier to see if they have funds for additional purchases. Another recommendation is to have the cashier at the beginning of the line where students are made aware whether they have funds or not for a la carte purchases.</p> <p>SA shared the HF2467 Q&A and Guidance memo. Also shared</p>	Provide a plan describing the steps you will take in implementing alternatives of students purchasing extra meals or a la carte so students are made aware beforehand there is or is not enough funds.	

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		Overcoming Unpaid Meal Challenges - Proven Strategies manual by USDA.		
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Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	The most recent assessment of the LWP (Local Wellness Policy) was not submitted.	<p>USDA requires SFA's to review the policy and conduct an assessment every three (3) years to be compliant.</p> <p>Submit the district's plan on how it will conduct an assessment on the implementation of the LWP (Local Wellness Policy) goals by June 1, 2020. <i>Once completed the assessment must be made available to the public.</i></p>	

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		FSD and business office were not able to locate all of the solicitations and contracts awarded to vendors since the last FSD retired. FSD is new to the position and this is her first year in this position. She plans to implement changes to the process to ensure all procurement is documented and records retained for 4 years.
700 - Resource Management	706 Did the SFA use the USDA Paid Lunch Equity Tool or a comparable mechanism to evaluate its need to raise its paid lunch prices?	SA helped SFA complete the PLE (Paid Lunch Equity) tool for 2018-2019 and 2019-2020 using the correct data. Since SFA has been able to submit a letter indicating the nutrition fund has had a positive account balance, the PLE tool has not been required.

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		SA recommended to SFA to continue completing the PLE tool annually to ensure paid student prices increase as necessary.
700 - Resource Management	709 With the exception of milk, did the SFA sell Smart Snacks*, second entrees, and/or catering?	<p>SA showed FSD the USDA Non-Program Revenue Calculator on how to complete it. Discussed how this tool is to help SFA's balance out with non-program food costs and whether SFA's non-program revenue is adequately contributing to the food costs.</p> <p>If revenue is not adequately contributing, SFA must determine where to increase prices, whether this be adult meals, a la carte, extra entrees and milks, vending, or paid student price.</p>
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	FSD completed all onsite monitoring reports, reports need to be signed by FSD and head cook/manager of each site.
1400 - Food Safety	1403 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?	SA provided TA on the Buy American provision, approved exceptions and the Buy American log. FSD was unaware foods received were non-domestic products of Mexico (cucumbers, cherry tomatoes, and green peppers). FSD is going to train staff on monitoring what is allowable products and whether it is to be returned to distributor or if there's a shortage of products, then record foods on Buy American log.
RMCR - Revenue From Non-program Foods	9 Did the SFA correctly calculate its non-program food ratio and its food cost ratio?	<p>At the end of each year, the SFA must determine whether the percentage of revenue from non-program food sold is equal to or greater than the percentage of money spent on non-program food (food costs).</p> <p>2019 Financial Report tool lists non-program revenue (1%) is not adequately contributing to non-program food costs (2%).</p>

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		SA completed and shared the USDA Non-Program Revenue Calculator tool for SFA to use and track food costs and revenue so SFA is able to determine price increases as needed.
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Site - Level Technical Assistance Clear Lake High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Discussed with FSD that not all M/MA need to be counted toward the grain ounce equivalents as the grain contribution in the certification worksheet exceeds the maximum required grain contributions over the course of the week. Worksheet was revised and uploaded to Review Attachments.
900 - SFA On Site Monitoring	901 a. Was the on-site review of the <i>lunch</i> counting and claiming procedure completed prior to February 1?	Discussed with FSD that kitchen manager or person in charge need to sign the onsite monitoring forms once observations are completed.
1100 - Smart Snacks in School	1104. Are students able to purchase foods during the school day?	Met with the business teacher that will be helping students start a coffee café 2nd semester. Shared information on Smart Snacks standards the Smart Snacks calculator to ensure beverages and food items are compliant for sale during school hours. Smart Snacks handouts have been shared with FSD and teacher. FSD will work with teacher to make sure everything meets requirements. A printout of beverages and foods must be kept for documentation for three (3) years plus the current fiscal year.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	SFA sells hot chocolate and cappuccino in a readymade machine. Hot chocolate and cappuccino exceed calories for Smart Snacks Standards. FSD is working with Team Nutrition to find products which meet Smart Snacks Standards. FSD will be contacting a company inquiring about previous products the

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		company sold to see if still in stock or available to purchase.
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?	SA observed products of Mexico in walk in refrigerator (cucumbers, green bell peppers, and cherry tomatoes). FSD was unaware these products were received as other staff receive at one site and transport food to the high school. SA recommends talking to staff responsible for receiving food, as well as distributor. Also discussed documenting food items on 'Buy American Exception Log' located in 'Download Forms' of IowaCNP.

Org - Level Commendations

Description
<p>• 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, were complete with SSN's and case numbers, 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.</p> <p>VERIFICATION: • 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.</p>
<p>• Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of November 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. MEAL REQUIREMENTS & COMPONENTS: • The Food Service Director (FSD) does a superior job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child</p>

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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 many homemade entrees, and standardized recipes are used for food production. • Free potable water is 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)? • 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.

• 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. • Money is not transferred out of the account to support other programs. • The SFA effectively utilizes its USDA entitlement for commodities. • Reports are 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. 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.

Site - Level Commendations Clear Lake High School (0109)

Description
<p>• Students may purchase a second entrée and/or a second milk at lunch. Second entrees are correctly documented on production records. • 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. SBP & SFSP OUTREACH: • School Breakfast Program (SBP) outreach was sent out at the beginning of the year to inform families of the availability of the program. • Reminders of the SBP were also sent out throughout the school year. • Outreach included announcements, newsletters, the school website, posters, etc. • Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer. • The information was shared via websites, lunch menus, newsletters, phone calls, flyers, etc.</p>
<p>• 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. • SFA on-site monitoring was completed to ensure that all schools are meeting program requirements.</p>

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