

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Sacred Heart School-Spencer (61028101)
On-Site Review Dates: December 17-19, 2019

Program Year: 2020
Month of Review: November
Lead Reviewer: Deann Murphy
Org Representative(s): Amanda Woodall

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The SFA had 4 students that were given Free/Reduced benefits incorrectly.	Errors were corrected on-site. No further Corrective Action needed for this finding.	
700 - Resource Management	V-0700	Each site at this SFA has their own accounting practices. At one site, lunch revenue is entered into the nutrition fund. At the other site, lunch revenue is entered into their general fund. One site bills the other site for paid lunches served as well as extra lunches provided, but does not bill for reduced lunches served. Each site charges different prices for a la carte foods. Only one site provides the state agency with their financial information as required.	The SFA will state how they will become one entity and ensure that all lunch revenues are deposited into the Nutrition Fund that is separate from the General fund.	
1000 - Local School Wellness Policy	V-1000	The SFA does not have an assessment of their wellness policy goals on file. Neither the policy nor the goals assessment have been made available to the public.	1). The SFA will submit a goals assessment of their local wellness policy. 2).They will state how/when they plan to make both the policy and the goals assessment available to the public. Both the policy and the assessment of the policy goals need to apply to both sites in the SFA.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	Non-program food revenue has not been calculated for SY18-19 to determine if it covers non-program food costs.	Please complete the non-program food revenue tool and submit the completed tool to the State Agency. Non-program food revenue/costs should consist of all adult meals, a la carte and vending to other programs (daycare) from both sites. If the tool shows that non-program food revenue does not cover non-program food costs, the SFA will state their plan as to how they will correct this.	

Site - Level Findings: Iowa Great Lakes Lutheran School (8102)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	Pre-K students are served lunch in their classroom which is an alternate POS site. The teacher calls the office in the morning with the	The SFA will submit to the State Agency documentation of how Pre-K students meals are being counted at the point of service without showing their	

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		meal count and tells office staff there are x number of meals needed with 1 being free. Only designated persons should know benefit status of students. There is no documentation at the point of service that students actually received their meal.	benefit status.	
300 - Meal Counting and Claiming - Lunch	V-0300	The claim filed for November 2019 includes the "extra" meals sent to the satellite school for students to get seconds. This seems to be a systemic problem.	The SFA will submit the JMC edit check record from IGLLS for both Pre-K and K-6 students, AND the schools chart showing the number of extra meals sent to the site and the number of Pre-K meals served. All documentation needs to match the December claim.	
400 - Meal Components and Quantities - Lunch	V-0400	There were 4 meals at IGLLS that passed by the POS and counted as reimbursable that did not contain milk. The site used Serve Only meal style so all students are required to take all components in their full quantities in order to count the meal as reimbursable.	The SFA will explain how they intend to ensure that all students will take all components in their full quantities when using the Serve Only meal style.	
400 - Meal Components and Quantities - Lunch	V-0400	The meal pattern requires that a minimum of 1/2 cup dark green vegetables be offered to students each week. The review week shows that only 1/4 cup dark green vegetables were offered to students which does not meet the minimum requirement. Also, during the on-site review, it was noted that students were not always offered 3/4 cup vegetables each day on the menu.	The SFA will submit a week of menus/Food production records showing that 1/2 cup dark green vegetables are offered to students for the week AND that at least 3/4 cup vegetables are offered to students each day.	

Site - Level Findings: Sacred Heart School (8101)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
600 - Dietary Specifications and Nutrient Analysis	V-0600	The review week menus offered students 15.25 oz. eq. grains which exceeds the recommended maximum of 10 oz. eq. grains per week. Although there is no direct penalty for exceeding the recommend maximums, excess grains offered suggests excess calories are provided which may exceed the maximum average of 500 calories allowed at breakfast daily.	Please explain how you intend to meet the 400-500 calorie requirement at breakfast on average daily, specifically in regards to grains offered each week.	

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	The SFA should attempt to directly verify students on e-lookup prior to sending the household the verification letter. If the student's name is found on e-lookup, verification is complete and the household does not need to submit income information to the SFA. If the student's name is not found, the SFA should proceed with verification as usual.

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300 - Meal Counting and Claiming	303 How often are cashiers and substitute cashiers trained on the meal counting and claiming system (including the backup system)?	Recommend all POS staff, including the Pre-K staff who has an alternate POS site, have training annually on what is expected at the POS. Training should include (as applicable) how to run the electronic POS, what to do if the system is not working, how and if they are able to enter a la carte sales, prices, etc. If the POS operator is ensuring that all students have a reimbursable meal, recommend annual training on OVS guidelines or meal pattern basics. The Pre-K teacher/staff needs to know to count meals as the student receives it - not just when it is determined in the morning.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	If a visiting student eats lunch at the school, they should pay the full adult price for the meal since it is not subsidized by federal/state reimbursement. The negative balance policy states that after a student has a negative balance, they cannot charge any more meals or a la carte to the account. Currently, students are still allowed to eat a reimbursable meal even if they have a negative balance. Recommend the SFA re-evaluate their policy so that they are following what is written.
700 - Resource Management		PROCUREMENT: Micropurchases: When comparing all food purchases and equipment repair, purchases were not spread equitably among all qualified sources. Discussed with the FSD keeping a micropurchase log to help her know how much she has spent at each vendor. Also discussed how surcharges that some vendors charge increase food costs overall and give less value for tax dollars spent. Small Purchases: For small purchases, the SFA needs to send out specs to 3 vendors if possible for price quotes. Discussed with the FSD the small purchase template and no bid form. Specs should contain all foods the SFA plans to purchase from that type of vendor for the entire year. Specs should include both federal and local terms and conditions, including Buy American language if procurement involves food. The SFA needs to keep all documentation of specs sent and quotes received from vendors on file for 3 years + current year. The FSD should spot check prices on invoices to ensure bid prices are correct. Strong encouragement given to the FSD to lock the milk coolers when not in use. Formal: Staff members and other groups that are not part of the AEA Purchasing contract should not be getting AEA Purchasing pricing, but instead, have their own account through Martin Brothers. Please contact both AEA Purchasing and Martin Brothers to check on who is part of the contract and how other groups can set up their own accounts to be billed directly.
700 - Resource Management	700 Did the SFA have the ability to accurately track all revenues and expenditures for the nonprofit school food service separately from all other transactions?	Lunch revenues and expenses should all go through the SFA and not be site specific. For example, the SFA should collect all lunch money from both sites and deposit it into each family's designated lunch account in JMC. Each account would be charged when a reimbursable meal is sold at the POS. The SFA should also determine what to charge students for seconds and those charges would also come out of each family's JMC account. This way, site staff would not need to know who is eligible for benefits, all money is handled at the SFA level and 1 site will not need to charge the other site for meals served each month.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	A copy of the USDA complaint procedure and form were given to the Determining Official to keep on file in case the SFA ever receives a discrimination complaint regarding the Child Nutrition Program.
800 - Civil Rights	810 Review program materials.	Each posted menu needs to have the statement "This Institution is an Equal Opportunity Provider."

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1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements?	The Local Wellness Policy committee needs to include a student and a community member who can give input into the policy and the goals assessment. Both the policy and the goals assessment need to be reviewed at least every 3 years and both need to be made available to the public. The Policy and assessment need to include both schools in the SFA.
1200 - Professional Standards	1213 Verify the SFA's response to Q1203 on the Off-site Assessment Tool.	Since the FSD is not on-site at the Iowa Great Lakes Lutheran School and the lunch servers are volunteers, recommend the person in charge of the lunch program at that site be Serve Safe certified. The Health Department often requires this.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	Part time staff, cashiers and regular volunteers should be trained on topics that are relevant to their jobs. For example, servers should be trained on topics such as food safety, reading food production records for proper portion sizes, meal pattern requirements, etc., instead of non-relevant topics, i.e. food bars and determining eligibility. The FSD should give all staff and volunteers guidance as to which training they should take.
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	Recommend the FSD track all staff, including office staff, and volunteers involved in the Child Nutrition Program at both sites on 1 tracking form so that she can ensure that everyone has met their required training hours and everyone has had appropriate training.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The FSD should individualize the Standard Operating Procedures (SOPs) at each site since one site is a production kitchen and the other is a satellite site that only holds temperatures/serves food. Drying dishes with a towel is a food safety violation (all dishes need to be sanitized and then air dried). There should be an SOP which addresses this. The FSD should review all SOPs with all staff/volunteers annually so they fully understand food safety practices. Also, milk refrigerator temperatures should be recorded at the satellite site each operating day.
1400 - Food Safety	1401 If conducted as part of the Administrative Review, are SFA contracted and self-operated warehouses, storing all foods (commercial and USDA) properly?	There is a great deal of ice build-up in the walk-in freezer at Sacred Heart School.
RMCR - Revenue From Nonprogram Foods	3 Did all revenue from catering and/or vending activities accrue to the SFA's nonprofit school food service account?	Sacred Heart School and the ECC signed a vending contract in Oct. 2019. The contract stated that the ECC would pay Sacred Heart a price per meal. Based on this contract, starting in October, 2019, the SFA should be invoicing the ECC monthly for all meals served at the prices listed. The ECC should claim all meals served for reimbursement and should keep that income in an account that is coded separately from the NSLP account. Food costs should be calculated in non-program food revenue at the end of the fiscal year. Revenues from this contract should cover food costs as shown by the non-program food revenue tool.
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	The State Agency e-mailed the FSD the non-program food revenue template and an example and gave instructions on how to complete it. The non-program food revenue tool should be calculated annually at the end of the fiscal year to determine if non-program food revenue was adequate to cover non-program food costs.

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Site - Level Technical Assistance Sacred Heart School (8101)

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	319 Electronic Systems Only	One student came through the breakfast line and initially refused to take 3 items on his tray for a reimbursable meal. The cashier counted this as a reimbursable meal because the POS does not allow a la carte sales at breakfast. The SFA should decide if a la carte is available at breakfast for students that do not take a reimbursable meal. If so, the POS needs to be set up to accept a la carte charges.
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Combination foods that contain 2 or more items, i.e. Egg and Cheese Sandwich at breakfast, etc., should have a standardized recipe on file.
600 - Dietary Specifications and Nutrient Analysis	603 Were any areas identified during the Off-site review requiring technical assistance or corrective action prior to the beginning of the On-site portion of the review?	The review week breakfast menu offered 15.25 oz. eq. grains. Although there is no maximum number of grains to offer, the recommended maximum number of grains in a week for breakfast for grades K-8 is 10 oz. eq. Excess grains increases the risk of exceeding the average calorie maximum of 500 calories per day.
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?	The SFA on-site monitoring should not be done as a desk review. Have another staff member observe the areas on the form and note any problems found. Make corrective action as needed as noted on the form.
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?	The SFA needs to record all foods they accept that are non-domestic on the Buy American Exception log. Non-domestic foods purchased routinely, i.e. pineapple, bananas, mandarin oranges, etc. can be listed once annually with a note that they are purchased routinely. Non-routine foods that are accepted should be recorded in the log each time.
1500 - Reporting and Recordkeeping	1502 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	All records pertaining to the Child Nutrition Programs at both sites need to be kept on file for 3 years + the current year. The exception to this is temperature records which need to be kept for 6 months.

Site - Level Technical Assistance Iowa Great Lakes Lutheran School (8102)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	317 a. Based on meal observation, does the meal counting system as implemented prevent overt identification of students receiving free and reduced price benefits?	The pre-school teacher calls in a meal count to the office in the morning, i.e. x number of meals with 1 free meal. Only designated staff should know who receives free/reduced benefits. All Free/Reduced information should be kept confidential. Also, there should be a POS count sheet with each student name listed that is marked by the teacher when the student receives their meal. This information can then be entered directly into the electronic POS system without knowing who gets free/reduced priced meals.
300 - Meal Counting and Claiming - Lunch	318 At the selected school(s), does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	The SFA may need to contact JMC to see if the Pre-K students can be added to the K-6 student edit check report. Currently these are 2 separate reports that have to be consolidated when filing the claim. Report consolidation increases the risk of errors on the claim.

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300 - Meal Counting and Claiming - Lunch	325 a. For the review period, complete S-1, 17.	The claim for reimbursable meals cannot include "extra" meals sent to the satellite site used for seconds.
400 - Meal Components and Quantities - Lunch	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	The menu on the day of review only included 1/2 cup carrots to be served to students at this Serve Only meal site. Minimum menu requirements are 3/4 cup vegetables offered daily to all students and with Serve Only meal style, all students must receive the full 3/4 cup serving daily. Staff was told about the error and they added an extra 1/4 cup carrots to each students tray.
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	When Serve only meal style is used, all students must take all components in their full quantities in order to claim the meal as reimbursable.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The SFA must plan a minimum of 1/2 cup dark green vegetables into the menus each week. Leafy green vegetables, i.e. romaine, fresh spinach, etc. only credit 1/2 as much as is served. Another option for a dark green veggie is broccoli.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	All foods sold a la carte to students at lunch should have documentation that they meet Smart Snacks criteria. Documentation can be found on the Alliance for Healthier Generation website calculator. Labels should be run through the calculator and kept on file showing that each food item sold a la carte is compliant. The exception to this is the entrée sold to the students the day it is served on the lunch menu. Also, all students can have Fat Free and 1% milk.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	The USDA requires SFAs to have or request 2 health inspections annually. If the health inspector only comes 1 time annually, the SFA should e-mail a request for a second inspection and keep the request on file.
Infant and Pre-K Meal Pattern Checklist - Lunch	11 Was the appropriate milk type served?	Pre-K students are only allowed to have unflavored Fat Free or 1% milk when following the CACFP meal pattern in their classroom. Flavored milk is not allowed with the CACFP meal pattern.

Org - Level Commendations

Description
A working water fountain was available in or near the cafeteria at both sites for students to drink water with their meal.
No discrimination was observed at either site during meal service.
PROCUREMENT: For Micropurchases: Each micropurchase made was less than the micropurchase threshold. Purchase prices are reasonable. The SFA keeps receipts for all purchases made. Small Purchases: The total procurement cost is less than the small purchase threshold. The SFA has records available on file. The FSD did try to contact a second vendor for a bid. The FSD attended procurement training in Oct. 2019. Formal Purchases: The SFA has the AEA Purchasing disk on file with the RFP, etc. The FSD keeps copies of all pricing changes monthly/weekly. She does monitor her contract by checking in each order and withholding payment until any issues are resolved. Processing: The SFA used 161% of their USDA Foods allotment in SY18-19.

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The And Justice for All civil rights poster was posted in both cafeterias. Annual civil rights training was provided to all staff involved in the program. 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 summary form is complete and on file. No discrimination was observed. SFA on-site monitoring was completed as an in-house review of program requirements. The current state and federal non-discrimination statements are listed on household notification letters.
The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The application selected for verification was confirmed prior to verification.
The district has a current wellness policy on file that gets reviewed annually by their wellness committee. Wellness committee meeting minutes are on file for anyone who wishes to see them. Wellness Policy Goals are set for nutrition promotion, nutrition education, and physical activity.
The FSD has attended state agency meetings on Healthy School Meals and Procurement in order to keep up on the multiple regulations associated with the Child Nutrition Program. Staff and volunteers at both sites have also completed training so that they have a better understanding of the program and how their roles impact the program. Most staff and volunteers have met their minimum professional standards training requirements.
The SFA checks e-lookup for students who might be directly certified for free/reduced benefits frequently. The current application form and guidelines were used, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. Applications were complete with SSN's and adult signatures, and all applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income or annual income listed. Carry over were given to families who received benefits last year and they were given reminders to turn in new documentation prior to the 30 day ending date. Free meals are extended to all members in the household.
The SFA had a positive balance in their nutrition account as of Dec. 31, 2018 so they were not required to increase paid student lunch prices this year.
The SFA has a district-wide written Food Safety plan that includes many required elements. The FSD is updating the manual for each school. The latest Health Inspection Report was posted in a public place at both sites after direction was given from the State Agency. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean. Food Service workers practiced good gloving procedures at both sites.
The SFA promoted both breakfast and the local summer feeding program to households as required.

Site - Level Commendations Sacred Heart School (8101)

Description
All components were available in adequate quantities at breakfast. The FSD had CN labels and Nutrition Facts labels on file for foods served. Many low sodium and low sugar foods were found in storage. Students seemed to have adequate time to eat their meal and the cafeteria was adequately supervised. Offer vs. Serve was done correctly at breakfast. Food production records are available for all meals served. Signage was posted so that students knew how to make a reimbursable meal.
Meal counts for the day of review were reasonable when compared to the review month (November) meal counts at Sacred Heart. The November meal counts at this site seemed accurate and complete. Students were not overtly identified as free/reduced/paid during the claiming process or during meal observations.

Site - Level Commendations Iowa Great Lakes Lutheran School (8102)

Description
The Iowa Great Lakes Lutheran School site has a number of dedicated volunteers who come in each week and serve meals to students.