

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Spencer Comm School District (61020000)
On-Site Review Dates: January 28-30, 2020

Program Year: 2020
Month of Review: December
Lead Reviewer: Deann Murphy
Org Representative(s): Chris Hogge

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	There were 8 benefit issuance errors from the sample of 420 students reviewed and 2 other household members not included in the sample that received incorrect meal benefits. This was an error rate of 1.90% of sampled students in the district.	The SFA corrected all application errors on-site. No other corrective action is needed.	
200 - Verification	V-0200	Three of the four verified applications were either originally determined incorrectly or verified incorrectly. Benefits were changed during the Administrative Review on 2 of these families based on income information provided. The SFA used net pay instead of gross pay when calculating benefit status. One household letter stated that the family was not going to be given an appeal period before changing benefits. One application selected for verification was not determined correctly so was not actually error prone.	The FSD and Assistant FSD will watch the webinar Preparing To Do Verification Fall 2019 found at https://educateiowa.gov/pk-12/nutrition-programs/learning-tools-schools . Both staff members will submit to the State Agency a signed/dated certificate showing that they watched the webinar.	
1000 - Local School Wellness Policy	V-1000	The District does not have a wellness committee made up of the required stakeholders that meets regularly to discuss student wellness. The policy goals have not been assessed and that assessment has not been made public as required.	The SFA will state when the wellness committee members (Culture and Climate Committee) will assess the Wellness Policy goals. The SFA will also state when and how they will make the Wellness policy and goals assessment available to the public. If they put them on their website, please state the web address where they can be found.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The non-program food revenue tool shows that the SFA needs to generate more income in order to cover non-program food costs. Based on information provided by the FSD, the calculation seems to have been done incorrectly.	The FSD will re-calculate the cost information in the non-program food revenue tool and submit the revised tool to the State Agency. If the tool still shows that non-program food costs are higher than non-program food revenue, the SFA will state how they intend to generate additional revenue to meet/exceed non-program food costs.	

Site - Level Findings: Spencer Middle School (0209)

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Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA does not use Food Production Records at breakfast to record what portions are served at each site. Staff are verbally told what to serve, but nothing is recorded. Food Production records are required for each meal served.	The SFA will submit to the State Agency 1 week of completed food production records for breakfast at the Middle School showing food items offered at each meal, quantity prepared, serving size, planned servings, total served and any left-overs.	
400 - Meal Components and Quantities - Lunch	V-0400	The review week lunch menus for the MS showed that the SFA was short on total vegetables on Friday by offering only 5/8 cup vegetables that day. Three-fourths cup vegetables is required to be offered daily for this age group. The SFA planned only 8.5 oz. eq. M/MA for the week for the main meal when the meal pattern requires 9 oz. eq. M/MA for the week. For the pre-made salad entree, the SFA planned 17.5 oz. eq. M/MA for the week. The recommended maximum M/MA for the week for this age is 10 oz. eq. Offering excess M/MA increases the risk of exceeding calories, sodium and saturated fat ranges. Also, the pre-made salad entree offers only 5 oz. eq. grains for the week when the meal pattern requires the SFA to offer at least 8 oz. eq. grains for the week.	The SFA will submit 1 week of middle school menus, food production records and labels for all foods offered, including alternate entree options, to the State Agency. All components must meet minimum meal pattern requirements, including sub-groups, for the week submitted. Menus must also stay close to meal pattern maximums or, if they do not, the SFA will show how the menus meet calorie, sodium and saturated fat ranges.	

Org - Level Technical Assistance

Area	Question	Comments
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Field trip/sack lunches do not fall under OVS rules since they are pre-bagged for the students. Therefore, all K-8 sack meals must meet minimum meal pattern requirements, including 1 oz. eq. M/MA, 1 oz. eq. grain, 3/4 cup vegetable, 1/2 cup fruit, 1 cup milk. HS sack meals need to meet their minimum meal pattern requirements as well. Information on the school website regarding the district's meal charge policy, meal prices, etc. are out of date, listing the past FSD's name and contact information, old prices, etc. and should be revised.
700 - Resource Management		PROCUREMENT: Discussed with the FSD how to complete the Procurement Plan for the next school year. The procurement plan should be completed annually before the SFA sends out vendor specifications each year. Micropurchases: JCL Solutions expenses were found to be unallowable costs. The Business Manager sent documentation showing that as a result of this AR, the nutrition fund was reimbursed for these expenses. The SFA does need to spread the wealth more evenly with their micropurchases. Small purchases: The bread vendor was listed on the off-site tool as a formal contract. However, the SFA did not post a public notice nor fill out an IFB/RFP for the contract so formal procurement procedures were not followed. Federal and local terms and conditions need to be included in the specs sent to vendors before bid prices are received. The SFA did not extend the pricing and it appears they accepted

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		the higher priced bid which is not allowed under Federal procurement rules.
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 State Agency provided a copy of the USDA complaint procedure and form to the SFA. If the SFA ever receives a discrimination complaint regarding their Child Nutrition Programs, the SFA is to follow this procedure and form and send it to the USDA.
800 - Civil Rights	810 Review program materials.	The posted menu only needs to list the shortened federal non-discrimination statement, i.e. This Institution is an Equal Opportunity Provider. The Iowa non-discrimination statement is not necessary.
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 main focus of the Local Wellness Policy and committee needs to be student wellness. The local wellness committee needs to be made up of an administrator, board member, Foodservice staff, PE teacher, School Health professional, parent, student and community member. Each of these stakeholders needs to be invited to give input into the wellness policy and goals assessment. Recommended to the Superintendent to have the Wellness Committee meet at least twice annually to set and then evaluate goals for the district at each grade level (Elementary, Middle, High School). A goals assessment template was provided to the FSD during the Administrative Review. This needs to be completed and both the policy and assessment need to be made available to the public.
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?	USDA requires SFAs to promote breakfast to households. Promotion should include the breakfast menu, price, times offered and information about why breakfast is important. SFAs can promote breakfast on their website, newsletter, e-mail, etc. and should occur at least twice annually. The FSD may wish to promote National Breakfast Week in March annually.
RMCR - Revenue From Nonprogram Foods	9 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	E-mailed the FSD instructions and an example of how to calculate non-program food costs. The current non-program food revenue tool shows that the SFA needs to generate extra revenue in order to cover non-program food costs. Based on a discussion with the FSD, there seems to be an error in the cost section of the completed tool. The FSD should recalculate reimbursable meal costs based on the instructions given and re-do the tool. This tool needs to be completed annually and kept on file at the SFA.

Site - Level Technical Assistance Spencer Middle School (0209)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	Breakfast signage should show how each food item credits. For example, each 1 oz. eq. item can credit as 1 item; a 2 oz. eq. item can credit as either 1 item or 2 items. The SFA should not credit two 1 oz. eq. items as 1 item total. Recommend the FSD and kitchen staff review the OVS manual on breakfast crediting. This was e-mailed to the FSD during the on-site review.

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400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The FSD and assistant were sent the State Agency Food Production Record template, completed samples of both breakfast and lunch and a link to a training video to help train staff on how to use the new template.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The on-site lunch worksheets were sent and reviewed with both the FSD and assistant FSD. Discussed how certain entree choices were either short or heavy on certain components. Discussed using the State Agency food production record (FPR) templates for the main and alternate meals and the Food Bar FPR for the salad bar offered. The SFA also needs to have standardized recipes for any foods that include 2 or more items mixed together, i.e. pre-made salads, turkey sandwiches, etc.
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	Both the And Justice for All poster and the latest health inspection need to be posted in a public place instead of inside the kitchen at all sites.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	Since the Health Inspector is only now coming once annually to inspect each kitchen, the FSD needs to request a second inspection from them and keep that documentation on file for the required 3 years + the current year.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	The dish machine log consistently records temperatures at 150-165F. A high temperature dish machine should reach 180F to properly sanitize the dishes. Upon observation, the cycle did reach >180F, but the thermometer does not record this. Suggested the FSD visit with the manufacturer and/or the health inspector to determine why the highest temperature is not being recorded. If a food borne illness occurred, there is no documentation at the MS showing that appropriate dish machine temperatures were reached and the dishes were properly sanitized.

Org - Level Commendations

Description
All staff involved in the Child Nutrition program have met their required professional standards training for this school year. The Assistant FSD uses the State Agency tracker tool to track all training completed. Certificates or sign-in sheets are kept on file for each employee. The director met the hiring requirements set by USDA for a district this size.
Benefit documents were organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were complete with SSN's and adult signatures, and were determined within ten days. 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.
District menus offer a variety of kid-friendly foods. A salad bar option was available at the Middle School. On the day of review it was full of a number of fresh, colorful vegetables and a variety of fruits. Water was available as required. The FSD has labels for foods served which support the components required by the meal pattern. Chocolate milk is only served once a week at the MS. Many low sodium vegetables were found in storage. The menu and signage is posted so students know what is offered each day.
PROCUREMENT: The SFA does have a written procurement plan and Code of Conduct on file for SY19-20. The Code of Conduct contains dismissal instructions in case the Code is violated. Micropurchases: All micro-purchases were under the threshold. Prices paid for each purchase were reasonable. Small Purchase: The FSD did reach out to at least 2 vendors with specifications that did not restrict competition. The FSD does spot check invoices for prices and checks in all products from the vendor. Formal: The FSD has a copy of the AEA Purchasing disk which contains the RFP and contract. The FSD checks in the products from the vendor and spot checks bid prices against the invoice as part of contract management. Reviewed invoices showed that all prices matched bid prices. The SFA received a refund in SY16-17 which was deposited in the nutrition fund. Processing: The SFA used 103% of their USDA Food entitlement dollars in SY18-19.

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The correct number of applications were verified as was reported on the Verification Collection Report form submitted to the State Agency. All income sources were verified and the process was completed on time. The applications selected for verification were confirmed prior to verification.
The district has a current wellness policy on file. Goals are set for nutrition promotion and nutrition education, physical activity and other, school based wellness activities.
The district has taken reasonable steps to ensure access to services are offered to Limited English Proficient households. 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 to ensure that all schools are meeting program requirements. The current state and federal non-discrimination statements are listed on household notification letters.
The SFA completed a Paid Lunch Equity (PLE) tool, but they did have a positive balance in their account so the paid student lunch price was only raised slightly. Reports are filed with the State Agency in a timely manner. and they keep their Nutrition program records for at least 3 years + current year as required. The SFA utilizes USDA Foods through both direct distribution and DOD for fresh fruits and vegetables.
The SFA participates in the Summer Food Program and so they promote summer to families in the community.

Site - Level Commendations Spencer Middle School (0209)

Description
Meal counts during the on-site review were reasonable when compared to the December review month counts. Meal count totals for the month of December appeared accurate and complete. There was a point of service, POS, at the beginning of the line as approved on the SFA application. An employee watches students at the end of the line to ensure everyone has a reimbursable meal. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Offer vs. Serve is done correctly.
Smart Snacks in the Middle School are limited to second entrees served that day and milk along with a vending machine located near the cafeteria. It contains all Smart Snack approved foods and beverages and the SFA has documentation on file for each item offered.
The SFA has a district-wide written Food Safety plan that includes most required elements. 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.