Bureau of Nutrition and Health Services

State Review Summary Report

St Joseph Community Catholic School-New Hampton (46628106)

Date of Review: January 14th - 16th, 2020

Program Year: 2020

Month of Review: December

Lead Reviewer: Donna Matlock
Org Representative(s): Christina Carlton

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Household applications were not correctly approved: verified application was incorrectly determined using net income rather than gross income. 2 Household benefits were not correctly transferred from the direct certification list to the benefit issuance POS.	Determining Official will participate in the Application Approval and Direct Certification – Part 1 & 2 webinar at this link: https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition . State your intentions to do this. Submit copies of letters notifying households of an increase or decrease in benefits. Indicate the date that missing information, such as SSNs, income frequency, dates of application, etc., were obtained.	
100 - Certification and Benefit Issuance	V-0100	SFA misread columns on DC (direct certification) list where one household should have been "other reduced" and was recorded as "other free."	For your response, indicate how you will ensure that direct certification benefits will be correctly transferred to the POS in the future. Indicate the date that changes to benefits were made for those receiving benefits at the incorrect	

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		SFA does not have the option to import the DC lists into Power School which will ensure the correct benefits are set in Power School where the SFA has been doing this manually.	level.	
200 - Verification	V-0200	Q209cF: The application(s) selected for review were incorrectly verified.	Q209cC: The SFA will attend the SA's Income Eligibility Webinar.	
1000 - Local School Wellness Policy	V-1000	local wellness policy was not submitted.	Submit the district's plan on how it will conduct an assessment on the implementation of the LWP (Local Wellness Policy) goals by June 30, 2020. Once completed the assessment must be made available to the public.	

Site - Level Findings: St. Joseph Community Catholic School (8106)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
Issuance	handled for children who have not submitted an application for the current school year?	SA provided technical assistance on USDA Eligibility requirements where previous school year eligibility benefits are carried over into the current school year for 30 operating days before benefits are decreased to paid. Talked about setting up the end date in software system or a reminder to change benefits after 30 operating days.

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100 - Certification and Benefit Issuance	112 Does the benefit issuance system identify how eligibility was determined?	SFA uses Power School software with Power Lunch for benefit issuance list. The drop down button only provides a few choices to select which doesn't match actual certification type for data collection. SA helped SFA identify the different types of certification for future data collection.
100 - Certification and Benefit Issuance	132 Does the direct certification list utilized by the SFA:	Secretary was downloading the DC (direct certification) lists but was not capturing all the columns therefore giving students wrong benefits. SA walked through the DE portal and discussed the formats to download. SFA uses MAC and does not have excel software to provide all columns as the current software Power School is not showing all columns on the DC list.
700 - Resource Management		SA shared DF (diverted food) spending report from Sarah White showing one vendor with 100% but FSD is planning to use up PAL dollars.
700 - Resource Management	703 Excluding the purchase of equipment using equipment grant funds, if the SFA used food service funds to buy equipment* during the school year under review, did it receive prior approval from the State agency either directly or via the State's pre-approved equipment list?	SFA misunderstood question and did purchase tables using nutrition funds. SA changed answer to yes to which then removed the risk flag.
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?	FSD participated in the Wellness Triennial Assessment webinar on January 15, 2020. SA provided handouts on LWP (Local Wellness Policy) during onsite visit.

Site - Level Technical Assistance St. Joseph Community Catholic School (8106)

Area	Question	Comments
<u> </u>	documentation.	SA discussed with FSD importance of indicating component contributions and planned servings. FSD lists 'amount prepped' but the top section for reporting isn't always completed with 'planned servings.'

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	FPR's submitted for certification worksheets were not fully completed so during onsite visit SA reviewed the FPR's which had more information to see documentation matches worksheets.

Org - Level Commendations

Description

- 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. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.
- Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of December 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.
- 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.
- 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.
- 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.
- The Food Service Director attended the Regional Procurement Training. The district Purchasing Policy was revised to increase the small purchase threshold for Child Nutrition Programs. There is a written procurement plan and code of conduct. The local policy for disciplinary actions for violations of the code has been identified on the written code of conduct. When using the micro purchase method, each transaction with the vendor was

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below the local micro-purchase threshold of \$3,500. The purchase prices were reasonable. • 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 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. • The Paid Lunch Equity (PLE) tool was completed and prices were increased as required. • The Non-Program Revenue (NPR) tool was completed, and no increase in prices were required. • 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.

Site - Level Commendations St. Joseph Community Catholic School (8106)

Description

- Signage was posted explaining what constitutes a reimbursable meal. A monthly breakfast menu is also posted. Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one of four items offered at breakfast. Students have a variety of meal components to select at breakfast. Students have a daily choice of a hot or cold breakfast.
- 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. 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 (FSD) does a wonderful 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 complete salad entrée as a la carte choice in addition to the main entrée. Menus included many homemade entrees, and standardized recipes are used for food production. Free potable water is available to all students for lunch and for breakfast 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. Recess is scheduled before lunch service. 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. •

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Nutrient analysis was not required.

- The Food Service Director completed the USDA menu worksheets for the week of December 2nd 6th, 2019 for breakfast and lunch at St. Joseph 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 St. Joseph Elementary school 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 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 were proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.