

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Wapsie Valley Community School District (67620000)
Date of Review: March 3rd – 6th, 2020

Program Year: 2020
Month of Review: January
Lead Reviewer: Donna Matlock
Org Representative(s): Dave Larson

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. One application was not determined since student appeared on DC (Direct Certification) list as "other reduced." SA determined application as free.	Q 126 ca: Submit dates when letters were sent notifying households of an increase or decrease in benefits. Indicate when the POS was increased from "reduced to free."	
100 - Certification and Benefit Issuance	V-0100	SFA did not extend free benefits to siblings of the same household. A student appeared on the DC list as "free."	For your response, indicate how you will ensure that direct certification benefits will be extended to other household members and correctly transferred to the POS in the future. Indicate the date that changes to benefits were made for those receiving benefits at the incorrect level.	
100 - Certification and Benefit Issuance	V-0100	Repeat finding from AR (Administrative Review) 2016-2017. The " Potential " direct certification lists are not being retained by the SFA.	Describe in a plan who will be responsible in downloading all required DC (direct certification) lists, including who will be retaining all documentation for 3 years plus the current fiscal year.	

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200 - Verification	V-0200	Q209cF: The application(s) selected for review were incorrectly verified.	Q209cC: Identify who will attend the SAs (State Agency) Income Eligibility Webinar.	
200 - Verification	V-0200	Q213F: The SFA did not send out a notice of adverse action which contains all required information and/or notification of appeal rights.	Q213C: Submit the date when a copy of the adverse action letter was sent to the family indicating the date benefits will be decreased.	
300 - Meal Counting and Claiming	V-0300	<p>The responses provided in the off-site assessment tool match the current practices by using the wrong report for claims from Infinite Campus. SFAs response indicates using the "Transaction Summary" report which does not capture the actual meal counts resulting in inaccurate meal counts in claims.</p> <p><i>USDA regulations state SFAs must have in place internal controls that ensure the accuracy of meal counts prior to submission of claims. Part 7 CFR210.8 (a)(2)(ii). The "edit check" report captures the daily meal count for free, reduced, and paid and ensure meal counts of each benefit status does not exceed the total number of students identified for each benefit.</i></p>	Describe in a plan who will ensure internal controls are established and correct reports are used to check daily meal counts prior to submitting claims.	

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700 - Resource Management	V-0700	<p>SFA is not fully utilizing allocated funds supported by USDA Foods. SFA has only allocated 70.82% of funds towards foods for meals with \$6,945.00 remaining for usage. DOD foods will need to be order throughout the school year to spend down allocation.</p> <p>To support school nutrition programs the State requires SFA's to utilize USDA funds to its fullest capacity up to 100% usage.</p>	<p>Describe in a plan how SFA will incorporate ways to utilize USDA dollars moving forward.</p> <p><i>Utilizing these funds provides SFA's with additional funds to improve the quality of foods, salaries, equipment & operations for an improved environment & morale.</i></p>	
800 - Civil Rights	V-0800	<p>Repeat Finding from AR 2016-2017</p> <p>The "Public Release" was not sent to the local media indicating the district participates in the NSLP & SBP. The Public Release can be found in Download Forms, ELIG080.</p>	<p>Describe in a plan when the Public Release will be sent out to local media moving forward. This should be done annually prior to the first day of school.</p>	
800 - Civil Rights	V-0800	<p>The racial/ethnicity summary form was not completed for the current school year. This form captures racial/ethnicity data from completed eligibility</p>	<p>Describe who will be responsible ensuring this summary form is completed annually and updated as needed throughout the school year.</p>	

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		applications. Form can be found in Download Forms, ELIG085.		
900 - SFA On Site Monitoring	V-0900	<p>Q901F: The on-site review of the meal counting and claiming procedure was not completed prior to February 1st.</p> <p>Q901bF: An extension was not requested and approved by the State Agency for completion of the on-site review.</p>	<p>Q901C: Describe how you will complete the on-site review of the meal counting and claiming by February 1st.</p> <p>Q901bC: In the future if the SFA is unable to complete the on-site review of meal counting and claiming procedures an extension will be requested from the State Agency. State your intention to do this step, if applicable.</p>	
1000 - Local School Wellness Policy	V-1000	The most recent assessment of the local wellness policy was not submitted.	<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 30, 2020. <i>Once completed the assessment must be made available to the public.</i></p> <p>USDA requires SFA's to review the policy and conduct an assessment every three (3) years to be compliant.</p>	
1600 - School Breakfast and SFSP Outreach	V-1600	<p>Repeat Finding from AR 2016-2017</p> <p>Q1601F: The SFA did not inform eligible families about the availability and location of free meals for students via the Summer Food Service Program.</p>	<p>Q1601C: Describe how you will inform eligible families about the availability and location of free meals for students via the Summer Food Service Program.</p> <p>Resources can be found at this link - https://www.educateiowa.gov/pk-12/nutrition-programs/summer-food-service-program These resources can be posted on the district website and</p>	

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			distributed to families, posted in buildings, grocery stores, library, in newsletters, and local media.	
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Site - Level Findings: Wapsie Valley High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	<p>The planned menu from the review period did not meet the required minimum and maximums. The R/O (red/orange) vegetable subgroup is consistently short for grades 9-12. Minimum weekly amount must be 1-1/4 cup of R/O offered every week.</p> <p>TA: FSD and head cooks for all sites are new this school year. SA had discussions with FSD and high school head cook regarding questions on meal pattern for both lunch and breakfast and how best to meet the different grade levels between 7th-8th and 9th-12th graders.</p>	<p>Describe in a plan how the R/O vegetable subgroup will be met weekly according to the meal pattern for 9th-12th grade.</p> <p><i>SA recommends offering red bell pepper strips, carrot sticks, tomatoes, or other red/orange vegetables since romaine salad is offered daily with meals. Additional R/O foods can be sweet potato fries (waffle, crinkle, or tater tots), pumpkin, or carrot/tomato juice.</i></p>	
1100 - Smart Snacks in School	V-1100	<p>Vending machines are available during school hours which contains food and beverage items not compliant for all grades. <i>(Ruffles Baked Cheese Blend chips exceeds 200 mg of sodium - not complaint for K-12 & Low and no-calorie</i></p>	<p>Please describe in a plan how you will ensure all beverages/food items sold via vending machines during school hours, will meet Smart Snacks standards.</p> <p>All items need to be checked using the "Product Calculator" at the website "Alliance for a Healthier Generation" website:</p>	

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		<p><i>beverages, with or without caffeine and/or carbonation; calorie-free, flavored water is for 9-12 only.)</i></p> <p>* The school day is defined as the midnight before to 30 minutes after the end of the school day.</p>	<p>https://www.healthiergeneration.org/resources/smart-snacks.</p>	
1400 - Food Safety	V-1400	<p>SA observed boxes of food on the floor of walk-in freezer. Storage of all food must be a minimum of 6 inches above the floor and 6" or more from the top of ceiling.</p> <p>SFA just received a delivery the previous day but all foods need to be inventoried and stored properly after delivery. Staff may need extra time to handle deliveries and storing of foods properly.</p>	<p>Describe in a plan how you will ensure the storage violation will be fixed and prevented in the future.</p>	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	132 Does the direct certification list utilized by the SFA:	SFA does not import the DC (Direct Certification) list into Infinite Campus software POS (Point of Sale) and benefit issuance list. Importing the DC list would identify student eligibility and eliminate benefit issuance errors. Which includes the ' <u>potential list</u> ' (<i>repeat finding</i>) that shows student matches to other

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		<p>students already receiving benefits.</p> <p>SA walked through Infinite Campus showing how to import the DC list. If SFA has questions, they can always contact the software company's IT representative.</p>
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	SFA will need to correct the verification report in IowaCNP, line number 5-8, to reflect the correct status of verified household as SA validated the application was not correctly approved.
200 - Verification	214 If a student's eligibility changed due to verification,	SA went over the SA prototype letter to use in notifying families of decrease in benefits as a result of verification; and shared the location of the letter in IowaCNP, in "Download Forms."
600 - Dietary Specifications and Nutrition Analysis	602 If Option 1 is selected, what initial risk level has been assigned for the targeted menu review site based on the results of the Dietary Specifications Assessment Tool?	<p>SFA has not uploaded the certification worksheets for SA review prior to onsite AR.</p> <p>SA assisted new FSD via phone in completing the certification worksheets. During the onsite visit SA and FSD worked on the certification worksheets together.</p>
700 - Resource Management		<p>Procurement:</p> <p>SFA did not have bid documents or solicitations to show proper selection or number of bids submitted for both Pan-O-Gold Bakery & Prairie Farms Dairy vendors. Superintendent, Business Manager, FSD, and all head cooks are new this school year. There was no records to show bids or contracts from vendors.</p>
1000 - Local School Wellness Policy	1005 <i>Provide a copy of the most recent assessment on the implementation of the local school wellness policy.</i>	SA sent an email with attachments on the LWP (Local Wellness Policy) Triennial Assessment requirements. Included was the School Wellness Progress Report Plan template.

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1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	<p>SFAs food service staff that were recently hired will need to complete training requirements based on duties based on hours of employment. SA shared the Professional Standards Guide and tracking tools.</p> <p>Online tutorials, handouts, and webinars are located at the nutrition website - https://www.educateiowa.gov/pk-12/nutrition-programs/learning-tools-schools</p> <p>Additional training opportunities are located in left sidebar of web page under "School Meals" section within "Communication Tools, Professional Standards, and Menu Planning & Recipes."</p>
RMCR - Revenue From Non-program Foods	6 Did the SFA assess its compliance with the Revenue from Non-program Foods requirements?	<p>SA provided the USDA Non-Program Revenue Calculator during onsite visit. SA worked with business manager in completing the tool using the Financial Report Tool in IowaCNP.</p> <p>SFA's minimum portion of non-program revenue of non-program food costs is 10%. SFA is only capturing 6% of revenue which is not adequately contributing to non-program food costs. SFA will need to consider raising prices for non-program foods (adult meals, a la carte, 2nd entrees/milk, vending).</p>

Site - Level Technical Assistance Wapsie Valley 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?	<p>SA shared with the SFA copies of -</p> <ol style="list-style-type: none"> 1. Vary Your Veggies poster, 2. What is a Reimbursable Meal handout, 3. New Vegetable Subgroup poster,

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		<ul style="list-style-type: none"> 4. Breakfast/Lunch Meal Pattern 5. Creditable Grains chart, What are the Required Serving Size of Grains 6. Milk Substitution handout 7. Smart Snacks handout 8. What is HACCP 9. FPR Daily Requirements handout 10. Breakfast & Lunch signage
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Discussed that toast or another grain needs to be offered with cereal if student declines the hot entrée, in order to meet the weekly grain ranges.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	SA provided the FSD and both head cooks the Iowa Menu Planning tool excel worksheet for each grade categories where it will help show if weekly menus meet the meal pattern. Also provided a copy of the meal pattern, and FPR (Food Production Record) template where it can be typed up in advance and printed off minimizing time in manual labor.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	<p>During breakfast food service staff were requiring students to both fruits offered to make 1 cup. SA discussed with staff with OVS (Offer vs. Serve) students are only required to take a 1/2 cup minimum with 2 other items to make a reimbursable meal.</p> <p>Discussed items versus components for breakfast and lunch, and went over the meal pattern for both meal services.</p>
500 - Offer versus Serve	502 Is there signage explaining what constitutes a reimbursable meal to students including the requirement to select at least 1/2 cup fruit or vegetable?	SA provided Team Nutrition's 11" x 17" tray posters showing how to make a reimbursable meal.
900 - SFA On Site Monitoring	901 a. Was the on-site review of the <i>lunch</i> counting and	The Onsite Monitoring was not completed by February

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	claiming procedure completed prior to February 1?	<p>1st. FSD, Business Mgr., and Head Cooks are all new this school year. SA discussed with FSD about the Onsite Self-Monitoring forms (NSLP260), purpose/process, and required due date for completion.</p> <p>SA shared the LEA Calendar (NSLP040), located in Download Forms, which provides deadlines/due dates for required processes and forms to be completed by.</p>
1500 - Reporting and Recordkeeping		<p>SA & SFA held a conference call discussing the offsite questions, documents required for AR both offsite and onsite for visit, and answers to questions SFA had.</p> <p>Provided help with FSD in completing the certification worksheets on Feb. 20 & 24th, 2020.</p>

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 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. • 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>• 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 on time.</p>
<p>• The district has a current wellness policy on file. • The SFA's wellness policy was reviewed and revised on 2/17/2020. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. • The wellness policy is available to the public via district website. • Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.</p>

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• 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. • No indirect costs are charged to the food service program. • 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 Wapsie Valley High School (0109)

Description
<p>• Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of January were complete. • Point of Service (POS) counts 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. • 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.</p>
<p>• The “And Justice for All” civil rights poster was posted in the cafeteria. • Annual civil rights training was provided to food service staff and documented. • The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. • No discrimination was observed. • SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. • The on-site monitoring forms were completed for 100% of the SFA’s sites for lunch and at least 50% were completed for breakfast prior to February 1st. • The correct state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school’s website.</p>
<p>• The Head Cook does a nice 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 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. • Menus included some homemade entrees, and standardized recipes are used for food production. • Free potable water is available to all students for lunch and breakfast. • 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. • 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 Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated the high 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</p>

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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 areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures.