

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Columbus Comm School District (13680000)
SNP - Review ID: 5060

October 9-11,
2018, Columbus
CSD

Program Year: 2019
Month of Review: September
Lead Reviewer: Cheryl Benson
Org Representative(s): Tamber Mapel

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Out of 172 applications reviewed, only three errors were discovered. One application did not have a signature of the adult household member who completed the application. One application was incorrectly denied benefits, and one household was on direct certification as free but was receiving reduced benefits.	The application with the missing signature subsequently became directly certified, so no signature is now required. The other two households were immediately changed to the correct benefit status. No further corrective action is required.	
700 - Resource Management	V-0700	(1) The Child Nutrition account must act as a non-profit account. That means that the SFA cannot have more than three months' operating expenses unless state agency approval has been obtained. Columbus' account has more than three months' operating expenses. (2) Non-program revenue and expenses must be calculated against total revenue and expenses. The percentage of non-program revenue must be equal to or greater than the percentage of non-program expenses. Since revenue is not sufficient, the SFA must recalculate using the USDA tool. (3) SFAs should utilize a minimum of 95% of their USDA Foods entitlement dollars. The SFA only utilized 82% of its entitlement in SY2018.	(1) For your response, submit a detailed plan to spend down the excess balance in the CN account. Suggestions are provided in technical assistance. (2) For your response, submit a completed Non-Program Revenue Tool which is attached. If revenue is still insufficient, also submit a plan to increase non-program revenue and/or decrease non-program expenses. (3) For your response, indicate how you plan to utilize more of your entitlement dollars for SY2019.	
1000 - Local School Wellness Policy	V-1000	Schools are required to assess the individual goals of their Local Wellness Policy, LWP, for each building at least once every three years. The LWP goals have not been assessed. Once the goals are assessed, the results must be shared with the public. The school must also ensure that all required stakeholders are invited to be on the LWP Committee. Stakeholders include PE teacher, school health professional, food service staff,	For your response, provide a timeline for inviting all stakeholders, how the invitation will be transmitted, a timeline for completing the goal assessment, and how the results will be shared with the public.	

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		administrator, board member, student, parent, and community member.		
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Site - Level Findings: Columbus Community High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Food Production Records, FPRs, did not include the following required information: alternate entrees (chef salad, sub sandwiches, and cereal/cheese), excluded additional fruit offered to grades 9-12 so it appeared that high school had insufficient fruit offered, leftover amounts, actual number served, condiments served, adults/a la carte servings, specific fruit offered at breakfast, planned numbers for grade groups and adults/a la carte were not divided, all food items offered had the same number of planned servings even though OVS is used.	For your response, submit one week of lunch FPRs from the high school. Also have staff who are responsible for FPRs watch the Webcast titled "Food Production Records" at https://www.educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts . Have them complete the Activity for one day of the week of FPRs you are submitting as well as answers to the quiz and upload the results.	
400 - Meal Components and Quantities - Lunch	V-0400	Meal Pattern requirements were not met for the week submitted for review. (1) Calories do not overlap for grades 7-8 and grades 9-12, but for the week submitted, the meal pattern was exactly the same for all grades 7-12. (2) The week submitted did not include any dark green vegetable and did not include sufficient red-orange vegetable.	For your response, indicate how you will ensure that the meal pattern is followed so that there is differentiation between the two grade groups and to ensure that all vegetable sub-group minimums are met. For suggestions, refer to technical assistance. Note: A repeat of the vegetable sub-group errors in the next review will result in fiscal action.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	133 Were all direct certifications (SNAP, TANF, FDIPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified?	Technical assistance was provided on correctly documenting students who are qualified for free meals via Homeless status. The district's Homeless Liaison must provide documentation to the SFA as outlined on pages 38-39 of the Eligibility Manual. The liaison can provide the director with a list of students, the date the student became homeless, and the signature of the liaison or the information can be provided on letterhead. An income application does not have to be completed.
300 - Meal Counting and Claiming	311 Describe the SFA's procedures for consolidating daily meal counts by category for each site to process the claim for reimbursement.	(1) The SFAs new system, Wordware, calculates meal counts on the monthly edit check for the entire month by the student's end-of-the-month eligibility status. That causes a large discrepancy between the daily edit checks and the monthly. This is something to keep an eye on and be sure that anyone involved in filing the claim is aware of. (2) The SFA is manually consolidating the middle school and high school daily numbers. It is highly recommended that the POS company be contacted to determine whether the system can electronically consolidate. If not, the director should at least implement a spreadsheet to help ensure accurate claims.

**Iowa Department of Education
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700 - Resource Management		Technical assistance was provided on maintaining non-profit status of the Child Nutrition account. Some things to consider: increasing the quality of food purchased, offering fresh fruits and vegetables daily at breakfast and lunch, offering multiple daily choices of fruits and vegetables, purchasing new equipment, increasing wages and benefits, sending the director to Mississippi for training at the Institute for Child Nutrition, other training for staff, pay for reduced breakfast and/or paid breakfasts (referred to as Universal Breakfast).
700 - Resource Management		Technical assistance was provided on using more of the SFAs USDA Foods entitlement. It is recommended that the SFA participate in DoD next year. Sign-up time is once a year. For information, contact the state office.
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	Procurement is intended to get SFAs the best product at the best price. Part of procurement is the Written Procurement Plan which must be completed annually. It is intended to serve as a roadmap for how you will procure goods and services. Along with the plan is a Code of Conduct which guides staff involved in procurement along an ethical path. The SFA should continue to work on both the written plan and code of conduct to ensure proper procurement procedures are used. Equipment repair and maintenance plus RevTrack fees were paid out of CN funds last year, but the business manager has changed that practice in compliance with the DE's Finance Department rules. When reviewing the SFAs procurement from SY2018, it was noted that Micro Purchases were not always spread around as they should be. For example, when purchasing food, the vast majority of food purchases were from Economart. While that is the largest grocery supplier in town, food can also be purchased at Dollar General, Casey's, and Grizzley. Some Micro Purchases would be better if the Small Purchase method was used so that prices could be compared. Milk and Bread bids were presented as formal procurement, but were actually conducted as Small Purchase. Technical assistance was provided on using bottom line procurement method for milk and bread and on writing more complete product specifications. It was recommended that the SFA use 3 Bids & a Buy prototype for these events since all terms and conditions are included. There are now many helpful documents in Download Forms on CNP to assist SFAs in procurement. Some items on the off-site procurement tool under formal procurement for the purchasing group that the SFA participates in were left blank. The SFA is responsible for all aspects of procurement even when part of a purchasing group.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	The USDA and Iowa non-discrimination statements must be on all materials that refer to Child Nutrition Programs, including the district's website. Technical assistance was provided. The most recent statements are in download forms, and the statement can be shared via a link placed on the website wherever information (menus, registration, etc.) are located.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	Technical assistance was provided on completing the Ethnic/Racial form. The number of students entered for Ethnicity must equal the number entered for Race. All students receiving benefits should be included as well as those who applied for benefits, but did not qualify. The form should be completed at least once a year and filed with applications.
1000 - Local School Wellness Policy	1005 Provide a copy of the most recent assessment on the implementation of the local school wellness policy.	There is extensive technical assistance for the Local Wellness Policy on the state's webpage. Go to https://educateiowa.gov/pk-12/nutrition-programs/school-wellness or enter School Wellness into the search

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		bar. The Iowa Association of School Board's website also has resources. Additional webinars and webcasts are also available.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Food Safety is one of the most important aspects of Child Nutrition Program oversight. No one wants their school's name on the news for the wrong reason. A good HACCP plan can help keep your programs safe. Keeping the Standard Operating Procedures, SOPs, up to date and keeping staff trained on SOPs is a good way to do that. In order to involve staff in the plan, they could review the current SOPs, review the latest SOPs on Iowa State University's website and the Institute for Child Nutrition's website to compare to the current ones. Discussing and updating the SOPs as a group will help ensure that they are practical for what is occurring at Columbus while providing required training hours for staff.
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?	Regulations require that the Buy American provision for food be followed by Child Nutrition Programs. When that is not possible, then the SFA must keep information on why the provision was not followed. This can be accomplished with a simple form that includes the date the product was accepted, name and description of the product, and reason for accepting a non-domestic agricultural commodity. The USDA recognizes two basic exceptions: 1) The product is not produced in sufficient quantities in the United States, or 2) The cost of a domestic commodity is significantly higher than the foreign product.

Site - Level Technical Assistance Columbus Community High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	Technical assistance was provided on lunch signage. The sign must include all menu choices including alternate entrees.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	All food used as part of a reimbursable meal must have documentation. Documentation includes crediting information such as CN labels or Manufacturer Formulation Statements for meat and grain items. All food items should have a nutrition label and ingredient label on file. Labels should come directly from the packaging and may be removed from the package, photocopied, or photographed. When a label is not on the package, it must come from the manufacturer, not the vendor. Whenever a product changes or a different product is purchased, labels need to be updated.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	All grain items offered at both breakfast and lunch must be whole grain rich, or at least 50% whole grain. The SFA has obtained a waiver for several items, but some items being used are not whole grain rich and do not have a waiver--Texas Toast, Rice Cereal, and a label for rice. Be sure that non-waivered grain items are whole grain rich.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	There are many ways to differentiate the meal pattern for grades 9-12 and 7-8. Additional meat/grain in the form of a larger entrée can be offered to the older grades. Additional items offered, such as Sun Chips with a sandwich or peanut butter served with celery could be limited to only grades 9-12. Adding a slice of bread or a roll to a meal is another idea. An occasional cookie, or other grain dessert, could be added to the menu for 9-12.

Iowa Department of Education
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State Review Summary Report
Columbus Comm School District (13680000)
SNP - Review ID: 5060

400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	There are tools available to check menus for compliance with the meal pattern such as the Menu Planning Tool for Multiple Entrees on the Menu Planning and Recipes page of the DE website which will indicate 'yes' or 'no' to indicate whether the meal pattern is being met. You will find many other tools on that page as well. The Menu Worksheets that were submitted for the review can also be used. There are webcasts, webinars and modules available on the Learning Tools-Schools page of the DE website. Webcasts are only a few minutes long and are accompanied by facilitator guides and resources. The Institute for Child Nutrition is also an excellent source for training and materials.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Suggestions for OVS improvement were offered. Currently the SFA serves one cup of vegetable to all students. It is recommended that a half cup serving spoodle be used and students be offered one scoop or two to cut back on waste. Even better would be to offer students a selection of vegetables each day. Offering more choices reduces waste and increases consumption of vegetables. Daily offering of fresh vegetables in addition to the hot vegetable is recommended.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	Any food sold to students from midnight the night before until a half hour after the end of the school day must meet Smart Snack standards. Two calculator print-outs for a la carte items were incorrect. One was not a whole grain and another was entered as a grain instead of potato and was over the maximum 200 mgs of sodium for a snack item. The director was checking on them. It appeared that older print-outs may be the problem. A vending machine in the high school cafeteria contained beverages with added sweeteners which is not permitted if grades other than 9-12 have access to the machine. The director will work with the Special Education teacher to replace the unallowable beverage with an allowable one.
1300 - Water	1300 Is free potable water 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)?	The water fountain in the high school cafeteria is not functioning. A replacement fountain has been procured but not installed. The director will place cups and a carboy in the cafeteria until the unit is installed.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	Technical assistance was provided on requesting two health inspections per year, per site. USDA regulations require that two inspections be requested and documentation maintained of the request.

Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were 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. A correct and current benefit issuance list was available. 172 applications were reviewed and all reviewed applications were complete with SSN's, 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 for school fees provided to households were signed and dated by the household. The SFA has a back-up system for benefit issuance documents and system.</p>
<p>CIVIL RIGHTS: The And Justice for All civil rights poster was posted in the cafeteria in a location where participants can read information on the poster. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided 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. SFA on-site monitoring for SY2018 was completed to ensure that all schools are meeting program requirements. The current state and federal non-discrimination statements are provided on all letters mailed to households.</p>

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COMPETITIVE FOODS (SMART SNACKS/HKA): Students may purchase a second entrée and/or a second milk at lunch as well as a variety of a la carte items. In order to purchase a second entrée or a la carte, the student must first purchase a reimbursable meal. Documentation was available to show that the majority of foods and beverages sold to students during the school day met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte along with ingredient and nutrient labels.

GENERAL: Columbus CSD has a new Food Service Director, a new Point of Service system, almost all new staff, and switched the elementary from a provisional site to a regular paying site this year. Despite all of those changes, the Child Nutrition Programs are being well run and are mostly in compliance. The new director has participated in a variety of training sessions offered by the state agency, and she has ensured that her staff is receiving training. In general, the director seems to have a good grasp on requirements, and she is working diligently to learn all aspects of the programs. Any corrections that could be made quickly were implemented during the on-site review.

HACCP/FOOD SAFETY: The SFA has a district-wide written Food Safety, and a copy of the written plan was available at the site reviewed. Standard Operating Procedures, SOPs, have been established and implemented. The latest Health Inspection Report was posted in a publicly visible location, and there were no critical areas noted on the report. 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 wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.

MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of September were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. There was a POS for all students, and the POS was organized and orderly; students enter their individual pin# into the keypad. Students are not overtly identified as free, reduced, or paid during the meal counting process or during meal observation. Cashiers are trained. All students observed selected a reimbursable meal.

MEAL REQUIREMENTS & COMPONENTS: All meal components were available at the beginning of service and throughout meal service on the days of observation. A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch. Three types of milk were offered. Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one or two of the five components at lunch and one of four items at breakfast. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheets for the school selected for review for a specified week during the review period. Nutrient analysis was not required.

PROCUREMENT: The off-site procurement tool was completed, and board purchasing policy and vendor paid lists were submitted. The SFA has a written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for purchases. The district is a member of a Group Purchasing Organization.

PROFESSIONAL STANDARDS: The SFA followed regulations for the district's size category when hiring a new director. Tracking was provided that documents that the director received the required 12 hours of annual training, managers received the required 10 hours of training, other full-time staff have received at least 6 hours of training, and other part-time staff have received at least 4 hours of annual training. All employees took ServSafe instruction. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.

RESOURCE MANAGEMENT & RECORD KEEPING: 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. The Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool. The district does not charge indirect costs to the food service program. Money is not transferred out of the account to support other programs. Reports are filed on time, and all records are maintained for at least three years plus the current year

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 including times and locations. Reminders of the SBP were also sent out throughout the school year. 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.

VERIFICATION: The correct number of applications for SY2018 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 applications selected for verification were confirmed prior to verification to ensure the original determination was correct.