

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Clayton Ridge CSD (27630000)**  
**October 16-17, 2018**

**Program Year:** 2019  
**Month of Review:** September 2018  
**Lead Reviewer:** Sandra Fiegen  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	All 412 eligibility determinations were reviewed, and one student was receiving no benefit but was correctly approved for reduced price meals. The September claim will be revised and the student will receive the meal payments incorrectly made from August 8 to present.	In your corrective action plan, please indicate how a double check of eligibility status will be conducted, using the eligibility information from the point of service software and available documentation for all students, going forward.	
200 - Verification	V-0200	School Year 17-18 verification efforts were reviewed because the current year verification is not completed yet. Two applications were verified, and one verification was not completed correctly, since 'every two week' information was interpreted as 'twice a month'. The family should have been moved from Reduced eligible to Full Pay status.	Before this year's verification has been completed, please view the two verification webinars posted at <a href="https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition">https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition</a> . Document that the training was completed in the Professional Development training tracking tool. In another section of corrective action, this tool will be completed with current school year training to-date for all persons with foodservice duties, and attached. In your response here, please indicate that you viewed the webinars and noted as such in the training tracking tool.	
300 - Meal Counting and Claiming	V-0300	On the day of review, approximately 2 dozen high school students were directed to return into the serving line to obtain a serving of fruit or vegetable at lunch. Three students refused to do so. Prior to meal service, the cashier and SA reviewer discussed what a reimbursable meal must be, but up to this time, students have not been required to receive a reimbursable meal for meals claimed for reimbursement. The three meals claimed incorrectly as reimbursable were not reverted to a la carte purchases on day of observation.	In order to claim a student meal as reimbursable, it must contain at least 1/2 cup of any fruit or vegetable items offered that day, or a combination of two. All students (regardless of eligibility status) must be notified and educated as to what constitutes a full meal. In lieu of selecting a full meal, student food selection on that day must be charged as a la carte purchases (regardless of eligibility status). All cashiers must be re-trained on offer versus serve requirements, the meal pattern requirements, and reimbursable meal requirements. Cashiers must be given the authority to direct students to select a reimbursable meal or notify the students that the food items selected that are not a reimbursable meal, will be charged as a la carte purchases. Parents and	

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			<p>guardians must be made aware of the definition of a full reimbursable meal (and that it contains a 1/2 cup serving of fruit or vegetable plus two other components), and that their student's account will be charged as a la carte if the selection presented to the cashier is not a full reimbursable meal.</p> <p>The food items and components planned for selection each day are the responsibility of the food service director, and will contain at least 1 cup of fruit and 1 cup of vegetables, for the student to select a minimum of 1/2 cup of something. The students will not request that certain items be available, they will select from what is planned.</p> <p>In your corrective action response, please indicate the methods that will be used to educate/inform each of these groups, and when the education/informing will happen within the next two months. Attach the documentation of these efforts to this corrective action item.</p> <p>1) students 2) cashiers 3) parents and guardians</p> <p>Several resources that you can use to develop your education/information efforts can be found at <a href="https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition">https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition</a>.</p>	
300 - Meal Counting and Claiming	V-0300	<p>Daily edit checks are not completed or documented. On the day of review, the point of service system froze during meal service several times, and the cashier needed to use a back up method of recording student ID to be entered later. During that time she did not have access to information concerning student balances, whether a student meal ID had already been used during that meal service, and whether the student account was at a negative level that is determined not to allow a la carte purchasing. Completing a daily edit check is essential to determining if the meal count recorded seems reasonable or whether the day's point of service activity should be re-examined for accuracy.</p>	<p>Daily edit checks are required in the NSLP regulations, as one of three edit checks to be completed prior to claim submission. In the Download Form section of the IowaCNP application, item NSLP060 is provided for your use (and is attached to the Review Attachments for this review). The second page of that item is an explanation of the purpose for the edit check, and if using an electronic system to count meals, these functions must still take place as the electronic counting system cannot do critical thinking steps that must occur.</p> <p>In your corrective action response, please indicate how you will complete daily edit checks, and how you will document this activity. This is a repeat finding from the previous review completed 3 years ago.</p>	
700 - Resource Management	V-0700	<p>As part of the resource management review, the previous school year vendor list was reviewed. Some items that were directly paid from foodservice funds should have been paid through indirect costs or remain a general fund expense.</p>	<p>In your corrective action response, please indicate the steps you will take to establish an indirect cost pool. Indicate the expenses that will be paid as indirect, and how you will code expenses so that they are correctly tracked. If no indirect costs are allocated against the foodservice fund, please indicate that those expenses will be paid by general funds instead of foodservice funds.</p> <p>Additionally, please indicate the steps you will take to learn more about allowable v unallowable costs to the foodservice program.</p>	

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700 - Resource Management	V-0700	The SFA does not have a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases. The plan must indicate those responsible for awarding, reviewing, documenting and monitoring procurement events.	The procurement plan that was attached to the review information was not complete, and SFA personnel need training on procurement in order to correctly identify transactions and agreements. For corrective action, please review the information about procurement located at <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-procurement/school-nutrition-procurement">https://educateiowa.gov/pk-12/nutrition-programs/school-procurement/school-nutrition-procurement</a> , view webinars located at <a href="https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition">https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition</a> , and complete the procurement plan template fully. Attach the plan to this corrective action when finished. Also attach the current contracts for bread and milk that were unavailable during the onsite review.	
1000 - Local School Wellness Policy	V-1000	No assessment of policy goals has been conducted and distributed to all community members (posted on a website or printed and distributed).	On a regular basis and at least every three years, the Local Wellness Policy and goals must be assessed and that assessment shared. Information on how to conduct the assessment was left with the business official/authorized representative and is also available at <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-wellness">https://educateiowa.gov/pk-12/nutrition-programs/school-wellness</a> . In your corrective action response, please indicate how an assessment of goals will be conducted, and when and how the results will be made available to the school community.	
1200 - Professional Standards	V-1200	No employee was designated as the food service director in the offsite questions. No administrative staff were noted as having foodservice duties. No training tracking is being maintained on a district-wide basis.	Resources for Professional Standards documentation and requirements can be found at <a href="https://educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition">https://educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition</a> . At least one person must be designated as the school food service director, and certain training requirements must be met for that person. All administrative personnel with foodservice duties must receive and document training applicable to their duties. If the new 'head cook' at the Elementary building will be designated as a co-director, she must meet the hiring standards to be found at the above resource, or complete a training plan that will be determined in collaboration with the review consultant. In your corrective action response, please attach (to this finding area) the training tracking tool that has been completed to-date with training received by all persons with foodservice duties in the district. Also attach a plan (written as a word document) for achieving the additional hours of training yet to be completed prior to June 30, being specific about the topic and number of hours and a general indication of when the training will occur such as a month and year).	
1600 - School Breakfast and SFSP Outreach	V-1600	Annually, all school districts must provide outreach for the Summer Food Service Program.	Materials were supplied for the district use in completing outreach about the Summer Food Service Program. In your corrective action plan, please indicate how you will complete outreach on an annual	

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**Site - Level Findings: Clayton Ridge High School (0172)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Prior to reviewer reminding, the school breakfast menu was not posted as required.	In your corrective action reply, please indicate how you will ensure that the breakfast menu is posted each day prior to meal service. the signage must include all items that are available as part of a reimbursable breakfast including options.	
400 - Meal Components and Quantities - Breakfast	V-0400	All food items that are stated to include equivalent grain or meat serving sizes must be documented with label and product information that proves the item is compliant. Not all labels and information for the review week were available as required. A.lso, all grain items must be whole grain rich unless a waiver has been granted to serve non-whole grain rich items. If there are requests to use non-whole grain rich items, at least half of all items must remain whole grain rich.	For the corrective action response, please email or attach a copy of the following CN labels, ingredient statements, recipes and product formulation statements as appropriate for the item: Breakfast items: churro, breakfast wrap, sandwich bread, granola, breakfast boat, and cereal. For the cereal, also send the serving size information. Lunch items: chicken patty, hamburger bun, scalloped potato recipe that you are using, cheese sandwich recipe, rice krispie bar label or recipe, goulash recipe, garlic toast recipe, and mr. rib patty.	
1300 - Water	V-1300	Water fountain or free water is not available in the cafeteria.	Water is required to be available in the cafeteria during breakfast and lunch meal service time. In your corrective action response, please indicate how this will be accomplished. Water fountain in the hallway is too far away from cafeteria to be considered part of the cafeteria.	
1400 - Food Safety	V-1400	Food safety report not posted in a publicly visible location.	The most recent food safety report must be moved to a spot where students and other school staff can read it. Please indicate where it will be located.	

**Org - Level Technical Assistance**

Area	Question	Comments
200 - Verification	209 Based on the review of verified applications:	While onsite reviewing the verification information, we discussed how to track activity involved in verification. The SFA is highly encouraged to use the verification tracking section of the ICAVES worksheet to note the activity, and to keep copies of all letters sent to the verified families (including the notice of adverse action, or other items as appropriate).
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	The complete media release was provided to the local newspaper but they chose to publish only a section of it. We discussed several options--in this review information, the media release that was supplied to the paper could be attached instead of what they published. Alternatively, the SFA needs to work with the paper to explain to them that the whole release should be

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		published if anything is. Because the school does not pay for this service, they will determine what steps to take for future years.
1100 - Smart Snacks	1100 What are the SFA's food sale policies?	A vending machine with nonapproved beverages is located in the entryway to the high school. The machine is in operation at all times. Please note that students cannot have access to nonapproved beverages during the school hours (which extends to 1/2 hour after the last bell). This machine should be made inoperable or should be moved to a teacher lounge where students do not have access to the machine. In addition, another machine is located in the high school study hall, but is not stocked. If no longer in use it is suggested that it be removed.
RMCR - Nonprofit School Food Srvc Acct	9 If the SFA encumbered bad debt from unpaid student meal accounts during the RM review period, how did it ensure that only allowable non-Federal revenues were used to restore operating losses? (Unpaid Meal Charges: Guidance and Q&A SP 23-2017)	During the entrance conference, the negative balances of a few families was discussed. A USDA memo on negative debt is attached to the review attachments, and please pay special attention to the information included under 'debt collections'.

**Site - Level Technical Assistance Clayton Ridge High School (0172)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast		To help in planning the correct minimum serving sizes for all meal items, please see the worksheet attached in the Review Attachments. There are tabs for K-5, K-8, 6-8 and 9-12 grade groupings. You are encouraged to use this worksheet for each week as menu planning is completed.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable <b>lunch</b> to students for all applicable grade groups?	Signage for lunch meals needs to include all options--for the day of review, yogurt was offered as an option to nacho meat and must be listed. Also, milk must be on the menu each day.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Nutrikids recipes are not current. It is suggested that the Nutrikids system be set aside as there is no person who is able to keep the data and recipes up to date. Please find recipes for all items on the menu that are ingredient based, and follow these recipes. If a recipe is not available in the menu recipe sources that you can find, a full complete recipe must be written and maintained on file. Resources for recipes and menu planning can be found at <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-meals/menu-planning-and-recipes">https://educateiowa.gov/pk-12/nutrition-programs/school-meals/menu-planning-and-recipes</a> .

**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, 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 correctly determined, 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.

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Good food safety procedures were observed.

Reports are filed on time, and all records are maintained for at least three years plus the current year. The SFA effectively utilizes its USDA entitlement for commodities. The Paid Lunch Equity, PLE, tool was completed and price increases were not required by the PLE tool. The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months.

Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of September appeared accurate and complete.

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 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. Ethnic/racial information is collected and the form is completed. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements.

The district has a current wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.

The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte, and the results are printed out and maintained on file.

**Site - Level Commendations Clayton Ridge High School (0172)**

**Description**

Please see all commendations in the Organization level area.