

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Postville Community School District (53100000)**  
**October 23-24, 2018**

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

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming	V-0300	Offer versus serve at lunch is not being implemented for the younger children (through approximately 3rd grade). The student's trays were being pre-filled and children not asked whether they wanted food items put on them.	Offer versus serve means offering each food versus filling plates without the child indicating that they want the food item. All food items must be either offered or served, there is no allowance for serving some of it and then allowing students to choose the rest of the meal. If no offer versus serve is being implemented for the youngest children, they must take all 5 components of the meal in the minimum serving size. If they are offered food and offer versus serve is implemented, each child must indicate that they want the food in order for it to be placed on their tray. Active communication must be in place. In your response, please indicate which grades will participate in offer versus serve, and how servers will ensure that they ask each child about each food item in the service line. If offer versus serve will not be followed, please indicate the grade levels that will not be allowed choices. Only high school level students must be allowed offer versus serve service.	
300 - Meal Counting and Claiming	V-0300	Field trip meals are alternative points of service. Each field trip meal must be reimbursable and must be documented as accurately counted when served on the trip.	The field trip (in October) food production record did not indicate that a reimbursable meal was served and cannot be counted for reimbursement. Each 'sack lunch/field trip' meal if packaged as a whole meal, must contain the minimum serving of each food component--1-2 ounces meat/meat alternate, 1-2 grain/bread servings of whole grain rich items, 3/4 cup of vegetable, 1/2 cup of fruit and 8 ounces of milk for K-8 grade students. In your response, please indicate how you will make sure that the non-reimbursable October field trip meals are not counted. Also, plan a field trip reimbursable meal with serving sizes, that you will prepare for upcoming field trips, and indicate that meal in your comments.	

**Iowa Department of Education**  
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**State Review Summary Report**  
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**October 23-24, 2018**

800 - Civil Rights	V-0800	No media release was sent to the local media outlet. The correct media release is located in the Download Forms section of IowaCNP.	Annually, the media release must be sent by the district to the local media. The district does not need to pay for the release to be published but acknowledgement that it is sent must be maintained. In your response, please indicate when you will annually send, and also send now for this year.	
800 - Civil Rights	V-0800	The correct USDA complaint procedure is not indicated in review response. The correct procedure is indicated within the USDA non-discrimination statement.	Please indicate how you will ensure that all persons who may be in the position of receiving a complaint, will know the correct process for receiving and documenting.	
800 - Civil Rights	V-0800	All persons who interact with students or compile data about civil rights compliance must receive training. Resources for training are located in the download forms section of IowaCNP and at <a href="https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/civil-rights-training">https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/civil-rights-training</a> . This includes the staff members who complete FFVP duties with children.	Please indicate how you will ensure that all staff persons receive annual training, and how the training will be documented and maintained in professional development tracking.	
1000 - Local School Wellness Policy	V-1000	Periodically the goals of the wellness policy including the new stated goals on the beginning of the webpage, must be assessed and the assessment shared with the school community. Information on how to do so was given to the foodservice director at the time of the review.	In your response, please indicate how you will ensure that goals are assess periodically and the assessment of specific goals is posted or shared with all community.	
1100 - Smart Snacks	V-1100	Alliance for Healthier Generation snack calculator readouts are not maintained as required to show compliance.	In your corrective action response, please indicate who will annually check compliance on all food and beverage items sold in all vending machines in the middle-high school building. Also indicate where all calculator readouts will be maintained. Additionally, please complete the calculator on all items for sale at this time, and scan, attach as a PDF to the review corrective action. The Alliance snack calculator and other resources are available at <a href="https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/smart-snacks-school">https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/smart-snacks-school</a> .	

**Site - Level Findings: Cora B Darling Elem and Middle School (0409)**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
400 - Meal Components and Quantities - Lunch	V-0400	All signage displayed either in school or on websites must include the full meal. In the website posting, only a couple of food item/components are mentioned for each meal each day. On the line signage must indicate all items, including milk. The signage posted in the meal service area must be within the service line and available in a place that all students, including high school students, can read.	In your corrective action response, please indicate how you will ensure that the website posting includes all food items (breakfast and lunch) that are part of reimbursable meals, and how you will ensure that the on-line menu indicates all items and is available for all students to see.	

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Postville Community School District (53100000)**  
**October 23-24, 2018**

400 - Meal Components and Quantities - Lunch	V-0400	Food production records and other records do not indicate that 2 grain/bread servings are available for high school students at lunch. Also, not all label information that documents grain/bread and meat component servings is obtained before food items are used in reimbursable meals.	<p>In your corrective action response, please indicate how you will ensure and document the following:</p> <ol style="list-style-type: none"> <li>1) all grain items must be whole grain rich, or waivers in place that indicate use of non-whole grain rich items.</li> <li>2) convenience type food items counted for grain/bread and-or meat/meat alternate and-or vegetable must be documented with either a Child Nutrition label or a Product Formulation statement.</li> <li>3) all recipes are available and used for items that include more than one food item. recipes will be complete.</li> </ol> <p>Also, with use of the appropriate complete food production forms, please send breakfast and lunch food production records for each day in September, filled in completely, documenting meal pattern compliance for each grade group. Send labels, recipes and supporting documentation for all grain/bread and meat/meat alternate items served in the month. Information about labeling can be found at <a href="https://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program">https://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program</a> and information about menu planning with food production records is available 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>.</p>	
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**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management	702 Did the SFA transfer funds other than approved indirect costs out of the food service account to support general school district expenses or non-food service-related activities?	The vendor paid list from 17-18 includes some items that are not allowable expenses from foodservice funds. Items have been attached in 'review attachments' to clarify allowable expenses, and more information is available at <a href="https://educateiowa.gov/pk-12/school-business-finance/accounting-reporting">https://educateiowa.gov/pk-12/school-business-finance/accounting-reporting</a> .
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?	
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Civil rights accommodation of students with disabilities is accomplished through obtaining the correct special dietary needs accommodation form, completed and signed by a recognized medical authority. The school nurse has a few forms correctly completed, but needs several more. Information on the form and a downloadable form are located at <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-meals-0">https://educateiowa.gov/pk-12/nutrition-programs/school-meals-0</a> . Additional resources for civil rights training are located at <a href="https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/civil-rights-training">https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/civil-rights-training</a>

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**State Review Summary Report**  
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**October 23-24, 2018**

1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	FSD annually documents the training hours completed by the foodservice staff. Encouraged including all staff training on one tracking tool, and also assessing whether meetings attended are truly training events. Professional development resources and tracking tools are 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> .
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?	Non-domestic purchases of asparagus and sugar snap peas were completed, product in cool storage. No documentation of the justification for non--domestic was available. A log of non-domestic purchases must be maintained and justification for purchase indicated. Please see log and other information at <a href="https://theicn.org/icn-resources-a-z/buy-american/">https://theicn.org/icn-resources-a-z/buy-american/</a> .

**Site - Level Technical Assistance Cora B Darling Elem and Middle School (0409)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	All claimed meals contained a serving of fruit or juice, and it was encouraged that both options be available at the end of the service line just before the cashier so that the last person serving can ensure that all students take either or both items.
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	The salad bar as offered, provides croutons and crackers as a grain component; serving sizes to obtain 2 grain/bread ounce equivalents would be unrealistic. Also, there needs to be signage that indicates to all students what a serving size is, of any item. meat servings are encouraged to be portion controlled.
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)?	Free water is available in the hallway outside the cafeteria area. Encouraged staff and supervising teachers to allow students to leave cafeteria to access the water fountain, since it is beyond the supervised area.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The most recent food safety inspection must be posted in a publicly visible location (could be placed in the same area as the menus for the day and the civil rights poster, on the 'white' wall next to service line)
1900 - Fresh Fruit and Vegetable Program (FFVP)	1901 Did the cost documentation provided support the school's FFVP claim for reimbursement?	Costs reported are supported with invoices, but three invoices were omitted from monthly expenses reported. Revision of the monthly FFVP was encouraged.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1905 Is the FFVP widely publicized within the school?	The district is encouraged to maintain documentation of all outreach and publicity for the FFVP. When a news story concerning fresh foods or local foods is completed, be sure that the FFVP program is mentioned.
Dietary Specifications Assessment Tool - Breakfast	19 Standardized recipes are followed: all ingredients are weighed or measured with standardized weight or measuring utensils.	Need to have a recipe on file for any food item that has more than one ingredient, such as the toasted cheese sandwich served at breakfast.
Dietary Specifications Assessment Tool - Lunch	1 Are specifications considered when purchasing menu items and condiments to limit the following?	The Whip-it dessert topping contains trans-fat. Please discontinue use.
Dietary Specifications Assessment Tool - Lunch	19 Standardized recipes are followed: all ingredients are weighed or measured with standardized weight or measuring utensils.	Recipes in use are not all standardized nor do they contain full and complete information. Please find standardized recipes to use or re-write all recipes to be sure that they contain all essential parts of a recipe (full complete ingredient list, serving size and volume information, accurate measures in ingredient and portions indicated in uniform terms (cups, fluid

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**State Review Summary Report**  
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**October 23-24, 2018**

		oz, oz, lb, etc), component contribution of a serving, full and complete directions that include HACCP critical control points.
Dietary Specifications Assessment Tool - Lunch	20 Meal pattern for appropriate age/grade groups are used for menu planning, including the meal patterns and serving sizes.	Documentation such as menus and food production records should clarify and prove that the correct meal patterns and serving sizes are used. Please review the documentation available and be sure that records are fully completed each day.
Dietary Specifications Assessment Tool - Lunch	4 Cheese (all varieties including reduced fat) is controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal. This includes cheese offered on salad bars.	The district is encouraged to place cheese (as well as ham and hard boiled eggs) offered on the salad bar in portion control serving cups.
Dietary Specifications Assessment Tool - Lunch	9 How often are bacon, bacon bits, pepperoni, chow mein noodles, pickles, olives, packaged crackers and/or croutons available to students?	Croutons and snack crackers including saltines are available every day on the salad bar. Pepperoni and pickled items are also available. You are encouraged to plan different grain servings for use on the salad bar because the serving size for crackers or croutons alone is not realistic to meeting the grain equivalency and these items are also high in sodium.

**Org - Level Commendations**

Description
Several local fresh produce vendors offer wonderful items for sale to the district. Additionally, a school garden (operated by the 4-H program) produces fresh vegetables that are sold to the school foodservice. Students have the opportunity to see the items grown and enjoy them in their meals each day.
The district has a current wellness policy on file, and some of the goals of the policy are highlighted on the foodservice webpage, as well as a full posting of the rest of the policy.
The district participates in several programs that are designed to increase student access to nutritious food and nutrition education. An Americorp Food Corps volunteer is on staff, and the activities planned have positively influenced student participation in school meal programs.
The district participates in the Community Eligibility Provision district-wide, and all enrolled students are offered free breakfasts and lunches each day.
The SFA effectively utilizes its USDA entitlement for commodities.
The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months.

**Site - Level Commendations Cora B Darling Elem and Middle School (0409)**

Description
Almost all students selected a reimbursable meal at breakfast and lunch without having a prompt to select a ½ cup of fruit or vegetable as one of the three required components.
Good food safety procedures were observed, and several foodservice staffpersons have completed ServSafe certification.
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, count activity and filed claims appear accurate.
The Food Service Director, FSD, does a wonderful job of menu planning and offering choices, especially with incorporating fresh fruits and vegetables in the daily menu. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat.

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Postville Community School District (53100000)**  
**October 23-24, 2018**

The food service staff were positive, happy and eager to visit with the students, and displayed pride in the important work that they are completing each day.