

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**H-L-V Comm School District (27660000)**  
**SNP - Review ID: 5056**

**Program Year:** 2019; October 23-25, 2018  
**Month of Review:** September  
**Lead Reviewer:** Cheryl Benson  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	SFAs are required to assess each individual goal in the Local Wellness Policy, LWP, at least every three years. The results of the assessment must be shared with the public. There has been no assessment of goals of the LWP. SFAs are also required to review the LWP at least every three years. The review of the policy was not provided.	For your response, submit a timeline for when the committee will meet to assess goals including when you expect this task to be completed. Indicate how the results of the assessment will be shared with the public. Finally, submit the latest review of the wellness policy.	

**Site - Level Findings: H-L-V Junior-Senior High School (0172)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Org - Level Technical Assistance**

Area	Question	Comments
200 - Verification		Technical assistance was provided on Verification. For more information, refer to pages 109-110 in the Eligibility Manual.
700 - Resource Management		SY2018 Vendor Paid List needs to be submitted <b>PROCUREMENT:</b> Information about DE Financial Department rules were shared. Equipment repair and maintenance, fees for on-line payment systems, etc., cannot be made directly from CN (Child Nutrition) account. The payment must be made from the general fund and may then be charged as an indirect cost. For further information, please contact the Finance Department of DE. Technical assistance was provided on procurement. The District's MICRO PURCHASE threshold is \$10,000 which is also the federal threshold beginning in SY2019. Micro purchase is where no prices are checked or bids sent out. The SFA simply purchases the items. However, the prices must be reasonable, and purchases must be divided between all vendors as evenly as possible. Receipts must be itemized to show that the prices

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		<p>were reasonable. There is a Micro Purchase log in download forms of IowaCNP that may be helpful in ensuring that purchases are spread around.</p> <p>The district's SMALL PURCHASE threshold is \$36,000 which is more restrictive than the federal threshold of \$250,000, so the SFA must use the local threshold. Purchases below \$10,000 can use either Micro or Small Purchase. Purchases over \$10,000 and below \$36,000 can use either Small Purchase or Formal Procurement. Small Purchase is where price quotes are obtained. It is recommended that the SFA use the 3 Bids and a Buy template available in download forms, and for milk bids also use the Milk-Bottom Line Cost spreadsheet to get a true bottom line bid. Small Purchase solicitation does not have to be in writing, but in most cases, it is recommended. Be sure that all applicable terms and conditions, such as Buy American and Termination for Cause, are included. At least three vendors should be contacted, and all records of the procurement should be maintained.</p> <p>Any purchases from the CN account over \$36,000 must be procured using FORMAL PROCUREMENT. In addition to requirements for Small Purchase, Formal Procurement must be in writing, and it must be advertised in the nearest regional publication. There are templates for RFPs and IFBs in download forms as well as a spreadsheet for product specifications.</p> <p>MONITORING CONTRACTS--SFAs are expected to monitor contracts to ensure that all terms, conditions, and prices are being enforced. Spot checking prices, tracking rebates and credits, logging Buy American exceptions, etc., are all parts of monitoring.</p>
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	<p>Technical assistance was provided on accommodating a student who could not have regular milk and could also not have soy milk, almond milk, or goat's milk. The director will procure some rice milk to offer to the student. All five components must be offered to students in order to claim a meal as reimbursable.</p>
800 - Civil Rights	810 Review program materials.	<p>Technical assistance was provided on making the Iowa and USDA non-discrimination statements available on the district's website in the same location as information on Child Nutrition Programs. Its current location did not clearly indicate that it was related to CN programs.</p>
1000 - Local School Wellness Policy	1002 When and how does the review and update of the Local School Wellness Policy occur?	<p>Technical assistance was provided on both the review of the wellness policy and the assessment of goals. The review should be available either from the committee or from Board minutes. It appears that the last review by the Board was December 2017. A prototype form for assessing goals was shared to assist in the assessment process. The district should also ensure that all indicated stakeholders are made aware of their ability to participate on the committee, including administration, school board members, food service staff, PE teacher, school health professionals, parents, students, and community members. A folder with multiple resources was shared with the director.</p>
1200 - Professional Standards	1206 a. Have the school nutrition staff met the annual training requirements for the current school year including part-time, full-time and any staff hired after January 1?	<p>Setting aside a regular time for staff training is recommended. Often schools release students early one day a week, and that may be a good time to schedule an hour once a month. There are many training materials available, and your Consultant can offer recommendations if there are specific topics of interest. Even if there isn't a specific topic, getting staff together to discuss menus--what works, what doesn't, issues with</p>

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		equipment or recipes, ideas for encouraging participation, and other topics could be discussed. Be sure to document the training sessions with an agenda and sign-in sheet.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The SFAs food safety plan was mostly complete, but it was recommended that Standard Operating Procedures, SOP, be checked to ensure they are comprehensive and applicable to the way things are done at the SFA. It is recommended that staff be involved in the process by dividing current SOPs among food service staff for them to review and comment on possible changes. A list of all SOPs available could also be shared, and staff could discuss the advantage of adding new SOPs to their food safety plan. Involving staff helps them review food safety procedures, gives them buy-in for the process, and provides required training hours.
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, the reason must be documented. This can be accomplished with a simple form that includes the date the product was accepted, name and description of the product, and the reason for accepting a non-domestic agricultural commodity. 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. This was discussed with the director, and she has implemented a log for non-domestic commodities.

**Site - Level Technical Assistance H-L-V Junior-Senior High School (0172)**

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	It is clear that the director has a thorough understanding of the meal pattern. There were a couple minor shortages that were pointed out. The director is encouraged to review quantities for grain and vegetable sub-groups weekly to ensure compliance. There were also two rice dishes offered that were not whole grain rich. After discussion, the director decided to submit a waiver for the two dishes.
1100 - Smart Snacks in School	1104. Are students able to purchase foods during the school day?	Technical assistance was provided on Smart Snack regulations as they apply to offering seconds for sale to students. Entrées for both breakfast and lunch may be sold a la carte the day they are menued plus the following day without compliance with Smart Snacks. However, anything offered as part of the meal besides the entrée must meet Smart Snack regulations. The director was notified that she must run these items through the Alliance Calculator and keep documentation that the items meet requirements in order to sell them a la carte in the future.
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	Technical assistance was provided on some issues to improve food safety. 1) Calibrate thermometers at least once a week and log the results. Logging results ensures that the calibrating is being done, and also provides documentation in case a food borne illness outbreak occurs. 2) Cases of food were stored directly on the floor of the freezer which is a violation of code. It is recommended that carts or plastic crates or some other items be obtained that would allow the cases of food to be raised six inches above the freezer floor as required. 3) When allowing students to return to the line for seconds, the students cannot return with used trays. Either a clean tray must be issued, or the food could be served on cardboard boats or other disposable container. 4) Older elementary

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		students were observed self-serving dinner rolls from a pan without a utensil. When ready-to-eat food is offered, either gloves or a utensil must be used for serving. It is recommended that tongs be placed in the container for use.
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**Org - Level Commendations**

Description
<p><b>APPLICATIONS/BENEFIT ISSUANCE:</b> Organization of benefit documents was greatly improved from the last review. 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. 118 applications were reviewed and all reviewed applications were correctly determined, signed and dated by both a household member and the SFA, applications were complete with SSN's and case numbers, and all applications were determined within ten days. 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 that indicate specific fees and were signed and dated by the household.</p>
<p><b>CIVIL RIGHTS:</b> The And Justice for All civil rights poster was posted in the cafeteria in a location where participants can read information on the poster. Annual civil rights training was provided 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 has been completed and filed. No discrimination was observed. The current state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school's website.</p>
<p><b>COMPETITIVE FOODS (SMART SNACKS/HKA):</b> Students may purchase a second entrée, as well as seconds on fruits and vegetables, and milk at lunch. No unallowable fundraisers are held during the school day. There were no vending machines available for students.</p>
<p><b>GENERAL:</b> The SFA worked hard to have everything ready for the review. Both the director and business manager attend training sessions in order to increase compliance with regulations. The food service staff work well together and relate well with students. In general, a well-run operation.</p>
<p><b>HACCP/FOOD SAFETY:</b> 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 reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. The latest Health Inspection Report was posted in a publicly visible location, and two inspections were requested last year. There were no critical areas noted on the report. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. Food Service workers wore proper hair restraints and practiced good gloving procedures.</p>
<p><b>MEAL COUNTING &amp; CLAIMING:</b> 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. Total Access is used as the school's POS system. There was a POS for all students, and the POS was organized and orderly. Students are not overtly identified as free, reduced, or paid during the meal counting process or during meal observation. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. All students observed selected a reimbursable meal.</p>
<p><b>MEAL REQUIREMENTS &amp; COMPONENTS:</b> The Food Service Director, FSD, has created menus that meet the meal pattern for reimbursable meals. All meal components were available at the beginning of service and throughout meal service on the days of observation. Documentation such as food production records, labels, inventory, standardized recipes, and purchase receipts indicated that 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. Water was available as required, and at least two types of milk were offered. Offer vs. Serve, OVS, was correctly implemented. 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. A monthly menu is also posted. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheet(s) for each school selected for review for a specified week during the review period.</p>
<p><b>PROCUREMENT:</b> The off-site procurement tool was completed, and board purchasing policy and Code of Conduct were submitted as well as a written Procurement Plan. The SFA ensures that no vendors have been debarred or suspended by USDA. The district is a member of a Group Purchasing Organization. The SFA had copies of the contract and bid prices.</p>
<p><b>PROFESSIONAL STANDARDS:</b> 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 in SY2018. Staff are well on their way to fulfilling training hours for SY2019. (Or state that there is a plan, and they are on-track to complete hours by the end of the There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.</p>
<p><b>RESOURCE MANAGEMENT &amp; RECORD KEEPING:</b> Financial records that were reviewed, indicated appropriate and allowable expenditures. 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</p>

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Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool. The Non-Program Revenue, NPR, tool was completed, and no increase in prices were required. The district does not charge indirect costs 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

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. Outreach included information mailed with benefit applications, information regularly included in the newsletter, and information on the website. 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 flyers sent home and posted at school and in local businesses in town.

VERIFICATION: The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The application selected for verification were confirmed prior to verification to ensure the original determination was correct.

WELLNESS POLICY: 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 wellness policy, the latest review of the wellness policy, are available to the public. Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.