

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Prairie Valley Comm School District (53250000)

Dates of Review: October 30, 31, November 1 and 2 2018

Program Year: 2019
Month of Review: September
Lead Reviewer: Deb Linderblood
Org Representative(s): MaChelle Showers

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The SFA did not have a letter from the Homeless liaison for a student who is homeless. One student was directly certified in July and JMC did not download her status as Other Reduced so she was changed to paid at the end of the carry-over period.	*Obtain a signed letter on district letterhead for the student who is homeless. The SFA obtained this letter while the State Agency was on-site. No further action is needed. *Change student who was not directly certified correctly in July to Reduced status. Send the household a letter informing them that their status will change to reduced price. Share this letter with the State Agency. The State Agency received this letter while on site. No further action is needed.	
700 - Resource Management	V-0700	The SFA has a Meal Charge Policy but it has not been disseminated to all households in the district and staff have not been informed of the policy.	State how you will disseminate your Meal Charge Policy to all households in the district and how staff will be informed of the policy.	

Site - Level Findings: Prairie Valley Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Students who cannot drink cow's milk were given a glass to get water and were not offered a milk substitute. Provided the SFA with a list of milk substitutes that are nutritionally comparable to cow's milk.	State the milk substitute which is nutritionally equivalent to cow's milk that you will offer to students who cannot drink cow's milk.	
400 - Meal Components and Quantities - Lunch	V-0400	For the week that the menu certification worksheets were completed, the SFA was short 1/8th cup of red/orange vegetable for the week. The Food Service Director thought the mixed vegetables contained more than 1/8th cup of red/orange vegetable. She now has the correct contributions (1/8th red/orange, 3/8th starchy and 1/4th other). TA provided that the SFA had 3/4th cup legume for the week and only needs 1/2 cup so recommended replacing the baked beans on Friday with 1/4th cup of carrots or tomatoes in order to meet the weekly requirement.	Complete and attach a menu template for a week's worth of menus (a different week than was used to complete the menu certification worksheets. Complete the vegetable portion of the template and show that the daily and weekly vegetable sub-groups were met. Also attach the corresponding food production records for this week.	

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1400 - Food Safety	V-1400	SFA is purchasing "Wow" butter which is manufactured in Canada.	State the product you will replace the "Wow" Butter with that is made in the United States.	
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Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	208 When a confirmation review was conducted:	TA provided that prior to sending the household the letter that they have been selected for verification, the SFA needs to have an individual other than the Determining Official confirm that the application had been determined correctly. This individual should sign the bottom of the application where it says "Confirming Official".
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	TA provided that upon selecting households for verification if the application has a case number written on it the SFA should try to find the students on ELookup. If found, this household is directly verified and a letter of selection does not need to be sent to the household.
200 - Verification	212 Did the SFA meet the follow-up requirements if the household failed to respond to the request for verification?	TA provided that when the SFA makes a follow-up attempt the person that makes the follow-up contact should sign and date the bottom of the Application where it says "Follow-up Signature".
700 - Resource Management		<p>*It is recommended that the procurement event page of the written procurement plan be reviewed annually (about February). It is best practice to keep a separate procurement event page for each school year. This practice will help ensure that the correct procurement method is identified based on the estimated value of a particular purchase.</p> <p>*TA provided that for equipment repair and preventive maintenance the SFA needs to use an unrestricted indirect cost rate to charge the nutrition account for these services. Showed the SFA where to find their indirect cost rate on the Department of Education web page. These expenses will not be listed on the Procurement Plan.</p> <p>*The written code of conduct did not identify the specific board policies that make reference to disciplinary action. These board policies were identified and TA provided that reference should be made to these policies in the code of conduct. Write in the policy numbers and titles on the school food service code of conduct that would apply to officers and employees who violate procurement procedures.</p>

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		<p>*TA provided that the SFA needs to solicit bids from 2-3 vendors when using small purchase even if they believe a vendor will not respond. Encouraged SFA to include the non-response form when they send out their solicitation and showed the FSD where to find the form on download forms. Required federal terms and conditions must be included when procurement is conducted using the small and formal methods of procurement. Please refer to the state-prototype templates posted on IowaCNP. When using micor-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." Showed the FSD where to find the micro-purchase log in download forms.</p> <ul style="list-style-type: none">· When procuring milk and bread, along with specifications (descriptions) for all items to be procured, the estimated annual usage for each item should be provided. To ensure the district selects a responsive vendor with the overall lowest price (bottom line), the cost of each item on price quotation request should be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template that calculates extended cost for milk was provided.· For milk, other things to consider when requesting prices from vendors are: coolers to be provided at no charge, Hazard Analysis Critical Control Plan (HACCP) plan to ensure clean crates and milk cartons are delivered, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should inform vendors whether a firm, fixed price or a fixed price with economic adjustment (escalator clause) is being requested. Instructed the SFA on where to find the 3 bids and a buy form on download forms and went over each section. TA provided that if the SFA is not satisfied with the product/service they are receiving from a vendor that detailed documentation, including pictures is needed.· Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-domestic
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		<p>agricultural commodity is accepted.</p> <ul style="list-style-type: none"> · The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification and be at equal or lesser price. · TA provided that the SFA should keep a log of their rebates and credits. Provided a paper copy of these logs and also informed the FSD that the form are on download forms.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	TA provided on where to find the web-site for processing complaints alleging discrimination. www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	TA provided that when completing the racial/ethnic form the number of students identified as Hispanic/Not Hispanic should match the number of students identified as White, Black, American Indian, Asian and Native Hawaiian.
800 - Civil Rights	810 Review program materials.	TA provided that the SFA should add the Iowa and USDA non-discrimination statement to their nutrition web page.
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>	The SFA completed an assessment of their wellness policy but the goals they assessed were the previous year's policy goals. TA provided that when an assessment is completed again, the correct goals need to be assessed.

Site - Level Technical Assistance Prairie Valley Elementary School (0409)

Area	Question	Comments
Infant and Pre-K Meal Pattern Checklist - Breakfast	4 Does all the cereal served to Pre-K meet the Pre-K meal requirements (no more than 6 grams of sugar per dry ounce)?	TA provided that the CACFP meal pattern require breakfast cereals served contain no more than 6 grams of sugar per dry ounce. The following cereals did not meet this requirement-Frosted Flakes, Lucky Charms, Apple Jacks, Cocoa Puffs and Trix. Cinnamon Toast Crunch is OK as it has 6 grams of sugar in 28 grams. Provided a handout with a chart to use to determine if a cereal meets the requirement as well as a list of WIC approved cereals that meet the requirement.

Org - Level Commendations

Description
Certification and Benefit Issuance: Benefit documents, as well as all paperwork, were very well organized. The current application for free and reduced price meals/milk and income guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the Point Of Service (POS) system, and denied applications were correctly determined. All applications were correctly determined, signed and dated by the household member and the SFA, were complete with Social Security Numbers, and all applications were determined within ten days. Income was only

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<p>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 are provided to applicants. Eligibility is kept confidential. 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 at the site reviewed, services are offered for Limited English Proficient households, annual civil rights training was provided for food service staff and documented and also for non-nutrition staff who run the POS. The SFA submitted the annual Public Release to the local media. Students with special dietary needs are correctly documented. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The correct state and federal non-discrimination statements are provided on the SFA's notification and verification letters.</p>
<p>Fiscal Action: Fiscal action will be below the USDA allowed disregard for this review so no claim adjustments for September will be needed.</p>
<p>Food Safety: The SFA has a district-wide written Food Safety plan that includes all required elements and a HACCP plan. A copy of the written plan was available at the site reviewed. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Food temperatures are documented on the daily food production record. Dishwasher temperatuers are taken and documented and thermometers are calibrated every Friday. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Foods are stored 6 inches off of the floor. Food Service workers wore proper hair restraints and practiced good gloving procedures. Cafeteria tables are washed and sanitized between groups of students eating. The following individuals at the site reviewed are ServeSafe Certified: Tara Picard, Joanne Saxton and Cindy Lange.</p>
<p>Local Meal Charge Policy; The SFA developed and approved a meal charge policy on November 28, 2018. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.</p>
<p>On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and 50% were completed for breakfast prior to February 1st.</p>
<p>Procurement: The Food Service Director attended the Regional Procurement Training in Fort Dodge, Iowa and also the Procurement Basics class. The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, have listed procurement events and procurement methods for each event. The SFA is part of the AEA purchasing group. The signed agreement with AEA Purchasing states that the school district agrees to procure food (excluding bread and milk) and non-food supplies through the Group's awarded Prime Vendor as well as vendors awarded the ware wash and small ware contracts. Review of invoices from the Prime Vendor showed the district was purchasing products from the market basket and all but two prices were validated. In school year 2017-2018 the SFA utilized 112.3% of their allotted PAL dollars. The SFA is participating in the Direct Distribution program, DOD and Diverted Foods. This school year, the SFA has used 82% of their allotted direct distribution dollars and is on track to utilize their Department of Defense Fresh Fruit and Vegetable allotment and Diverted Foods allotment.</p>
<p>Professional Standards: The Food Service Director has completed 23 hours of Professional Training in school year 2018-2019. The Head Cook at Farnhamville has completed 17 hours and the Head Cook at Gowrie has completed 20.5 of their required 10 hours of Professional Training requirement. All nutrition staff have met their required training for Professional Standards in school year 2019 as well as non-nutrition staff who run the Point of Sale. An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours. On-site, tutorial and webinar training is provided.</p>
<p>Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.</p>
<p>Resource Management: All expenditures that were reviewed appeared allowable. 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. The Non-Program Revenue (NPR) tool was completed and no increase in prices were required. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs.</p>
<p>School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach includes the district informing the public of the breakfast program during school registration and the monthly breakfast menus are posted on the district's website. Summer Food Service Program (SFSP) outreach included posters being posted in businesses and advertisement in the local newspapers; on local cable channel; and on the district's web site.</p>
<p>Verification: The correct number of applications were verified and were correctly selected from error prone applications. The process was completed on time. Two of three Applications selected for verification were confirmed prior to verification and documented. The Determining Official participated in the Verification webinar. The verification report was completed accurately and on time.</p>
<p>Wellness Policy: The SFA's wellness policy was reviewed and revised on January 25, 2017. The public is made aware of the SFA's wellness policy and assessments via the district's web site. The following individuals are involved in reviewing and updating the LWP: Superintendent, School board members, and the School Improvement Advisory committee (SIAC) which consists of School staff, community members, parents, and students. Potential stake holders are made aware of thier ability to participate in the Wellness Committee. The SFA completed an assessment of their wellness policy on March 28, 2017. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.</p>

Site - Level Commendations Prairie Valley Elementary School (0409)

Description
<p>Meal Components and Quantities: The Food Service Director does a god job of menu planning. She has developed a 10-week cycle menu. All meal components were available at the beginning of meal service</p>

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on the days of observation and throughout meal service. All meals observed met at least the minimum daily requirements. The menus met weekly and daily meal pattern requirements for the K-4th age/grade group. 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 and neatly organized in binders. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch and breakfast—including many fresh fruits and vegetables. Standardized recipes are used for food production. Water was available as required. At least two types of milk are offered. 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 at both breakfast and lunch. Numerous nutrition related posters are displayed in the cafeteria.

Meal Counting and 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. JMC is used as the school's POS system. There is 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 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 and appeared aware of what constitutes a reimbursable meal. Edit checks are performed. All students selected a reimbursable meal without having a prompt to select a ½ cup of fruit or vegetable as one of the five required components (is a serve school).

Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of September 10-14, 2018 for breakfast and lunch at the Farnhamville Elementary School. The worksheets showed that all meal components were served. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Farnhamville Elementary School is at low risk for noncompliance 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 portion sizes of condiments, 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. A nutrient analysis was not required.

Pre-school Menus: Pre-school students only eat breakfast at school. The CACFP meal pattern was followed as they are not co-mingled with the Kindergarten through 4th grade students. All components were served. Offer vs. serve is not used.

Smart Snacks: Students are able to purchase milk via a la carte sales. Exempt leftover National School Lunch Program entrees are only sold the same day they are initially offered.

Water: Free potable water is available to all students for lunch and for breakfast.