

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Southeast Webster-Grand CSD (60960000)
Dates of Review: October 23 – 26, 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
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.	
800 - Civil Rights	V-0800	The SFA has not completed the racial/ethnic form for school year 2018-2019.	Complete and attach the racial/ethnic form. Assistance and TA provided on how to complete the form.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The SFA does not have a spend down plan approved by the State Agency. The Financial Report on IowaCNP shows that the SFA's cost per three operational months is \$110,286.85 and their account balance was \$111,762.05.	Describe below the purchases you have already made in school year 2018-2019 in order to spend down your account balance as well as any purchases you plan to make yet this school year. Also submit this plan to Patti Harding, Administrative Consultant (patti.harding@iowa.gov) for State Agency approval.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA's non-program food revenue does not contribute adequately to total revenue.	State your plan for how you will 1. increase the amount of non-program revenue you bring into the food service account 2. determine an accurate non-program food cost to be used in the Certified Annual Report.	

Site - Level Findings: Dayton Center (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1300 - Water	V-1300	Water is only available down the hall from the cafeteria and not close enough that students would be allowed to go get water to go with their meal.	Describe how you will make water accessible to students at breakfast and lunch.	

Org - Level Technical Assistance

Area	Question	Comments

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200 - Verification	208 When a confirmation review was conducted:	TA provided that prior to sending the selection letter to the household requesting documentation for verification the SFA needs to have someone other than the Determining Official confirm that the application was approved correctly. Upon doing this, the Confirming Official should sign in the appropriate space at the bottom of the application.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	TA provided that the SFA should attempt to directly verify applications selected for verification by entering the students into ELookup. If located the household would be directly verified and a notification of selection would 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, this should be documented in the appropriate space at the bottom of the application.
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> <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,</p>

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		<p>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 price 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 agricultural commodity is accepted.· 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.
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700 - Resource Management		In school year 2017-2018 the SFA utilized 90.3% of their allotted PAL dollars. The SFA is participating in the Direct Distribution program, DOD and Diverted Foods. Encouraged the SFA to spend 95% or more of their allotted dollar amount.
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.
RMCR - Revenue From Nonprogram Foods	9 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	TA provided that the SFA's Business Manager and Food Service Director should be working together to determine their non-program food cost. A la carte items should be coded on the invoice or be purchased on a separate invoice. Adult meal food cost should be determined by coming up with an average cost of a meal times the number of adult meals that are sold. These two amounts should be added together and then add on the food cost for second milks and second entrees.

Site - Level Technical Assistance Dayton Center (0409)

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	325 a. For the review period, complete S-1, 17.	The SFA underclaimed 426 paid pre-school meals on their September claim. TA provided that the SFA should consider high-lighting these meals on the pre-school roster to be sure the correct number is used on the claim.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Servers were serving all students the entrée and not allowing them the opportunity to decline this option. TA provided that students need to be given the opportunity to decline having the entrée and take three other components.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The Food Safety Inspection Report was posted in the serving line but was back in a corner where it was not visible. TA provided that the report needs to be in a more visible location,
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	Ground beef was being thawed above portion cups of juice. TA provided that when thawing meats they should not be stored above ready to eat food items.
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)?	The cereals being served to the Pre-K students contain more than 6 grams of sugar per dry ounce (Frosted Flakes, Lucky Charms and Froot Loops). TA provided that cereals served to Pre-K students must contain no more than 6 grams of sugar per dry ounce. Provided a handout which has a chart to determine if a cereal is creditable and also a handout showing WIC approved cereals which are creditable. The FSD stated that she will start to serve Chex cereal.

Org - Level Commendations

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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 but two 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 are provided to applicants. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.
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. The SFA submitted the annual Public Release to the local media in several surrounding communities. Students with special dietary needs are correctly documented and accommodated. No discrimination was observed. The correct state and federal non-discrimination statements are provided on notification and verification letters.
Fiscal Action: There is no fiscal action being assessed with this review.
Local Meal Charge Policy; The SFA developed and approved a meal charge policy on August 23, 2017. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.
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. Corrective action was not required.
Procurement: The Food Service Director attended the Regional Procurement Training in Fort Dodge as well as 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 Superintendent, Business Official and Food Service Director have signed the Procurement Plan. There is a Code of Conduct Policy which references Board Policies for Code of Ethics and Gift to Employees. 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. A review of invoices from the Prime Vendor showed the district was purchasing products from the market basket and prices were validated. The SFA has debarment statements from the vendors that they purchase from using small or formal purchasing. The food service director spot checks invoices from the prime vendor to ensure products delivered match the order and the description of the product solicited by GPO. This school year, the SFA has used 62% of their allotted direct distribution and is on track to utilize their Department of Defense Fresh Fruit and Vegetable allotment and Diverted Foods allotment.
Professional Standards: The Food Service Director has completed 23 hours of Professional Training in school year 2018-2019. The Head Cook at Dayton Center has completed 16.5 hours and the Head Cook at Burnside has completed 13 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.
Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.
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. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs.
School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach consisted of the district informing the public about the breakfast program at school registration and monthly breakfast menus are posted on the district's website. Summer Food Service Program (SFSP) outreach was completed by posters being displayed in businesses and the program being advertised in the local newspapers, on local cable channels and being on the district's website.
Verification: The correct number of applications 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 Determining Official participated in the Verification training webinar. The verification report was completed accurately and on time.
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, School Improvement Advisory Committee (SIAC) which consists of School staff, community members, parents, and students. Potential stake holders are made aware of their 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.

Site - Level Commendations Dayton Center (0409)

Description
Food Safety: The SFA has a district-wide written Food Safety plan that includes all required elements, as well as a HACCP plan. A copy of the written plan was available at the site reviewed. Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Food temperatures are documented periodically throughout meal service. Dishwasher temperatures are taken and documented

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and thermometers are calibrated every Monday. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Chemicals are stored separately from food items. Food Service workers wore proper hair restraints and practiced good gloving procedures. The Head Cook is ServeSafe Certified.

Meal Components and Quantities: The Food Service Director does a good job of menu planning. All meal components were available at the beginning of meal service 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 age/grade group at Dayton Center. 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. A variety of entrees, fruits, and vegetables are offered throughout the month for breakfast and lunch—including many fresh fruits and vegetables. Standardized recipes are used for food production. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch and there are numerous posters promoting good nutrition.

Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Point of Service (POS), counts and filed claims appear accurate. JMC is used as the school's POS system. 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. Daily 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 three required components.

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 Dayton Elementary School. The worksheets showed that all meal components and vegetable sub-groups were served. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Dayton 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.

Offer vs. Serve: All students observed selected 1/2 cup of fruit and/or vegetable. Cafeteria staff have been trained on offer vs. serve. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at breakfast and lunch.

Pre-school Menus: Pre-school students are served their meals in the classroom and are not co-mingled. The CACFP meal pattern was met for breakfast and lunch. Student's meals are pre-plated on trays. Students are served 1% milk.

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 offered.