

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Schleswig Comm School District (58320000)
SNP - Review ID: 4992

Program Year: 2019
Month of Review: September
Lead Reviewer: Brenda Windmuller
Org Representative(s): Laurie Chandler

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One application was processed as free and should have been reduced.	The error was corrected during the on-site visit. No further action required at this time.	
700 - Resource Management	V-0700	Last School Year (SY), the SFA utilized only 82 percent of the Planned Assistance Level (PAL) for USDA Foods. Recommendation provided the SFA consider participating in the DoD Fresh program in addition to the Direct Distribution (Brown Box). Recommended contact the USDA Foods Program Consultant at Iowa Department of Education (IDOE).	The SFA will explain how they will oversee FSMC operations to ensure at least 95 percent of the USDA PAL is utilized.	
700 - Resource Management	V-0700	SFAs that utilize FSMC services must reconcile invoices prior to payment. The following errors were found on invoices for January 2017, August 2018, and September 2018: (1) The FSMC was not using the correct Meal Equivalent Rate. Page 19 of the contract indicates that the ME rate is \$3.5325 and must remain constant for the term of the Contract and all renewals. The FSMC was using \$3.61 as the ME rate. (2) It was not possible to determine how the A la Carte dollar amount was determined. (3) The FSMC is combining reimbursable meal counts with some non-reimbursable meal counts. (4) A count of afternoon milk sales to Pre-K, K, and 1 are not tracked by the SFA, so the SFA is unable to reconcile milk charges from the FSMC.	For your response, (1) submit copies of corrected invoices using the correct Meal Equivalent rate for January 2017, August 2018, and September 2018. (2) Submit information on how the a la carte dollar amount is determined and indicate how the SFA will be able to confirm the amounts each month. (3) Submit a copy of an invoice that shows the reimbursable and non-reimbursable meals have been divided. (4) Indicate how the SFA will track milk sales for afternoon milk to Pre-K to grade 1.	

Site - Level Findings: Schleswig Middle-School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1100 - Smart Snacks in School	V-1100	Gatorade sold in the vending machine does not meet smart snacks standards for the middle school students who have access to the machine.	SFA will explain how they have elected to correct this issue. Options include: change the product offered in the vending machine OR make arrangements to have	

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			the machine turned off between midnight and 30 minutes after school is out for the day OR relocate the machine to a location where students do not have access.	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	One application was determined free based on income application, and should have been reduced. The SFA's error rate was 1.32%. It was determined that the web based calculator was not working properly at the time that the application was processed. The formula error on ICaves has been fixed at this time. The SFA sent a letter to the household notifying them of the change in the benefit level.
300 - Meal Counting and Claiming	301 How does the SFA's point of service system identify a student's eligibility? Include all types of distinct counting methods (e.g., check-off list for grades 1-3, tickets for grades 4-8).	Students should stop at the POS and give something in exchange for their meal. This can be as simple as stating their name. This process was corrected during the on-site review. This process is designed to: 1. Make the student stop so that the POS operator can ensure that they have a reimbursable meal. 2. Ensures a more accurate counting procedure. 3. Puts responsibility on the students to "pay" for their meal.
700 - Resource Management		Discussed what records should be kept on file for 3 years plus the current year. These records should include but not be limited to: production records, recipes, menus, CN labels, professional development, on-site monitoring, ethnic racial count, benefit applications, DC lists, verification reports, invoices, contracts, bid solicitations, debarment statements, Procurement selection matrix, meal counts, and claims. The POS system used by the SFA currently does not allow access to records beyond the current year. The SFA will need to work to find a way to maintain all NSLP records for 3 years beyond the current school year.
700 - Resource Management		PROUREMENT: 1). Technical assistance provided to review and complete the procurement event page annually. Best practice is to complete a procurement plan in February when SFAs are considering procurement for upcoming school year. 2). Technical assistance provided to check with neighboring SFAs for chemical vendors. Recommended "spread the wealth" if using micro-purchase method or use small purchase method to complete a price comparison and select vendor with the lowest price for dishwasher detergent.
700 - Resource Management		SFA discussed with SA the option of putting a portion of the SFA's USDA Foods entitlement money towards the DoD program which is weekly deliveries of produce. Watch for communication after the first of the year with information on how to sign up for this program. The SFA spent only 82% of their USDA Foods dollars in 2017/2018.

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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?	Technical assistance was provided on reconciling FSMC invoices, how to track the Meal Equivalent rate, milk sales, and how to check a la carte charges. Technical assistance was also provided on documenting menu changes in writing. There was discussion on the difference between Fixed Price and Cost Reimbursable contracts.
1100 - Smart Snacks	1101 What is the SFA's process for determining compliance with non-packaged or recipe food items (combination foods that do not have a label)?	There is a vending machine located on the walking path around the gym. This machine is meant to service the community members using the fitness center and walking path, but is located such that middle school students have access to the machine. Because the students do have access to the machine, all items in the machine must meet the smart snacks standards. The maximum size beverage for this age group is 12 oz and should not exceed 60 calories. The current Gatorade product in the machine is 20 oz with 130 calories.
1400 - Food Safety		The SFA inquired about Sharing Tables and what they would need to do to start one. The SA shared the Share Table Fact sheet, Sample Petition and SOP. The SFA will need to complete a Petition and submit it to the DIA for approval prior to proceeding with implementation.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The Food Safety Plan (HACCP Manual) did not contain the blood borne illness or bodily fluid clean up policy. These policies were posted on the wall in the kitchen. SFA should include them in the HACCP binder as well. Only one copy of the HACCP binder was available on site, it was located in the manager's office across the hall from the kitchen. The SA recommended that a copy is placed in the kitchen for staff to access should they need to refer to a policy. Kitchen staff should also be trained on the contents of this binder. Personal beverages were stored on the top shelf in the reach-in cooler.
1600 - School Breakfast and SFSP Outreach		Discussed ideas for additional promotion of breakfast. Promotion is intended to increase the participation rate of breakfast of all students. Ideas include: ask administrators to serve breakfast one day, special themed breakfast, and informational table at parent-teacher conferences.

Site - Level Technical Assistance Schleswig Middle-School (0172)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	SFA should be sure to menu a variety of vegetables to include all 5 vegetable sub-groups each week. Vegetable Sub-groups: beans, dark green, red/orange, starch and other. The week reviewed did not have a dark green vegetable. Overall, the September menu is heavy on starchy vegetables. All vegetable sub-groups are represented on the salad bar and menus are compliant.

Org - Level Commendations

Description

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<p>APPLICATIONS/BENEFIT ISSUANCE (100): Benefit documents, as well as all paperwork, were extremely well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were determined within ten days. Access to benefit information is correctly limited. Free meals are extended to all members in the household.</p>
<p>BREAKFAST & SUMMER PROMOTION (1600): The SFA does an excellent job of promoting breakfast. The FSMC does a promotion during National School Breakfast week. Menus are posted in each cafeteria as well as the website. Summer Food Service Program, SFSP, outreach for the SFSP program state-wide is shared via websites, newsletter and communication with families prior to the end of the school year. SFA works to align the SFSP hours with other community activities like reading programs, and swimming pool hours.</p>
<p>FISCAL ACTION: Errors fell below the \$600 disregard. No fiscal action was required.</p>
<p>FSMC: The SFA and FSMC have a current Fixed-Price contract in place. As required, the SFA retains signature authority over Programs, retains control of the nonprofit school food service account, and files the monthly claim. Twice a year, the SFA conducts on-site visits to monitor operations for compliance with regulations. The sale of all meals and competitive foods accrue to the food service account. The Advisory Committee meets at least twice a year and the notes from the meetings indicate an active involvement in menu planning by students. USDA Foods usage from last year was reconciled. The SFA has someone named as the Program Director, and he had the required 12 hours of training last year including 8 hours of food safety training.</p>
<p>MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month. Meal count totals for the month of September appeared accurate and complete. There was a point of service (POS) at the point where meals are served for all students.</p>
<p>ORGANIZATION: The SFA was well organized and well prepared going into the Administrative Review. All off-site questions were completed in their entirety in a timely manner. Supporting documentation was attached.</p>
<p>PROCUREMENT: The Human Resources Director, Superintendent, Determining Official, and FSMC Food Service Director attended the regional procurement training. The SFA had a completed written procurement plan for SY 17-18. The micro- and small purchase thresholds were correctly identified. The SFA did an excellent job of responding to the off-site procurement questions including providing local policies as requested.</p>
<p>PROFESSIONAL STANDARDS (1200): Tracking was provided that documents that the director received the required 12 hours of annual training, and all other staff have received at least 4 hours of annual training in 2017/2018 and are on track to complete the required hours for 2018/2019. The SFA has a plan to complete the required training hours for 2018/2019.</p>
<p>RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed, indicated appropriate and allowable expenditures. The Paid Lunch Equity (PLE) too was not required for the 2018/2019 school year due to a positive balance in the School Lunch Account in January 2018. Reports are filed on time, and all records are maintained for at least three years plus the current year.</p>
<p>VERIFICATION (200): 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 SFA had two people attend Verification training. The verification report was completed accurately and on time.</p>
<p>WELLNESS POLICY (1000): The wellness policy was updated in 2017. The policy has nutrition education, physical activity and other wellness goals included. An assessment has been completed and is posted on the school's website. A wellness committee is in place to set goals and help assess the completion of the goals. The committee meets 2 times annually and minutes are kept. The SFA incorporates nutrition education into health and science classes, participates in community clean-up activities, and houses a fitness center which is available for the community's use. These activities promote a healthy lifestyle for the students and the community as a whole.</p>

Site - Level Commendations Schleswig Middle-School (0172)

Description
<p>Cafeteria: the SFA has clear signage explaining what makes a reimbursable breakfast and a reimbursable lunch. The kitchen staff maintains a log of product that does not meet the "Buy American" standards. The SFA has a nice salad bar which includes all vegetable sub-groups. Students were observed taking a lot of vegetables from the salad bar and coming back for seconds from the salad bar, evidence that they enjoy this option and are willing to try new things.</p>
<p>CIVIL RIGHTS (800): The "And Justice for All" civil rights poster was posted in the cafeteria. Annual civil rights training was provided food service staff and other district staff working with the NSLP 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. The non-discrimination statements is included on program materials.</p>
<p>HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes most required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Food Service workers wore proper hair restraints and practiced good gloving procedures.</p>
<p>MEAL PATTERN: All students observed on the on-site visit had a reimbursable meal, the menu was complete with all food groups represented and served in their proper quantity. Offer vs. Serve was implemented properly and staff was monitoring food items on trays. Water was available to all students during meal times in the fountain in the hall. Students are encouraged to carry water bottles with them throughout the day. Menus for the month of review contained all required components. Production records, CN Labels and recipes were all available to verify the meal pattern.</p>

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