

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**AGWSR Comm School District (00090000)**  
**Dates of Review: November 7, 8 and 9, 2018**

**Program Year:** 2019  
**Month of Review:** September  
**Lead Reviewer:** Deb Linderblood  
**Org Representative(s):** Vicki Harken

**Org - Level Findings**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
100 - Certification and Benefit Issuance	V-0100	One student was directly certified to receive reduced price benefits and should have been receiving free meal benefits.	Send the family a notification letter explaining that their student will begin to receive free meal benefits. This was done while the State Agency was on site. No further action is needed.	
700 - Resource Management	V-0700	In school year 2017-2018 the SFA only utilized 77.2% of their allotted PAL dollars. The SFA is only participating in the Direct Distribution portion of the program.	State your plan for how you will use 95% or greater of your allotted PAL dollars. TA provided that the SFA may want to consider participating in DOD so that some of their allotted dollars can be used for fresh fruits and vegetables.	
800 - Civil Rights	V-0800	All staff who interact with program participants have not had civil rights training in school year 2018-2019. TA provided that there is a training power point presentation on IowaCNP under download forms as well as a game. A list of the staff who still need training was provided during the on-site visit.	Have these employees complete civil rights training. Attach a sign-in sheet showing the name of the class, date, time and signature of those who completed the training.	
1000 - Local School Wellness Policy	V-1000	The SFA currently does not have a Wellness Committee. Their Wellness policy has not been reviewed/ revised since 2012 and an assessment of the goals has not been completed. Provided the SFA with the "Does Your Wellness Policy Measure Up" document and the Local Wellness Policy Progress Report document.	State your plan and a timelines for: 1.) Who will be designated to be the lead person for your Wellness Committee and by when 2.) Determining who will be invited to be on the Wellness Committee and by when 3.) When and how potential committee members will be invited to participate on the Wellness Committee 4.) When the Wellness Policy will be reviewed/ revised 5.) When an assessment of the Wellness policy will be completed 6.) How and by when the Wellness Policy and assessment will be made available to the public.	
1200 - Professional Standards	V-1200	The new Food Service Director did not meet the Professional Standards hiring standards.	Complete and attach a training plan with training already completed and training that will be completed within the next year.	

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1200 - Professional Standards	V-1200	Substitute Nutrition Staff have not started to obtain their four hours of needed Professional Standards Training.	Describe how substitute Nutrition Staff will obtain their required Professional Training for school year 2018-2019.	
1200 - Professional Standards	V-1200	One of the individuals who does eligibility determination has not started to obtain the required 4 hours of Professional Training.	Describe how this individual will obtain their required 4 hours of training for school year 2018-2019.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	Per the SFA's financial report off of IowaCNP for school year 2017-2018 the nutrition account's cost per three operational months is \$108,914.47 and their account balance is \$118,066.38. Thus the account exceeds the three month operating balance by \$9,151.92. The SFA currently does not have a plan for spending down this excess. TA provided on ways the SFA could spend this money down (purchase needed equipment or supplies, increase nutrition salaries, etc.).	Develop and attach a plan to spend down money in the nutrition account so that it does not exceed three month operating balance. Also send this plan to Patti Harding for approval at <a href="mailto:patti.harding@iowa.gov">patti.harding@iowa.gov</a> .	

Site - Level Findings: Ackley-Geneva High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Menu certification worksheets were completed for the week of September 17-21, 2018 and showed the following: 1.) three days short on vegetables (only 1/2 cup on Monday, Wednesday and Friday), 2.) short meat/meat alternate on one day, 3.) no legumes were offered during the week. 4.) short on other vegetables for the week (only had 1/2 cup and need 3/4th cup). TA was provided that the 9-12th graders need to be offered 1 cup of vegetable per day and that vegetable sub-groups must be offered each week. Suggested moving the fruit/vegetable bar so that is before the Point of Service and/or offering two different vegetables in the serving line. TA also provided on using the bread grain chart and how to determine the contributions in a recipe. Reviewed that legumes must be served each week (1/2 cup) and need 3/4th cup of other vegetables per week. Encouraged the Food Service Director to consider signing up for DOD next school year so as to get a second delivery per week of fresh fruits and vegetables.	Select a week from your cycle menu (that is different than the menus used to complete the menu certification worksheets) and complete and attach the menu template that was provided. Also attach recipes, CN labels, product formulation statements and production records that correspond to this weeks' worth of menus. Also, state your intentions to have the Food Service Director attend the State Agency's Healthy Meals workshop next summer.	
1100 - Smart Snacks in School	V-1100	The food and beverages sold in the vending machines have not been entered into the nutrition calculator. This is a repeat finding.	Enter the following vending foods into the nutrition calculator: Orville Redenbacher Naturals Popcorn, BeVita Bites (chocolate) and Late July Nacho Chipotle. Attach the nutrition calculator page showing that the products are Smart Snack compliant or if it is not compliant state the food item that you will replace the product with and attach the nutrition calculator page for the replacement item.	

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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	107 a. When and how are households notified of students' certified eligibility?	The SFA is currently verbally informing households who are denied benefits that they are denied. TA provided that these households must be provided notification in writing. The denial letter must include the right to appeal.
100 - Certification and Benefit Issuance	135 Are the Direct Certification lists retained on file by the SFA?	In school year 2017-2018 the SFA did not keep copies of their direct certification lists. They began to do so in 2018-2019. TA provided that direct certification lists should be printed and kept on file for 3 years plus the current year.
200 - Verification	209 Based on the review of verified applications:	One application selected for verification had two pay stubs which were submitted. When the State Agency used the gross pay it was determined that the household's status should have been changed from free to reduced. TA provided that the SFA should always use gross pay when completing verification. The SFA also needs to be sure they receive a month's worth of pay stubs.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	TA provided that when the SFA selects households to verify they should attempt to find the students using ELookup. If found, the household is directly verified and a notice of selection does not need to be sent to the household. These applications would be reported on the Verification Report under line 5-7.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	TA provided that if a student does not take a reimbursable meal that they should be encouraged to do so, but if they still do not then the items on the student's tray should be charged as a la carte items.
700 - Resource Management		<ul style="list-style-type: none"> <li>• The procurement event page on the written procurement plan should be revised to reflect the upcoming school year's procurement events, correct procurement methods and contract award type. 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. On the plan the SFA should identify if they will award based on line item or bottom line for any purchasing event using small or formal purchasing method.</li> <li>• TA provided that for equipment repair and preventive maintenance the SFA needs to use a unrestricted indirect cost rate to charge the nutrition account for these services. Showed the SFA where to locate their indirect cost rate on the Department of Education webpage. These</li> </ul>

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		<p>expenses will not be listed on the Procurement Plan.</p> <ul style="list-style-type: none"><li>• TA also provided that the SFA needs to have debarment statements from vendors when using small or formal procurement methods.</li><li>• Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a Buy) and formal methods of procurement. Please refer to the state-prototype templates posted on IA_CNP.</li><li>• When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." A micro-purchase log should also be maintained so that the SFA can track the dollar value spend with each vendor. The micro-purchase log template can be found on IowaCNP under download forms.</li><li>• 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.</li><li>• For milk, other things to consider when requesting price from vendors are: is pricing requested for paper cartons or plastic bottles, 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 requested.</li><li>• For bread, provide vendors with a package count/package weight/weight per serving for each bread product. Review current school year bread product purchases to include any regularly purchased items when requesting price quotes.</li><li>• The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and the description of the product solicited by GPO. Prices on the invoice should match bid pricing or be lower unless SFA was given advance written notification per solicitation of any price increase. Food items procured</li></ul>
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		<p>by the SFA not on the GPO solicitation must be procured using appropriate procurement methods.</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <p>* 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.</p> <p>* TA provided that since the SFA does an RFP for their milk it is recommended that they use the template that is on IowaCNP under download forms to be sure they have included all of the necessary language.</p> <p>* Reviewed each section of the 3 bids and a buy template. Discussed that the SFA should send the Vendor statement of No-bid with the solicitation document as well as the Debarment statement. Provided a paper copy of the 3 bids and a buy template and the No-bid form.</p> <p>*Reviewed that the SFA needs to have a Code of Conduct policy and that the SFA's following policies should be referenced in the policy: 401.2 Employee Conflict of Interest, 402.4 Gifts to Employees, 413.3 Classified Employee Suspension and 413.4 Classified Employee Dismissal.</p> <p>* Provided a paper copy of rebate and credit tracking forms that the SFA should use and keep on file.</p> <p>* Instructed the SFA that if they have issues with a vendor that detailed documentation needs to be kept including pictures if applicable. The vendor should be contacted and allowed an opportunity to resolve the issues.</p> <p>* Along with the Procurement Event page it is best practice to have the signature page signed and dated so that the appropriate individuals are aware of the Nutrition Department's procurement plan and that there are regulations that must be followed.</p>
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	The SFA has an outdated short version of the USDS nondiscrimination statement on their monthly menus. Provided the correct version to the

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		Food Service Director.
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 go to find the USDA complaint form to use if the SFA would have someone file a complaint alleging discrimination. <a href="http://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer">www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer</a> .
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	TA provided that when completing the racial/ethnic form that the total number for ethnicity should match the total number for racial identities. SFA revised their racial/ethnic form while the State Agency was on-site.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	TA provided that when completing the on-site monitoring forms the SFA should put the date that the breakfast review was completed and the date the lunch review was completed so that the State Agency can determine if the form was completed prior to February 1st of each year.
1200 - Professional Standards	1208 Is the SFA tracking training hours on an annual basis?	TA provided that training hours should be tracked on a yearly basis and one column on the training tracker be used per year so that it is easier to see how many hours of training have been completed each school year. Provided the Food Service Director with a copy of Iowa's individual training tracker tool.
1200 - Professional Standards	1209 Did the employees that work outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program receive training applicable to their duties related to the program?	TA provided that the individuals who are serving as determining officials should have four hours of Professional Training per year including civil rights training.
1200 - Professional Standards	1211 Review an employee list for the day of the review and verify that the SFA's information from the Off-site matches the current (day of review) employee list.	On the list of Food Service staff provided, there are two individuals listed as Nutrition Services Directors. TA provided that one individual should be the Director and the other person should be a manager. The Director will need 12 hours of Professional training per year and the Manager will need 10 hour.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	TA provided that a copy of the SFA's Food Safety Plan should be available at each site.
1600 - School Breakfast and SFSP Outreach	1600 Did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	TA provided that the availability of the School Breakfast Program should be promoted. Referred the Food Service Director to the breakfast page of the Bureau's web page for some posters which promote the program.
RMCR - Revenue From Nonprogram Foods	2 For each of the categories selected, what process(es) did the SFA use to ensure that all funds received from the sale of nonprogram foods were deposited into the SFA's nonprofit school food service account?	TA provided in Regards to the Ala Carte' items and student council getting some of the profit. School program regulations require all revenue from the sale of non-program foods to accrue to the nonprofit school food service account if the food was purchased through the nutrition account. You are allowed however to sell food to a student organization such as the student council as long as the cost includes non-food costs such as labor and storage and they then can re-sell these foods and keep the profit. Since the student council is restocking the Ala carte' items, you could come up with an agreeable hourly rate that the nutrition account would pay to the student council for this service. They would then get this money in lieu of part of the profit from the sale of the Ala Carte' foods. State Agency provided two documents: USDA memo SP13-2014-School Food Service Account Revenue from the Sale of Non-Program Foods and a handout called "How School Nutrition Can Work with School Groups for Smart Snacks Compliance".

**Site - Level Technical Assistance Ackley-Geneva High School (0109)**

Area	Question	Comments
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1400 - Food Safety	1404 Is a copy of the written food safety plan site specific and available at each school?	The Food Service Director is in the process of updating the SFA's Food Safety Plan. TA provided that each Standard Operating Procedure should be dated when it is reviewed/ revised. The Food Service Director attended HACCP training this past summer so that she can continue to improve their food safety plan.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The most recent food safety inspection report is not posted in a publicly visible location. TA provided that the inspection needs to be posted where participants can see it when going through the serving line.

**Org - Level Commendations**

Description
Certification and Benefit Issuance: Benefit documents, as well as all paperwork, were very well organized in notebooks. 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 the one denied application was correctly determined. All applications were correctly determined using ICAVES, signed and dated by the household member and the SFA, were complete with Social Security Numbers and case numbers, and all 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 their benefit issuance system which is web based. Three of the four individuals who make eligibility determinations have listened to the Application Approval and Direct Certification webinar in school year 2018-2019.
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. The SFA submitted the annual Public Release to the local media. 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.
Fiscal Action: Fiscal Action appears to be below the USDA allowed disregard for this review so no claim adjustments for September seem to be needed.
Food Safety: The SFA has a district-wide written Food Safety 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 on the food production records. Dishwasher temperatures are taken and document. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. The following individuals at the site reviewed are ServeSafe Certified: Denise Willems, Megan Harms, Delene Knoll and Barb Kuper.
Local Meal Charge Policy; The SFA developed and approved a meal charge policy on July 12, 2017. The policy was sent to all households along with their registration packet. 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 at least 50% were completed for breakfast prior to February 1st in school year 2017-2018.
Procurement: The Food Service Director attended the Regional Procurement Training in Grundy Center and the Procurement Basics training in the summer of 2018. 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. To date, this school year, the SFA has used 50% of their allotted direct distribution allotment.
Professional Standards: The Food Service Director has completed 37 hours of Professional Training already in school year 2018-2019. Most of the full-time nutrition staff have started to meet required training for Professional Standards in school year 2019 and additional training is planned. An annual Training Spreadsheet is maintained showing which staff have been trained and meet required annual hours.
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 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.
School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach was information about the program being posted at registration. Summer Food Service Program (SFSP) outreach was information sent out to families via an e-mail through JMC.

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Verification: The correct number of applications were verified and were correctly selected from error prone applications in school year 2017-2018. The process was completed on time. The application(s) selected for verification were confirmed prior to verification. The SFA had at least one person attend training. The verification report was completed accurately and on time.

Wellness Policy: 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 Ackley-Geneva High School (0109)**

Description
Meal Components and Quantities: 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. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements 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. Water was available as required. 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.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. 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. 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 17-21, 2018 for breakfast and lunch at the Ackley-Geneva High School. The worksheets showed that all meal components were offered. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Ackley-Geneva High 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, 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: Offer vs. Serve is being implemented properly. 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.
Smart Snacks: Students are able to purchase foods via a la carte sales and vending machines. All foods sold a la carte meet the Smart Snack standards for nutrition content. Exempt leftover National School Lunch Program entrees are only sold the same day, or the day after, they are initially offered. Beverages sold meet the standards for the 9-12th grade students. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.
Water: Free potable water is available to all students for lunch and for breakfast via a water fountain.