

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Ankeny Community School District (02610000)**  
**Date of Review: 11/5/2018 – 11/9/2018**

**Program Year:** 2019  
**Month of Review:** October  
**Lead Reviewer:** Jean Easley  
**Org Representative(s):**

**Site - Level Findings: Ankeny High School (0109)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	Lunch counts are not taken at the point of service for the line at Summit Alternative High School. Students must have their meals counted at a Point of Service (POS) and the POS must be located where the meals are offered. Meal counts taken in the classroom prior to meal service <i>cannot</i> be used to compile a claim for reimbursement.	Describe your revised procedure for taking a count at the Point of Service (POS) at the Summit Alternative High School location.	
1100 - Smart Snacks in School	V-1100	<p>In the vending machine located in the cafeteria, there was a Gatorade Whey Protein Bar (chocolate chip and chocolate caramel) that is not Smart Snack approved because the first ingredient was not a component and the bar had 50% saturated fat.</p> <p>In the Perky Hawk coffee bar, Nature Valley Protein Bars (peanut butter and dark chocolate) were sold. These bars are not Smart Snack approved because they have too much saturated fat. Products that contain only nuts are exempt from the 10% saturated fat and 35% total fat rule. Since this product contains more than nuts, it must follow Smart Snack rules and this bar has too much saturated fat and total fat to qualify. TA provided.</p>	Describe how the SFA will ensure products in the vending machine will comply with Smart Snack regulations. Provide written confirmation that the unapproved protein bars in the vending machine and the coffee bar will no longer be sold.	

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**Site - Level Findings: Prairie Ridge Middle School (0218)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Signage is not available at or near the beginning of the service line to identify the components of a reimbursable lunch, including the requirement that students must select at least 1/2 cup fruit or vegetable, or explain offer versus serve. (See 7 CFR 210.10(a) (2))	For your response, describe your plan to improve signage at Prairie Ridge and upload a photo. Indicate where signage will be posted and who is responsible for daily updates of menu.	
1400 - Food Safety	V-1400	Storage of food observed to be less than 6 inches off the floor. Juice crates were observed to be stored on the floor in refrigerator.	Describe your plan to ensure the storage violation will be corrected and prevented in the future.	

**Site - Level Findings: Prairie Trails Elementary (0412)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The Type A lunch planned 10/3/18 was not served because of a school event in which only bagged lunches were offered that day (at this site only). CORN, a starchy vegetable, was not offered as planned; therefore, the 1/2 cup starchy vegetable subgroup weekly requirement was not met. The weekly shortage was 1/4 cup because 1/4 cup Sweet Potatoes was offered 10/4/18.	For your response, describe the adjustment which could have been made to the menu (and will be made to the menu moving forward) to avoid being short the weekly vegetable subgroup requirement.	

**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		<p><b>PROCUREMENT:</b></p> <p>1) Technical assistance was provided to change the federal small purchase threshold to \$250,000 (effective July 1, 2018) in food service procurement procedures.</p> <p>2). A Ekon-O-Pac machine (a clear plastic bag packaging/sealing machine) was purchased using the non- competitive method (sole source). Prior to purchase, the food service director conducted a cost saving analysis of the then used packaging materials using 6" and 9" clam shells. A trial run with Ekon-O-Pac resulted both material and staff time savings that were significant. The new machine also used less space. Documentation was available. Staff feedback highly recommended purchase of machine to replace</p>

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		<p>packaging items in clam-shells. FSD could not find a similar product for comparison in the market. State agency approval is required prior to purchase using sole source method.</p> <p>2) The suspension and debarment certification statement must be completed for all procurement using small purchase method.</p> <p>3) The Buy American Provision must be included in Milk/Dairy solicitation document.</p> <p>4) Include Equal Employment requirements from Appendix II of 2 CFR 200 for all procurement events using small and formal procurement methods.</p> <p>5) A public notification in a major circulating newspaper is required for all procurement events using formal method including dairy.</p> <p>6) Recommend use of rebates, discounts, and credit excel spreadsheet for tracking cost reimbursable contracts (prime vendor).</p> <p>7) The Wisconsin milk prototype template was used for the procurement of dairy products. The Request for Proposal (RFP) and the Invitation for Bid (IFB) were used interchangeably in this document. Recommended reviewing this document to remove Wisconsin specific terms and conditions. It would be beneficial for the vendor to know Average Daily Participation (ADP) for breakfast and lunch for each site. 8) Include the process/procedure used for pre-approval of products in issued RFP.</p>
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	<p>COMPLAINTS: Civil Rights complaints regarding school nutrition are to be directed to USDA. The process and the form is found here: <a href="http://www.fns.usda.gov/civil-rights">http://www.fns.usda.gov/civil-rights</a></p>
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	<p>DIET MODIFICATION FORMS: A copy of completed Diet Modification Forms should also be maintained at each site by the Team Lead (and school nurse).</p>
1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	<p>PROFESSIONAL STANDARDS: Authorized Representative is required to have 4 hours training documented and tracked annually. All employees working in an aspect of school nutrition need to be provided training to do their job, including civil rights.</p>
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	<p>HACCP/FOOD SAFETY: Continue to expand, review and update the HACCP/Food Safety Plan. SOPs should be reviewed annually. Provided USDA resource "Food Safe Schools Action Guide" - see action guide checklist, Iowa State University HACCP resources, ICN and other school districts' HACCP plans for ideas. Review of revised SOPs can be used for training annually. Temperature sheets at Middle School did not include a place to note corrective action. Thermometer calibration was reviewed at the high school.</p>

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1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	OUTREACH FOR FREE SUMMER MEALS: In addition to outreach promoting locations in Ankeny Churches, you could include SFSP Flyers showing how to text "FOOD" to 877-877 for nearest SFSP meal sites for Des Moines area locations.
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**Site - Level Technical Assistance Ankeny High School (0109)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	One student went through the breakfast line with a cereal pack and no other items. The cashier was initially going to charge her the a la carte price and allowed the student to leave the serving line. The student did not have any money in her account (students with a negative balance can get a reimbursable meal but are not allowed to get a la carte items) and since the student left the serving line, the cashier was not able to ask her to pick additional items to make a reimbursable meal. The cashier did not want to give the cereal away for free and was planning on counting it as a reimbursable meal. SA provided TA on why it was not a reimbursable meal before it was entered into the POS as such. SA encourages the food service director to provide training to staff on the local procedure that should be implemented in this scenario.
1100 - Smart Snacks in School	1107. Are exempt SBP and NSLP leftover entrees only sold the same day, or the day after, they are initially offered?	SECOND MEAL: reminder that a "second meal" must meet smart snack guidelines for all side items. Only the entree is exempt the same day, or the day following.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	The food service staff calibrate thermometers once a month or less. TA provided on the importance of calibrating thermometers and calibrating them at least weekly.

**Site - Level Technical Assistance Prairie Ridge Middle School (0218)**

Area	Question	Comments
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	HEALTH INSPECTION REPORTS: reminder to post the most recent food safety inspection reports are posted in a publicly visible location. Corrected on site.
1400 - Food Safety	1411 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?	BUY AMERICAN EXCEPTION LOG: World Horizon cans of Pineapple and Olives were in storeroom. Although it is generally understood these products are not produced in the US, it is expected to maintain a Buy American Exception Log.

**Site - Level Technical Assistance Prairie Trails Elementary (0412)**

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Area	Question	Comments
800 - Civil Rights		Posted menu at Prairie Trails Elementary had the following statement "USDA is an equal opportunity provider and employer." It should be " <b>This institution is an equal opportunity provider.</b> " Build A Healthy Lunch poster that the menu is posted onto has the correct version.

**Org - Level Commendations**

Description
<p><b>APPLICATIONS:</b> Benefit documents are well organized. Online and paper applications are available for household convenience. 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. All applications were correctly determined, signed and dated by household member and SFA, complete with SSN's, case numbers, and determined within ten days as required. Determining Official participates in annual training and regularly reaches out to State Agency with questions.</p>
<p><b>CIVIL RIGHTS:</b> Civil Rights posters were posted in the cafeterias. Annual Civil Rights training was provided to staff and documented. The annual Public Release to local media. Ethnic/racial information is collected and the form is completed. No discrimination observed. SFA on-site monitoring completed ensuring all sites meet program requirements. The correct state and federal non-discrimination statements are provided on materials describing the program including letters and the district website.</p>
<p><b>DIET MODIFICATIONS:</b> A procedure is in place for making accommodations for special diets and allergens. The Diet Modification Form can be easily found on webpage.</p>
<p><b>MEAL CHARGE POLICY:</b> The SFA has an approved meal charge policy. The policy is posted on the district website and was provided as a written copy at registration.</p>
<p><b>MEAL COUNTING &amp; CLAIMING:</b> Meal counts during site review is reasonable when compared to the review month of October counts. Point of Service counts and filed claims for October appear accurate. No overt identification of students who receive benefits was observed. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for review period of October. Cashiers are well-trained; and daily and monthly edit checks are performed.</p>
<p><b>MEAL REQUIREMENTS &amp; COMPONENTS:</b> SFA does a superior job of menu planning and offering choices; several hot, cold and "grab and go" menu options offered daily for elementary, middle and high school. Planned menus meet daily and weekly requirements. Students and parents can view menus, nutrition and allergy information online at SchoolCafe'. Learn how to build a reimbursable meal is a helpful tool. Fresh fruits and vegetables choices offered daily.</p>
<p><b>NUTRITION DOCUMENTATION:</b> required crediting documentation is nicely organized. Standardized Recipes are online for all recipes and grab and go meals as well as how items/menus credit towards meal pattern. Food Production Records are maintained online. CN Labels, Product Formulation Statements are maintained in electronic system.</p>
<p><b>NUTRITION STAFF and PROFESSIONAL STANDARDS:</b> All nutrition staff were observed to be helpful, knowledgeable of meal pattern and courteous to student customers. Food Service Director and Managers strive to provide appropriate training to all. Training is tracked electronically. Team Leads are ServSafe Certified.</p>
<p><b>PROCUREMENT:</b> The Food Service Director (FSD) attended the State Agency's Regional Procurement Training held in Ankeny. The food service procurement procedures and the code of conduct including the procurement events for SY 2018-2019 are completed. The micro-purchase threshold was correctly identified in the food service procurement procedures. Purchases using the micro-purchase method are kept to a minimum and limited to items such as for special diets. To review compliance with small purchase method, three vendors were selected. 1) Price comparison among three vendors was completed for a la carte beverages for the high school. The vendor with the lowest price was selected. 2) The second was a combined purchase of a three door refrigerator and freezer and a single rack conveyor dish washer. Five vendors were contacted. Three vendors submitted a response. The vendor with the lowest overall price for the equipment including installation and removal of old equipment was selected. To review compliance with the formal procurement method, two vendors were selected: 1) The prime vendor contract for food and distribution services was reviewed. Specifications allow pricing to be submitted for an equal product. The Prime vendor contract included all required Federal terms and conditions. The Prime Vendor Request For Proposal (RFP) included the Buy American provision. The RFP had evaluation criteria with price as the primary factor. The evaluation criteria was objective and identified clearly how contracts would be evaluated. FSD maintains sufficient records for all Procurement activities. FSD monitors all contracts to ensure contract terms and conditions are being met and cost reimbursable contract discounts, credits and rebates are returned to Nutrition fund in a timely manner. FSD is on track with ordering and usage of USDA Foods to maximize allotted dollars by end of school year.</p>

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<p><b>RESOURCE MANAGEMENT: &amp; RECORD KEEPING:</b> All expenditures reviewed appeared allowable. The SFA has a separate financial account for the nonprofit school food service. The Non-Program Revenue, NPR, tool was completed. Nutrition department provides food (non program food) priced competitively to Before and After School Care, Head Start, Preschool Snacks. All records are maintained for at least three years plus the current year</p>
<p><b>SMART SNACKS:</b> Documentation was available to show that all foods and beverages sold to students during the school day met Smart Snack and Healthy Kids Act standards.</p>
<p><b>VERIFICATION:</b> 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. Applications selected for verification were confirmed prior to verification.</p>
<p><b>WELLNESS POLICY:</b> A wellness policy is 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 and the most recent assessment for all schools is nicely posted on website available to the public.</p>

**Site - Level Commendations Ankeny High School (0109)**

Description
<p>Breakfast and lunch signage is posted and clearly describes how students can make a reimbursable meal. Free, potable water was available in the cafeteria. Cashiers asked students to get larger servings of fruits and vegetables if needed to make a reimbursable meal. All meals observed to be counted and claimed as reimbursable contained all required items/components. The point of service line is orderly and organized.</p>
<p>Food Safety: Manager is ServSafe Certified. Food is stored properly as food is at least 6" off the floor in all storage locations and all freezers, coolers and refrigerators are kept at the correct temperature. The HACCP book is available onsite. Temperature logs are available for all cooling equipment within the kitchen and serving areas. The most recent health inspection is posted in a public location.</p>

**Site - Level Commendations Prairie Ridge Middle School (0218)**

Description
<p>All meals were observed to be reimbursable. Nutrition staff politely encouraged students to take an additional item when it would make a reimbursable meal.</p>
<p>Students are observed to have adequate time to eat.</p>
<p>Two Hot Entrees and several Grab and Go Cold items were available on the day of observation at Middle School. All meal components were available at the beginning of meal service on the days of observation and throughout meal service.</p>

**Site - Level Commendations Prairie Trails Elementary (0412)**

Description
<p>Breakfast: All meal components were available at the beginning of meal service on the day of review and throughout meal service. Students are offered two different bagged breakfasts which contains 4 items and they may select a milk as well. Bagged meals are kept on cold packs or in the refrigerator. Three types of milk are offered (skim, skim chocolate and skim strawberry). Students all had a reimbursable meal.</p>
<p>Lunch: All meal components were available at the beginning of meal service on the day of observation and throughout meal service. Students may select from the main hot entree (chicken strips) Sunbutter sandwich or Jungle Jag Pack. Three types of milk are offered (skim, skim chocolate and skim strawberry). The point of sale is at the beginning of the line and a staff person is at the end of the line making sure each student has a reimbursable meal. All but one student had 1/2 cup of fruit or vegetable on their tray.</p>
<p>The kitchen is extremely clean and organized. Good hand washing procedures were observed as well as good gloving procedures. Kitchen staff wore hair restrains. Foods are stored 6 inches off of the floor. Records are kept for 3 years plus the current year. Posters promoting good nutrition and physical activity are posted in the serving line.</p>