

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
English Valleys Comm School District (20970000)
November 7-9, 2018

Program Year: 2019
Month of Review: October
Lead Reviewer: Cheryl Benson
Org Representative(s): Martha Gorsh

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming	V-0300	Meal claims for August/September and October were not accurate. The SFA uses a monthly report for claims and that report did not match the daily count report. The claims were revised during the on-site review.	For your response, indicate who will be responsible for cross-checking the daily meal report with the monthly report to ensure the claim is accurate prior to filing the claim.	Jane Ackerman will be responsible for cross checking the daily meal report with the monthly report to ensure the claim is accurate prior to filing the claim.
800 - Civil Rights	V-0800	Ethnic/racial information on students who applied for free or reduced meal benefits was not tracked as required. This is a repeat violation from the last review.	Complete the ethnic/racial for that is in download forms and submit a copy.	

Site - Level Findings: English Valleys Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The following meal pattern errors were reviewed: (1) Grain for breakfast for the cereal-only meal for grades K-3 and grain for the Grab-n-Go breakfast does not meet minimum weekly quantities. Cereal provides 1 ounce equivalent of grain per day. The minimum per week is 8 ounces. Also, if the students are not allowed to take both options, then there are entrees that do not include a grain. (2) Pre-K students are not using Offer vs Serve which means all five components must be on their tray in at least minimum amounts. The SFA was only putting 1/2 cup of vegetable on the pre-k trays instead of 3/4 cup. The SFA indicated they begin using the CACFP meal pattern. (3) Almond milk that does not meet meal pattern requirements is being used as a substitute. One student at breakfast took the almond milk and it was counted as a part of his reimbursable meal. It was also stated that the almond milk was not paid out of the CN fund, but review of receipts indicated that it was paid out of CN funds which is an unallowable expense unless the student has a	(1) Indicate how the minimum weekly grain of 8 ounces will be met at breakfast. (2) Indicate whether the daily vegetable quantity served to pre-k will increase to 3/4 cup or whether Offer vs Serve will be implemented, or whether the CACFP meal pattern will be implemented. (3) Indicate whether the almond milk will continue to be offered. If so, submit documentation that the purchase is not being made from CN funds and also submit documentation that all staff responsible for recognizing reimbursable meals have been trained on correctly recognizing what a student must have on his or her tray if they take the almond milk. (4) Submit a plan for making more calorie differentiation between grades K-8 and 9-12. (5) Indicate the date that staff were trained on breakfast OVS so that they know that students cannot be required to take milk as one of their 3 items. It is okay to encourage students to take milk.	

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		<p>special diet form on file that states almond milk is the only replacement allowed. (4) Calories for grades 9-12 do not overlap with any other grade group. There does not appear to be sufficient differences in the meals served to K-8 and 9-12 to meet meal pattern requirements. The only difference on the week submitted for review was a brownie served one day to grades 9-12.</p> <p>(5) Elementary students are told they must have milk in order to have a reimbursable breakfast. Staff cannot force students to take milk as long as they have a reimbursable meal.</p>	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	When determining application benefits, the annual tab on I-CAVES should only be used if there is more than one frequency of income. If all income on the application is weekly, monthly, etc., then that specific tab should be used. Using the annual income tab for all applications may lead to a determination error.
100 - Certification and Benefit Issuance	133 Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified?	(1) When the liaison is documenting students as Homeless, either an official letterhead should be used, or the liaison should sign and date the document. (2) The SFA should indicate in some way other students who are in a household with a student who is on the direct certification list. This can be done by writing the other names on the DC list and indicate who they are with or by keeping a separate document that indicates the household members.
100 - Certification and Benefit Issuance	136 a. Are free and reduced price benefits provided to students in a manner that assures confidentiality and prevents overt identification during meal service or at any other time in accordance with regulations and FNS Policy Memos?	The SFA is using two waivers for the same purpose. It is recommended that only one waiver be used. Whichever waiver is used, it must state that "You do not have to complete this waiver to receive free or reduced price meals."
200 - Verification	209 Based on the review of verified applications:	The SFA usually only has to verify one application per year. The income documentation submitted for the verified application for SY 2019 would change the household from free to reduced benefits. The Verifying Official had determined that the household would remain free. Since the notification letter has not been sent to the household, the Consultant obtained a copy of the letter notifying the household they will be changed to reduced benefits.
700 - Resource Management		Procurement: (1) Be sure the written procurement plan is comprehensive. The plan submitted only indicated the main vendor, bread, and milk. Missing was Amazon, CDW, Freeman Foods, Menards, and Rapids. (2) The SFA must keep a Buy American Exception Log. Anytime a food product is accepted by the SFA that is not an American commodity, the exception, and the reason for the exception must be logged. The USDA recognizes two reasons for an exception: the commodity is not produced in sufficient quantity in the United States, or the price for the domestic commodity is

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		<p>significantly higher. (3) When using Micro Purchase, prices do not have to be checked, but to even the playing field, purchases must be spread around as much as possible. Freeman Foods was used 44 times with no other source being used. It is also recommended that better planning be used so that it is not necessary to purchase more than once a week from the grocery store. There is a Micro Purchase chart in download forms to assist in tracking micro purchases. Also keep in mind, that just because a purchase is below the Micro Purchase threshold, does not automatically make it a Micro Purchase. If prices are checked, it is a Small Purchase. (4) Both the written procurement plan and the off-site chart indicated that \$15,000 was spent with the main vendor. However, the Vendor Paid list indicates over \$70,000. The amounts should be corrected to match the vendor paid list. (5) The SFA should be working on next year's written procurement plan now.</p> <p>(6) When using formal procurement with federal dollars, the IFB or RFP must be advertised in the nearest regional newspaper. Product specifications must be well-written and precise. For example, the bread bid did not state grams or ounces for buns and bread, and stated simple 'whole grain' instead of stating that the products must be at least 50% whole grain. The dairy bid did not indicate fat content for cottage cheese or sour cream. Neither of those bids indicated the estimated quantity to be purchased. The estimated quantity should then have been used to multiply by the proposed prices to obtain a true bottom-line assessment. (See NSLPPROC015 in download forms) There were no terms or conditions included such as Buy American, debarment statement, or termination for cause. Since both bread and dairy are under the small purchase threshold, it is recommended that Small Purchase Procurement be used. The 3 Bids & a Buy template in download forms will provide all of the needed terms and conditions. Be more specific on what you expect, for example clean coolers that lock and maintain temperatures between X degrees, delivery time expectations, cleanliness, etc. If the SFA still wants to use formal procurement, there are templates in download forms for IFB, RFP, and for specifications. (7) Prices were spot checked against bid prices and no errors were discovered. (8) There is a prototype form for tracking rebates, discounts, and credits in download forms.</p>
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?	There is a milk cooler in one of the elementary hallways where it is accessible to anyone in the building, but it is not kept locked. This is not only a financial issue since milk and juice can be taken from the cooler at any time by anyone present, it is also a food safety issue since it allows for tampering with the product. Any asset of Child Nutrition Programs must be safeguarded against theft and tampering.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	It is highly recommended that the purchase of almond milk cease and the SFA instead procure soy milk that meets requirements and/or lactose free milk. Minimum requirements were shared with the SFA.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Technical assistance was provided on special diets. Students who request special diets due to medical reasons that can be accommodated within the meal pattern, must be accommodated as soon as possible after becoming aware of the request. Even if the school requires a medical form, the SFA cannot wait for that form before providing the diet modification. However if the diet request cannot be accommodated within the meal pattern, then the SFA cannot accommodate the diet modification until there is a Diet Modification Request form on file that is signed by a medical professional who can prescribe medicine. The form must indicate what cannot be

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		offered and what must replace the items. The SFA may have to contact the household or medical professional for clarification. The Diet Modification Request form has recently been updated and can be obtained from download forms on IowaCNP. The form does not have to be replaced annually, but it is advisable to follow up on modifications with the household each year.
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	A one-page Civil Rights training was provided for use with teachers in the classroom and other staff who assist with minor areas of Child Nutrition Programs.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	When completing the Ethnic/Racial form, divide all students who applied for benefits (Free, Reduced, and Denied) into Hispanic or Not Hispanic. Then take those same students and divide them by race. The columns for ethnicity and for race should equal each other since it is the same students. This form is to be completed annually and kept on file with the applications.
1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements?	Technical assistance was provided on the Local Wellness Policy, LWP. There were two items that need updated the next time the LWP is reviewed. The policy mentions the SMI review by the state agency, but that review no longer exists. The SMI has been incorporated into the Administrative Review. Also the policy states that the assessment of goals is shared with the Board, but the assessment is available to the public as required. A folder with resources was provided during the entrance conference.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	SFAs must have annual food safety training and the HACCP plan must be regularly reviewed. It is recommended that food service staff assist in reviewing Standard Operating Procedures which provides training and review at the same time.
1500 - Reporting and Recordkeeping	1501 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	It is recommended that records older than 3 years plus the current year be destroyed. This is especially important for old benefit applications and other documents that identify students or households.

Site - Level Technical Assistance English Valleys Elementary School (0409)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Technical assistance was provided on offering sufficient grain for K-3 breakfast and grab-n-go breakfasts. The younger students could be allowed to take the hot and cold entrees as the older students can. However that is a lot of food for them. Instead of the entrée, they could be offered a second grain or meat/ma such as graham crackers, cheese stick, or yogurt.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	(1) Be sure to periodically check Food Production Records, FPR, to ensure they are being filled out completely. The required items should always be completed including leftovers, milk, condiments, etc. Be sure to review them for accuracy since products and crediting can change. Keep a daily record of juice and cereal used. Technical assistance was provided on entering PK on the lunch production records or they can be added to the CACFP record. (2) Technical assistance was also provided on the requirements for Standardized Recipes.

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400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	There are many ways to differentiate the meal pattern for grades 9-12 and K-8. Additional meat/grain in the form of larger entrees can be offered to the older grades. Additional items can be offered such as Sun Chips with sandwiches, rolls, bread and butter, or peanut butter with celery. An example from the menu would be the Macaroni and Cheese where meatballs are also offered. The meatballs could be limited to grades 9-12, or the lower grades could be offered fewer meatballs or less macaroni and cheese.
Infant and Pre-K Meal Pattern Checklist - Lunch	2 Is the SFA using the meal pattern flexibility and offering one menu when Pre-K students are co-mingled in the meal service area?	Technical assistance was provided to the director on the CACFP meal pattern for Pre-K students. The meal pattern allows for smaller portions for these younger students. Food Production Records used for CACFP were also shared. The director was cautioned that the minimum meat/meat alternate for lunch is 1.5 ounce equivalents while the grain is only .5 ounce equivalent, there sugar maximums for cereal and yogurt, chocolate milk cannot be offered, and juice can only be offered once per day.

Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used, 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. A correct and current benefit issuance list was available. Over 200 applications were reviewed and all reviewed applications were correctly determined, signed and dated by both a household member and the SFA, applications were complete with SSN's and case numbers, and all applications were determined within ten days. 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 that indicate specific fees and were signed and dated by the household.</p>
<p>CIVIL RIGHTS: The And Justice for All civil rights poster was posted in the cafeteria in a location where participants can read information on the poster. Annual civil rights training was provided food service staff 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. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. The current state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school's website.</p>
<p>COMPETITIVE FOODS (SMART SNACKS/HKA): There are no vending machines, school stores, or fundraisers involving food during the day. Students at the elementary can purchase milk and sometimes an entrée.</p>
<p>HACCP/FOOD SAFETY: The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. The latest Health Inspection Report was posted in a publicly visible location, and two inspections have been requested for each serving site. There were no areas out of compliance noted on the latest inspection report. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and thermometer calibration. The kitchen and storage areas were orderly and clean.</p>
<p>MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. There was a POS for all students, and the POS was organized and orderly. Students at the elementary school tell the cashier their individual pin#, and she types it into the POS system. Students are not overtly identified as free, reduced, or paid during the meal counting process or during meal observation. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. All students observed selected a reimbursable meal.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, has established menus that meet the meal pattern for reimbursable meals. All meal components were available at the beginning of service and throughout meal service on the days of observation. Lunch menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation such as food production records, labels, inventory, standardized recipes, and purchase receipts indicated that 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 were offered throughout the review period for lunch, and included daily fresh vegetables at lunch and frequent fresh fruits. Students at breakfast have a choice of a cold or hot meal. Water was available as required, and at least two types of milk were offered. Several 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. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheets for each school selected for review for a specified week during the review period.</p>

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PROCUREMENT: The off-site procurement tool was completed, and board purchasing policy and vendor paid lists were submitted. The SFA has a written Procurement Plan completed. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. The district is a member of a Group Purchasing Organization.

PROFESSIONAL STANDARDS: Tracking and documentation was provided from SY2018 to show that the director received the required 12 hours of annual training, the kitchen manager received the required 10 hours of training, other full-time staff have received at least 6 hours of training, and other part-time staff have received at least 4 hours of annual training. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.

RESOURCE MANAGEMENT & RECORD KEEPING: 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 indicated by the PLE tool. Or The District had a positive balance in January 2018 and elected to not increase paid lunch prices. The Non-Program Revenue, NPR, tool on IowaCNP indicates that no increase in prices is required. The district does not charge indirect costs to the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for commodities. Reports are filed on time, and all records are maintained for at least three years plus the current year.

SBP & SFSP OUTREACH: School Breakfast Program, SBP, outreach was sent out at the beginning of the year to inform families of the availability of the program including times and locations. Reminders of the SBP were also sent out throughout the school year. Summer Food Service Program, SFSP, outreach was shared with families at the end of last school year to inform the families of the availability and location of free meals in the summer.

VERIFICATION: The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The application selected for verification was confirmed prior to verification to ensure the original determination was correct. The SFA had at least one person attend verification training.

WELLNESS POLICY: The district has a current wellness policy 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, the latest review of the wellness policy, and the most recent assessment of policy goals are available to the public. Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.