

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Boyden-Hull Comm School District (07470000)**  
**On-Site Review Dates: October 30-31 and Nov. 6-8, 2018**

**Program Year:** 2019  
**Month of Review:** October  
**Lead Reviewer:** Deann Murphy  
**Org Representative(s):** Steve Grond

**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	The SFA is using a household notification letter generated from their own software. The letter was not approved by the State Agency as required.	The SFA will state their intentions that they plan to submit their household notification letter generated from their software to the State Agency annually. The Notification Letter, along with Download form NSLP022, needs to be submitted to <a href="mailto:Deb.Linderblood@iowa.gov">Deb.Linderblood@iowa.gov</a> prior to using it each year to ensure all required elements are present.	
100 - Certification and Benefit Issuance	V-0100	Out of 184 students reviewed as receiving Free/Reduced benefits, the SFA had 5 errors including either misclassification of benefit level or the application lacked a Social Security number.	The SFA corrected all of these errors on-site. No further action needed.	
200 - Verification	V-0200	There were a number of errors noted in the verification process in SY2017-18 which was reviewed by the State Agency.	All staff who handle verification of applications will complete the tutorial called Verifying Eligibility and submit the certification of completion to the State Agency. The tutorial can be found at <a href="https://educateiowa.gov/pk-12/nutrition-programs/iowa-school-meal-programs-web-based-tutorials-webcast">https://educateiowa.gov/pk-12/nutrition-programs/iowa-school-meal-programs-web-based-tutorials-webcast</a> . Each participant will need to set up his/her own account in order to receive a certificate.	
700 - Resource Management	V-0700	FSMC Review: Invoices from October, November, and December of 2017 were reviewed. The SFA is not conducting proper oversight of invoices prior to payment. The following errors found: In most cases, the number of reimbursable meals billed from the FSMC did not match the number of reimbursable meals claimed by the SFA. The FSMC used \$3.22 for the Meal Equivalent Rate instead of \$3.2225. (page 20 of contract) Reimbursable breakfasts were charged as one meal equivalent instead of three breakfasts equaling two lunches. (page 22)	Both the SFA and FSMC agreed to review past invoices back to the point where the errors began and to reconcile all errors. For your response, submit corrected invoices for the three months reviewed-October, November, and December of 2017 along with any additional documentation to support the revisions. Submit a full reconciliation of the value of SY2018 USDA Foods received. Submit a copy of a revised invoice that includes sufficient information as indicated in Appendix 3 of the Contract. Finally, submit a plan on how the SFA will conduct	

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		<p>Crediting of the value of USDA Foods was done incorrectly in SY2018. Payroll processing fees were charged which is an unallowable cost under the terms of the contract. (page 21) The invoice submitted to the SFA from the FSMC does not contain sufficient information for the SFA to reconcile the invoice. (Requirements are listed in Appendix 3 of the Contract.) Documentation of SFA approval of menu changes was not maintained. (page 28)</p>	<p>reconciliation of the monthly invoices from the FSMC. What will the process look like, and who will be responsible for ensuring that invoices are reconciled prior to payment. Any staff who will be responsible for reconciling invoices must view the webinar titled "Oversight and Management of FSMC Contracts." Indicate the name(s) of staff who viewed the webinar and the date(s). In SY 2017-2018, the SFA utilized only 85 percent of the Planned Assistance Level (PAL) for USDA Foods. The goal is to utilize 95 percent PAL. The SFA did not participate in DoD Fresh, which is another way to maximize use of USDA Foods PAL. The deadline for participating in DoD Fresh for the current SY is past due. State your plans on maximizing usage of USDA Foods PAL for SY 2019-2020.</p>	
800 - Civil Rights	V-0800	<p>All staff who participate in the school lunch program need to have Civil Rights training annually. Not all SFA staff have had the appropriate Civil Rights training this year. Appropriate training can be found on IowaCNP Download Forms with either NSLP500 or NSLP501 and can be done as a group with a sign-in sheet to document participation.</p>	<p>The 7 SFA staff who are involved in the School Nutrition Program who have not yet had civil rights training will complete their training and submit documentation of that training to the State Agency.</p>	
1000 - Local School Wellness Policy	V-1000	<p>The final rule for the Local Wellness Policy requires that it be reviewed at least every 3 years. The SFAs Local Wellness Policy was last reviewed in 2014 so is out of compliance. The goals assessment is complete, but has not yet been made available to the public as required.</p>	<p>The SFA will state what month in SY2018-19 they expect to finish reviewing the Local Wellness Policy AND how they intend to make the goals assessment of that policy available to the public.</p>	
1200 - Professional Standards	V-1200	<p>Current professional standards training is not being tracked adequately in the district which can result in some staff not receiving adequate training. FSD require 12 hours training annually, Managers need 10 hours annually, FT nutrition staff (over 20 hours/week) need 6 hours annually, PT nutrition staff (under 20 hours/week) and non-nutrition staff need 4 hours annually. Civil Rights training needs to be completed annually. A designated individual in the district needs to compile training information for all individuals involved and track this annually.</p>	<p>The SFA will submit a completed training tracker to the State Agency showing all training done in SY2018-19 so far. The tracker should list all individuals who are involved in the NSLP/SBP and the training they have completed to date.</p>	

Site - Level Findings: Boyden Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	<p>USDA requires each student be entered into the POS as they pass by with a fully reimbursable meal and that they give something in exchange for their meal. Currently, the kindergarten students are pre-entered into the POS based on a list generated in the classroom and simply pass</p>	<p>The SFA will describe how they intend to ensure that all students, including kindergarten students, are entered into the POS as they pass by the cashier and not pre-entered based on a list.</p>	

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		by the cashier at lunch.		
400 - Meal Components and Quantities - Lunch	V-0400	Based on a comparison of the meal observation and the written food production records (FPR), the staff are not following or properly completing the food production records. For example, the Taco Soup recipe lists 8 oz as a serving. The FPR lists 1 scoop for a serving size and the FSD states that staff serve a 4 oz ladle of soup. At breakfast, the FPR states 1 slice toast should be served; meal observation showed staff serve 1.5 slices toast. Newton Bagel meal is not recorded on the FPR. Staff started out with a 2 oz scoop for pears on the day of review until told by the State Agency that the FPR listed a 4 oz scoop. Garden Bar FPR does not always show all the fruits/vegetables served each day, making it appear that the SFA is not meeting the meal pattern. Meal observation shows that that are following the meal pattern.	The SFA will submit training certificates for kitchen staff who are responsible for completing/following FPRs showing that they have been trained on how to properly follow them. Training can be found at <a href="https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts">https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts</a> under the topic area of Food Production Records.	
900 - SFA On Site Monitoring	V-0900	The SFA did not complete the on-site review forms last year. They have completed the form for the Elementary, but not the HS.	The SFA will submit to the State Agency their completed on-site review form for the HS.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	127 Are the correct income eligibility guidelines used to certify applications?	Please be sure to use the correct year of ICAVES. When determining the 2018-19 applications, the HS determining official used 2017-18 ICAVES. Using the wrong income eligibility guidelines can lead to incorrect determinations.
200 - Verification	208 When a confirmation review was conducted:	Verification requirements were reviewed with HS office staff. All applications picked for verification need a confirmation review and signature. Confirming official is responsible to ensure not only the benefit calculations are correct, but also that all household members claimed on the application are listed, there is a parent signature and a SSN or indication of no SSN. Both the determining and verifying official need to watch the verification webinar annually. One applicant did not respond to the verification request in SY2017-18 and was denied benefits, but no follow-up was documented. The SFA must document that at least 1 follow-up attempt was made before discontinuing benefits. Households are to be given 10 days to appeal decisions whether benefits are increased or decreased. Increased benefits must be made within 3 operating days.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Non-reimbursable meal prices, i.e. adult, non-attending child, second meal, should all be set at the adult price since these meals are not reimbursable and the SFA is not receiving government subsidies to lower the cost.
700 - Resource Management		FSMC: (1) Technical assistance was provided concerning Professional Standards training for the SFA's Program Director. An individual tracking

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		<p>form was sent to the director so she can track her required 12 hours of training per year. She was also informed that the hours can be averaged over a two year period as long as the two years are indicated on the tracking form. (2) Technical assistance was provided on the Advisory Council that is required for schools that use FSMC services. The SFA wants to meet separately with students but must also at some point meet jointly with parents, students, and a representative from the FSMC. There was a discussion on how to accomplish that. (3) The SFA must rebid for FSMC services for SY2020. The SFA will be required to bid for a Fixed-Price contract for FSMC services instead of a Cost-Reimbursable contract since oversight of fixed price requires less time and resources to monitor. (4) Since the FSMC did not utilize at least 95% of USDA Foods entitlement for school year 2018, a recommendation was made that the SFA participate in the DoD produce program part of USDA Foods next year to add an additional option for maximizing the use of USDA Food's entitlement.</p>
700 - Resource Management		<p><b>PROCUREMENT:</b></p> <p>1) The superintendent attended state agency regional procurement training last school year. There was, however, a misunderstanding that the written procurement plan and code of conduct policy was the responsibility of the Food Service Management Company (FSMC). This was clarified during the procurement review. A written procurement plan and code of conduct is the responsibility of the school district. Technical assistance was provided to complete written procurement plan and code of conduct for SY 2018-2019.</p> <p>2) Technical assistance was provided to include all planned procurement events using school nutrition funds on the written procurement plan. For SY 2018 -2019, this included the purchase of a convection oven in addition to listing the procurement (base year or renewal year) of the Food Service Management Company (FSMC) to operate the district's school meal programs.</p> <p>3) Technical assistance was provided to have written specification for any type of purchase including installation of new equipment. Written specifications are required when prices are compared between two or more vendors, that is, when using the small purchase method or when using either of the formal procurement methods (Sealed Bids or Request for Proposals).</p> <p>3) The Suspension and Debarment Certification statement should be completed by a vendor who is paid using the school nutrition funds. Other Terms and Conditions should be sent with the written specifications. See the small purchase template in Download forms on IowaCNP for required federal terms and conditions to include.</p>
1000 - Local School Wellness Policy	1000 Provide a copy or appropriate web address of the current Local School Wellness Policy.	<p>Guidance was given on the SFA's local wellness policy regarding a need to change their Smart Snacks guidelines that are included in the policy. Currently these are not correct. A Smart Snacks handout was provided to help the wellness committee with this revision.</p>
1200 - Professional Standards	1215 Validate the SFA's response to Question 1205 on the Off-site Assessment Tool, if applicable.	<p>Much of the FSMC manager/staff training dealt with Sanitation, safety issues. Staff seemed unsure of the meal pattern/OVS requirements so the FSD was encouraged to provide more training on these areas so that staff is more confident in their responsibilities.</p>
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	<p>The Iowa Excel training tracker template was sent to both the FSMC and the SFA FSD. One person in the district needs to be responsible to record</p>

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		and track all training to ensure that all involved staff meet their training goals each year.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	USDA requires schools to promote their breakfast program to households at least 2 times annually. Breakfast promotion should include information about why students should eat a healthy breakfast, meal times/cost, etc. Promotion can be in the school newsletter, website, email blast, etc. USDA also requires all SFAs to promote the summer feeding program. Recommend the school place the promotion template in IowaCNP Download Forms (SFSPMPL007_NSLP or 009 or 010) in their spring newsletter or website to help direct families to free summer meals.
RMCR - Nonprofit School Food Srvc Acct	11 If Yes, was the equipment included on an approved State agency equipment list or did the SFA otherwise secure prior approval from the State agency before purchasing the equipment (per FNS Policy Memo SP 31-2014)?	The SFA was directed to contact their State Agency consultant prior to purchasing equipment costing over \$5,000 as required by USDA until a State approved equipment list is authorized.

**Site - Level Technical Assistance Boyden Elementary School (0409)**

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?	Recommend placing a staff person near the fruit, especially during busy times, to help ensure that students take the required 1/2 cup fruit at breakfast.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	Original Rice Krispies were found being sold to students that were not compliant. These were received by mistake, but receiving staff did not catch the error. In the HS, 20 oz Poweraid was being sold to Jr. High/HS students. This is not a Smart Snack approved beverage and needs to be removed. Power Zero can be sold, but only to HS students. Also in the HS is a vending machine filled with snacks. The SFA must all have calculator printouts on file for each of these products.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Recommend recording milk cooler temperatures daily.

**Org - Level Commendations**

Description
Direct Certification is downloaded twice monthly as required and benefits are transferred to the POS in a timely manner. Qualifying household members are properly extended eligibility. Applications were determined within 10 days of receipt and most had a confirming signature. Rollover applications were removed after 30 operating days.
FSMC: The SFA and FSMC have a current Cost-Reimbursable 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 as required. The SFA has someone named as the Program Director, and she has had required food safety training, as well as at least 12 hours of training for SY2018. Invoices from FSMC clearly show rebates, credits, and discounts. The FSMC and SFA have a good working relationship.
Procurement: The School has a Procurement plan and Code of Conduct on File for SY2018-19. Price quotations for convection oven requested and obtained from two vendors.
The correct number of applications were verified in SY2017-18 and the verification process was completed in a timely manner. One application had to be withdrawn and a new application was chosen correctly. Verified income documentation was figured correctly.
The District completed a non-program food revenue tool which showed that they bring in adequate revenue to cover non-program food costs. They did not need to complete a PLE tool this year since they had

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Bureau of Nutrition and Health Services

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over a \$0 as of January 31, 2018, but they did raise meal prices. April 2018 receipts were reviewed which showed that all expenses were allowable.

The District has a Local Wellness Policy on file which is published on the district website. All required areas have at least 1 goal listed. They have an active wellness committee made up of a number of stakeholders. The district has done a good job promoting wellness with both students and staff. They have a goals assessment completed.

The menus meet all nutrition requirements. Alternate entrees are offered if students do not like the main hot meal served. Both sites offer a garden bar with a variety of fruits and vegetables. The SFA offers many fresh fruits and veggies and occasionally has the students taste test new items to add to the menu. Foodservice has CN/PFS/Nutrition labels and standardized recipes on hand to show compliance. Students were offered each component correctly at the Elementary. Students are allowed to serve themselves many of the food items available. The menu is posted for the month for both breakfast and lunch. Signage is present for both meals to show students what they must take to make a reimbursable meal. The cashier patiently helped younger students say/learn their PIN numbers.

**Site - Level Commendations Boyden Elementary School (0409)**

**Description**

Free water is available to all students for both breakfast and lunch. The school offers water refill stations for students to refill their water bottles.

Meal counts for the day of review were reasonable when compared to meal counts for the month of October. Meal count totals for the month of October appeared accurate and complete. There was a point of service, POS, at the end of the line as was noted in the SFA application. 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.

Older elementary students are able to purchase a la carte items, but only after they have taken a reimbursable meal. Calculator printouts are available for many a la carte items.

The SFA has a district-wide written Food Safety plan that included required elements. The latest Health Inspection Report was posted in a publicly visible location at both sites. Temperature logs are maintained for coolers-including freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean. Foodservice staff are continually being trained on sanitation and safety issues throughout the year.