

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Ar-We-Va Comm School District (03550000)
SNP - Review ID: 4994

Program Year: 2019
Month of Review: October
Lead Reviewer: Brenda Windmuller
Org Representative(s): Sara Anderson

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	The SFA has not completed an assessment of the wellness policy within the past 3 years.	The SFA will provide a timeline of when they will complete an assessment of the Wellness Policy and explain how it will be made available to the public.	

Site - Level Findings: Westside Junior-Senior High School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1100 - Smart Snacks in School	V-1100	The SFA currently operates a vending machine in the High School area with non-compliant items.	The SFA will outline a plan which brings them into compliance with Smart Snacks Standards. 1. Provide the times that the machine will be on during the day. 2. List the product to be sold in the vending machine during the school day. 3. Submit a smart snacks calculation for each item to be sold in the vending machine during the school day. 4. State the hours of operation of concision stands.	

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. Procurement Plan and Code of Conduct must be completed annually. Must have signed debarment certifications kept on file.

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		<p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Agreements valued at \$10,000 or more should have an exit clause.</p> <p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p> <p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none"><input type="checkbox"/> All price adjustments throughout the year<input type="checkbox"/> All invoices<input type="checkbox"/> All contracts and agreements<input type="checkbox"/> All bids solicited<input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)<input type="checkbox"/> Documentation of why you selected a specific vendor (Selection Rubrics)<input type="checkbox"/> Copies of bid solicitation<input type="checkbox"/> Debarment statements<input type="checkbox"/> CD provided by the AEA (if applicable) <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.<input type="checkbox"/> Purchases should be distributed around community, not just one store.
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		<p>Small Purchases- Purchases that are under \$250,000 (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Include all terms and conditions <input type="checkbox"/> Include terms: Buy American and Equal Opportunity <input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more <input type="checkbox"/> Attain Signed Debarment Statements <input type="checkbox"/> Awarded on lowest price (unless written documentation to justify) <input type="checkbox"/> Maintain documentation <p>Formal Purchase- Purchases equal to and exceeding \$250,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised. <input type="checkbox"/> Include all requirements of a small purchase <input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. <input type="checkbox"/> Everything must be in writing.
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?	<p>WELLNESS POLICY: It is required to review the Wellness Policy once every three years, the posted policy was last reviewed on June 13, 2018. The policy should be made available to the public.</p> <p>The district is required to complete an assessment of the wellness policy at least once every three years (once a year is best practice) and make the results public. This has not been completed in the past 3 years.</p> <p>The Wellness policy should reflect local goals; and a separate policy and assessments may exist for each building within the district.</p> <p>The Wellness Policy Final Rule and an assessment template were shared with the SFA.</p>
1100 - Smart Snacks	1100 What are the SFA's food sale policies?	The SFA has stocked the vending machine near the H.S. entrance with non-compliant food items. No Smart Snacks data is

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		<p>on file. SFA reported that the Booster Club stocks the machine with items purchased from Sam's club. The machine was turned on in the morning as students arrive for school, then had been shut off when school started, and turned back on at the end of the school day. Students may not have access to non-compliant items between midnight and 30 minutes after the end of the school day. SA provided Smart Snacks regulations to the SFA.</p> <p>SMART SNACKS: Competitive foods and beverages sold to students during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) must meet Smart Snack guidelines and nutrition standards. This includes vending machines, concession stands and all other food items sold to students.</p> <p>These items must be: whole grain-rich; first ingredient must be fruit, vegetable, dairy product or a protein; or be a combination food that contains at least ¼ cup of fruit and/or vegetable. Items must meet the calorie, sodium, fat and sugar standards. Items must also adhere to the size restrictions for each age group. A brochure was provided.</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 SFA should maintain one spreadsheet tracking the training hours of all employees through the year and verify training has been completed each year. Documentation should include the length of the training.</p> <p>All staff members working with the School Lunch Program should complete training annually to include Civil Rights Training. No evidence was provided that the janitorial staff helping with lunch have completed training to date.</p>
RMCR - Nonprofit School Food Srvc Acct	10 Excluding equipment purchases made with USDA grants, did the SFA purchase equipment during the RM review period that cost at or above the capitalization level established by the State or SFA for financial statement purposes or at or above \$5,000 (whichever was less)?	Reminded SFA that all equipment purchases valued over \$5000 require advanced approval from the SA.

Site - Level Technical Assistance Westside Junior-Senior High School (0172)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	<p>SFA did have a menu board to communicate the daily menu to students, however no signage specific to breakfast on reimbursable meals was present. SA provided breakfast posters to the SFA and shared some ideas how to display the menus to better communicate to students what they must take to make a reimbursable meal.</p> <p>TA was also given to encourage students to take a reimbursable meal rather than one or two a la carte items.</p>

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		Regulations require that the SFA promote breakfast twice per year, encouraging all students to participate.
400 - Meal Components and Quantities - Lunch	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	The items on the fruit and vegetable bar ran out before the last students were through the line. Items are only re-stocked between meal periods. The last students did not have access to all vegetable sub-groups as not all sub-groups are represented on the "hot lunch line."
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	SFA had hamburger and hot dog buns stored directly on top of hamburger in the freezer. SFA should follow proper storage practices in all coolers, freezers and storage areas. Six cans of diced tomatoes on the shelf were rusty. These should be sent back and the USDA Foods Consultant at the DE should be notified of the problem.
Dietary Specifications Assessment Tool - Lunch	22 Portion sizes for condiments (e.g. hot sauce, ketchup, mustard, salad dressing) are controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal.	During the On-site review, H.S. students were allowed to serve their own condiments. There was no guidance to what was an appropriate size serving. Use of pre-portioned packages is best practice, ladles or regulatory pumps are other methods of portion control.

Org - Level Commendations

Description
APPLICATIONS/BENEFIT ISSUANCE (100): Benefit documents, as well as all paperwork, were extremely well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were correctly determined, applications were complete with SSN's and case numbers, and all applications were determined within ten days. SFA opts to have the confirming official review all applications for accuracy. Income was only converted to annual when there was more than one frequency of income. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential.
SUMMER PROMOTION (1600): The SFA does an excellent job of promoting their Summer Food Service Program (SFSP) outreach for the SFSP program state-wide is shared via websites, lunch menus, newsletters, and the local radio station. The SFA partners with local churches and the pool to coordinate meals.
CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The "And Justice for All" poster is visible to program participants.
MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the (October) review month counts. Meal count totals for the month of October appeared accurate and complete. There was a point of service (POS) at the point where meals are served for all students observed at lunch. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records, were on file for all meals claimed for reimbursement for the review period.
On-site Monitoring (900): The on-site monitoring forms were completed for lunch and breakfast prior to February 1st.

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PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases. 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 SFA maintains a micro-purchase log. Three representatives of the district attended Regional Procurement Training.

PROFESSIONAL STANDARDS (1200): Tracking was provided that documents that the director received the required 12 hours of annual training, managers received the required 10 hours of training, and all other staff have received at least 4 hours of annual training. (Or state that there is a plan, and they are on-track to complete hours by June 30, 2019.) Civil Rights training was included in annual training.

RESOURCE MANAGEMENT & RECORD KEEPING (700): The Resource Management section of the Off-Site Assessment tool was completed on time. October receipts that were reviewed, indicated appropriate and allowable expenditures. The SFA effectively utilizes its USDA entitlement for commodities, spending 98.7% of allotted funds in 2017-2018. Reports are filed on time, and all records are maintained for at least three years plus the current year.

VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification. The SFA had several people attend training. The verification report was completed accurately and on time.

Site - Level Commendations Westside Junior-Senior High School (0172)

Description
FOOD SAFETY (1400): The SFA maintains a clean and well organized kitchen, following safety standards: food handling, recording temperatures, proper labeling and food storage. The latest health inspection report was posted in a publicly visible location. The SFA had a HACCP Manual in the kitchen.
MEAL PATTERN: All students observed on the on-site visit had a reimbursable meal, the menu was complete with all food groups represented and served in their proper quantity. Offer vs. Serve was implemented properly and staff was monitoring food items on trays. Water was available to all students during meal times. Menus for the month of review contained all required components. The SFA utilizes a fruit and vegetable bar which provides students with choices daily and offers additional vegetable sub-groups.
NUTRITIONAL QUALITY OF SCHOOL MEALS (600): The SFA does a good job of creating a variety of menus, while meeting the nutrition guidelines. Dietary specifications seem to be meet with an appropriate calorie, saturated fat and sodium level being offered to all students. CN labels are on file.