

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Linn-Mar Comm School District (37150000)
Dates of Review: November 26-30, 2018

Program Year: 2019
Month of Review: October
Lead Reviewer: Deb Linderblood
Org Representative(s): Stacy Fish

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The SFA uses notification letters from their POS system and did not have them approved for school year 2018-2019.	State your intentions to have your notification letters approved by the State Agency each school year. TA provided on where to find the form for requesting approval. The approval request form should be submitted along with the SFA's free/reduced, denied, free direct certification and reduced direct certification notification letters or indicate that you will use the State Agency prototype notification letter.	
100 - Certification and Benefit Issuance	V-0100	One application was approved for free meal benefits and should have been denied.	Attach a revised application showing an income level that supports the free status or attach a notification letter showing that the household was changed to paid status. The State Agency obtained this while on-site. No further action is needed.	
100 - Certification and Benefit Issuance	V-0100	The household notification of denied benefits does not have the USDA or Iowa non-discrimination statement.	Add the USDA and Iowa non-discrimination statement to your denial notification letter. This was corrected while the State Agency was on-site. No further action is needed.	
200 - Verification	V-0200	The SFA initially verified too few applications. The consultant called the Food Service Director and instructed her to complete an additional application. TA provided that the SFA should always round up when determining the number of applications to verify.	State your intentions to participate in the State Agency's Verification webinar next fall. State the position title(s) of the individual(s) who will participate in the webinar.	
300 - Meal Counting and Claiming	V-0300	The reports the SFA gets off of their POS system does not compare lunches to be claimed to the attendance adjusted allowable amount. TA provided that the SFA should complete an Edit Check Report each month to compare lunches to be claimed for the month to the attendance adjusted allowable amount. Provided the Food Service Director with the State Agency's Edit Check Report form.	Complete and attach an Edit Check Report for November for Echo Hills Elementary and Excelsior Middle School.	
700 - Resource Management	V-0700	In school year 2017-2018 the SFA only utilized 75.0% of their allotted PAL dollars. They are	State your plan for how you will spend 95% or greater of your allotted PAL dollars each school year.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Linn-Mar Comm School District (37150000)
Dates of Review: November 26-30, 2018

		currently participating in USDA foods, DOD and Diverted foods. The SFA did not spend \$3,719 of their DOD PAL dollars, \$23,914.30 of their Diverted Foods PAL dollars and \$42,568.46 of their Direct Distribution PAL dollars.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The SFA does not have a spend down plan approved by the State Agency. The Financial Report on IowaCNP shows that the SFA's cost per three operational months is \$1,206,538.57 and their account balance was \$1,211,917.90.	Describe below your plan for how you will spend down your cash resources so that they do not exceed 3 months average monthly expenses. Also submit your plan to Patti Harding at patti.harding@iowa.gov.

Site - Level Findings: Echo Hills Elementary School (0463)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Production Records at Echo Hills Elementary are missing: 1.) all types of milk offered and a count 2.) total quantity to be prepared for all planned portions in measurable amounts 3.) the number of planned servings for each individual menu item offered for student and adult meals 4.) total seconds and a la carte sold 5.) total leftover amounts 6.) number of actual servings for students and adults/a la carte after meal service. TA provided on what elements are required on Food Production Records and provided the handout "Checklist For Reviewing Food Production Records."	Complete and attach a week's worth of production records from Echo Hills Elementary for breakfast and lunch showing that all the required information is recorded. Provided a Food Production Record checklist showing the required elements and also provided food production templates.	
400 - Meal Components and Quantities - Lunch	V-0400	For the week that the menu certification worksheets were completed there were only 6.75 grains offered instead of the required minimum of 8 oz. eq. TA provided that when determining the oz. eq. of grains, the SFA must count each day the menu offering that has the lowest oz. eq. and add these together to come up with their minimum grains for the week.	State how you will increase the number of oz. eq. offered during the week of menus used to complete the menu certification worksheets so that the minimum offered is at least 8 oz. eq. State your plan for how you will assure that all menus meet the weekly requirement for grains. TA provided that when multiple menu options are offered the SFA must count the lowest amount of grain offered each day from the items offered to determine the weekly minimums.	

Site - Level Findings: Excelsior Middle School (0209)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
900 - SFA On Site Monitoring	V-0900	In school year 2017-2018 on site monitoring was not completed for breakfast.	Complete and attach an assessment of the meal counting and claiming system at Excelsior Middle School for breakfast. TA provided that the State Agency has a revised reporting form that includes a review of breakfast. Provided a copy of the form to the SFA.	

Org - Level Technical Assistance

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Linn-Mar Comm School District (37150000)
Dates of Review: November 26-30, 2018**

Area	Question	Comments
100 - Certification and Benefit Issuance	133 Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified?	TA provided that when the homeless liaison provides a letter listing the students who are homeless he/she should sign the letter.
200 - Verification	208 When a confirmation review was conducted:	TA provided that prior to sending a letter to the households selected for verification, the confirming official needs to make sure that the application was determined correctly. This individual should sign and date the bottom of the application to document that this was completed.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	TA provided that once the SFA has selected applications to verify they should enter the students into Elookup. If the student is found, then this household is directly verified and a selection letter does not need to be sent to the household.
200 - Verification	211 Does the SFA's verification notification letter include all required information?	The SFA is currently using a verification notification letter off of their POS system. This letter does not have the Iowa non-discrimination statement. TA provided that the SFA should use the State Agency prototype notification letter which is on IowaCNP under download forms.
200 - Verification	213 If applicable, did the SFA's notice of adverse action contain all required information, including notification of appeal rights?	TA provided that if a household's benefit level declines due to verification the SFA must give the household 10 calendar days from the date of the results letter to appeal. The SFA then has 10 operating days following the appeal period in which to change the student's eligibility status.
700 - Resource Management		<ul style="list-style-type: none"> · 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. · 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. Explained where to locate their indirect cost rate on the Department of Education webpage. These expenses will not be listed on the Procurement Plan. The installation of the new dishwasher exhaust system should have been paid through PPEL or general funds. · The written code of conduct did not identify all of the specific board policies that make a reference to disciplinary action. A

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Linn-Mar Comm School District (37150000)
Dates of Review: November 26-30, 2018

		<p>number of board approved policies that reference disciplinary action and gifts were identified. Write in the policy numbers and titles on the school food service code of conduct that would apply to officers and employees who violate procurement procedures.</p> <ul style="list-style-type: none">· 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.· When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth."· The food service managers or other trained staff 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 by the SFA not on the GPO solicitation must be procured using appropriate procurement methods.· 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.· 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>* TA provided that the SFA should attach a list of office supplies to be purchased with the purchase order request.</p> <p>* In school year 2017-2018 office supplies were purchased only from one vendor. When using the micro-purchase method, purchases should be equitably spread among qualified vendors. In the current school year, following procurement training, the Food Service Director is purchasing office supplies from multiple vendors.</p> <p>* The small purchase method was used to purchase small wares. Specifications should be expanded to allow for price</p>
--	--	---

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Linn-Mar Comm School District (37150000)
Dates of Review: November 26-30, 2018

		<p>comparison between similar products.</p> <p>* A review of three invoices from the prime vendor showed that there was one item substituted. The alternate item was labeled clearly as the substitute. The price of the alternate item was about \$15 higher per case than the bid product. No credit was obtained. The FSD/kitchen manager should make sure that the substitute item price is equal to or lower than the bid item. Additionally the alternate item should be of equal or superior quality.</p> <p>*There were two items found on invoices that were not in the bid market basket. If these items are to be ordered consistently, the items should be added to the market basket.</p> <p>*The FSD should obtain produce pricing weekly from the vendor as stated in the solicitation.</p> <p>* TA provided that the SFA should track rebates and credits.</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?	TA provided on where to go to file a complaint alleging discrimination in the school meals program. The web address is: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
800 - Civil Rights	810 Review program materials.	TA provided that the district's nutrition web page does not have the most current Iowa non-discrimination statement. Sent the Food Service Director the current statement.
1000 - Local School Wellness Policy	1000 Provide a copy or appropriate web address of the current Local School Wellness Policy.	The district's wellness policy states that staff will not withhold food or beverages (including food served through meals) as punishment. However students who failed to have their identification badge when coming through the serving line were directed to put their meal tray on a table and that they would have to wait and come through the serving line after everyone else had been served. TA provided that this practice was punitive and also results in students being fed cold food. The district should find another way to enforce with students that they must remember to bring their identification badge with them to meals.
1000 - Local School Wellness Policy	1005 <i>Provide a copy of the most recent assessment on the implementation of the local school wellness policy.</i>	TA provided that the SFA should make the wording of the goals in their Wellness Policy match the goals on their assessment. Also discussed that the Wellness Policy needs to have the dates it was reviewed/ revised. A date should also be documented on the assessment showing when the assessment was completed.

Org - Level Commendations

Description
Certification and Benefit Issuance: Benefit documents, as well as all paperwork, were very well organized. 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 denied applications were correctly determined. All applications except one were correctly determined, 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

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Linn-Mar Comm School District (37150000)
Dates of Review: November 26-30, 2018

<p>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 benefit issuance documents and system.</p>
<p>Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria at the site two sites reviewed, translated free and reduced price applications are offered for Limited English Proficient households, annual civil rights training was provided for food service staff and documented. The SFA submitted the annual Public Release to the local media. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed.</p>
<p>Fiscal Action: Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for October seem to be needed.</p>
<p>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 two sites reviewed. The latest Health Inspection Report was posted in a publicly visible location at Excelsior Middle School and Echo Hills Elementary. Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Food temperatures are documented at both schools and dishwasher temperatures are taken and documented. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean at both schools. Food Service workers wore proper hair restraints and practiced good gloving procedures. The Food Service Director and Administrative Assistant are both ServeSafe Certified. At Excelsior Middle School Kimberly Long and Lisa Eiler are ServeSafe Certified and at Echo Hills Elementary Jill Paul and Mary Heims are ServeSafe Certified.</p>
<p>Local Meal Charge Policy: The SFA has a meal charge policy. The policy was mailed to all households and it is also put in the school directly. Cashiers were informed of the policy and it is on the district's web page. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.</p>
<p>On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch prior to February 1st in school year 2017-2018.</p>
<p>Procurement: The Food Service Director attended the Regional Procurement Training in Cedar Rapids. The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, have listed procurement events and procurement methods for each event. There is a Code of Conduct Policy which references Board Policies for Code of Ethics. The SFA is part of the Eastern Iowa Purchasing Group (EIPG). A review of invoices from the Prime Vendor showed the district was purchasing products from the market basket. The food service director spot checks invoices from the prime vendor to ensure products delivered match the order and the description of the product solicited by GPO.</p>
<p>Professional Standards: The hired Food Service Director meets the hiring standards. The Food Service Director has completed her required Professional Standards training for school year 2018-2019. All nutrition staff have started to meet the required training for Professional Standards in school year 2019 or will be attending training which will be offered in January. An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours.</p>
<p>Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.</p>
<p>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.</p>
<p>School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach consisted of including information on the district's web page about breakfast and listing it on the menus as well. The district celebrates school breakfast week in their kitchens and has bright posters in their serving lines. Summer Food Service Program (SFSP) outreach included sending flyers to schools for the FLY program in the Marion/Cedar Rapid areas as well as posting on the district's website how to find areas that offer a SFSP and this information is posted at the schools as well.</p>
<p>Verification: Applications were correctly selected from error prone applications. All income sources were verified with at least one month's income.</p>
<p>Wellness Policy: The SFA's wellness policy was reviewed and revised in May of 2017. The public is made aware of the SFA's wellness policy and assessments via the student support services web page and on the school nutrition web page. The following individuals are involved in reviewing and updating the LWP: staff, students, parents and community leaders. Potential stake holders are made aware of thier ability to participate in the Wellness Committee. The SFA completed a thorough assessment of their wellness policy in June of 2018. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.</p>

Site - Level Commendations Excelsior Middle School (0209)

Description
<p>Meal Components and Quantities: The Food Service Director does a god job of menu planning. 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. The menus met weekly and daily meal pattern requirements for the 5-8th grade group. Documentation indicated that foods purchased and food production ensured 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 are offered throughout the month for lunch—including many fresh fruits and vegetables. Standardized recipes are used for food production. 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. There are numerous posters displayed promoting good nutrition and physical exercise.</p>

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Linn-Mar Comm School District (37150000)
Dates of Review: November 26-30, 2018

Meal Counting and Claiming: Meal counts for Excelsior Middle School were reasonable when compared to the review month counts. Meal count totals for the month of October were accurate and complete. Point of Service (POS) counts and filed claims appear accurate. Total Access 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.
Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of October 1 - 5, 2018 for lunch at Excelsior Middle 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 Excelsior Middle 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, offering reduced-fat salad dressings, 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 but two 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. All foods sold 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 6-8th age group of students. Documentation was available to show that all a la carte sold to students during the meals met Smart Snack standards. 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.

Site - Level Commendations Echo Hills Elementary School (0463)

Description
Meal Components and Quantities: The Food Service Director does a god job of menu planning. 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. The menus met the daily meal pattern requirements for the Kindergarten through 5th graders. Documentation indicated that foods purchased and food production ensured 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 are offered throughout the month for lunch—including many fresh fruits and vegetables. Standardized recipes are used for food production. At least two types of milk are offered. Many 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 at both breakfast and lunch. There are numerous posters promoting students to try new foods and promoting physical activity.
Meal Counting and Claiming: Meal counts during the on-site review of Echo Hills Elementary School were reasonable when compared to the review month counts. Meal count totals for the month of October were accurate and complete. Point of Service (POS) counts and filed claims appear accurate. Total Access 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. 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 October 1 - 5, 2018 for breakfast and lunch at the Echo Hills Elementary School. The worksheets showed that all meal components were offered at breakfast and lunch. The Food Service Director also completed the Dietary Specifications Assessment tool for lunch which indicated that Echo Hills Elementary 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, offering reduced-fat salad dressings, 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 milk via a la carte sales. Exempt leftover National School Lunch Program entrees are only sold the same day, or the day after, they are initially offered.
Water: Free potable water is available to all students for lunch and for breakfast.