

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Lutheran Interparish School (70298204)
SNP - Review November 28-29

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

Site - Level Findings: Lutheran Interparish School (8204)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Food Production Records, FPRs, must record all food offered as part of a reimbursable meal including milk and condiments. FPRs must include total quantity prepared, serving size, leftover amounts for each food item offered. Quantities must be in amounts that are measurable. FPRs were missing milk, total quantity prepared, many serving sizes, and several food items such as potatoes and garlic toast. (Note: a repeat of this error on future reviews may result in fiscal action.)	For your response, (1) Submit one week of complete and accurate food production records. (2) Watch the webcast titled "Food Production Records." Also download the accompanying Facilitator's Guide and Resources. Answer questions 1-8 of the activities from one day of the FPRs submitted for number 1 above and submit. Indicate which day of the week was used for the activity.	
400 - Meal Components and Quantities - Lunch	V-0400	The meal pattern for the week submitted was not in compliance with requirements. Students in K-8 must have a minimum of 3/4 cup vegetable per day, 1/2 cup fruit per day, 1 cup milk per day, 1 oz. equivalent of meat/meat alternate per day and 9 oz. equivalent per week; and 1 oz. equivalent of grain per day and 8 oz equivalents per week. Grain was short of the weekly minimum for grades K-4, grain was short for all grades one day, and vegetable quantity was short for all grades one day. (Note: a repeat of this error on the next review may result in fiscal action.)	For your response, (1) correct the attached Certification Menu Worksheet for grades K-8 so that it meets meal pattern requirements. (2) Watch the webinar titled "Menu Planning Resources-March 2016" located under Learning Tools-Schools, sub-heading Menu Planning and Resources on Iowa DE website, and submit a copy of the Professional Standards Documentation. (3) Also indicate how you will ensure that all future menus are in compliance.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	The Local Wellness Policy, LWP, needs updated in a couple areas, the assessment of goals needs to be completed and shared with the public.	The principal has been working with the LWP committee and the Consultant to update the policy and to include all required stakeholders. The committee will meet in January, and the assessment of policy goals will be posted on the school's website by next fall. No further action is required.	
RMCR - Revenue From	V-RMCR	Each year, the SFA must assess its compliance with regulations for Nonprogram Foods.	For your response, complete the Non-Program Revenue tool and attach a copy. (Alternatively, the	

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Lutheran Interparish School (70298204)
SNP - Review November 28-29**

Nonprogram Foods		Nonprogram foods are any foods sold outside of reimbursable meals including adult meals, second entrees, and extra milk. The percentage of revenue received for nonprogram food sales must equal or exceed the percentage of money spent on nonprogram food.	Financial Report on IowaCNP could be completed which includes nonprogram calculations.) If the tool or the financial report indicates that insufficient funds are collected, then also indicate how you will increase revenue and/or decrease food costs for nonprogram food.	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	(1) Technical assistance was provided on using the individual tabs on I-CAVES and not converting income to annual income unless there is more than one frequency of income. (2) The letter of notification of benefits was from last year and did not include information about Other Reduced. The determining official should check the dates on forms in Download Forms on IowaCNP to ensure that the most recent forms are being used.
200 - Verification	208 When a confirmation review was conducted:	(1) Once the application has been selected for verification, someone other than the person who originally determined the application must re-determine the application to ensure that the original determination was correct. This second person is the Confirming Official and must sign and date the application in the indicated space. (2) Be sure to get at least one month's income documentation for verification to ensure that the income is normal and usual and to better validate the frequency.
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?	Resources for Procurement were shared, including documents in Download Forms on IowaCNP and recommendations for terms and conditions when bidding. (1) Technical assistance was provided on Micro-Purchasing. Micro-purchase is when there is no price comparison or bids or quotes. Purchases are simply made from a vendor. When using Micro-purchase, the prices must be reasonable and the purchases must be spread around between all qualified vendors. A Micro-Purchase log is available in Download Forms. Receipts from past years were not maintained, and purchases are not spread around to all qualified vendors in the area, such as convenience stores. (2) Technical assistance was provided for Small Purchase. For small purchase, documentation must be maintained for specifications of what is being procured, vendors contacted, prices offered, and how the decision to select the vendor was determined. At least three vendors should be contacted. Recommendations were made for milk bids. The SFA should multiply out estimated quantities times the bid prices to determine a true 'bottom line' amount which helps determine which one is the lowest bid. The SFA should include terms in the bid such as milk coolers and replacement products if the bid product is not available. Responses to bids were not maintained and terms were not included. (3) To monitor bids, prices should be spot-checked at

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Lutheran Interparish School (70298204)
SNP - Review November 28-29**

		<p>least monthly. (4) Be sure to include all applicable terms and conditions. For example, all food bids must include the Buy American statement, all bids with a value of \$10,000 and more must have Termination for Cause included, and all vendors must be checked to ensure they have not been debarred from doing business with the federal government. There are other terms and conditions, many of which are found in Section 5 of the state agency RFP and IFB templates in download forms on IowaCNP.</p> <p>Formal Procurement 1).The AEA Purchasing and School Food Authority (SFA) signed agreement for SY 2018-2019 is for food, chemicals, and small wares.</p> <p>Rebates must be tracked. It is recommended that the spreadsheet in download forms be used to track rebates by each vendor and vendor totals for entire year. This is to ensure that all rebates accrue to the district child nutrition funds. The form can also be used to track discounts and credits. (The spreadsheet was emailed to the SFA.)</p> <p>SFAs that participate in a cooperative purchasing group such as IAEP are responsible for all procurement regulations just as if they were purchasing independently. All procurement and contract documents should be available including the RFP or IFB, all contract conditions, and a current list of products and prices. Any products not on the current list must be competitively procured. A sampling of prices should be checked at least monthly.</p> <p>Since the SFA is purchasing bread products in conjunction with the public school, LIS must either be included on the bread bid as a Purchasing Group or add a piggyback condition to the bid with the public school.</p>
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	Documentation for bona fide religious beliefs were provided (see Review Attachments) so that the SFA can delete a portion of the Iowa Non-discrimination Statement.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Technical assistance was provided on Special Diets. Any request for a special diet due to a medical issue must be accommodated as soon as possible with or without the special diet form as long as the accommodation can be made within the meal pattern. If the accommodation cannot be made within the meal pattern, then the special diet form must be on file before the accommodation can be made. It is up

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Lutheran Interparish School (70298204)
SNP - Review November 28-29**

		to the SFA whether accommodations are made for personal preferences or religious reasons, however, accommodation is encouraged. Note--be sure to download the new special diet form.
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.)	The Iowa Training Tracker tool was provided to the director. Three employees need to be tracked--director, one full time, and one part time employee. The hours needed each year are 12, 8, and 4 respectively. Training hours can be averaged over a 2-year period as long as the tracking tool indicates which two year period is being used and as long as there is some training every year. After the tracking tool was completed, the result is that two employees need an additional 8 hours each by the end of the year. Training possibilities were discussed. It is recommended that a regular training schedule be set so that staff have set times per month or per quarter for training. Training resources were provided to the director.
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	Technical assistance was provided on completing the Non-Program Revenue Tool in a packet of information at the entrance conference. The Financial Report on IowaCNP should also be completed. If the Report were completed, the Tool would not be necessary. There is a webinar for completing the Report titled "2018-19 Memo and Financial Report for Non-Publics, May 2018." There are also instructions in download forms on IowaCNP.

Site - Level Technical Assistance Lutheran Interparish School (8204)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Technical assistance was provided to the director for ensuring that the meal pattern is met in the future. It is recommended that the director carefully review each week's menus to ensure that both the minimum daily and minimum weekly requirements are met. Entering the menus into the Menu Planning Tool or the Certification Menu Worksheets is recommended also. A link was sent to the director with menu planning and recipe resources.
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	(1) Technical assistance was provided on updating the food safety plan. It is recommended that Standard Operating Procedures, SOPs, be revised in an on-going rotation and include the other two staff members in the revision process. Staff could review current SOPs, make recommendations for adapting the procedures to what is being done at LIS. New SOPs need to be added as the current collection is not complete. A link to the ISU website with prototype SOPs was provided. Since annual training on food safety is required, and minimum staff training hours are required, this is an excellent way to fulfill both of those requirements while also updating the food safety plan. (2) The SFA is calibrating thermometers, but the results are not documented. It is recommended that the results be logged.
Nutrient Analysis & Validation Checklist	2 If required, has the SFA/school implemented corrective action as agreed to during the on-site review to ensure the appropriate source documents are accurate before starting the nutrient analysis process?	(1) Technical assistance was provided on Food Production Records, FPRs. FPRs are very important and are required by regulation. They must be comprehensive. An example and a checklist were provided. (2) Another area that is extremely important are standardized recipes which are also required. The best and easiest way to use a recipe that is already standardized, such as USDA recipes, Iowa Gold Star, and Healthier Kansas recipes. Information was provided on recipe requirements. (3)

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Lutheran Interparish School (70298204)
SNP - Review November 28-29

		<p>Technical assistance was provided on calculating the ounce equivalent grain contribution for homemade grain items such as bread or cookies. Multiply the pounds of grain in the recipe by 453.6 Divide that number by the number of servings the recipe makes Divide that by 16 and always round down to the nearest quarter-ounce (If there are pounds and ounces of grain, divide the ounces by 16 to get a decimal. For example, 10# and 6 oz of flour would equal 10.375 pounds)</p>
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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. A correct and current benefit issuance list was available. Seven applications were reviewed and all reviewed applications were correctly determined, signed and dated by both a household member and the SFA. Access to benefit information is correctly limited. Free meals are extended to all members in 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 to all school staff and was correctly documented. A copy of the district's public release was on file, documenting that it was submitted to local media. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. Ethnic/racial information is collected and the form has been completed and filed. No discrimination was observed. 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>GENERAL: LIS is a small, private school so keeping up with all of the federal requirements for Child Nutrition Programs can be challenging. However, the staff is willing to learn and works hard to comply with regulations. There was a concerted effort to have all requested materials ready for the review, and efforts were made to complete missing documents during the on-site visit. The overall approach and attitude of the SFA is appreciated.</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 SY2019. There was no corrective action noted on the report. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.</p>
<p>MEAL COUNTING & CLAIMING: Meal counts during the on-site review 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. There was a POS for all students, and the POS was organized and orderly. Each teacher uses a tablet to record either a meal or milk sale as the student walks by and states his or her name. 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: All meal components were available at the beginning of service and throughout meal service on the days of observation. Most of the required 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. Water was available as required, and at least two types of milk were offered. Students had sufficient of time to eat after receiving meals. Food service staff was polite and respectful to students, other staff, and each other.</p>
<p>PROCUREMENT: The off-site procurement tool was completed, and board purchasing policy and vendor paid lists were submitted. The SFA had a written Procurement Plan for SY2019 that includes federal and local thresholds, and procurement methods, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. 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. A signed agreement with the Group Purchasing Organization for SY 2018-2019 is on file. The signed agreement states that the school district agrees to procure food (excluding bread and milk), small ware supplies, and chemicals through the Group's awarded Prime Vendors.</p>
<p>PROFESSIONAL STANDARDS: The director provides good training and tracks training for volunteers. A comprehensive tracking tool for food service employees was completed during on-site review.</p>
<p>RESOURCE MANAGEMENT & RECORD KEEPING: Financial records that were reviewed, indicated appropriate and allowable expenditures. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. 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.</p>

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Lutheran Interparish School (70298204)
SNP - Review November 28-29

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.

SFSP OUTREACH: Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer via the Panther Proclaimer newsletter.

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.

WELLNESS POLICY: The district has a 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.