

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Corning Comm School District (14310000)**  
**SNP - Review ID: 5001**

**Program Year:** 2019  
**Month of Review:** October  
**Lead Reviewer:** Brenda Windmuller  
**Org Representative(s):** Kim Wood

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	The Wellness Policy and the Assessment of the policy are required to be reviewed at minimum once every 3 years and made available to the public. The date on the posted policy is 2-20-14. Records indicate that the policy was reviewed on 4-10-17. The assessment is not currently available to the public.	1. SFA will exchange the Wellness Policy on the website to the most recent version and submit a link to the policy to the SA. 2. The SFA will explain how they will make the Wellness Policy Assessment available to the public going forward.	

**Site - Level Findings: Corning Elementary School (0409)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1400 - Food Safety	V-1400	The SFA must relocate the current Health Inspection Report to a location visible to the customers.	The SFA will move the Inspection Report to a location visible by the public. In the Corrective Action Response, explain the location and attach a photograph of the report in the new location.	
1400 - Food Safety	V-1400	Temperatures of coolers, freezers and the dishwasher should be taken and recorded daily. Maintain these documents on file for a minimum of 6 months.	SFA will begin recording temperatures daily and submit copies of temperature logs for December 10- December 21.	

**Org - Level Technical Assistance**

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Area	Question	Comments
100 - Certification and Benefit Issuance	137 Did the SFA accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document?	SFA should work closely with Villisca to develop a method of sharing Free/Reduced information as they share students living in the same households.
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>Must have signed debarment certifications kept on file.</p> <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"> <li><input type="checkbox"/> All price adjustments throughout the year</li> <li><input type="checkbox"/> All invoices</li> <li><input type="checkbox"/> All contracts and agreements</li> <li><input type="checkbox"/> All bids solicited</li> <li><input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)</li> </ul>

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		<ul style="list-style-type: none"><li><input type="checkbox"/> Documentation of why you selected a specific vendor (Selection Rubrics)</li><li><input type="checkbox"/> Copies of bid solicitation</li><li><input type="checkbox"/> Debarment statements</li><li><input type="checkbox"/> CD provided by the AEA (if applicable)</li></ul> <p>Three types of purchases, (Federal Thresholds):</p> <p><b>Micro-purchase-</b> under or equal to <b>\$10,000</b>(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><li><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.</li><li><input type="checkbox"/> Purchases should be distributed around community, not just one store.</li></ul> <p><b>Small Purchases-</b> Purchases that are <b>under \$250,000</b> (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"><li><input type="checkbox"/> Include all terms and conditions</li><li><input type="checkbox"/> Include terms: Buy American and Equal Opportunity</li><li><input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more</li><li><input type="checkbox"/> Attain Signed Debarment Statements</li><li><input type="checkbox"/> Awarded on lowest price (unless written documentation to justify)</li><li><input type="checkbox"/> Maintain documentation</li></ul> <p><b>Formal Purchase-</b> Purchases equal to and <b>exceeding \$250,000</b> (or local purchasing threshold if more restrictive),</p>
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		<p>a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <p><input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised.</p> <p><input type="checkbox"/> Include all requirements of a small purchase</p> <p><input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</p> <p><input type="checkbox"/> Everything must be in writing.</p>
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?	SFA should work to include students and additional community members on the Wellness Committee. Policy and objectives should be customized to reflect local goals. Consider separate goals for different age levels. The Wellness Policy and Assessment must be reviewed at minimum once every three years and both must be made available to the public. Discussed option of posting the Wellness Policy and the Assessment under the Foodservice tab on the web site to make them easier to find. Templates and resources provided by the SA.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The HACCP policy does not contain SOPs for blood born pathogyn or body fluid clean up. The FSD has these policies on file, they will be added tot eh HACCP binder.
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)?	TA was given that any equipment purchase valued at \$5000 or greater and paid for by the Lunch account must have approval from the SA prior to purchasing.

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

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast		Students are required to give something in "exchange" for their meal. This can simply be stating their name or ID number. The SFA has started having students provide their name as they pass by the POS.
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?	SFA should keep copies of the CN labels (or product formulation statements) for all food items served. While nutritional labeling is valuable information, it is not adequate for determining meal pattern contribution.

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400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable <b>lunch</b> to students for all applicable grade groups?	The SFA should post the daily menu for students to see what is being served, not just the monthly menu. Signage should include information on what students must select to make a reimbursable meal. The SA provided posters and links to the USDS site for additional posters.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	TA was given to the FSD to make sure that lettuce cups are full so that they count for the 1/2 cup intended. Also discussed ways to incorporate additional dark green vegetables into the menu to include adding romaine or spinach to the lettuce mix.
1400 - Food Safety		Unopened milk, juice and strawberry packets were being washed off and returned to the kitchen for re-sale. This practice is not allowed. un-eaten items must be thrown away or the SFA may explore starting a share table. Information on share tables was provided by the SA.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The SFA's most recent health inspection report was on a bulletin board over the FSD's desk. This must be posted in a location that the public may have access to read it if they choose.
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	Temperatures of all coolers and freezers should be recorded at least once per day. Cooling temperatures and reheating temperatures should be recorded for all leftovers. All food items stored in the cooler and freezer should be labeled for content of container and the date of preparation.

**Org - Level Commendations**

Description
APPLICATIONS/BENEFIT ISSUANCE (100): 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. Access to benefit information is correctly limited. Free meals are extended to all members in the household.
BREAKFAST & SUMMER PROMOTION (1600): The SFA promotes breakfast by having special menus and promotions throughout the year. Menus are posted in each cafeteria as well as the website. Summer Food Service Program, SFSP, outreach for the SFSP program state-wide is shared via websites and flyers.

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<b>CIVIL RIGHTS (800):</b> The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided to 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. Ethnic/racial information is collected and the form is completed. No discrimination was observed. SFA on-site monitoring was completed. The non-discrimination statement appears on program materials.
<b>HACCP/FOOD SAFETY:</b> The SFA has a district-wide written Food Safety plan that includes most required elements. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures.
<b>LOCAL SCHOOL WELLNESS POLICY (1000):</b> The wellness policy has been reviewed within the past three years. The policy has nutrition education, physical activity and other wellness goals included. A wellness committee is in place to set goals and help assess the completion of the goals. The committee is made up of faculty, staff, and one community member. The committee meets 2 times annually and minutes are kept. The committee is working to implement "SWITCH" initiatives. The SFA is a Team Nutrition (TN) School and TN posters are hung in the cafeteria.
<b>MEAL COUNTING &amp; CLAIMING:</b> 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. All meals were observed to be reimbursable meals on the day of the on-site review. 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.
<b>On-site Monitoring (900):</b> The on-site monitoring forms were completed prior to February 1st.
<b>PROCUREMENT:</b> 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 FSD attended Regional Procurement Training in 2018.
<b>PROFESSIONAL STANDARDS (1200):</b> 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 the end of the year.) There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.
<b>RESOURCE MANAGEMENT (700):</b> The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed, indicated appropriate and allowable expenditures. Reports are filed on time, and all records are maintained for at least three years plus the current year. Errors fell below the \$600 disregard, no fiscal action is required.
<b>SMART SNACKS (1100):</b> The SFA does not allow elementary school students the option to purchase a la care items other than milk. There are no vending machines present.
<b>VERIFICATION (200):</b> The correct number of applications were verified and were correctly selected from error prone applications. The verification process was completed on time.

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

Description
<b>MEAL REQUIREMENTS &amp; COMPONENTS:</b> The Food Service Director, FSD, does an excellent job of menu planning and offering choices. There is good meal participation at all sites. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. Menus met weekly and daily meal pattern requirements for the grade group within the building. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. Standardized recipes are used for food production. Water was available in two water fountains in the cafeteria and students are provided with cups. The elementary cafeteria was well supervised, and staff interacted well with the students. Food service staff was polite and respectful to students, other staff, and each other.

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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. Trays are checked by the kitchen staff and again by the POS operator.