

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
IKM-Manning Comm School District (31680000)
SNP - Review ID: 4990

Program Year: 2019
Month of Review: September
Lead Reviewer: Brenda Windmuller
Org Representative(s): Debbie Janssen

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One application error. Student processed as free should be reduced.	SFA corrected the issue during the on-site review. No additional action required at this time.	
1000 - Local School Wellness Policy	V-1000	The SFA has not completed the assessment of the Wellness Policy within the past 3 years.	The SFA will submit a timeline for completing the assessment and explain how the assessment will be made available to the public.	

Site - Level Findings: IKM-Manning High School (0127)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	One application was approved as free based on the application, should have been reduced. Student's income was missed when completing the I Caves.
700 - Resource Management		Procurement: Minor errors on the procurement plan. Estimated value is essential in determining what type of procurement method(s) you are allowed to use. The AEA Purchasing agreement is for 2 years plus 2.

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		<p>No Procurement Plan for 2017/2018 was on file. SFA should be checking prices on invoice against contract prices to ensure that they match. (Pork & beans #600150, purchased on 9-28-18 charged \$20.21, contract price \$16.95)</p> <p>Equipment repair and maintenance are not allowed to be charged to the School Lunch account as a direct cost. Expenses may be recovered using the indirect cost rules. Purchases valued at \$5000 or greater must receive state approval prior to purchase. SFA does not have documentation of multiple bids on the Hobart Double Deck Oven, invoice price \$7486.00. The value of this purchase qualifies as a small purchase in 2017. Small purchase regulation must be followed.</p> <p>SFA was advised to monitor the milk contract as it is valued at \$2000 less than the maximum limit. If the value reaches \$25,000, the SFA will need to complete a formal bid process.</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>
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		<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. <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
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		<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 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. <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.
700 - Resource Management		FSD and SA reviewed the district's Negative Balance Policy and how it complies with the Iowa HF2467.
700 - Resource Management	703 Excluding the purchase of equipment using equipment grant funds, if the SFA used food service funds to buy equipment* during the school year under review, did it receive prior approval from the State agency either directly or via the State's pre-approved equipment list?	Discussed the requirement for SFA to get pre-approval from the SA for equipment purchases exceeding \$5000. SFA purchased an oven for \$7486.00 on December 11, 2017.
800 - Civil Rights	810 Review program materials.	Missing the non-discrimination statement on the salad bar menu. Corrected during on-site visit.
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?	Wellness Policy: The SFA has not completed an assessment of the Wellness Policy. A template was provided to the SFA. The assessment must be completed at a minimum of once every 3 years. Both the policy and the assessment must be made available to the public. The policy is posted on the district web site under board policies. It was suggested to make a wellness tab for posting the policy and the assessment.

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1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	<p>ANNUAL TRAINING: Food Service Director was advised to maintain a spreadsheet with all staff, tracking training classes attended, date attended and length of time for each class. All Food Service staff and SFA employees working with the School Lunch Program are required to have Civil Rights training annually. Training hours should meet the following guidelines:</p> <p>Director- 12 hours annually</p> <p>Manager- 10 hours annually</p> <p>Full-Time Staff- 6 hours annually</p> <p>Part-time Staff- 4 hours annually</p>
RMCR - Revenue From Nonprogram Foods	5 If the SFA served adult meals at non-pricing sites and/or served adult meals free of charge to adults not directly involved in the meal service, determine how the nonprofit school food service was reimbursed in full for the cost of all adult meals served. Was the SFA's process for recovering the full cost of adult meals served sufficient?	The SFA's NSLP application stated that the adult lunch price is \$3.55, the actual price reflected in the POS is \$3.65. The SFA will adjust the application to reflect the actual price.

Site - Level Technical Assistance IKM-Manning High School (0127)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	<p>Menus: Ice Cream Bar served on 9/25/18 is not Smart Snack Compliant and should not be served as part of the meal. All menu items containing 2 or more ingredients must have a Standardized recipe. The daily salad bar should include enough components daily to make a reimbursable meal or students should have the ability to go through the hot lunch line and the salad bar. SFA should encourage more consumption of Bean/legumes by offering more variety. Reminder that ½ cup of lettuce only counts as ¼ c. When counting extras like lettuce or tomato to put on top of a sandwich, use accurate measurements. Radishes fit into the "other" category in the vegetable sub-groups.</p>

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1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	<p>Food Safety: Food boxes are stored directly on the walk-in freezer floor. Internal temperatures of the walk-in freezer are not being taken. The internal temperature of the reach-in colder was 40 degrees on 11 days. No corrective action was documented. Production records for 10-9-18 showed the corn salad temperature as 42 degrees, no corrective action documented. Tongs are not being utilized for all self-serve foods (rolls) Food items taken by students should never be put back into the cooler or the food service stock for re-service. Foods may be tampered with or contaminated.</p>
1500 - Reporting and Recordkeeping		<p>Communication: The SA suggests that the SFA creates a list of all tasks related to the NSLP and assign stakeholders to each task to avoid the confusion of who is responsible for what, and to ensure that all pieces are covered. The SA will help compile the list of tasks.</p>
Dietary Specifications Assessment Tool - Lunch	21 How often are extra, non-reimbursable food items (e.g. potato chips, ice cream, pudding and/or gelatin) offered on the menu? Items sold a la carte are exempt.	<p>Nutrition: SFA should review the daily nutritional standards. Limits for grades 9-12: Calories 850, Fat 10% of total calories, Sodium 850mg. One items of concern was identified on the weekly menu reviewed. Ice Cream Bar served on 9/25/18, one 2.65 oz serving contained 160 calories, 5 g of fat, and 75 g of sodium. When run through the Smart Snacks Calculator, it was non-compliant. Additionally, salad bar items such as “fluff” salads and mayonnaise based salads should be kept to a minimum. These items add empty calories to the diet.</p> <p>Regulations allow you to serve a grain based dessert once a week. Items like ice cream and pudding are found consistently throughout the monthly menu.</p>

Org - Level Commendations

Description

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<p>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. Most applications were correctly determined, applications were complete with SSN's and case numbers, and all applications were determined within ten days. 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.</p>
<p>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.</p>
<p>FISCAL ACTION: Errors fell below the \$600 disregard. No fiscal action was required at this time.</p>
<p>LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years. Last updated in 2016 and scheduled to be reviewed in December 2018. The policy has nutrition education, physical activity and other wellness goals included. The committee is made up of students, faculty, staff, and community members on the district's SIAC committee.</p>
<p>MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the (September) review month counts. Meal count totals for the month of September appeared accurate and complete. There was a point of service (POS) at the point where meals are served for all students observed at lunch at the High School. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.</p>
<p>On-site Monitoring (900): The on-site monitoring forms were completed for the Irwin Elementary site for lunch and breakfast 10/5/2017. SFA has until February 1, 2019 to complete the monitoring for this school year.</p>
<p>PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for reviewing, reviewing, documenting and monitoring procurement events, and specifications were well-written and comprehensive. 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 ensures that no vendors have been debarred or suspended by USDA. FSD attended Regional Procurement Training in September 2018.</p>
<p>RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed, and indicated appropriate and allowable expenditures. The Paid Lunch Equity (PLE) too was waived this year due to a positive balance in the school lunch account as of January 30, 2018. Reports are filed on time, and all records are maintained for at least three years plus the current year. The Non-program revenue tool was completed.</p>
<p>VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. The verification process was completed on time last year and in progress at the time of the 2018/2019 AR. The applications selected for verification was confirmed prior to verification and the SFA checked e-lookup prior to sending notification to the household.</p>

Site - Level Commendations IKM-Manning High School (0127)

Description
<p>COMPETITIVE FOODS & SMART SNACKS (1100): Students may purchase a second entrée and other a la carte items at the high school. Documentation was available to show that all foods and beverages sold to students by the food service department during the school day met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte by the food service department.</p>
<p>HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes most required elements. The latest Health Inspection Report was posted in a publicly visible location at the HS. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. The</p>

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kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Food Service workers wore proper hair restraints and practiced good gloving procedures.

MEAL PATTERN: All students observed on the on-site visit at the High School 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 doing a great job of monitoring food items on trays. Water was available to all students during meal times. Menus for the month of review contained all required components. Production records were available for the month of review. The FSD utilized 96% of the USDA Foods money allocated to her last year.

MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, does an excellent job of menu planning and offering two entrée choices at the HS. 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 each age/grade group within the district and within each building. 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 and well organized. Standardized recipes are used for food production. Water was available as required. Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. All students were observed to have a reimbursable meal during the day of the review, with an occasional friendly prompt by staff to take a serving of fruit or vegetables.

PROFESSIONAL STANDARDS (1200): Tracking was provided that documents that the director received the required 12 hours of annual training, and all other kitchen staff at the HS have received at least 4 hours of annual training.