

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Zion-St John Lutheran School-Paullina (60998203)
On-Site Review Dates: November 13-15, 2018

Program Year: 2019
Month of Review: October
Lead Reviewer: Deann Murphy
Org Representative(s): Jan Brandhorst

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Household notification/direct certification letters generated from SFA software must be approved by the State Agency prior to their use. Currently the SFA is using the letter generated from JMC which does not meet all requirements.	The SFA will state their intentions to get annual approval from the State Agency prior to using their household notification/direct certification letter in the future. The SFA needs to submit their notification letter to Deb.Linderblood@iowa.gov in the summer of 2019 along with Download form NSLP022.	
200 - Verification	V-0200	There was no confirmation review completed for Verification in SY2017-18. The household chosen for verification did not submit all income documentation reported to the SFA on the application form. The SFA did not send the household notification of verification results. Verification was not completed in a timely manner. The deadline for completing the verification process is Nov. 15.	The Verifying official will complete the tutorial "Verifying Eligibility" and submit their certificate of completion. The tutorial can be found at https://educateiowa.gov/pk-12/nutrition-programs/iowa-school-meal-programs-web-based-tutorials-webcast .	
700 - Resource Management	V-0700	The SFA does not have a procurement Code of Conduct on file.	The SFA will submit their completed procurement Code of Conduct to the State Agency. The Code of Conduct must include disciplinary actions listed.	
800 - Civil Rights	V-0800	The SFA did not send the public release to the local media as required. Download Form NSLP176 contains the full Public Release. The media does not have to publish it and the SFA is not required to pay for this to be published, but the SFA needs to show that it was sent to the local media prior to each new school year.	The SFA will explain how and when they will submit the Public Release to the local media prior to the beginning of SY2019-20.	
800 - Civil Rights	V-0800	Civil Rights training has not been completed in SY2018-19 by the staff involved in the National School Lunch Program (NSLP). There is no record that it was completed in SY2017-18 by the	Please provide evidence that the 3 staff involved in the NSLP have completed Civil Rights training. Training can either be done individually or as a group. Suggested group trainings can be found on IowaCNP NSLP500 or NSLP501. A sign-in sheet needs to be submitted showing date completed, time in-time out, topics covered, signature of all who attended. If individual training occurs, please submit the completed Civil Rights quiz located at the back of the Civil	

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		FSD. This is a repeat violation from the last Administrative Review.	Rights manual along with the name of the individual who completed it and the date it was completed.	
800 - Civil Rights	V-0800	The posted menu does not list the shortened non-discrimination statement, "This Institution is an Equal Opportunity Provider."	The SFA will submit their December menu that includes the shortened non-discrimination statement.	
1000 - Local School Wellness Policy	V-1000	The Local Wellness policy provided does not have a date when it was developed/reviewed by the School Board although the Pastor stated it was completed last year. The school does not have a wellness committee made up of a variety of stakeholders, i.e. administration, school board, PE teacher, Foodservice representative, parent, student, community member, and health professional if applicable who meets at least annually. Both the policy and the policy goals need to be reviewed at minimum every 3 years. The school has not fully assessed the policy goals. Neither the policy nor the assessment of its goals have been made public. This is a repeat violation from the last Administrative Review.	1). The school will submit a list of participants that they plan to include in their wellness committee and an invitation to a wellness meeting, listing the date of that meeting and an outline of topics that will be covered. 2). The school will state what month in SY2018-19 they intend to have the school board approve the current policy. 3). Finally, the school will state how and when they intend to make both the policy and the assessment available to the public.	
1200 - Professional Standards	V-1200	The FSD is new to the National School Lunch Program and did not meet the hiring requirements. She did not complete all of the training topics assigned by the State Agency as a new director. She has not yet completed her required 12 training hours in SY2018-19 and is unsure of program requirements.	The FSD will submit certificates of completion for the following tutorials: Determining Eligibility, Food Buying Guide, Offer vs. Serve, Food Safety, Standardized Recipes, Iowa USDA Foods, Meal Counting. Tutorials can be found at https://educateiowa.gov/pk-12/nutrition-programs/iowa-school-meal-programs-web-based-tutorials-webcast .	
1200 - Professional Standards	V-1200	Training is not currently being tracked and no one in the school has taken responsibility to track staff training.	The SFA will state who will be in charge of tracking all staff member's professional standards training each year. The SFA will complete the tracking tool of their choosing (from one of the two templates provided by the State Agency) listing all training completed and will submit it to the State Agency.	
1200 - Professional Standards	V-1200	Neither the Authorized Representative/Principal nor the Business Manager/kitchen helper has met their 4 hours of Professional Standards training this year. The Business Manager serves as the Determining Official, but has not been trained on Determining Eligibility. Both of these staff members are new to the Nutrition Program and need training to better understand the requirements.	The SFA will submit certificates of completion or sign-in sheets showing that they have completed 4 hours professional standards training. Part of this training needs to include civil rights. Other training should be applicable to their job responsibilities.	

Site - Level Findings: Zion-St John Lutheran School (8203)

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400 - Meal Components and Quantities - Lunch	V-0400	The review week menu and day of review menu did not meet meal pattern requirements in the following ways: 1. Not all grains served were whole-grain rich. 2. Inadequate fruit was offered 1 day during the review week. 3. Inadequate grains were offered during the review week, with only 1/2 oz. eq. grain offered on 2 days of the review week and only 5.75 oz. eq. grain were offered for the week. Minimum required grains are 8 oz. eq. for the week. Food Production Records (FPR) were not accurate and did not include all foods offered each day. There was 1 single FPR completed for the entire week for the salad bar, even though the FSD did not think the same exact foods were served on the salad bar each day.	1. The FSD will watch the webcast called Food Production Records found at https://educateiowa.edu/vision.tv/default.aspx?q=CT1wecDsedDnculQvbTupA%253d%253d . 2. The SFA will plan and serve one week of menus that are compliant with the meal pattern. For your response, submit the menu for the week served and properly completed FPR showing that all portions offered to students met all meal pattern requirements. The SFA will also need to submit all labels from the food served for the week showing that all grains served were whole-grain rich and all components were met.	
500 - Offer versus Serve	V-0500	The SFA application stated that they were using serve only meal style, but meal observation shows that the FSD is actually using OVS. The SFA requires each student to take the entrée and milk. Students cannot be required to take a particular component, but must be allowed to decline any particular food. The only requirement is that they must take 3 components with 1 being 1/2 cup fruit and/or vegetable.	The 2 kitchen staff will complete the tutorial on Offer vs. serve found at https://educateiowa.gov/pk-12/nutrition-programs/iowa-school-meal-programs-web-based-tutorials-webcast and submit the certificate of completion to the State Agency.	
600 - Dietary Specifications and Nutrient Analysis	V-0600	The SFA is serving 1/2 portions to students and having them come back for more if they want it. Also, they are allowing students to come back for seconds of any food item/component increasing the risk that calorie limits are not being followed for this age group. The daily salad bar includes black olives and cheese which are high in sodium. Salt is present on the serving line for students and staff to use, increasing the risk that sodium requirements are not being met. These are repeat violations from the last Administrative Review.	The SFA will explain how they intend to meet the calorie and sodium requirements for K-8 grade (600-650 calories average/day, < 1,230 mg ave. day). The SFAs response should include what portions they will serve all students the first time through the line; what, if any, seconds will be allowed; if salt will be offered to students; and how often, if at all, cheese, olives and other high sodium foods will be offered. OR, If the SFA prefers, they may provide the State Agency with a menu certification worksheet simplified nutrient assessment showing that calorie, saturated fat and sodium levels for 1 week of planned menus are all within required ranges.	
1400 - Food Safety	V-1400	The latest health inspection has not been posted in a public place as required. This is a repeat violation from the last Administrative Review.	Please state where you have posted the most recent health inspection.	

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1400 - Food Safety	V-1400	Students are allowed to dump their garbage and dirty plates in the kitchen where food is being served. The kitchen staff was noted emptying dirty plates and then helping to serve food without washing her hands in between.	Both the FSD and the kitchen helper will complete the tutorial on food safety and submit their certificates to the State Agency. The tutorial can be found at https://educateiowa.gov/pk-12/nutrition-programs/iowa-school-meal-programs-web-based-tutorials-webcast .	
1400 - Food Safety	V-1400	No food temperatures are being taken presently. Food storage temperatures are being taken periodically, but not daily. These are repeat violations from the last Administrative Review.	The SFA will keep food temperatures for all hot/cold foods served for 2 weeks and submit records showing that this is being done. Also, the SFA will record food storage temps daily for all refrigerators, milk cooler and freezers and submit 2 weeks of records showing that this is being done.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	105 How long does the application's approval take from the date the SFA receives the application from the household?	All free/reduced applications need to be determined within 10 operating days.
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	Make sure to include all income reported when determining income eligibility. Enter "received by" date on each application when the SFA gets it. If multiple income frequencies are provided by the household, determine the application based on annual income. If one income frequency is given, determine the application based on the frequency listed. For example, if only monthly income is reported, determine the application based on the monthly income frequency.
100 - Certification and Benefit Issuance	133 Were all direct certifications (SNAP, TANF, FDIPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified?	DHS Free Lunch Letters need to be signed and dated by the parent/guardian. This was discussed with the SFA at the last Administrative Review. Also, strongly encouraged the Determining official to utilize E-Lookup to find students who might qualify for F/R benefits without having to complete an income application. The Authorized Rep. needs to complete and submit Download form NSLP002 to the address on the form for the school to have access to this.
700 - Resource Management		Much technical assistance was given to the FSD to help develop the SFAs SY2018-19 Procurement plan. We also discussed how to properly procure small purchases and micropurchases following USDA regulations. Procurement templates can be located on IowaCNP under Download forms. The FSD may wish to keep a micropurchase log to help track micropurchases.
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?	Non-creditable foods are not allowed to be purchased with Child Nutrition dollars. Examples of non-creditable foods are enriched grains, coffee, etc. Recommend both the FSD and the business manager check invoices/receipts for non-compliant foods and charge them to the general fund.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The link listed below for the USDA complaint process/form was sent to the Authorized Rep. If parents wish to file a

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		complaint about the child nutrition program, this is the process that should be used: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
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 resources were e-mailed to the Principal. The wellness policy provided is not dated and has not yet been reviewed by the school board. Both of these need to happen. Recommend taking a second look at the most recent policy developed to determine if the items listed in the policy are realistic and occurring in this school.
1200 - Professional Standards	1214 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.	Professional Standards website/resources were e-mailed to the FSD, Office Manager and Principal so they are aware of multiple topics/ways to obtain training throughout the year.
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.)	Two different training tracker templates were sent to the FSD, Office Manager and Principal. One person in the school needs to be responsible to keep the tracker current and ensure that all staff involved in the NSLP have met their training requirements each year.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Recommend reading through the HACCP manual to make sure that you are following the Standard Operating Procedures (SOPs) included. Train kitchen helpers to follow SOPs at least annually. If SOPs included do not apply to this SFA, take them out of the manual. Similarly, include in the manual the temperature sheets that you are using, making sure they include all needed information based on the SOPs discussing food/food storage temperature.
1500 - Reporting and Recordkeeping	1501 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	Discussed with the staff that all records pertaining to school foodservice must be kept for 3 years + the current year. The only exception to this is temperature records that only need to be kept for 6 months. Also, staff needs to keep applications, verification, financial records, etc. on file for 3 years + the current year. Technical assistance given to the SFA to complete and submit the verification report by Dec. 3, 2018 and site enrollment is due now as well.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	The SFA has a copy of the summer meals hotline flier. This, or something similar, needs to be sent out to households each spring to inform families where they can access free summer meals across the state. Other fliers that can be sent home can be found on IowaCNP Download Forms, SFSPTMPL007_NSLP or SFSPTMPL009_NSLP.

Site - Level Technical Assistance Zion-St John Lutheran School (8203)

Area	Question	Comments
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?	Much technical assistance was given to the FSD prior to meal service on the day of review so that all components in their minimum quantities were served. The bun served was not WGR, but it did credit as a grain component.
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Much technical assistance was given to the FSD in completing food production records (FPR) properly, meal pattern and portion sizes. A K-8 meal pattern is used, which allows 600-650 calories on average daily per

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		student. Serving seconds provides excess calories which increases risk of non-compliance. Also, the SFA may not serve students 1/2 portions and make them come back for more if they are still hungry. Students must be served a full portion the first time through the line. A FPR needs to be completed for both the hot meal and the salad bar for each day a meal is served. FPR need to list the portions actually served to the students, amounts left-over, etc. An example of a fully completed FPR was e-mailed to the FSD for her reference.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Technical Assistance was given to nutrition staff regarding rules for using offer vs. serve (OVS). The State Agency also e-mailed the FSD and Office Manager the OVS manual. The State Agency will change the SFAs application to show that they are using OVS instead of Serve Only at lunch.
1300 - Water	1300 Is free potable water available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)?	There is a working water fountain in the gym close to the cafeteria, but students are all required to take milk at lunch. Recommend placing a pitcher of water with cups on the serving line so that students know that free water is available to them. Providing free water to students at meals is a requirement of the program.
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	Students should not be allowed to dump their garbage and unload their dirty plates near the meal service line (2013 FDA Food Code 2-103.11(B) unnecessary people in the food prep areas). Instead a cart/garbage should be set up away from the "clean"/serving area for dirty dish disposal. Also, kitchen staff need to wash their hands with soap and water in between cleaing dirty dishes and serving food (Food Code 2-301.14 (E & F)- When to Wash)..
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Food temperatures need to be taken daily with all hot/cold food items served. These can be written on the food production records. Food storage temperatures should also be recorded daily for all coolers and freezers.
1400 - Food Safety	1411 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	The SFA needs to keep an Exception Log listing items they have accepted that are non-domestic. Examples of non-domestic foods found in storage include mandarin oranges, bananas, pineapple, tuna, black olives. The exception log needs to list the date that the non-domestic item was accepted, item name/description, and the reason it was accepted. Two reasons are valid for accepting non-domestic foods, i.e. 1). food is not available in the US or not available in adequate quantities in the US OR 2). the domestic product is significantly higher priced than the non-domestic product.

Org - Level Commendations

Description

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Ethnic/Racial information was collected and the summary form was completed and on file.
Menu errors were not repeat violations and all components were served daily so fiscal action is less than the \$600 USDA disregard meaning that no claim adjustment will need to be made for this review.
Resource Management: The foodservice account appears to have a positive balance so that meal prices did not need to be raised this year. A comprehensive of the schools finances was not needed based on the information given. The school had completed their financial report prior to the on-site review.
The denied application was determined correctly. The household was notified in writing as required. Approved applications all had a social security number and parent signature.
The FSD did attend the 3 hour regional procurement training and the 2 hour Administrative Review training offered this fall.
The school has a HACCP plan. They are checking food storage temperatures. The dry storage areas are clean and organized with many foods stored in covered, labeled tubs.
The SFA has a meal charge policy which is communicated to households in the student handbook.
The SFA provides students and staff with a vegetable bar which utilizes fresh vegetables from several subgroups.
There is no pop machine in the building and food sales are limited to extra milk offered at lunch and snacks. Snack milk is paid for by families.

Site - Level Commendations Zion-St John Lutheran School (8203)

Description
3 types of milk are being offered which exceeds the requirements.
Pre-school meals are served family style, but students eat in the cafeteria with the older students (co-mingled). The SFA correctly follows the NSLP meal pattern with pre-school meals. Family style meal service seems to be done correctly.
Teachers mark student names into a binder during meal time if the student takes a hot lunch meal. Foodservice staff ensure a reimbursable meal has been taken by each student. After lunch is over, the FSD enters student names into JMC for an accurate meal count each day. The Point of Sale (POS) counts for the day of review seemed accurate. October (review month) counts seemed appropriate and matched the claim. Student eligibility status is kept confidential. No discrimination was observed.
The And Justice for All Poster was posted in a public place.
The FSD uses standardized recipes. She had labels for all foods served to support the meal components. She uses many USDA Food items and in SY2017-18 she used 96% of her allotted USDA Foods Entitlement.
There is signage posted at the beginning of the serving line showing students what they need to take to make a reimbursable meal. The monthly menu is posted as well.