

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
CEDAR RAPIDS SCHOOLS zz (10530000)
December 10-13, 2018

Program Year: 2019
Month of Review: October
Lead Reviewer: Sandra Fiegen
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming	V-0300	Students have the ability to see meal account personal information and balances on some computer screens at the point of service.	When the cashier's computer screens can be seen by students and other customers, financial information must be protected from view. In your corrective action response, please indicate how you will modify the screen view information so that students and other adults cannot see it.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	According to the SFAs Nonprogram Revenue calculation on the financial report on IowaCNP, revenue was insufficient. The percentage of revenue for nonprogram foods must be equal to or greater than the percentage of food costs for nonprogram foods.	For your response, complete and attach the USDA Nonprogram Revenue tool. If revenue is still determined to be insufficient, also indicate your plan to increase revenue for nonprogram sales and/or decrease costs of nonprogram foods.	

Site - Level Findings: Roosevelt Middle School (0227)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Garfield Elementary School (0463)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Cedar Rapids (HSAP) (0509)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Truman Elementary School (0589)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	132 Does the direct certification list utilized by the SFA:	Encouraged learning about Headstart eligibility and looking for that designation on submitted applications. Headstart participation does not need to be in a district operated site, and the HACAP Headstart operations include many local sites.
200 - Verification	212 Did the SFA meet the follow-up requirements if the household failed to respond to the request for verification?	Encouraged noting date in summary or on other information that second notice letter was sent, or when email or phone contact was attempted. Also, if verification notice indicates that a family will lose benefits starting at a certain day, follow through on the information indicated. If other information needs to be added, such as when second notices will happen, add that to the letter.
300 - Meal Counting and Claiming	308 Have alternate points of service been approved by the SA?	Be sure that the mobile lines are indicated as reimbursable lines whether they are in operation in the cafeteria or in a hallway or as a kiosk.
700 - Resource Management		<p>PROCUREMENT: When either small or formal procurement methods are used to purchase any agricultural commodity including a la carte beverages, include the Buy American provision in the solicitation document.</p> <p>Include all required federal terms and conditions when using small and formal procurement methods. The federal terms and conditions to include are based on the dollar value of the procurement. For procurement events with an estimated dollar value exceeding \$100,000 include the Byrd Anti-Lobbying Amendment requirement. Refer to small purchase and RFP templates on IA_CNP. A checklist of the federal terms and conditions provided.</p> <p>Last school year, food service preventive maintenance and repair was charged directly to the school nutrition funds. The Food and Nutrition Manager is well aware these will be an indirect costs to the school nutrition funds. The Bureau of Nutrition and Health Services is seeking further clarification from School Finance. Information will be shared with School Food Authorities (SFAs) as it becomes available.</p> <p>To ensure compliance with Buy American provision, include language in solicitation documents on the consideration of an alternative domestic product before accepting a non-domestic product. Inform vendors on the requirement for SFAs to document the acceptability of a non-domestic commodity. There are two exceptions when SFAs can purchase non-domestic foods - 1) when competitive reveals the cost of the domestic food is significantly higher than the non-domestic product or 2) the domestic food is not produced or manufactured in a sufficient and a reasonable available quantities of a satisfactory quality.</p> <p>Maintain an exception log with justifiable documentation when a non-domestic commodity is accepted. A template can be found in the Institute of Child Nutrition -Buy American - U.S. Agriculture Supporting Healthy School Meals Handbook, 2018- Lesson 2-3.</p>

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		<p>The Prime Vendor solicitation identified "tuna" as an exception to meeting Buy American Provision. Tuna is available in the U.S. in sufficient quantities and therefore should not be an exception.</p> <p>The public notification has the following statement: "By virtue of statutory authority, preference will be given to products and provisions grown and coal-produced within the State of Iowa." Geographic preference for Child Nutrition Programs is only allowed for unprocessed or minimally processed agriculture commodities.</p>
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?	USDA commodity allocation levels for the previous school year are separated into regular planned assistance (PAL), Department of Defense allocations, and Diverted foods. Because of changes in the diverted foods levels and items, the overall PAL amounts were underutilized; In the current year, the levels of each USDA allotment area are being more closely tracked and usage is on track to fully utilize the district's allocation.
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?	Regulation states that assessment of the wellness policy must be completed at the individual building level. District has an assessment in place, but building specific information is not easily accessible. SA encouraged SFA to include a contact link for building specific assessment information, and this was completed prior to review completion.

Site - Level Technical Assistance Roosevelt Middle School (0227)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	317 a. Based on meal observation, does the meal counting system as implemented prevent overt identification of students receiving free and reduced price benefits?	Lunch meals at this middle school begin at 10:30. Breakfast meal service ends only two hours prior to the time that lunch service starts. When students eat lunch at 10:30, they may not be hungry yet for lunch, and the amount of time yet in school for the afternoon is unusually long before they have another opportunity to eat a snack or meal. This can contribute to poor eating habits. It is recommended that the schedules be adjusted so that a more normal spacing of mealtimes occurs.
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	Signage must be posted at the beginning of the serving line instead of behind the serving line where it is difficult to read.
600 - Dietary Specifications and Nutrient Analysis	605 Based on the Nutrient Analysis, did the school meet the Dietary Specifications (Calories, Saturated Fat, Sodium, and Trans Fat) for the appropriate age/grade group being served?	Technical assistance was provided on monitoring condiments. Due to available space and time to go through the serving line, condiment usage is completely unmonitored and uncontrolled. After discussion, it was determined that the best solution would be to place Ranch dressing on the serving line and leave all other condiments where they are currently.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The food safety inspection report is not posted in a publicly visible location and needs to be moved.

Site - Level Technical Assistance Garfield Elementary School (0463)

Area	Question	Comments
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1900 - Fresh Fruit and Vegetable Program (FFVP)	1910 Did the FFVP meal service follow HACCP principles and applicable sanitation and health standards, including the handling of any left overs?	Sanitation methods were discussed while onsite. The tubs used to transport food snacks to the classrooms are wiped out or sprayed with quaternary sanitizer frequently. The SOP was found in resources. It is recommended that all FFVP schools plan regular reminders about food safe processes, and share the SOP template after it is adapted to meet the specific steps that happen at each school.
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Site - Level Technical Assistance Truman Elementary School (0589)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	317 a. Based on meal observation, does the meal counting system as implemented prevent overt identification of students receiving free and reduced price benefits?	Students should make some type of exchange at the POS when they are receiving their meal. While most students did stop and tell the cashier their names, there were a significant number of students who did not make an exchange at the POS. Cashier should make sure that all students say their name at the POS and students should be reminded that that is the expectation.

Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE: Of the sample of 590 application and benefit issuances reviewed, there were no discrepancies or errors. Benefit documents, as well as all paperwork, were very well organized. The administrative staff who are responsible for benefit issuance and maintenance of information are very thorough and complete. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. All applications were correctly determined, signed and dated by the household member and the SFA, were complete with SSN's and case numbers, and all applications were determined within ten days. The correct and current benefit issuance list and Direct Certification information was available and is maintained on file.</p>
<p>BREAKFAST: Grab and Go breakfast and second chance breakfast options have been added in some buildings to encourage students to participate. Procedures to ensure that reimbursable breakfasts are selected are in place, and the initiative has increased breakfasts in the buildings where it is implemented.</p>
<p>CEP PARTICIPATION: Community Eligibility Provisional Claiming (CEP) is available to sites that have a minimum of 40% of students identified through direct certification methods as eligible for meals at no charge. Districts can elect to group school buildings together to create a higher percentage overall of students eligible. In this district, additional sites were added to the grouping and thus more students are able to participate at no cost, in breakfast and lunch meals. Correspondingly, participation in breakfast and lunch meals has increased, and this benefits families of the district. The district is to be commended in expanding the access to CEP claiming and in providing this additional benefit status to their families.</p>
<p>CIVIL RIGHTS: The And Justice for All civil rights poster was posted in observed cafeterias in locations where participants can read information on the poster. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided food service staff and documented. The district has taken exceptional 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. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. The current state and federal non-discrimination statements are included on appropriate materials, including the SFAs website.</p>
<p>COMPETITIVE FOODS: Nutrition calculator printouts are on file for all a la carte foods and beverages and vending machine items sold. All competitive foods sold during the on-site review meet the Smart Snack requirements. Administration at each site is informed of the Smart Snack regulations to ensure that fundraisers that take place during the school day are Smart Snack approved.</p>
<p>FOOD SAFETY: The district HACCP plan is regularly reviewed and modified, and all site personnel are trained on HACCP in an ongoing basis. Each site completes training with their staff through 'SOP Tuesdays', a chance to discuss a particular food safety process and the procedures contained in one SOP. The administrative management team chooses the SOP to review through suggestions of the site staff when available.</p>
<p>FRESH FRUIT AND VEGETABLE PROGRAM: The district administrative office assists individual school sites (who are eligible to participate) in completing the annual application to participate and then requires schools selected to complete an internal contract/promise of conducting administrative operations within their site. They provide training to the schools selected, and allow the schools to choose the vendor in</p>

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appropriate methods. They monitor activities and provide technical assistance. Several resources used in setting up the relationship with each site were shared as part of this review, and the SA appreciates use of the items.

MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count documentation maintained at the central office for the month of October were accurate and complete. Point of Service (POS) counts and filed claims appear accurate. Meal Magic is used as the school's POS system. There was a POS count for all students observed, and 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 were on file at the schools visited for all meals claimed for reimbursement for the review period. Cashiers are trained annually. Substitute cashiers complete cashier work at least once per month as additional ongoing training, and daily edit checks are performed.

MEAL REQUIREMENTS & COMPONENTS: The central administrative staff does a superior job of meal planning, and offering multiple choices each day at all grade levels and buildings. More than the minimum amount of fruits and vegetables are offered each day, and fresh items are regularly menued. Student preference and acceptability are considered when planning, and students are encouraged to try the food items offered. Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building observed. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. All requested CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels for items used for producing meals were on file, and information was very thorough and complete. Onsite preparation ensure that food items are of highest quality, and the aromas in the building can also encourage students to participate.

ON-SITE MONITORING: On-site monitoring forms were completed for all sites in the district for lunch during the last school year and is already in process for schools for the current school year.

PROCUREMENT: Food and Nutrition (FN) Manager, Child Nutrition (CN) Resource Management and Compliance Specialist, and Food and Nutrition Supervisor attended the State Agency's Regional Procurement Training in Cedar Rapids. The leadership of the Food and Nutrition Manager and the district's procurement department has benefited a number of small districts who otherwise do not have the knowledge and the skills to conduct proper procurement. The Group Buying Organization (GBO) -Eastern Iowa Purchasing Group started by the CRCSO Food and Nutrition Department for the purpose of joint procurement has grown to thirty (30) School Food Authorities (SFAs). All thirty SFAs jointly procure food, supplies, warehousing, and distribution services. In addition, SFAs in the Cedar Rapids/Marion, as well as Muscatine and Dubuque CSD jointly procure dairy, bread, chemicals, and laundry services. The CRCSO Food and Nutrition written procurement plan for SY 2018-2019 was completed. The small purchase threshold was correctly determined. Procurement events were identified as well as the estimated value of the procurement and the procurement method to be used. Cost analysis is completed at time of contract renewal. To review compliance with procurement requirements, three vendors were selected to review micro-purchase method. Micro-purchases are limited to special diets and occasional replacement of small wares such as dippers, trays, etc. A review of invoices showed prices were reasonable. Efforts are made to spread the wealth equitably. Small purchase method is used in the procurement of fresh produce for the Fresh Fruit and Vegetable Program (FFVP). Each elementary school awarded the FFVP grant dollars is responsible for conducting procurement of fresh produce for the program. The Fruit and Nutrition Department developed a vendor contract template that is used by the FFVP contact at the elementary school awarded the FFVP grant to procure fresh produce from vendors. The FN Manager and staff provide guidance as necessary and ensure compliance with program requirements, as well as file the claims with reimbursement. The vendor contract for Garfield Elementary was reviewed. Request for price and delivery was sent to three vendors. The correct vendor was selected. Review of invoices showed the school was billed as per contract agreement. A majority of the Food and Nutrition Department purchases - foods, supplies, equipment, dairy, bread, chemicals, and beverages for a la carte are procured using the formal procurement method by issuing Request for Proposals (RFP). The Prime Vendor for food, Equipment purchase, and beverages for vending contracts were reviewed. A public notification is sent to major circulating newspaper(s) for all formal procurement events. A copy of the printed advertisement is retained. Specifications allowed for an "equal" product to be submitted for brand name products. An evaluation criteria is include in all RFPs with price weighted as the primary factor. All RFP documents reviewed state clearly that the contract will be awarded to the most responsive and responsible vendor whose proposal is most advantageous to the program. Contractual and administrative requirements are clearly stated in the solicitation. The solicitation allows for fairness and transparency. All contracts are monitored prior to payment to ensure contractors meet the terms and conditions. A review of selected SFA/vendor documents show detailed and sufficient procurement records are retained.

PROFESSIONAL STANDARDS: Training hours are tracked for all staff with school nutrition responsibilities. Civil rights training was provided to all staff with school nutrition program responsibilities. Documentation is on file for all training received. Full and part time school nutrition employees have received the required number of training hours for the school year. Substitute employees received civil rights training and training applicable to their job responsibilities. Non-food service employees received civil rights training and training based on the school nutrition program responsibilities.

SCHOOL WELLNESS POLICY: The wellness policy contains all of the required elements and has been updated in the past 3 years as required. The wellness policy and assessment are made available to members of the public as they are both posted on the district's website. The district has a wellness page on their website, thus making it easier for the public to find all wellness documents in one location. The general public is invited to participate in the wellness committee as meeting information is posted on the districts website, community newsletter and social media sites. The SFA has a detailed school wellness action plan that details the goals that are currently being implemented or will be implemented.

VERIFICATION:The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification. The SFA had at least one person attend training.

Site - Level Commendations Roosevelt Middle School (0227)

Description

Food service staff at Roosevelt MS provide approximately 200 breakfasts and 525 lunches per day. Each staff member was aware of his or her responsibilities and carried them out efficiently. It was evident that staff and students respect each other and interact respectfully. Cashiers were well-trained on Offer vs Serve; even grab-and-go breakfast bags were carefully inspected to ensure that the students had a reimbursable meal. The Point of Service, POS, was correctly operated. Even though the site is a CEP building, there was a definite POS for each student, and it was evident that students were used to stopping at the POS.

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Site - Level Commendations Garfield Elementary School (0463)

Description
FFVP is publicized approximately 1-2 times per year in newsletter communication with parents, and several tweets and Facebook postings about the FFVP also occur at regular times throughout the year.
Food production records were available and correctly completed. Food Safety monitoring logs are completed each day, and maintained on site. The Food safety HACCP SOP's and plan were available for all foodservice staff to reference.
Food service staff at Garfield Elementary provide just over 200 lunches on average and 145 breakfasts per day. Each staff member was aware of her responsibilities and carried them out efficiently, and with a positive demeanor. It was evident that staff and students enjoy each other and interact respectfully. Cashiers were well-trained on Offer vs Serve, and one student was sent back to the service area to choose a fruit or vegetable serving. The Point of Service, POS, was correctly operated. Even though the site is a CEP building, there was a definite POS for each student, and it was evident that students were used to stopping at the cashier to show their meal to her. The cashier would thank them for stopping and direct them that they could go. She was careful in completing the count information, and had appropriate personal encouragements to say to each child.
The Fresh Fruit and Vegetable Program snack service was observed, and the classroom teacher encouraged the students to taste the snack. She and the students discussed the snack, and students added information about their experiences with the item. The teacher allowed adequate time for the students to finish, approached it as a learning experience, and all students participated.

Site - Level Commendations Cedar Rapids (HSAP) (0509)

Description
All required signage, food production records, food safety monitoring logs and other recordkeeping was neatly completed and available as directed. The foodservice staff mentioned how they appreciate 'SOP Tuesdays', a 15-20 minute time period to review one foodsafety SOP each week.
Several adults were assisting students to choose a reimbursable meal, and to have information available for the cashier. The Home School children attend the building only one day per week, so familiarity with the lunchroom routine is not as established as with other children. The staff was very patient and accommodating, and all children had a reimbursable meal.

Site - Level Commendations Truman Elementary School (0589)

Description
Staff at Truman Elementary provide approximately 68 breakfasts and 200 lunches per day to their students. Interaction between staff and students was extremely positive. Staff clearly care about their students and went out of their way to interact with students. All site staff carried out their duties efficiently and correctly. Cashier was well-trained on Offer vs Serve and all students had a reimbursable meal. Proper food safety procedures were observed on site and all required signage was posted as required.