

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Catholic Schools of Sioux City (60398005)
On-Site Review Dates: November 26-29, 2019

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The household notification letter that the SFA is using is generated from their own software system and has not been approved by the State Agency as required.	The SFA will state its intentions to submit their household notification letter to the State Agency prior to using it for SY2019-20. The intended letter must be sent to Deb.Linderblood@iowa.gov along with completed Download Form NSLP022 during the summer of 2019.	
100 - Certification and Benefit Issuance	V-0100	Out of 83 students reviewed, there were 7 benefit issuance errors found. This was an error rate of 8.43%. In addition, the State Agency also found one denied application error.	Based on the error rate over 8% the SFA will need to complete an Independent Review of Applications for SY2019-20 where a confirmation review/signature will be required for all income applications received. See page 51 in the SY17-18 Eligibility Manual for School Meals for more details on this Review. All application errors were fixed on-site. No further action is needed at this time.	
200 - Verification	V-0200	Neither the determining official nor the verifying official have completed Professional Standards training for determining applications or verifying applications. Verification errors were noted, including no confirming official signature on either of the verified applications, the error prone application was not determined correctly and, therefore, not verified and verified income was not determined correctly.	Both the Determining Official and the Verifying Official will complete the 2 tutorials called Determining Eligibility and Verifying Eligibility. Once the tutorials are complete, the named officials will submit their certificates of completion to the State Agency. Tutorials can be accessed at https://educateiowa.gov/pk-12/nutrition-programs/iowa-school-meal-programs-web-based-tutorials-webcast . Instructions for setting up individual accounts is given on the webpage listed.	
700 - Resource Management	V-0700	(1) Prior to payment, FSMC invoices must be reconciled to ensure all charges are accurate and allowable. The Meal Equivalent rate and Fee Per Meal must be accurate as well as meal counts and a la carte charges. Invoices from SY2018 indicate that the meal equivalent rate was incorrect and invoices from SY2019 indicate that the Fee Per Meal rate is incorrect. Overcharges for SY2019 are \$1300.66. (2) Catering for adult meals and Pre-K does not follow the payment terms indicated in the RFP/Contract, Section	For your response, (1) submit documentation that the overcharges have been repaid and submit a copy of a future invoice to show that the Price Per Meal has been corrected. If the November invoice is incorrect, it must be reconciled prior to payment. (2) The RFP/Contract cannot have conflicting terms in the contract. The SFA must either amend the current agreement or go out and rebid the contract for SY2020. Please indicate which option will be selected. Further, the SFA must immediately begin receiving payment from the FSMC for use of facilities	

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		<p>III.J.(5)(f). The dollar amount of the catering must be divided by the Meal Equivalent Rate and then charged by the Per Meal Rate. There is a conflicting term in the RFP/Contract, Section III.Q.(13) that indicates the catering costs and fees will be segregated and charged separately. The FSMC and SFA have been using the SFA facilities and USDA Foods for catering without any remuneration to the SFA. (3) Student reimbursable meals are subsidized while non-reimbursable meals are not subsidized, therefore, at least the minimum adult meal price as set by the State Agency must be charged for second student lunches. (4) There was a deficit of \$697.23 in crediting for USDA Foods received in SY2017-2018.</p>	<p>for catering and for repayment for use of USDA Foods. Submit one month's charges for catering. (3) Submit one month's invoice that indicates the correct dollar amount is charged for non-reimbursable student meals. (4) Submit documentation that the discrepancy in USDA Foods for last year has been reconciled. Indicate who will ensure that donated food reconciliation will be conducted.</p>	
800 - Civil Rights	V-0800	<p>None of the SFA staff involved in the school meals program has had Civil Rights training, which is required annually.</p>	<p>The Determining Official, Confirming Official, and Director of Finance will complete Civil Rights training and submit documentation showing that it was completed. Documentation can be a sign-in sheet showing date, time in-time out, training used and participating staff signatures. Suggested group training content can be found on IowaCNP, Download Forms NSLP500 or NSLP501.</p>	
900 - SFA On Site Monitoring	V-0900	<p>SFAs that use FSMC services have multiple monitoring responsibilities. Some of those responsibilities include approving all meal and a la carte prices in writing (III.B.(5)(i)), approving all menu changes in writing (III.D.(4)(c)), conducting on-site visits twice a year (III.B.(5)(l))and submitting the monitoring form to the State Agency, and having an advisory board that meets twice a year. (III.D.(1)) Further, the SFA must reconcile all charges on all invoices, reconcile USDA Foods, ensure that federal procurement regulations are followed, etc. Due to a large overturn in SFA and LEA staff, many of the SFAs responsibilities have not been completed.</p>	<p>For your response, review the entire RFP/Contract and determine the oversight responsibilities of the SFA for FSMC activities. Then create a checklist or manual that can be used when staff turnover occurs so that the responsibilities are completed regardless of staffing. Be sure to indicate the tasks/responsibilities and the position of the person who is responsible. Indicate who will be responsible for maintaining the checklist/manual. Other sources of information may be the manual (Contracting with Food Service Management Companies: Guidance for School Food Authorities), and the webinar titled "Oversight and Management of Food Service Management Contracts," on the Iowa DE website.</p>	
1000 - Local School Wellness Policy	V-1000	<p>The SFA does not have an active wellness committee that meets at least annually as their policy states. The committee needs to be made up of Administration, Board member, parent, student, PE teacher, a representative from foodservice, school nurse if applicable and a community member. Also, the SFA has not completed an assessment of their policy goals. This assessment is required at least every 3 years, but the policy states it will be done annually. The assessment needs to be made available to the public.</p>	<p>The SFA will 1).submit to the State Agency an invitation to the members of the wellness committee for the next meeting which will be held during SY2018-19. The invitation needs to include all stakeholders listed in the finding, the date and time of the next meeting, and the agenda that will be discussed. 2).state the month in SY2018-19 that they expect to complete their wellness assessment. 3). state how they will communicate the assessment to households.</p>	
1200 - Professional	V-1200	<p>Both the SFA FSD and the FSMC FSD are new to their positions and neither one met the hiring</p>	<p>1. The FSMC will develop a training plan and timeline for their FSD and submit the plan to the State Agency.</p>	

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Standards		requirements. The SFA has less than 500 students so the State Agency can approve their hiring as long as a training plan is in place for both staff members.	The plan needs to include at least 8 hours food safety training, plus training on the following topics: Meal pattern, Offer Vs. Serve, Food Buying Guide, Food Bars, Food Labels, USDA Foods, Standardized Recipes, Procurement, Smart Snacks. 2. The SFA's FSD will complete the assigned webinars not yet completed: Verification Reporting - Oct 2018 found at https://educateiowa.gov/pk-12/nutrition-programs/school-nutrition/income-eligibility-and-verification , and Management and Oversight of FSMC Contracts found at https://educateiowa.gov/pk-12/nutrition-programs/procurement-child-nutrition-programs/food-service-management-company-fsmc . The SFA's FSD will submit a certificate of completion or a screen shot of each of these webinars to the State Agency.	
1200 - Professional Standards	V-1200	The FSMC staff is tracking their training, but the SFA staff is not. Tracking is required and should be the responsibility of one person to ensure adequate training is done each year.	1). SFA staff (Determining Official, Confirming Official, Director of Finance) involved in the school meals program will enter their Professional Standards training on an appropriate training tracker and submit it to the State Agency. The SFA FSD needs 12 hours training annually, the other 2 staff need 4 hours annually and all training needs to be relevant to the job. 2). The SFA will also state who will be in charge of the tracker for the entire staff (SFA/FSMC) involved in the school meals program.	
1600 - School Breakfast and SFSP Outreach	V-1600	The SFA is required to help promote the summer feeding program in the community/state. No notice of the program was sent out to households last year. This is a repeat problem from 3 years ago as well and needs to be done annually. Promotion materials can be found on IowaCNP Download Forms or obtained from the Sioux City public school district who offers the program.	Please state how and when the SFA intends to send out summer feeding promotion materials to households during SY2018-19 and beyond.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA has not completed a non-program food revenue tool to determine if a la carte revenue covers a la carte costs.	The SFA will complete and submit their non-program food revenue tool to determine if a la carte revenues are covering a la carte costs. If they are not, the SFA will explain how they will generate more revenue to cover these costs.	

Site - Level Findings: Bishop Heelan Catholic High School (8106)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1400 - Food Safety	V-1400	Food and food storage temperatures have not been recorded.	The SFA will submit 2 weeks of food and food storage temperatures to the State Agency. Specifically, you need to submit records for all refrigerators and freezers where food is stored, milk coolers, food temperatures of hot/cold foods served daily and dishmachine temperatures.	

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State Review Summary Report
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	When determining income applications, the SFA needs to use the income frequencies on ICAVES that match the income frequencies given on the application. For example, if the household provides only one income frequency, i.e. monthly, the SFA should use the monthly income frequency tab on ICAVES or on Infinite Campus to determine eligibility. The Annual tab should only be selected if the household reports annual income or multiple income frequencies.
100 - Certification and Benefit Issuance	131 Are any applications denied incorrectly?	When approving/denying applications, the determining official needs to make sure the number of people living in the household that the family lists matches the number of names listed. If not, the SFA should contact the household before determining the household's eligibility. Also, the determining official needs to sign/date all applications processed whether the application is approved or denied.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	The SFA has a local meal charge policy of No charging which is explained in the Student handbook. However, it is not being followed. The SFA should either enforce their stated policy or change it to be more realistic.
700 - Resource Management		Much technical assistance was given to the Director of Finance to develop a SY2018-19 Procurement Plan. This is a required document that needs to be updated annually and kept on file for 3 years + the current year. The SFA has their own conflict of interest policy that meets most of the Code of Conduct requirements for foodservice Procurement. It is missing disciplinary actions, however, that must be added to the policy. Either link an existing policy name/number which describes what disciplinary actions will be taken if the Code is violated or write them into your existing policy. A policy template is also available for use on IowaCNP Download Forms if the SFA would prefer to use that in place of their existing policy.
700 - Resource Management		Regulations for making micropurchases were reviewed with the Director of Finance. Micropurchases are those purchases made without comparing prices and must be under the local micropurchase threshold. These purchases must be spread equitably from at least 3 vendors. Discussed using the Micropurchase log found in IowaCNP Download Forms to help track purchases. LSI can be one vendor, but others must be used as well. All procurement valued at over the local formal purchase threshold (\$9,999) must be made using the formal procurement method. This procurement method was reviewed with the Director of Finance. We also discussed allowable vs. non-allowable costs. For example, equipment purchased that becomes a part of the facility cannot be paid for out of foodservice funds, i.e. permanent shelving, gas connection, wiring, etc.
700 - Resource Management		Technical Assistance was given to the SFA and the FSMC to make sure to utilize at least 95% of their USDA Foods entitlement each year. Last year, due to staff changes and lack of oversight, they used only 85% of their entitlement dollars. This year, almost 100% has been used already. The problem seems to be resolved, but continued oversight will need to occur.

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700 - Resource Management		The SFA may want to consider returning to self-operation and combine all the SFAs in their diocese in the Sioux City area into one single SFA, hire one Food Service Director, FSD, to oversee food service operations in all buildings, and have current individual FSDs act as kitchen managers. The increasing complexity of food service operations to comply with federal regulations make combining SFAs a sensible solution. The SFA may also want to consider claiming Pre-K meals under National School Lunch Program or under Child and Adult Care Program for reimbursement.
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?	SA encourages SFA to reconcile monthly reports of a la carte items from their POS with the invoice from the FSMC. For the three months reviewed for SY18/19 invoiced amounts were fairly accurate, except for the adult meals from September. SFA POS report indicated that there was 1 adult meal purchased, but the FSMC charged for 3 adult meals on the 9/30/18 invoice. A monthly spot check will help insure accuracy for payment.
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	The SFA needs to send the updated public release to the local media annually prior to the beginning of each school year. The media does not have to print it and the SFA is not required to pay for it, but should keep documentation showing that it was sent.
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 SFA should use the procedures included in the USDA complaint guidance e-mailed to the Principal if any parent/student complains about discrimination regarding the National School Lunch Program.
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)?	USDA policy SP31-2014 states that SFAs that purchase capital equipment over \$5000 must get State Agency approval to ensure that it is an allowable cost. All future equipment purchases over \$5000 should be approved by the state agency prior to purchase. The State Agency is working on an approved equipment list. Once that is available, all equipment listed will be allowable without contacting the State Agency.
RMCR - Nonprofit School Food Srvc Acct	13 Did all recorded expenses represent an activity or function recognized as reasonable, necessary, allocable and otherwise compliant with the provisions of 2 CFR 200 Subpart E?	Technical Assistance was provided to the Director of Finance that garbage collection, wiring, pest control, etc. cannot be charged to the foodservice account. Equipment purchases under \$5000 and equipment repair/maintenance are allowable expenses.

Site - Level Technical Assistance Bishop Heelan Catholic High School (8106)

Area	Question	Comments
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	Kiwi-Strawberry Vitamin Water with 120 calories/20 oz serving and Sunchips were available for a la carte sales and did not meet Smart Snacks requirements. The Vitamin Water was pulled and the Sunchips will no longer be ordered per Corporate Staff. All available a la carte items need documentation showing they are smart snacks compliant. Exceptions are milk and entrees sold that day or the day after they were offered on the reimbursable menu.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Food and food storage temperatures need to be recorded at least daily. Many of your temperature sheets require twice daily recordings. Temperature records must be kept for at least 6 months.
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	The SFA should keep a Buy American Exception log on-site and staff should record any non-domestic products received and accepted by the

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Bureau of Nutrition and Health Services
State Review Summary Report
Catholic Schools of Sioux City (60398005)
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	<p>reviewed schools or at off-site storage facilities as applicable?</p>	<p>school. The log should note the date the non-domestic products were accepted, the product name and country of origin and the reason it was accepted. The use of non-domestic products should be limited to those products that are not grown in the US in adequate quantities, i.e. bananas, mandarin oranges, pineapple, etc. OR the domestic product is significantly higher in price. Justification for the most recent price can be found at the Agriculture Marketing Services website https://www.ams.usda.gov/market-news.</p>
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Org - Level Commendations

Description
<p>Benefit documents were organized. The current application form was used, E-Lookup was checked at the beginning of the year and for all new students. Benefits are accurately transferred in a timely manner to the POS system. Free meals are extended to all members in the household. Eligibility is kept confidential.</p>
<p>Fiscal action for this review was less than the USDA allowance of \$600 so no claim adjustments will be needed.</p>
<p>FSMC: The SFA and FSMC have a current Fixed-Price contract in place. As required, the SFA retains signature authority over Programs, retains control of the nonprofit school food service account, and files the monthly claim. The sale of all meals and competitive foods accrue to the food service account. USDA Foods usage from last year was reconciled. The SFA has someone named as the Program Director, and she has had required food safety training.</p>
<p>The And Justice for All civil rights poster was posted in the cafeteria. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided to all FSMC staff. Ethnic/racial information is collected and the summary form is completed. No discrimination was observed. The non-discrimination statement is listed on the posted menu.</p>
<p>The district has a current 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. The policy has been reviewed within the last 3 years and is posted on the school's website for public review.</p>
<p>The FSMC does a good job in writing compliant menus that meet the dietary specifications with a lot of menu choices for the students. There are 4-5 entrée options for students to choose from daily. Offer vs. Serve was done correctly and students are able to serve themselves many foods. The SFA has a daily fruit and vegetable bar that is well utilized. CN labels, standardized recipes and Product Formulation Statements were available for all foods served. Free water through a working water fountain in the cafeteria is available as required. The daily menu is posted at the beginning of the serving line and signage on how to make a reimbursable meal is located on both fruit/veggie bars. The SFA also has nutrition education signage in the cafeteria. Students seemed to have sufficient time to eat. Cashiers sent students back who did not have adequate fruits/veggies on their tray to make a reimbursable meal. Various non-sodium seasonings are available for students to use.</p>

Site - Level Commendations Bishop Heelan Catholic High School (8106)

Description
<p>The foodservice staff has met their Professional Standards training requirements for this year. They keep a training tracker which compiles the training they have done. The Director of Finance did attend the Regional Procurement Training and the Administrative Review training offered earlier this fall to better learn the program requirements and prepare for this review.</p>
<p>The SFA has a written Food Safety plan that includes the required elements. The latest Health Inspection Report was posted in a publicly visible location. Foodservice staff are given training throughout the year on food safety topics</p>