### **Bureau of Nutrition and Health Services**

### **State Review Summary Report**

## Schaller-Crestland Comm School District (58230000)

SNP - Review ID: 5066

Program Year: 2019

Month of Review: September

Lead Reviewer: Brenda Windmuller

Org Representative(s): Jesse Barnett

## **Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Multiple errors were found on application to include processing applications at the wrong benefit level and incomplete information on the application.	SFA will describe the process which they will follow to ensure that all applications are complete and processed correctly.	
100 - Certification and Benefit Issuance	V-0100	than the original list from July 2018.	The SFA will state their process to download the DC list each time that it becomes available and how and where the these lists being saved.	
200 - Verification	V-0200		1. Verifying Official and Confirming Official will watch the Verification webinar. Submit the date completed. 2. SFA will complete the Verification calculator. 3. SFA will Conduct verification based on the results of the calculator. 4. SFA will submit completed Verification Report.	
700 - Resource Management	V-0700	Procurement: The SFA was required to complete the Off-Site Procurement Tool, Procurement Plan and Code of Conduct for the 2018/2019 Administrative Review. These items were not completed for the review.	The SFA will 1. Complete and submit the Off-Site Procurement Tool. 2. Complete and submit the Procurement Plan for 2018/2019. 3. Complete and submit the Code of Conduct to include the disciplinary action. (If SFA references School Board policy for the disciplinary action, attach the board policy as well.)	
800 - Civil Rights	V-0800	Ethnic/Racial data had not been collected for 2018/2019.	SFA will complete the provided Ethnic/Racial form for 2018/2019 and submit.	

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1200 - Professional Standards		met when selecting a new FSD. The FSD has been placed on a training plan to strengthen his knowledge of areas specific to the NSLP.	Food Service Director will complete one hour of training in meal patterns, one hour of training in menu planning and one hour of training on Offer vs Serve. SFA will submit certificates of completion or submit the date each training was completed.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	•	The SFA will complete and submit the Non-Program Revenue Tool.	

# Site - Level Findings: Ridge View Middle School (0209)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch		students had a reimbursable meal. On	SFA will submit the planned dates for staff to receive OvS training.     SFA will explain their process to ensure that all students have a reimbursable meal.	
900 - SFA On Site Monitoring	V-0900		The SFA will complete the On-site monitoring form for 2018-2019 and submit it.	

## **Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance		Four individuals were given benefits at the wrong level. (3 students free, processed as reduced, 1 student reduced, processed as free.) Twelve applications were incomplete due to no social security number. One application was not signed and dated by the SFA. One application was missing the frequency the parent was paid. TA was given to write the received date on applications, all applications must be processed within 10 days of receiving, DC lists must be downloaded every two weeks (or as available) and copies should be kept on file.  It is also advised to work with the neighboring district to ensure that adequate information is kept on file for students sharing a household with the other district.
100 - Certification and Benefit Issuance	134 Does the SFA perform Direct Certification matches according to the required timeframes?	The SFA must retrieve the Direct Certification every two weeks (or as uploaded) and make necessary adjustments

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		to benefits in the POS. SFA only has one DC list on file, from the beginning of the school year. TA was given to keep these records on file.
200 - Verification	207 a. Did the SFA complete verification?	VERIFICATION: The SFA is required to complete the verification process by November 15th each year. The Verification Report must be submitted to the SA by mid December each year. The process had not been started as of the on-site review (December 11, 2018). SFA representatives should watch the SA's Verification webinars and read the eligibility manual for instructions. SA sent a link to webinars and eligibility manual.
700 - Resource Management		Procurement: SFA does not have a completed procurement plan on file or the Code of Conduct with disciplinary action. The Off-Site Procurement Tool was not completed prior to the AR. Several Hy-Vee receipts simply say "produce", receipts should be itemized. Cleaning products were purchased from Janitors Closet when the SFA has a contract with AEA Purchasing for ware washing items.
		Procurement Plan and Code of Conduct must be completed annually.
		Must have signed debarment certifications kept on file.
		Include Buy American Clause in all Small and Formal Purchase agreements.
		Agreements valued at \$10,000 or more should have an exit clause.
		A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.
		A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.

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	Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?
	SFA should keep on file:
	☐ All price adjustments throughout the year
	□ All invoices
	☐ All contracts and agreements
	□ All bids solicited
	☐ Documentation that a vendor did not reply to bid (if applicable)
	□ Documentation of why you selected a specific vendor (Selection Rubrics)
	□ Copies of bid solicitation
	□ Debarment statements
	□ CD provided by the AEA (if applicable)
	Three types of purchases, (Federal Thresholds):
	<b>Micro-purchase</b> - under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.
	☐ Track micro purchases, what purchased when and dollar amount.
	□ Purchases should be distributed around community, not just one store.
	<b>Small Purchases</b> - Purchases that are <b>under \$250,000</b> (or local purchasing threshold if more restrictive), can be made

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		by requesting a quotation (3 bids and a buy) which is an informal method.  Include all terms and conditions  Include terms: Buy American and Equal Opportunity  Include Termination for Cause and Convenience if \$10,000 or more  Attain Signed Debarment Statements  Awarded on lowest price (unless written documentation to justify)  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.  Notice of accepting all types of formal purchase must be advertised.  Include all requirements of a small purchase  If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.  Everything must be in writing.
700 - Resource Management	711 If the SFA charged for adult meals, were the meal prices sufficient to cover the overall cost of the meals in compliance with FNS Instruction 782-5, Rev. 1?	The Non-Program Revenue Tool was not completed. All non-program sales to include a la caret, fund raisers, catering and vended meals (meals to day care) are required to be priced at a level which covers all of the expenses.
1100 - Smart Snacks	1101 What is the SFA's process for determining compliance with non-packaged or recipe food items (combination foods that do not have a label)?	SFA should run Smart Snacks Calculations on all a la carte items sold. Maintain a copy of those calculations to document compliance. Run new calculations annually as companies sometimes change product or formulations. A link to the Smart Snacks Calculator was sent to SFA and SA showed manager how to use and showed manager how to use the calculator.

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1200 - Professional Standards	1212 a. After review of documentation, did the SFA hire any new directors on or after July 1, 2015?	SFA hired a new FSD in April 2017 who did not meet the minimum qualifications as outlined by the USDA. The SA developed a training plan for the FSD, which was not completed. The SFA has been provided a copy of the Professional Standards documentation which includes hiring standards as well as annual training requirements. The FSD should complete 12 hours of training annually, managers 10 hours, full-time staff 6 hours and part-time staff 4 hours. Annual training should include Civil Rights Training. All individuals working with the School Lunch Program including the secretaries processing applications must complete annual training. The SFA should track and monitor individual training. A tracking tool was provided by the SA.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The HACCP plan is missing the bloodborne pathogen and body fluid clean up SOPs. They have a procedure hanging on the wall that should be included in the HACCP binder.
1500 - Reporting and Recordkeeping	1500 Are reports submitted to the State Agency as required?	All required reporting to the SA must be completed in a timely manner. TA was shown where to find the calendar of deadlines. The area consultant also sends weekly emails with reminders of upcoming deadlines. Emails with deadlines and checklists were provided to the SFA in preparation for the AR. Documentation was not submitted to the SA in preparation for the AR in a timely manner and reports have not been submitted to the state as required. The SFA must make an effort to follow these deadlines for both the Administrative Review as well as regular monthly and annual reporting.

### Site - Level Technical Assistance Ridge View Middle School (0209)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	Six students were observed going through the line and directly to a table to eat without going through the Cashier. All students must pass by the Cashier to pay for their meal and so that the tray can be checked to ensure that it is a reimbursable meal.
300 - Meal Counting and Claiming - Lunch		PowerSchool is providing two different results on numbers on reports. The Daily Meal Count Report and the Meal Count Listing have two different totals. The SFA should contact PowerSchool to see why that is happening.

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400 - Meal Components and Quantities - Breakfast	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	The SFA has cranberry juice cocktail in the cooler (not served the day of review) which only contains 15% fruit juice. This does not count as the 1/2 cup fruit requirement.
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable <b>breakfast</b> to students for all applicable grade groups?	There is no signage specific to breakfast. The daily breakfast menu is not posted for breakfast or lunch. This is especially important as the staff changed the breakfast menu on the day of review from biscuits and gravy to pancakes due to a shortage of gravy supplies. A link to the USDA's posters was provided as well as a breakfast poster from the SA.
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	During the on-site review, ten student meals were observed to be missing 1/2 cup fruit and/or vegetables, making these non-reimbursable meals.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Monthly menus are vague and do not include all sides. Menus should include all of these items for menu planning purposes as well as allowing students to plan ahead. Menus are heavy on starch and missing other subgroups throughout the menu. All vegetable sub-groups are represented on the salad bar. Salad bar items should all be recorded on production records to document offering. SFA should incorporate fruits and more vegetable variety including all sub-groups on the hot line. Production records should include quantity of product prepared, serving size (use unit of measure as reflected by meal pattern standards).
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	The SFA did not have an "And Justice For All Poster" displayed. One was provided by the SA.
800 - Civil Rights	812 Did meal service observations on the day of review indicate that program benefits were made available to all children without discrimination?	The Cashier was calling to students "you need to bring money" which is a violation of lowa code HF2467. Staff was coach on acceptable methods of collecting money.
900 - SFA On Site Monitoring	901 a. Was the on-site review of the <i>lunch</i> counting and claiming procedure completed prior to February 1?	Each year, schools with more than one building must conduct a monitor of meal counting and claiming in all buildings by February 1. Half of the buildings in the district that offer breakfast must be monitored each year. The form is found in Download forms. The On-site monitoring was not completed in 2017-2018.
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	Four bags of ice were stored directly on the floor of the walk-in freezer. Electric rosters are stored on the floor in store room. Left-overs stored in cottage cheese and ice

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cream co	ntainers. SFA should invest in Food safe storage
containers	s. Temperatures of the dishwasher should be
taken dail	y and recorded.

#### Org - Level Commendations

#### Description

BREAKFAST & SUMMER PROMOTION (1600): The SFA does a good job of promoting breakfast with reminder signs and daily announcements. 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, lunch menus, newsletters, banners, and the local radio station.

LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years. The policy has nutrition education, physical activity and other wellness goals included. An assessment has been completed and is posted on the school's website. 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 community members. The committee meets annually and minutes are kept. The district's web site is nicely organized and makes it easy to find specific board policy.

MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of October appeared accurate and complete.

PROFESSIONAL STANDARDS (1200): The FSD has attended New Manager's Orientation and has completed several hours of training, beyond the required 12 hours, including attending the Procurement training in fall 2018. Most other Food Service Employees have completed their required hours or are close to completion for 2018/2019.

RESOURCE MANAGEMENT (700): Review month receipts were reviewed and indicated appropriate and allowable expenditures. All records are maintained for at least three years plus the current year. The Business official is doing a great job of monitoring invoices. The Lunch program is operating with a healthy budget. Errors fell below the \$600 disregard.

#### Site - Level Commendations Ridge View Middle School (0209)

#### Description

Food Service Director: The FSD brings great passion to the school with a desire to feed students high quality meals. He is innovative and has good rapport with the students. His staff is creating tasty food from scratch when they can.

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 Middle School. Temperature logs are maintained for all coolers-including milk coolers, freezers, and food served. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled.

MEAL PATTERN: The menu was complete with all food groups represented and served in their proper quantity. Water was available to all students during meal times. Menus for the month of review contained all required components. The SFA offers a salad bar with a variety of fruits and vegetables which covers all of the vegetable sub-groups. Standardized Recipes are used.