

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Pius X School-Cedar Rapids (10538116)
Review Dates: December 12 – 14, 2018

Program Year: 2019
Month of Review: November
Lead Reviewer: Deb Linderblood
Org Representative(s): Dawn Bliss

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One application for free and reduced price meals did not have an adult signature.	Obtain an adult signature on the application for free and reduced price meals that was missing the signature. Attach a copy of the completed application to IowaCNP under review attachments. This was corrected while the State Agency was on-site. No further action required.	
1000 - Local School Wellness Policy	V-1000	<p>The SFA started to complete an assessment of their Wellness Policy however they did not assess each goal in their policy. TA provided that the Progress Report (assessment) needs to assess how the school is doing at meeting each goal that is listed in their policy. So, under Nutrition Education and Promotion the SFA should assess:</p> <ol style="list-style-type: none"> 1. St. Pius School will provide nutrition education and engage in nutrition promotion that is offered as part of a sequential, comprehensive, standards-based program, which is part not only of physical education classes, but also part of classroom instruction in other subject areas. 2.. St. Pius School will provide nutrition education and engage in 	State your timeline and plan for completing an assessment of your Wellness Policy that provides an assessment of each goal listed in your policy. Also state your plan and a timeline for how the Wellness Committee will be involved in assessing the Wellness Policy.	

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		<p>nutrition promotion that includes promotion of enjoyable, developmentally appropriate, culturally relevant participatory activities, such as promotions, taste-testing and school gardens.</p> <p>The SFA will then go on to assess the rest of their goals in this area and then move onto your goals for Nutrition Guidelines for all Foods Available on Campus, Physical Activity Goals, etc. TA also provided that the assessment should be conducted by the Wellness Committee.</p>		
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The SFA's net cash resources currently exceeds 3 months operating expenses.	Complete and attach a plan for how you will spend down some of the money in the nutrition account so that it will not exceed three month operating needs. Also send the plan to Patti Harding at patti.harding@iowa.gov .	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA did not correctly determine its non-program revenue and non-program food cost on the Financial Report on IowaCNP.	Re-do the Financial Report on IowaCNP so as to capture all of the non-program revenue and non-program food cost. Attach a copy of the revised report. If after re-doing the report it shows that additional non-program revenue is needed, indicate below how you will begin to bring in additional non-program revenue.	

Site - Level Findings: St Pius X School (8116)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	The SFA is not completing an Edit Check Report and their POS system does not have this report and thus they are not assessing if meal counts for free, reduced or paid exceeds the number of attendance adjusted eligible students. Provided the SFA with the State Agency Edit Check Report and provided TA on how to complete the form.	Complete and attach an Edit Check Report for the month of December.	
400 - Meal Components and Quantities - Lunch	V-0400	Nine students did not take 1/2 cup of fruit or vegetable and the staff person at the end of the line did not make them take the required quantity.	Describe how you will assure that all students take 1/2 cup of fruit or vegetable.	

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Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	209 Based on the review of verified applications:	TA provided that if the SFA does not have any error prone applications then they would select randomly from all applications. They then should identify on their Verification Report that they used the Alternate One sample size process.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	TA provided that if the SFA selected an application that had a case number written on it the SFA should use ELookup and if the student(s) are found this household is directly verified and a selection letter does not need to be sent to the household.
200 - Verification	214 If a student's eligibility changed due to verification,	TA provided that if a student's benefit level decreases that the SFA needs to give the household 10 calendar days in which to appeal from the date of the notice of adverse action letter. Benefits then need to be changed within 10 operating days following the appeal period.
700 - Resource Management		<ul style="list-style-type: none"> · The procurement event page on the written procurement plan should be revised to reflect the upcoming school year's procurement events, correct procurement methods and contract award type. It is recommended that the procurement event page of the written procurement plan be reviewed annually (about February). It is best practice to keep a separate procurement event page for each school year. This practice will help ensure that the correct procurement method is identified based on the estimated value of a particular purchase. On the plan the SFA should identify if they will award based on line item or bottom line for any purchasing event using small or formal purchasing method. · TA also provided that the SFA needs to have debarment statements from vendors when using small or formal procurement methods. · Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a Buy) and formal methods of procurement. Please refer to the state-prototype templates posted on IA_CNP. · When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." The school gets tee shirts printed by a local business. If using micro-purchase method be sure to spread the wealth. We recommend small purchase be used. The school is purchasing food products for the day care as well as the school nutrition program. Day care products should

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		<p>be separated at the check-out from items that are specifically purchased for the school nutrition program. If a local vendor does not have a charge system available, the school can purchase gift cards and use these to pay for products. For checks and balances, gift cards should be supported with itemized receipts.</p> <ul style="list-style-type: none">· When procuring milk, along with specifications (descriptions) for all items to be procured, the estimated annual usage for each item should be provided. To ensure the schools select a responsive vendor with the overall lowest price (bottom line), the cost of each item on price quotation request should be extended by multiplying the unit cost per item with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template that calculates extended cost for milk is available in Download forms in IA_CNP.· For milk, other things to consider when requesting prices from vendors are: rotation of milk by delivery individual to ensure First In, First Out (FIFO) and date stamped on milk cartons. The solicitation should inform vendors which schools in the buying group request a firm, fixed price and which request a fixed price with economic adjustment (escalator clause). If the SFAs will award the bid based on an escalator clause there is no need to ask for a fixed price. The procurement document should specify the number of milk coolers each SFA wants provided. The solicitation document should not list the vendors that bids will be solicited from.· The food service director should spot check invoices for all vendors to ensure products delivered match the order and the description of the product solicited by the buying group. Prices on the invoice should match bid pricing or be lower unless the school was given advance written notification per solicitation of any price increase. Food items procured by the school not on the buying group solicitation must be procured using appropriate procurement methods.· Food service director or designated individual should check deliveries to ensure Buy American provisions are met. An exception log should be maintained when a non-domestic agricultural commodity is accepted. A template log can be found on the Institute of Child Nutrition - Buy American US Agriculture Supporting Healthy School Meals Lesson 2-3.
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		<p>* The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification and be at equal or lesser price.</p> <p>* For milk purchases the SFA is going together with six other SFA's. The current solicitation includes some features of small purchase method and formal purchase method. The total estimated value for milk for all schools combined should be compared with the most restrictive purchase threshold. This will determine whether a small purchase (3 Bids and a Buy) or formal method of procurement such as Invitation for Bid should be used to procure milk. If the dollar value is over the threshold for small purchase the SFA's must use the formal procurement method.</p> <p>* The SFA does not have a gift policy. TA provided that they should use the State's guidelines. No gifts valuing \$3.00 or more can be accepted from a vendor.</p> <p>* TA provided that the purchasing group needs weekly produce price changes for all members. Food Service Director should retain these records for a period of 3 years plus the current year.</p> <p>* TA provided that seasonal items such as chicken nuggets in the shape of Christmas trees be added to the solicitation document.</p>
700 - Resource Management		The SFA is currently charging the nutrition account for electricity as a direct cost. The SFA thought they could do this as the nutrition department has its own meter. TA provided that electricity must be an indirect cost. The SFA can use up to 10% applied to labor cost, supply costs and food service travel costs. Referred the SFA to the non-public indirect cost guidance on the DE web site for further assistance.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	TA provided that when possible the long version of the USDA non-discrimination should be on letters and materials used for the Child Nutrition Program. The short version can be used on items such as the menu where space is limited. Showed the Food Service Director the long version of the USDA statement.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	TA provided on the web-site the SFA should go to if they have a complaint alleging discrimination in the Child Nutrition Program. The web-site is: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Provided the Food Service Director with the most up to date Diet Modification Form. TA provided that they should insert the milk substitute that they will make available if parents request a milk substitute.
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	TA provided that it is recommended that students be invited to participate on the Wellness Committee.

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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.)	TA provided on where to find the Iowa training tracker tool on the Bureau's web page. Also provided information on the USDA training tracker tool.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	TA provided that the Food Service Director should initial and date each SOP when they are reviewed and/or revised. Also discussed that SOPs need to accurately reflect the operations actual practices and thus need to be reviewed each year.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	TA provided that additional resources are available on IowaCNP under download forms to use to inform eligible families about the availability and location of summer food service programs.
RMCR - Revenue From Nonprogram Foods	8 Did the SFA:	TA provided that on the Financial Report on IowaCNP the SFA needs to include in non-program revenue the revenue from day care meals, milks, second entrees and adult meals. For non-program food costs the food cost of day care meals, milks, second entrees and adult meals should be added together. To determine the food cost of milk the SFA should obtain an average cost of milk and take this times the number of milks sold and also do the same for second entrees. For adult meals, an average cost of a meal should be determined and take this amount times the number of adult meals sold over the year.

Site - Level Technical Assistance St Pius X School (8116)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	The SFA's alternate meal throughout the week of the on-site review was waffles with sausage. The SFA was giving one sausage which credits as 1 oz. eq. of meat/meat alternate. TA provided that one sausage meets the daily requirements but that if a student selected the alternate meal every day of the week they would not meet their weekly requirements.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	TA provided that cafeteria staff should be provided Offer vs. Serve training on a yearly basis.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Dish machine temperatures were only being taken weekly. TA provided that for good safety and sanitation procedures temperatures should be taken daily.
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?	<p>Cantaloupe, frozen broccoli and frozen cauliflower were found in the kitchen that were produced in Mexico. TA provided that the Food Service Director needs to talk to the vendor's sales representative to determine if a U.S. product is available and at what cost. A log should be maintained of products accepted that are not produced in the U.S. with a reason for why the product was accepted.</p> <p>The agricultural food component is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or Competitive bids reveal the costs of domestic agricultural food components are significantly higher than the non-domestic ones.</p>

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Org - Level Commendations

Description
Certification and Benefit Issuance: Benefit documents were very well organized. The current application for free and reduced price meals/milk and income guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred to the Point Of Service (POS) system, and denied applications were correctly determined. All applications were correctly determined, were complete with Social Security Numbers and all applications were determined within ten days. All applications are confirmed by a second individual. Income was only converted to annual when there was more than one frequency of income. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.
Civil Rights: The And Justice for All civil rights poster was posted in the serving line, Spanish applications are offered for Limited English Proficient households, annual civil rights training was provided for food service staff and documented. The SFA submitted the annual Public Release to the local media (Cedar Rapids Gazette). Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The correct state and federal non-discrimination statements are provided on all notification letters, verification letters and monthly menus.
Fiscal Action: Fiscal action is below the USDA allowed disregard for this review so no claim adjustment for November is needed.
Food Safety: The SFA has a written Food Safety plan that includes all required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Hot food temperatures are documented on the Food Production Records. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Food Service workers wore hair restraints and practiced good gloving procedures. The Food Service Director, Dawn Bliss, is ServeSafe Certified.
Local Meal Charge Policy; The SFA developed and approved a meal charge policy. The policy was distributed to all households and staff were informed of the policy. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.
Procurement: The Food Service Director attended the Regional Procurement Training in Cedar Rapids. The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, have listed procurement events and procurement methods for each event. There is a Code of Conduct Policy which references Archdiocesan Policies for disciplinary action. The SFA is part of the Eastern Iowa Purchasing Group (EIPG) for food (including bread) and supplies. The school is part of the metro Catholic Schools for milk solicitation. A review of invoices from the Prime Vendor and milk showed the district was purchasing products as specified in each solicitation. The food service director spot checks invoices from the milk and prime vendor to ensure products delivered match the order and the description of the product solicited by the buying group. The school has done an outstanding job of utilizing their planned assistance level (PAL) allocation. In school year 2017-2018 the SFA utilized 99.6% of their allotted PAL dollars. So far this year, the SFA has utilized 55% of their allotted PAL dollars. The SFA participates in Direct Distribution, DOD and Diverted Foods.
Professional Standards: The Food Service Director has completed 25.5 hours of Professional Training in school year 2018-2019 of her required twelve hours. All but two nutrition staff have met required training for Professional Standards in school year 2019 and there is monthly training planned for the remainder of the school year. An annual Training Spreadsheet is maintained showing which staff have been trained and meet required annual hours.
Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.
Resource Management: All expenditures that were reviewed appeared allowable. There were no unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate financial account for the nonprofit school food service. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs.
Summer Food Service Program Outreach: Summer Food Service Program (SFSP) outreach consisted of a flyer being posted in the school's hallway.
Verification: The correct number of applications were verified and were randomly selected from all applications. The process was completed on time. The application selected for verification was confirmed prior to verification. The verification report was completed on time.
Wellness Policy: The SFA's wellness policy was reviewed and revised in the fall of 2017-2018. The public is made aware of the SFA's wellness policy via the school's web site. The following individuals are involved in reviewing and updating the LWP: Principal, Gym teacher, Nurse, board members, and a parent representative. Potential stake holders are made aware of their ability to participate in the Wellness Committee. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.

Site - Level Commendations St Pius X School (8116)

Description
Meal Components and Quantities: The Food Service Director does a god job of menu planning. She has developed a five week cycle menu. All meal components were available at the beginning of meal service on the day of observation and throughout meal service. All meals observed met at least the minimum daily requirements. The review week menus met weekly and daily meal pattern requirements for

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Kindergarten - 5th grade students. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch—including many fresh fruits and vegetables. Standardized recipes are used for food production. At least two types of milk are offered. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal at lunch.

Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of November were accurate and complete. Point of Service (POS), counts and filed claims appear accurate. Total Access is used as the school's POS system. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records (FPRs) were on file for all meals claimed for reimbursement for the review period.

Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of November 5 - 9, 2018 for lunch. The worksheets showed that all meal components and vegetable sub-groups were offered and in sufficient quantities. The Food Service Director also completed the Dietary Specifications Assessment tool for lunch which indicated that the school is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen vegetables in place of canned, and not offering salt. A nutrient analysis was not required.

Offer vs. Serve: Offer vs. Serve is being implemented properly. All but nine students observed selected 1/2 cup of fruit and/or vegetable. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable.

Smart Snacks: Students are able to purchase foods via a la carte sales (milk and second entrees). Exempt leftover National School Lunch Program entrees are only sold the same day. Beverages sold meet the standards for the Kindergarten-5th grade students.

Water: Free potable water is available to all students for lunch just outside of the cafeteria.