

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**South Central Calhoun Community School District (60910000)**  
**December 12-14, 2018**

**Program Year:** 2019  
**Month of Review:** November  
**Lead Reviewer:** Christine Crow  
**Org Representative(s):**

**Site - Level Findings: SCC High School (0109)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA offers a variety of breakfast options during the week, including a breakfast bar. According to the food production record and CN label provided for the week of review, the breakfast bar entrée option does not meet the meal pattern requirement of at least 1 oz. grain equivalent since it only credits as 0.25 oz. grains and doesn't come with any other grain options. TA provided.	Describe how the 1 oz. grain requirement will be met when serving the breakfast bar as an entrée item on the breakfast menu. Provide a CN label or nutrition facts label for additional products that may be served along with the breakfast bar.	
400 - Meal Components and Quantities - Lunch	V-0400	<p>1. Although the vegetable subgroup requirements were met for dark green, red/orange, bean/legume and other vegetables, the lunch menu served during the review period did not meet the starchy vegetable subgroup item.</p> <p>2. The recipe provided for the chili served during the week of review did not provide common units of measurements to allow for SA to confirm that it met the daily</p>	<p>a. Describe how the menu served during the week of review will be modified to meet the starchy vegetable subgroup requirements. Send the January menu to show that all vegetable subgroups are represented.</p> <p>b. Provide a standardized recipe for the chili that includes the correct units of measurement and includes all components required for a standardized recipe.</p>	

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		<p>meat/meat alternate requirements. For example, the beans were measured in gallons which is a unit of measurement for volume and the food service director was not able to inform me how many beans were actually used. The amount of ground beef in the recipe did not provide enough to meet the daily meat/meat alternate requirements for high school students. The other recipes provided for the menu items served during the review period were not standardized because some were missing preparation instructions, serving instructions, and critical control points. All recipes must contain these items in addition to ingredients and their weights or measurements needed, total yield, serving size, and how it contributes toward meal plan requirements.</p> <p>3. The salad bar provided to students during the review period and on-site review provides cheese, cottage cheese, and diced ham in uncontrolled amounts which may surpass the calorie and sodium requirements for students. Since there is no portion control of these items it is also difficult for the cashier to confirm that students have at least 2 oz. of meat/meat alternate on their tray. If these items are going to be placed on the salad bar there must be some portion control to ensure calorie and sodium requirements are met and to ensure</p>	<p>c. Describe how you will control portions of all grain and meat/meat alternate items served on the salad bar.</p> <p>d. Describe how you will modify the menu and/or meal service to ensure all students have at least 2 oz. of grain equivalent on the taco day.</p>	
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		<p>servings meet the meat/meat alternate serving requirements to make a reimbursable meal.</p> <p>4. During the on-site review, the lunch menu served did not meet the grain requirement for 9-12th grade students. High school students must have at least 2 oz. grain equivalent on their trays to be counted for a reimbursable meal. Although 2oz. of grain is available for students, many students only took 1-1.5 oz. of grain. Therefore 25 students did not have 3 components in their full required serving size to make a reimbursable meal.</p> <p>TA provided on menu ideas that could be added to the taco menu to meet the daily grain requirements, how to control portions of all menu items on the salad bar other than fresh fruits and vegetables, starchy vegetable subgroup ideas, standardized recipes, and using the correct units of measurement for menu items. If the grain or starchy vegetable subgroup serving requirements are not met during future administrative reviews, fiscal action will be taken. SA encourages the SFA to send food service staff to the IDOE Healthy School Meals training next summer.</p>		
1100 - Smart Snacks in	V-1100	There was 2% milk, and 100 calorie packs of Oreos and chips ahoy cookies	Provide written confirmation that these products will no longer be purchased and	

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School		sold at the a la carte line and raspberry tea sold in the vending machine that did not meet the Smart Snack requirements. All food and beverage items sold to students during the defined school day (midnight until 30 minutes after dismissal) must meet Smart Snack requirements. TA provided to the food service director and the high school principal.	sold to students during the defined school day. Provide a nutrition calculator printout of the foods that will be sold instead of these food items.	
1400 - Food Safety	V-1400	The food safety inspection report must be posted on display in a public location. TA provided.	Describe where the report will be posted for the public to view.	

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	An assessment of how the goals written within the wellness policy are being implemented at each school within the district must be completed at least once every 3 years and must be made available to the public. Although the wellness policy has elements on all other required items, it must also have a policy on food and beverage marketing. There are sample wellness policies, a progress report template form, and other wellness resources on the <a href="#">IDOE School Wellness website</a> . TA provided to the superintendent, authorized representative and food service	Describe when the wellness policy will be updated to include all required elements. Describe when an assessment will take place on how the wellness policy goals are being implemented at each school within the district and how it will be made available to the public.	

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		director.		
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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	130 Is household notification of denied benefits consistent with FNS requirements?	Families that apply for benefits and are denied must be sent a letter of notification of eligibility status in order to inform them of the reason for their denial, their right to appeal, how to appeal, and how to re-apply for benefits anytime throughout the year. The letter of notification of eligibility status can be found in Download Forms. TA provided to the determining official.
200 - Verification	208 When a confirmation review was conducted:	Prior to notifying families that they were selected for verification, someone other than the determining official must confirm that the original eligibility status determined is accurate. The confirming official must confirm the status and sign the application. TA provided to the determining and verifying official.
700 - Resource Management		SFAs must provide a hard copy of the negative balance to all families annually. The SFA must have a plan on how they will inform families of the negative balance policy if they miss registration or if they register in the middle of the year. TA provided.
700 - Resource Management		Procurement: - In addition to the delivery and product specifications, the required terms/conditions, including the Buy American

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		<p>provision and the Equal Employment Opportunity provision, must be included in a small purchase and formal purchase agreement. The SFA must ensure that all small purchase and formal purchases are made with vendors who aren't suspended by the USDA. Small and formal purchase templates that include all required and optional terms and conditions and a procurement plan template that includes a debarment certification statement are located in Download Forms.</p> <ul style="list-style-type: none"> <li>- All bids must be awarded to the responsive and responsible vendor that provides the lowest price. The bread bid was awarded to the lowest price bidder but the milk bid was not.</li> <li>- The SFA must have a Buy American exception log to provide reasoning as to why the SFA has purchased any agricultural items that were not made in the USA. Reasonable exceptions include increased price or unavailable products or substitutions. A Buy American exception log is available in Download Forms.</li> <li>- Code of conduct must include conflict of interest, a policy that indicates that staff may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts and the disciplinary actions to be taken if the code of conduct is violated.</li> <li>- TA provided on line item versus bottom line pricing and contract award types, purchasing methods and local purchase thresholds. Micropurchase requirements reviewed including spending funds equitably throughout the community and keeping a micropurchase log.</li> </ul>
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	USDA has a complaint procedure that must be used in the event a civil rights complaint was made regarding the school nutrition program. TA provided on the procedures

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		that must be taken along with a handout describing those procedures.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	The racial ethnic form was completed but it included all students instead of just those students who applied for benefits or were on the DC list. The racial ethnic form must be completed annually to show that discrimination was not made against any racial or ethnic identity that applied for benefits or was on the DC list. TA provided to the determining official.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	The on-site monitoring forms were completed prior to February 1 for this school year, but they did not include the information on the free, reduced price and paid meal counts for the observed meal and the total enrolled students by eligibility status. The SFA must answer all questions listed on the on-site monitoring form. TA provided to the FSD who checked the edit check reports on the dates in which the on-site monitoring took place and updated the forms. No further action required.
1200 - Professional Standards	1215 Validate the SFA's response to Question 1205 on the Off-site Assessment Tool, if applicable.	All staff with responsibilities in the school nutrition program must have professional standards training annually. The food service director must have at least 12 hours annually, the managers must have 10 hours, and all staff who work more than 20 hours per week in school nutrition programs must have 6 hours of training annually. The authorized representative must have 4 hours of training annually and the cashiers must receive training on their job duties annually. The director and staff who work more than 20 hours per week have met their training requirements but the food service managers still need 2 additional hours of training this school year to meet the requirements. SA encourages additional training on the meal pattern requirements and offer versus serve.

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		In addition to tracking the training, documentation must be available to show training took place. Appropriate documentation includes certificates, attendance log, meeting agendas, or PowerPoint slides that include attendee's signature, date, and duration of time. TA provided.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Although the HACCP Plan had many of the required elements it must include an SOP for the control and clean-up of blood and bodily fluids and field trip meals. Sample SOPs can be found on the Iowa State University Extension and Outreach site ( <a href="https://www.extension.iastate.edu/foodsafety/haccp-school-foodservice">https://www.extension.iastate.edu/foodsafety/haccp-school-foodservice</a> ). TA provided.
1400 - Food Safety	1401 If conducted as part of the Administrative Review, are SFA contracted and self-operated warehouses, storing all foods (commercial and USDA) properly?	All food must be stored at least 6" off the floor. While SA was on-site, there were bread containers stored on the ground. TA provided to the high school food service staff who agreed to contact their bread vendor for racks and/or to work with the maintenance to get pallets to store food on.
RMCR - Nonprofit School Food Srvc Acct	4 If Yes, did the SFA develop a spend down plan approved by the State agency?	The school food service account has more than 3 months of operating costs. If the school food service account has more than 3 months of operating costs, they must develop a plan on how they intend to spend down their account balance. The SFA is currently working towards purchasing new equipment. Additional ideas discussed including hiring additional staff, wage increases for current food service staff, and including more fresh fruits and vegetables and/or homemade items on the menu. TA provided to the



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		business manager.
RMCR - Revenue From Non-program Foods	10 If the SFA found that its revenue ratio was less than its food cost ratio, did the SFA take additional steps to sufficiently increase its non-program food prices, add sufficient funds to its nonprofit food service account, and/or take other actions to adequately resolve the problem?	According to the 2017-2018 financial report, the non-program food revenue as a percentage of total food revenue does not adequately cover the cost of the non-program food as a percentage of total food costs. In review of the SFA's FY18 lunch balance transfer worksheet the non-program food cost documented in the financial report on IowaCNP is inaccurate. According to the worksheet (see attached) the non-program food revenue as a percentage of total revenue (12%) is equal to the non-program food costs as a percentage of total food costs (12%). TA and handout issued.
RMCR - Indirect Costs	4 Did the SFA apply the indirect cost rate to the correct direct cost base?	The SFA applied the unrestricted indirect cost rate to the direct cost rate of food, supplies, food service salary and benefit costs, and food service staff travel costs. When charging the school nutrition fund indirect costs, the SFA may apply the unrestricted indirect cost rate to the direct cost of food service employee travel, food service supplies (not including food), and food service labor and benefits. The total amount of federal reimbursement must be equal to or more than the amount of indirect costs plus direct costs. Handout and TA provided.

**Site - Level Technical Assistance SCC High School (0109)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	Breakfast signage was not available during the observed meal. All breakfast and lunch meals served must have signage posted to inform students and staff how the menu items served contribute towards a reimbursable meal. TA provided to staff who agree to post the breakfast menu on the same white board that is used to advertise the lunch

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		menu.
1100 - Smart Snacks in School	1107. Are exempt SBP and NSLP leftover entrees only sold the same day, or the day after, they are initially offered?	Leftover entrée items that were served for breakfast may be sold as an a la carte item for lunch or breakfast the following day. Leftover entrée items may not be given away for free to students or staff. TA provided to the high school food service manager and food service director.

**Org - Level Commendations**

Description
<p><b>CERTIFICATION/BENEFIT ISSUANCE AND VERIFICATION:</b> • The 30 day carryover of eligibility status is provided to students who received benefits in the previous school year. The determining official provides a letter to families prior to the expiration of the 30 day carryover of eligibility asking families to reapply. • The applications are processed within 10 days of when the SFA receives them. • Benefits are extended to all students within the household. • Direct certification lists are downloaded twice a month and kept on file. • The SA template letter of notification of eligibility status is sent to all families on the DC list. • All applications are complete with signatures, social security numbers, names of all people in the household, and dates. • All applications are determined accurately and the eligibility status is correctly transferred to the point of service. • Denied applications are on file and are correctly denied. • The SFA selected the correct number of applications (2) to verify. • Applications selected for verification are selected from error prone applications first. • The SFA utilized the correct method of verification. • The verification process and report were completed on time. • The State Agency template letter of notification of verification selection and results were sent to those families selected for verification. • The SFA processed the proof of income accurately and correctly reduced benefits in the appropriate amount of time. Benefit changes were accurately made in the point of service system.</p>
<p><b>CIVIL RIGHTS:</b> • The correct non-discrimination statement is found on menus. • The public release was sent to the local media source prior to school starting. • Program forms are made available in different languages as needed to meet the needs of families with Limited English Proficiency. • Civil Rights training was provided to program staff. • Diet modification forms are on file for students who have special dietary needs and the SFA works with students and their families to offer foods that meet their needs. • The “And Justice For All” poster is on display in a public location. • No discrimination was observed while SA was on-site.</p>
<p><b>FOOD SAFETY:</b> - The HACCP Plan is available at all sites. - Temperatures for all cooling equipment is monitored and recorded twice daily. - Temperatures for all hot foods are monitored and recorded. - Good food safety practices are observed. - There is at least one ServSafe certified staff person at each site.</p>
<p><b>LOCAL SCHOOL WELLNESS POLICY AND COMPETITIVE FOODS:</b> - The SFA’s wellness policy has been updated within the past 3 years and is available for the public to view. - The SFA invites a variety of stakeholders to participate in the update of the wellness policy. - Nutrition calculator printouts are available for a la carte foods sold outside of the reimbursable meal.</p>
<p><b>MEAL COUNTING AND CLAIMING:</b> - The point of service reports match the claim for the breakfast and lunch meals served during the review period. - The point of</p>

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service line is organized and orderly to allow the cashier to ensure all students have a reimbursable meal. - The preschool students are counted and claimed for their breakfast and lunch meals at the point of service. - The number of students claimed for their breakfast and lunch meals during the review month did not surpass the total number of students enrolled for free, reduced price, or paid.

MEAL PATTERN REQUIREMENTS AND NUTRITIONAL QUALITY: - Food production records are available for all meals including preschool and 9-12 meals, and they include the salad bar items, all menu items/components served, serving sizes, planned servings for students, a la carte items and adult, leftovers or shortages and actual amounts served. - The lunch menu served during the review period met the daily and weekly meal pattern requirements for grain, milk, fruit, dark green, red/orange, bean/legume, and other vegetable subgroups. - The breakfast menu served during the review period met the daily and weekly meal pattern requirements for grain, fruit and milk. All students during the observed breakfast met meal pattern requirements. - The SFA provides breakfast and lunch meals to preschool students and follows the CACFP meal pattern. The CACFP meal pattern requirements are met during the on-site review and month of review. The SFA serves the meal with a partial family style meal service depending on what is served. - The SFA offers at least 2 different types of milk. - Free, potable water is available to students during meal times. - CN labels, product formulation statements and labels are organized and available for all menu items served. - Fresh fruits and vegetables are made available for students daily.

NEGATIVE BALANCE POLICY: - The SFA has a negative balance policy that is provided in a hard copy form annually at registration. - Families are notified of their ability to apply for benefits at least twice annually through email communication that is sent out to all families.

PROCUREMENT: - Bid letters were sent out to multiple vendors for milk and bread and include product and delivery specifications and a due date for bids. - All purchases made were done so within the correct purchasing requirements as stated in the local purchasing policy. - The SFA has a procurement plan that includes all purchases to be made, purchasing amounts, and assigned staff to conduct contract management.

PROFESSIONAL STANDARDS: - The food service director is ServSafe certified 7/8/2014 – 2019 and there is at least one food service staff person at each site that is ServSafe certified. - The FSD and all food service staff that work more than 20 hours per week met their training requirements for this school year. - The authorized representative organizes a training tracking tool. - All staff with responsibilities within the school nutrition program, including cashiers and the authorized representative, have received civil rights training.

RESOURCE MANAGEMENT: • The correct paid student lunch price is charged based on the PLE tool requirements. Since the school food service account has a positive balance they did not have to increase paid student lunch prices. • The correct adult lunch price is being charged. • The school food service account has multiple checks and balances to ensure all revenues are deposited into the school food service account and all expenses are allowable. • All expenses made during the review period were allowable. • All documents are kept for the 3 years plus the current year.

SUMMER FOOD SERVICE PROGRAM AND SCHOOL BREAKFAST PROGRAM OUTREACH: The SFA informs families about SFSP and the SBP with fliers sent home with students, School Alert text messages sent to families, church bulletins, and fliers posted throughout the community.