

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Storm Lake Community School District (62190000)**  
**November 27-29, 2018**

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

**Org - Level Findings**

| Area                                     | Findings ID | Finding Description   | Required Corrective Action  | Corrective Action Response |
|--|-------------|---|---|----------------------------|
| 100 - Certification and Benefit Issuance | V-0100      | Of the 490 applications selected, only 2 were determined inaccurately. One application was determined to be reduced price when, according to the family size and income, should have been determined as free. Student information entered into the SFA-1 and SFA-2. The SFA may modify and resubmit their claim for the additional reimbursement and the family may be reimbursed for this error. One student was provided free benefits because the SFA mistakenly thought the student was in a household with another student on the DC list. This student should have been paid instead of free eligible. TA provided. | Submit a copy of the letter of notification of eligibility status that was sent to both families notifying them of their eligibility change. Send a copy of the point of service system that states the students' status was updated to the correct eligibility status. |                            |
| 700 - Resource Management                | V-0700      | FOOD SERVICE MANAGEMENT COMPANY (FSMC): The FSMC invoices provided from last school year could not be reconciled. The reviewer's meal equivalents for breakfast, lunch, a la carte and  | The SFA will provide a response on how the monthly invoices are reconciled. Provide a corrected copy of the reconciled invoice going to the beginning of the school year.   |                            |

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|                               |        | snack did not match the FSMC meal equivalents.   |  |  |
| 700 - Resource Management     | V-0700 | FSMC: The adult lunches and student seconds were counted in the student reimbursable breakfasts and lunches. This is not correct. TA provided by SA and the FSMC corrected the error for the October 2018 invoice while SA was on-site. The FSMC agrees to review invoices and make corrections going back to the first invoice for the current school year.   | Submit invoices for September, November and December 2018 to show that the SFA reconciled the invoices correctly.  |  |
| 1200 - Professional Standards | V-1200 | SFAs that hire FSMCs must have a program director that meets hiring standards to ensure the FSMC is meeting the USDA requirements. The program director must be employed by the SFA, meet hiring standards, and receive 12 hours of professional standards training annually and 8 hours of food safety certification training every 5 years. There has recently been a change in SFA Program Director and the SFA is currently without a program director. TA provided. | Describe who the new program director will be and change the application in IowaCNP to reflect the newly hired director. Describe the timeline of when the program director will receive his/her food safety certification training. |  |

**Site - Level Findings: Storm Lake Middle School (0209)**

| <b>Area</b>                                  | <b>Findings ID</b> | <b>Finding Description</b>   | <b>Required Corrective Action</b>  | <b>Corrective Action Response</b> |
|--|--------------------|--|--|-----------------------------------|
| 400 - Meal Components and Quantities - Lunch | V-0400             | During the on-site review, SA reviewed CN labels and standardized recipes for entrée items being sold and discovered that southwest chicken salad recipe was not being followed and that the | Provide training to staff on importance of following the standardized recipes and on the updated recipes. Submit the attendance log for the training and written confirmation that the food service director will continue to inform |                                   |

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|                          |        | recipe for the southwest chicken salad and the vegetarian chef salad did not credit as stated on the recipe. TA provided to the food service director and manager on standardized recipes. The recipes were modified while SA was on-site and crediting information is now accurate.  | staff on any future recipe changes.   |  |
| 1400 - Food Safety       | V-1400 | The ServSafe certification for the kitchen manager at the middle school expired earlier in the calendar year. At least one person at each site must be ServSafe certified. TA provided.   | Describe the date and location of when and where the kitchen manager at the middle school will become ServSafe certified again.   |  |
| 1700 - Afterschool Snack | V-1700 | After school snacks must be monitored twice a year using the snack monitoring form found in Download Forms. Snack counts must be taken at the point of service. There were 2 snack programs at the middle school in which the counts aren't being taken at the point of service. SA suggests the SFA begin using the area eligible count found in Download Forms NSLP 0014. TA provided to the authorized representative and FSD. | Monitor the afterschool snack program and submit the monitoring form for the middle school. Train the staff that provide snacks to students on how to take a count at the point of service. Submit a copy of the point of service count for the TAG and STARS snacks provided at the middle school. |  |

**Site - Level Findings: Storm Lake Elementary School (0418)**

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|------|-------------|---------------------|----------------------------|----------------------------|
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| 1900 - Fresh Fruit and Vegetable Program (FFVP) | V-1900 | The vendor invoice and receipt do not provide adequate information to complete the claim for reimbursement accurately. The invoice for pre-portioned (unit) produce shows the total servings prepared and a total cost. The cost per unit is needed from the vendor to complete the claim for reimbursement. The ETA director is calculating the cost per portion (unit). Instead the cost per unit for each produce item should be provided by the vendor. The cost per unit can include the cost of the produce and the labor costs. As the amount of labor can vary depending on the produce, the cost per unit varies for each produce item. Technical assistance was provided. | The ETA director will meet with the vendor. The director will send vendor invoices and receipts to validate the December FFVP claim for reimbursement. |  |
|---|--------|---|--|--|

**Org - Level Technical Assistance**

| Area                                     | Question   | Comments   |
|--|--|--|
| 100 - Certification and Benefit Issuance | 141 Does the SFA account for benefits that have been extended to students living in a household that is receiving SNAP, TANF, or FDPIR benefits? | Regardless of their relationship with the family, any student living in the same economic household as a student that is eligible for benefits through income status or direct certification can also be provided benefits. TA provided.                                     |
| 200 - Verification                       | 212 Did the SFA meet the follow-up requirements if the household failed to respond to the request for verification?                              | If a family does not respond to the initial letter of notification of verification selection the SFA must contact them through either text, email, letter, or phone to request verification information before reducing their status. TA provided to the verifying official. |
| 700 - Resource Management                |  | Negative Balance Policy: Based on new State  |

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|                                     |  |   |
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|                                     |  | legislation House File 2467, SFAs are required to notify families twice a year that they may complete income applications. Currently the SFA informs families once a year of their ability to apply for meal benefits. TA provided to the determining official.   |
| 700 - Resource Management           |  | <p>PROCUREMENT: Technical assistance was provided on completing the written procurement plan including the code of conduct policy.</p> <p>The purchase of a single rack conveyor dishwasher was made using equipment grant dollars. Proper procurement was conducted for this item, documentation is on file. The purchase, however, should not be included in the written procurement plan events as no school nutrition funds were used.</p> <p>Procurement by small purchase should include federal terms and conditions. The purchase of all agricultural products should have the Buy American Statement. Other terms and conditions to include are suspension and debarment certification statement, equal employment opportunity, and small business certification. Depending on the estimated value of the procurement. Other federal terms and conditions may be required. Refer to the small purchase (3 Bids and a Buy) template available on IA_CNP Download Forms.</p> |
| 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 has a complaint policy but it does not include all requirements for handling a civil rights complaint made against the School Nutrition Programs. TA provided to the SFA for handling a civil rights complaint. A written handout describing the procedure and a complaint form provided.   |
| 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? | The SFA must permit involvement of a variety of stakeholders in the development, implementation, review and modification of the wellness policy. The SFA can inform potential stakeholders of wellness committee meetings and involvement through fliers,   |

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|                               |   | newsletters, emails, and posts on the district website. The SFA completed assessments of policy goals at each site but the assessments are not available for the public to access and goals listed on the assessment forms indicate that all goals have been met. SA suggests that the SFA create new goals to work on once the goals have been met. The wellness policy assessments must be made available to the public. Resources for implementing new wellness policy goals are on the IDOE website. TA provided on making wellness policy assessments available to the public and other wellness committee resources. |
| 1200 - Professional Standards | 1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable. | The SFA has provided adequate training to staff to meet the professional standards requirements. Documentation must be available for all trainings and it must include the training date, staff names, training topics/objectives, and duration of time that training event occurred. TA provided.   |

**Site - Level Technical Assistance Storm Lake Middle School (0209)**

| Area               | Question   | Comments  |
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| 1400 - Food Safety | 1406 Is the most recent food safety inspection report posted in a publicly visible location? | The food safety inspection report was not posted in a public location when SA was on-site. TA provided and staff immediately moved it to a public location. |

**Site - Level Technical Assistance Storm Lake Elementary School (0418)**

| Area  | Question | Comments   |
|---|----------|--|
| 1900 - Fresh Fruit and Vegetable Program (FFVP) |          | FRESH FRUIT AND VEGETABLE PROGRAM: The ETA Director is using the small purchase method (3 Bids and a Buy) to procure prepared single-serve produce for the Fresh Fruit and Vegetable Program (FFVP). The price quotation solicitation document |

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|  |  | <p>should clearly specify the information to be provided by the vendor on the invoice and receipts. The vendor invoice/receipt should support the claims for reimbursement. Example of how FFVP claims should be completed on IA_CNP was provided. The information from this example should be used to request vendor invoice/receipt information in future FFVP solicitations.</p> <p>The FFVP solicitation should be completed in summer, ahead of the start of the FFVP program. Although grant awardee notification may be delayed, the solicitation document can inform vendors that the contract will be contingent on the district receiving the federal funds to operate the program.</p> <p>Required federal terms and conditions must be included in the FFVP solicitation. This includes Buy American provision and suspension and debarment certification statement. For more information refer to the small purchase procurement document on IA_CNP.</p> |
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**Org - Level Commendations**

| Description   |
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| Afterschool Snack Program: - The food production records were on file for the afterschool snacks served during the review month. All snacks that were provided met the snack meal pattern requirements.   |
| CERTIFICATION AND BENEFIT ISSUANCE: • The SFA provides the 30 day carryover of eligibility status to students who had benefits in the previous school year. • Income applications are processed within 10 operating days. • The letter of notification of eligibility status is sent to families who receive benefits through Direct Certification. If an income application is denied, the letter of notification of edibility status is sent to the household. Letters of notification of eligibility were approved by the SA. • Income applications are complete with required dates, signatures, social security numbers, household members, and their income. Benefit status is correctly transferred into the point of service system. • Documentation is on file for all homeless and migrant students. • DC lists are printed and kept on file. |
| CIVIL RIGHTS: • The correct USDA non-discrimination statement is on the district’s nutrition website and on menus. • Translators and handouts in different languages are available for families with Limited English Proficiency. • The public release was sent to a local media outlet prior to the start of the school year. • Civil rights training was provided to all staff with school nutrition responsibilities. • The “And Justice For All” poster is on display in a public location. • Diet modification statements are on file for all students that have special dietary needs. Staff work with families to ensure students receive the  |

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appropriate foods. • The racial ethnic form was completed to show that no discrimination was made in providing benefits to students.

**FOOD SAFETY:** - The food service director is ServSafe Certified as of 01/21/2016 – 1/21/21. - Good food safety practices were observed while SA was on-site. - Temperature logs are available for the refrigerator, freezers, and milk coolers. - Temperatures are monitored and recorded for hot and cold foods served. - The HACCP plan was complete and located at each site within the district.

**FOOD SERVICE MANAGEMENT COMPANY (FSMC):** As required, documentation is available to show that monitoring of the FSMC operations was completed twice at each school building in the previous School Year (SY). The first monitoring of FSMC operations for the current school year is completed. The SFA established an advisory board composed of parents, teachers, and students to assist in menu planning. The advisory board meetings are well documented. The FSD has developed a format for these meetings to gather meaningful responses for menu planning. There has been a considerable increase in meal participation at all school buildings and especially at the high school where previous participation was low. Last school year, all school buildings received two health inspections each. Last SY, the FSMC did an excellent job of utilizing the USDA Foods Planned Assistance Level (PAL). Spending in USDA Foods exceeded the SFA's allotted PAL.

**LOCAL WELLNESS POLICY AND COMPETITIVE FOODS:** • The policy is assessed and updated at least once every 3 years. The policy was reviewed and updated 2 years ago and is currently under review. • The wellness policy is made available to the public as it is located on the district's webpage. • The wellness policy contains all required content including goals for nutrition promotion and education, physical activity, other school based activities, nutrition guidelines for all foods and beverages sold during the school day, a policy for all food and beverages provided (not sold) to students throughout the day, and a policy for food and beverage marketing. • The SFA has assessed the progress on the implementation of the wellness policy goals in each school building. - Nutrition calculator printouts are available for all a la carte items sold. Competitive foods sold at the review school meet the Smart Snack requirements. - The vending machine at the middle school sells beverages approved for all grade groups.

**MEAL COUNTING AND CLAIMING:** • Cashiers are trained annually on the meal counting/claiming procedures. • The point of service line at breakfast and lunch was organized and orderly to allow staff to ensure students received a reimbursable meal. • The edit check report matched the claim for the review month. Claims are submitted in a timely manner. • Offer versus serve was implemented correctly.

**MEAL PATTERN REQUIREMENTS:** • The menu nutrition information is provided to families on the SFA's website. • Various entrée options and fresh fruits and vegetables are offered daily. • Food production records are available for all meals claimed and are complete with the menu components, fruit and vegetable bar options, portion sizes, planned and actual servings for each grade group and adults, and leftovers. • The SFA used 101.6% of their USDA foods in the previous school year. • All breakfast and lunch meals counted and claimed during the observed meals were reimbursable. • At least two different types of milk are served. • Signage is available at both breakfast and lunch to inform students how the menu constitutes a reimbursable meal. • Signs promoting healthy food and physical activity are posted throughout the cafeteria. • CN labels, product formulation statements, standardized recipes are on file for all menu items. • The lunch menu served for 5-8th grade students during the week of review met the meal pattern requirements for the grain, meat/meat alt, total vegetables and vegetable subgroups, milk, and fruit. • The breakfast menu served for 5-8th grade students during the week of review met the meal pattern requirements for fruit, grain, and milk. • Grains served during the review month and during the on-site review are whole grain rich. The SFA has a whole grain exemption approved and on file. • Free, potable water is available at meal service and cups are available for students.

**NEGATIVE BALANCE POLICY:** - The SFA has a negative balance policy that is currently being revised and approved by the board. - The policy is provided to all families annually at registration or when a student transfers into the district. - Students are not identified as having a negative balance in the lunch line and information is kept confidential.



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| <p><b>ON-SITE MONITORING:</b> • On-site monitoring forms have been completed this school year for the elementary school, east early childhood school, middle school, and high school.</p>   |
| <p><b>PROCUREMENT:</b> The School Food Authority (SFA) Program Director (PD) and the Food Service Management Company (FSMC) Food Service Director (FSD) attended the Regional Procurement Training in Sioux Rapids. The micro-purchase and small purchase thresholds were correctly identified on the written procurement plan. Micro-purchases are limited. Purchase orders and invoices were available for all vendors and showed compliance with the micro-purchase threshold. At the beginning of each school year, the FSD procures small wares for each school building following an inventory of current supplies and new supplies needed. Small purchase method is used. Documentation is on file that shows price comparison between at least two vendors. Small wares are purchased from the vendor with lowest overall cost.</p> |
| <p><b>PROFESSIONAL STANDARDS:</b> Training provided to the food service staff is tracked on the Iowa professional standards tracking form. - The food service director, authorized representative, and most food service staff met their training requirements. Those who have not met training requirements have a training plan to meet requirements and will attend staff meetings and watch webinars. - Documentation is on file for training events taken.</p>   |
| <p><b>RESOURCE MANAGEMENT:</b> - The correct paid student lunch price is charged based on the PLE tool requirements. - The SFA used 101.6% of their USDA Foods. - The school nutrition funds are tracked separately from all other district funds. - There are internal controls and checks and balances within the school nutrition account to ensure all expenses are allowable and revenues are correctly deposited. - The non-program food revenue adequately covers the non-program food cost. - The school nutrition account has more than 3 months of operating costs and the SFA has a plan on how to spend the money. - Expenses made during the review month are all allowable.</p>   |
| <p><b>SCHOOL BREAKFAST PROGRAM &amp; SUMMER FOOD SERVICE PROGRAM OUTREACH:</b> • Families were notified about the School Breakfast Program and the SFSP through newsletters, their website, JMC, posts in the local newspaper, flyers that were sent home and flyers that were posted throughout the community.</p>   |
| <p><b>VERIFICATION:</b> - All applications selected for verification were confirmed and signed by a confirming official. - Letters of notification of verification selection and verification results were sent to families. - The SFA selected the correct number of applications to verify. - The correct verification documents were collected from families and their pay stubs were verified correctly. When student's eligibility status was reduced the verifying official provided the correct letter giving them time to appeal and then changed their status in JMC. - Students whose benefits changed based on verification findings did so in the correct timeframe.</p>  |

**Site - Level Commendations Storm Lake Elementary School (0418)**

| <b>Description</b>  |
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| <p><b>FRESH FRUIT AND VEGETABLE PROGRAM:</b> The Elementary Tornado Academy (ETA) Director does a wonderful job operating the Fresh Fruit and Vegetable Program (FFVP) at the elementary school. She pays close attention to her FFVP budget to ensure FFVP snacks will be available to all students through the school year. The FFVP grant is used only for the purchase of fresh produce and not any FFVP operating or administrative costs. The ETA director monitors the FFVP grant budget closely and provides a daily student count/servings to prepare to Fareway, FFVP vendor. Fareway then has the flexibility to decide what produce to provide for the day. A monthly menu is not developed. Leftover snacks are not an issue. The teachers are good about ensuring all FFVP snacks are eaten or leftovers are discarded. The ETA director checks student enrollment by classroom monthly and works closely with teachers to minimize waste. This information is communicated to Fareway, FFVP vendor to ensure amounts prepared are adequate but not excessive. FSMC supports the FFVP by providing for the delivery of FFVP snacks from the grocery store to the school as well as cleaning and sanitizing the FFVP carts. Standard Operating Procedure (SOP) for the transportation, distribution, and service of the snack is available. Standard</p> |

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Operating Procedures from the vendor for the preparation of cut produce and the cleaning and sanitizing of food contact surfaces were also available. Nutrition Education is integrated in the curriculum. To publicize the program, an article on the FFVP will be posted on the school website in December and another one in April/May prior to summer vacation. The article will link to Pick a Better Snack resources on the Iowa Department of Education website. The FFVP snacks are provided to the students during the school day and outside of the school breakfast and lunch program, as required.