

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Independence Comm School District (31050000)
January 8-9, 2019

Program Year: 2019
Month of Review: November
Lead Reviewer: Sandra Fiegen
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 265 eligibility determinations reviewed, three were incorrectly determined. One determination based on income did not include all income, and two determinations for free based on Direct Certification were later changed to Reduced based on a subsequent certification list, should have remained free.	In your corrective action response, please indicate the date that each error was corrected, and how you will review procedures for application approval and eligibility determination to ensure that errors do not repeat.	
200 - Verification	V-0200	Incorrect number of applications were verified according to number of determinations reported in each category.	Re-count all determinations according to category (for online applications that provided a case number, check on elook up for the student and move the determination from 'case number provided' to 'DC' if found). Re-count total number of eligibilities in each category and revise the verification report. If needed, verify additional eligibilities according to error prone status. Additionally, please indicate here how you will re-train on verification activity.	
1000 - Local School Wellness Policy	V-1000	An assessment of the goals of the wellness policy is not completed. A statement of activities toward goal assessment is done, but does not state if goals have been reached.	In your corrective action plan, please state how you will assess goal attainment and how you will distribute the assessment to the community. Information on how to conduct policy assessment was left with SFA and is also available at https://educateiowa.gov/pk-12/nutrition-programs/school-wellness .	

Site - Level Findings: East Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Standardized recipes are required for all food items that contain more than one ingredient, and full preparation instructions need to be available for all convenience food items that require heating. Recipes and instructions need to include HACCP control points as well.	For corrective action, please attach the standardized recipes for items used for breakfast and lunch in two weeks of January (you choose the two weeks) and the corresponding menus. Please be sure that the recipes contain all ingredients, directions, HACCP designation, and meal component contributions. Also, please indicate your plans for obtaining and using	

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			standardized recipes for all food prepared in the future at all sites.	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	118 How frequently are updates made to the point of service and benefit issuance document(s)?	Be sure to update eligibility reason as soon as students move from income eligible to DC eligible, so that the highest possible eligibility reason is contained on documentation. Also, be sure that reasons and notes linking the eligibility issuance system and the documentation are complete in order to find students easier.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Under proper execution of the offer versus serve provision, Kindergardeners either need to be allowed to choose what 3 components they want, or be served all 5 components in the minimum serving size. The servers can't make them take all the hot items and then allow them to choose for the additional fruit and vegetables at salad bar.
700 - Resource Management	701 At the end of the SFA's RM review period, did the food service have net cash resources that exceeded three months' average expenditures?	Encouraged foodservice and business officer to review the financial report in IowaCNP together, and to use the resource in download forms to assess whether the CAR information is accurately representing the financial status of the foodservice department.
700 - Resource Management	706 Did the SFA use the USDA Paid Lunch Equity Tool or a comparable mechanism to evaluate its need to raise its paid lunch prices?	Encouraged examining the foodservice account fund balance even if the PLE tool is not required to be used, in order to decide whether to raise prices in the upcoming year. WE also discussed whether the PLE tool should be completed even if it is not required to be, as part of the decision of pricing.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	Encouraged posting the full USDA nondiscrimination statement on the nutrition services home webpage.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Encouraged the FSD getting all the special diet request forms, and looking at them to ensure that they contain all minimum required information and are signed by a recognized medical authority. Currently, the school sites maintain the forms and send a list to the FSD.
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	Encouraged other non-foodservice staff to receive civil rights training, such as building secretaries, etc, when they have duties that include foodservice operations.
1100 - Smart Snacks	1102 How does the SFA account for accompaniments when determining whether food items meet the Smart Snack standards?	We discussed the need to use the smart snack calculator for all a la carte items offered to ensure that they meet nutrition guidelines. AEA Coop snack list is not accurate in all cases. SFA has obtained the calculator results and they are available.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	A full HACCP plan does exist, but SFA is encouraged to update the HACCP plan for the district and sites. We discussed what constitutes a full plan.

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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?	Encouraged doing statewide outreach for SFSP also, and provided resources to do so.
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Site - Level Technical Assistance East Elementary School (0409)

Area	Question	Comments
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	The 'justice for all' poster must be placed on serving line. (was in the back of the kitchen). Was re-positioned during the review.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Be sure that temperatures for cold holding are based on an accurate thermometer (unit temp display is not an accurate one). Also, be sure that cold holding logs have room for comment areas/corrective action.
1500 - Reporting and Recordkeeping		We discussed how the Kindergarten milk is paid for, and highly encouraged using a system of paying that directly links to the student's meal accounts (milk is an a la carte item). In this way, the parents will pay for exactly the milk that their student drinks, and not over-pay or under-pay.
Dietary Specifications Assessment Tool - Lunch	4 Cheese (all varieties including reduced fat) is controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal. This includes cheese offered on salad bars.	Please consider how higher fat, sodium or protein foods are served in all school sites. Placing these items in a self-serving area allows students to overserve; they should always be portion controlled when possible in all service areas.

Org - Level Commendations

Description
All but three benefit issuances were correctly determined, and applications were signed and dated by the household member and the SFA, were complete with SSN's and case numbers, and were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Rollover eligibility determinations were removed if the household did not apply within thirty days of the school year. All households who received benefits at the end of the previous year were contacted within the 30 day period to confirm if they intended to reapply. Free or reduced price meals are extended to all members in the household when one person is identified as eligible.
Benefit documents, as well as all paperwork, were very well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. The online application and materials were approved by SA before use as required. The correct and current benefit issuance list was available.
Local producers vend fresh fruits and vegetables that are used in the foodservice program.
Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Cashiers are trained, were observed completing their duties correctly, and daily edit checks are performed. All students observed for breakfast and lunch meals selected a reimbursable meal without having a prompt to select a ½ cup of fruit or vegetable as one of the three required components. All meals claimed on day of observation were reimbursable.
Students had a sufficient amount of time to eat after receiving meals at lunch, and recess is scheduled before lunch service. Colorful, appealing signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. Food service staff were polite and respectful to students, other staff, and each other, and assisted students in opening containers or getting their food ready to eat.
The district has an active, comprehensive wellness policy on file, and multiple activities are planned each year to support the goals of the policy. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.

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<p>The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided food service staff and documented. A copy of the district's public release was on file, documenting that it was submitted to local media. Ethnic/racial information is collected annually. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements.</p>
<p>The Food Service Director, FSD, does a superior job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat. Daily multiple choices of fruits and vegetables encourages student consumption. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. All meals observed met at least the minimum daily requirements.</p>
<p>The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for awarding, reviewing, documenting and monitoring procurement events, and specifications were well-written and comprehensive. The FSD continues to learn and apply procurement knowledge to future activities.</p>
<p>The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. Temperature and other monitoring logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.</p>
<p>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, and net cash resources do not exceed three operating months. The district does not charge indirect costs to the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for commodities. Reports are filed on time, and all records are maintained for at least three years plus the current year.</p>
<p>Tracking was provided that documents the district foodservice staff are on-track to complete hours by the end of the year. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.</p>

Site - Level Commendations East Elementary School (0409)

Description
<p>Please see commendations in previous section.</p>