

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Humboldt Community School District (30600000)**  
**December 3-6, 2018**

**Program Year:** 2019  
**Month of Review:** October 2018  
**Lead Reviewer:** Christine Crow  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	Proof of income provided by one household selected for verification was inaccurately determined. The proof of income was determined to be reduced price when it was actually paid/denied. The verifying official was asked to provide a copy of the letter of notification of eligibility change that was sent to the family notifying them of their status change. The verifying official completed and sent the letter while SA was on-site. The eligibility status is scheduled to be decreased on the appropriate day. No further action.		
800 - Civil Rights	V-0800	The non-nutrition staff with responsibilities in the school nutrition program, including the determining official and the authorized representative have not received civil rights training. All staff with responsibilities within Child Nutrition Programs must have annual civil rights training. TA provided to the determining official and authorized	Submit documentation to show that the determining official and authorized representative took civil rights training.	

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		representative on training requirements and training resources.		
800 - Civil Rights	V-0800	The Iowa non-discrimination statement found on the district website is not the current statement and the website does not include the USDA non-discrimination statement. All program materials must include the most current USDA and Iowa non-discrimination statements. The most current statements can be found on the Iowa Department of Education website: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs">https://www.educateiowa.gov/pk-12/nutrition-programs</a> TA provided to the authorized representative and food service director.	Submit a copy of the menu that includes the most current non-discrimination statement.	
1000 - Local School Wellness Policy	V-1000	An assessment of the implementation of the wellness policy goals must be conducted for each school within the district and made available to the public. Assessments must be conducted at least once every 3 years. Assessment template forms and other wellness policy resources are available on the IDOE Local School Wellness Policy page ( <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/school-wellness">https://www.educateiowa.gov/pk-12/nutrition-programs/school-wellness</a> ). In addition to the wellness policy and assessments, the SFA must have a wellness committee comprised of a variety of stakeholders. Parents, students, teachers, PE teachers, food service staff, administration, the school nurse, School Board members and members of the community must be invited. A folder of resources along with TA was also provided	Describe how the SFA will form a wellness committee, when the first meeting will be, and when the assessment of wellness policy goals will be completed.	

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		to the authorized representative and FSD.		
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**Site - Level Findings: Humboldt Junior High 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	The food production records (FPR) were missing some of the required information including the actual servings provided, total quantity prepared, and planned number of servings, which should be different for every menu item since the SFA provides offer versus serve. SA was not able to determine if certain menu items met the meal pattern requirements since the unit of measurement on the FPR did not align with the information provided on the CN label. For example, the chicken fajita serving was 1/3 cup when the CN label is reported in ounces. Other menu items were measured using units of measurement intended for volume when they were not a liquid menu item. TA provided to the FSD.	Provide information on what 1/3 cup fajita chicken weighs. Compare the weight to that on the CN label and adjust the serving sizes to meet the meal pattern requirements if necessary. Describe the weight of the chicken and what the new serving size is if necessary.  Provide documentation that training to food service staff was provided on food production records and appropriate units of measurement.	
1100 - Smart Snacks in School	V-1100	A student organization sells smoothies to students during the week and then provides the purchased smoothies on Friday during school. The FSD is not aware of this fundraiser. All food and beverages sold during the defined school day of midnight until 30 minutes after dismissal must meet Smart Snack requirements. TA provided to the FSD.	While SA was on-site, the FSD worked with the student group to obtain a recipe that met Smart Snack standards for the grade group served. No further action for this. See the attached recipe and nutrition calculator print-out.	
1400 - Food Safety	V-1400	While one of the milk coolers had an outside thermometer, the other milk cooler	Provide a copy of the completed temperature logs for both milk coolers at	

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		<p>did not have a thermometer in or outside. Cooler temperatures must be monitored and recorded daily to ensure milk and other foods are stored at the correct temperatures. SA encourages the SFA to have a thermometer inside of the cooler as the outside thermometers aren't always accurate. TA provided to the FSD and head cook at the middle school.</p>	<p>the middle school.</p>	
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**Org - Level Technical Assistance**

<b>Area</b>	<b>Question</b>	<b>Comments</b>
100 - Certification and Benefit Issuance	129 Is household notification of eligibility consistent with the responses provided on the Off-Site Assessment Tool?	<p>The letter of notification of eligibility status sent to families with students on the Direct Certification list must be approved by the State Agency (SA) if the SFA chooses not to use the approved template found in Download Forms. Approval must be requested before letters are sent. TA provided to the determining official.</p>
200 - Verification	208 When a confirmation review was conducted:	<p>The confirming official must confirm and sign the application to indicate that the original determination of eligibility status was accurate prior to notifying the family they have been selected for verification. The confirming official cannot be the same person that made the original determination of eligibility status. TA provided to the determining and verifying official.</p>
700 - Resource Management		PROCUREMENT TA provided on the following:

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		<ul style="list-style-type: none"> <li>- The SFA must include all micro-purchases on their procurement plan and spend their funds equitably throughout the community when making micro-purchases.</li> <li>- Although the bid documents included product specifications, they must also include the required terms and conditions such as the Buy American provision and Equal Employment Opportunity provision. SA suggests the SFA also include a due date of when they would like a vendor response and the estimated amount of products to be purchased. A small purchase/3 Bids and a Buy template and other procurement resources are available in Download Forms.</li> <li>- The local small purchase threshold is \$50,000 and the amount spent on milk is nearing that threshold. The SFA will have to begin conducting formal procurement or increase the local small purchase threshold.</li> <li>- Although the code of conduct has all other required elements, it must also include the disciplinary actions that would be taken in the event that an employee violates the code.</li> <li>- Price lists must be provided and saved for the milk/dairy vendor if the SFA uses an escalator clause. The SA encourages the SFA to contact their milk vendor to receive monthly price lists.</li> </ul>
700 - Resource Management		The district has a negative balance policy that is available on their website. The SFA must provide a hard copy to families annually and must also inform families of their ability to apply for benefits two times per school year. TA provided to the authorized representative and food service director.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Although the food safety HACCP Plan has many of the required elements, it did not contain a standard operating

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		procedure on fruit and vegetable bars. The Iowa State University Extension and Outreach website ( <a href="https://www.extension.iastate.edu/foodsafety/haccp-school-foodservice">https://www.extension.iastate.edu/foodsafety/haccp-school-foodservice</a> ) has sample SOPs that may be used as a guide. TA provided to the FSD.
RMCR - Nonprofit School Food Srvc Acct	4 If Yes, did the SFA develop a spend down plan approved by the State agency?	The USDA does not allow schools to have more than 3 months of operating costs and the SFA's school nutrition account balance is over this amount, according to the 2017-2018 financial report. The SFA has purchased some equipment thus far in an attempt to spend down the balance. TA provided to the authorized representative, superintendent, and food service director on approved ways to spend down the account balance. Suggestions include purchasing new equipment, including additional fresh fruits and vegetables on the menu, adding additional homemade menu items to the menu, increasing the wages of food service staff, and/or charging indirect costs to the account.
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	According to the 2017-2018 financial report in the IowaCNP the non-program food revenue did not adequately cover the non-program food costs. TA provided on what a non-program food is and how to calculate the cost and revenue. Handout issued.

**Site - Level Technical Assistance Humboldt Junior High School (0209)**

Area	Question	Comments
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	The SFA's kitchens are required to get inspected twice annually by the Department of Inspections and Appeals. If the SFA has not received a 2nd inspection by February, the SFA must contact their inspector to request an inspection. TA provided.

**Org - Level Commendations**

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Description
<p><b>CERTIFICATION AND BENEFIT ISSUANCE:</b> • The SFA provides the 30 day carryover of the previous year’s eligibility status for all students who received benefits in the previous school year. • All applications are processed within 10 operating days. • All households that complete an income application are sent the letter of notification of eligibility status, including those applications that are denied. • Benefits are extended to all students within the household. • The point of service system is backed up and there is a backup determining official in case the regular official is unavailable. • Applications contain all required dates, social security information or indication of no social security number, signatures, family members and their income. • All applications are on file for free and reduced price students and they are accurately determined. • Denied applications were accurately determined. • Direct certification lists are downloaded in a timely manner and kept on file.</p>
<p><b>CIVIL RIGHTS:</b> - The SFA strives to communicate with Limited English Proficient families through translators and translated documents. - Civil rights training was provided to all nutrition staff. - The food service staff has diet modification forms on file documenting the special dietary needs of students. The SFA works with families and students to ensure students get their dietary needs met. - The “And Justice For All” poster was on display in a public location. - The SFA utilizes the correct complaint procedure/form in the event the SFA receives a civil rights complaint related to the school nutrition program. - No discrimination was observed during the on-site review. - The racial ethnic form was completed to show that no discrimination was made in providing benefits to students. - A public release was sent to the local media outlet.</p>
<p><b>FOOD SAFETY:</b> - Good food safety practices were observed while SA was on-site. - The food safety inspection report was posted in a public location. - Food is stored properly. - Temperatures of hot foods are monitored and recorded. - Temperatures for some coolers and freezers were monitored and documented. - The HACCP plan is complete and available at all sites. - There is at least one ServSafe certified employee at each site.</p>
<p><b>LOCAL WELLNESS POLICY AND COMPETITIVE FOODS:</b> • The SFA provides parents with a list of appropriate snack ideas. • The wellness policy contains all required elements, is made available to the public, and has been updated within the past 3 years. • Nutrition calculator print outs are available for all a la carte foods and most competitive foods sold on campus. •</p>
<p><b>MEAL COUNTING AND CLAIMING:</b> - The edit check matched the claim for the breakfast and lunch meals served at the review site during the month of review. - The point of service line at the review site was organized and orderly to ensure all students had a reimbursable meal. - All breakfast and lunch meals claimed during the on-site review were reimbursable. - The number of students on the claim during the month of review did not exceed the number of enrolled free, reduced price or paid students.</p>
<p><b>MEAL PATTERN REQUIREMENTS:</b> - The lunch menu, including a fruit and vegetable bar, provides a variety of fresh fruit, vegetable and entrée options to students. - The food production records contain the required information on menu items including condiments and milk, serving sizes, leftovers and items on the fruit and vegetable bar. - The SFA offers two different types of milk. - CN labels, PFS, and standardized recipes are available for all menu items served during the review period. - All students during the observed breakfast and lunch had a reimbursable meal. - All grains served are whole grain rich. - Signage is available for the breakfast and lunch meals to inform students how to make a reimbursable meal. - Free potable water is available as there is a water fountain near the cafeteria. - The daily and weekly meal pattern requirements for milk, fruit, and grain were met for the breakfast menus served during the review period. - The daily and weekly meal pattern requirements for milk, fruit, total vegetables, all vegetable subgroups, and grain were met for the lunch menus served during the review period.</p>
<p><b>ON-SITE MONITORING:</b> On-site monitoring has been completed at each site within the district prior to February 1st of the previous school year. The food service director has a plan on conducting on-site monitoring at each site for this school year.</p>
<p><b>PROCUREMENT:</b> - The SFA has a procurement plan that includes all small and formal purchases. - Bid letters were sent out for all small purchases including bread,</p>

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milk, uniform purchases, and small equipment to various vendors. The SFA picked the lowest priced, responsive and reasonable vendor. - The SFA's conducted the correct purchasing method based on their local purchasing thresholds. - The food service director reports doing contract management. The prices on the invoices match the price lists. - There is a code of conduct in place that covers conflict of interest, gifts, and checks and balances. - The food service director attended the procurement training this fall and the SFA provided a vendor paid list, the off-site procurement review tool, and procurement plan. - Prices lists are saved for the AEA purchasing group.

**PROFESSIONAL STANDARDS:** • The SFA hired a new food service director that met the hiring standards. • The food service director is ServSafe certified as of 06/02/2014 – 2019. Each site within the district has at least one staff member that is ServSafe certified. • The SFA tracks the training received by the authorized representative and all nutrition staff. • Documentation is available for all training received by staff with responsibilities within the school nutrition program. • The non-nutrition staff received the correct number of training hours required by the professional standards requirements.

**RESOURCE MANAGEMENT:** - The nutrition account has a positive balance as of 01/31/18 and did not have to complete the PLE tool or increase student lunch prices. - The SFA spent 95.9% of their USDA PAL in the 2017-2018 school year. - The SFA charged the correct adult lunch price. - Allowable expenses were made during the month of review. - School nutrition documents are kept on file for at least 3 years plus the current year.

**SBP AND SFSP OUTREACH:** • The SFA informed families about the SFSP through the local newspaper, radio, posters, and their website. • The School Breakfast Program was promoted by the SFA through menus, program details on the website, and through newsletters.

**VERIFICATION:** - The SFA selected the correct number of applications to verify. - The verification process and report were completed on time. - Families selected for verification that did not respond by the original due date listed in the letter of notification of verification selection were sent another letter to remind them to provide proof of income. - The letters of notification of verification selection and results were the correct, SA approved letters. - Correct proof of income information was collected from the families selected for verification.