

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
South OBrien Community School District (60990000)
On-Site Review Dates: December 11-14, 2018

Program Year: 2019
Month of Review: November
Lead Reviewer: Deann Murphy
Org Representative(s): DANIEL MOORE

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Two applications did not contain a parent social security number as required and so were incomplete.	Errors were fixed on-site. No further corrective action is needed.	
100 - Certification and Benefit Issuance	V-0100	The SFA did not have State Agency approval prior to using the household direct certification or eligibility letters generated from their JMC software system as required. This is a repeat finding from the last Administrative Review.	The SFA will state their intention to submit their JMC generated direct certification and household notification letter that they plan to use in the future to Deb.Linderblood@iowa.gov . The letters need to be submitted along with IowaCNP Download Form NSLP022 during the summer annually.	
1000 - Local School Wellness Policy	V-1000	The SFA's Local Wellness Policy was last reviewed in February, 2015. USDA requires this policy be reviewed every 3 years so the policy is out of compliance. The district does not have an active wellness committee made up of the necessary stakeholders, i.e. Board, Administration, PE teacher, Foodservice representative, school nurse, student, parent, community member. An assessment of the policy goals has not been completed or made available to the public as required.	For your response, the SFA will: 1). submit to the State Agency an invitation to the members of the wellness committee for the next meeting which will be held during SY2018-19. The invitation needs to include all stakeholders listed in the finding, the date and time of the next meeting, and the agenda that will be discussed. 2).state the month in SY2018-19 that the SFA expects to update their wellness policy AND complete their wellness assessment. 3). state how the SFA will communicate the policy AND the assessment to district households.	
1200 - Professional Standards	V-1200	There are 5 employees identified by the SFA who have a role in the School Nutrition Program, including 3 staff who assist with determining applications, 1 confirming official and one Business Manager. These staff members do not have certificates on file showing that they have completed at least 4 hours of Professional Standards training this year or for the last 2 years. Their hours must be tracked on a tracking form and one person in the district must be in charge of ensuring that all professional standards hours are met each year. Part of the training each year must include Civil Rights training.	For their response, the SFA will: 1). State who will be responsible for completing the Professional Standards tracking form and ensuring that all staff involved in the Child Nutrition Programs have completed their required training annually. 2). The SFA will submit a completed tracker for the 5 identified non-nutrition individuals showing what training they have completed so far in SY2018-19. They each need a minimum of 4 hours training on topics pertinent to their job duties related to the Nutrition Program. 3). The 5 non-nutrition individuals identified will complete Civil Rights training and submit documentation showing that this has been done. Civil Rights group training is available	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
South OBrien Community School District (60990000)
On-Site Review Dates: December 11-14, 2018

		which has not yet been completed.	on IowaCNP Download Forms NSLP500 or NLSP501. Documentation can be a sign-in sheet showing the date the training was completed, which training was provided, time in-time out, and participating staff signatures.	
1600 - School Breakfast and SFSP Outreach	V-1600	The SFA has not promoted the Summer Feeding Program to district households as required. This was discussed with the SFA during the last Administrative Review.	The SFA will explain how and when they intend to promote the summer feeding program each year so that households know where to access free meals during the summer months.	

Site - Level Findings: South O'Brien Elementary School (0424)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
900 - SFA On Site Monitoring	V-0900	The Business Manager completed the SFA on-site monitoring form at Primghar and found some food safety and POS issues that were recorded on 11/5/18, but were not followed up on. Since this is an internal audit by the SFA, all findings need to be followed up and corrected within 45 days (as noted on on-site monitoring form).	The SFA will develop a corrective action plan for the on-site monitoring findings at the Primghar site and add them to the on-site monitoring form. They will submit the completed form to the State Agency.	

Org - Level Technical Assistance

Area	Question	Comments
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Field trip sack lunches need to have a POS at the point where the teacher provides each student a fully reimbursable meal. Recommend sending a class list along for the teacher to check off the student name as the child gets a sack meal. The list of students who ate a sack lunch can then be entered into JMC after the field trip is over. Also, the district needs to have a meal charge policy in place that is communicated with all families and staff and followed. If the current policy is not being followed, the district should revise it.
700 - Resource Management		Encouraged the FSD to apply for the DOD program to better utilize their USDA Foods Entitlement money. The goal is to use at least 95% of USDA Foods entitlement annually.
700 - Resource Management		Much TA was given regarding procurement practices used in the district. For micropurchases, items purchased need to be spread equitably between stores. Since the district has a grocery store in each town, the SFA should purchase items at both stores and spread dollars used a bit more evenly. Keeping track of purchases using the micropurchase log found in Download Forms may be helpful. For Small Purchases, the SFA needs to keep all documentation regarding procurement, i.e. vendor specifications, bids, contracts, invoices, etc. for 3 years + current year. All federal/local terms and conditions must be sent at the time of the original solicitation. The SFA needs to use extended pricing for items such as bread and milk, giving vendors an idea of the quantity the SFA will be ordering for the year. The bid must be awarded to the lowest priced vendor using the extended pricing - not just unit pricing. For formal

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
South OBrien Community School District (60990000)
On-Site Review Dates: December 11-14, 2018

		procurement with AEA Purchasing, several prices were found on the invoices that were different from the bid price given. The FSD needs to check invoice prices against bid prices regularly, checking 3-4 items on each invoice for accuracy, communicating any price differences with the Business Manager so the bill is not paid until differences are resolved.
700 - Resource Management		Reviewed the SFA SY2018-19 Procurement plan with staff, showing them where they needed to make changes to fit their own operation. If the district thinks they will be purchasing equipment in the future, this will need to be added to the procurement plan prior to sending out bids. Also, the district needs to link a current board policy number/name to the code of conduct which discusses accepting gifts of nominal value and disciplinary actions that will be taken if the Code is violated.
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 Local Wellness Policy needs to be reviewed every 3 years. The Superintendent was given the most updated version of the IASB Wellness Policy template and e-mailed a template of the policy goals assessment. Discussed with him the need for both of these to be completed at least every 3 years and made available to the public. Best practice is to have a policy goals assessment completed for each building.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	The USDA requires SFAs to promote their breakfast program to households at least 2 times annually. Promotion should include encouragement to eat school breakfast, price, and times available.
RMCR - Indirect Costs	4 Did the SFA apply the indirect cost rate to the correct direct cost base?	The State Agency clarified with the Business Manager that the direct cost base should be made up of food service staff salaries/benefits, kitchen supplies, kitchen staff travel expenses. Purchased food is a direct cost, but does not go into the direct cost base to determine indirect costs. Payroll expenses for secretarial time, as clarified in the School Business Alert, are indirect cost expenses and cannot be paid for directly by the non-profit school foodservice account.

Site - Level Technical Assistance South O'Brien Elementary School (0424)

Area	Question	Comments
600 - Dietary Specifications and Nutrient Analysis	605 Based on the Nutrient Analysis, did the school meet the Dietary Specifications (Calories, Saturated Fat, Sodium, and Trans Fat) for the appropriate age/grade group being served?	Based on calculations by the FSD, students may be exceeding their limits on calories and sodium at lunch. Students are allowed to take 1/2 cup fruit plus 1-2 juices daily and come back for extra hot vegetables and bread which adds to their calorie and sodium intakes. Discussed with the FSD ways to bring calories and sodium levels into alignment with the requirements of the program, i.e. limiting juice to 2 times weekly and only allowing students to take 1 - 4 oz juice when it is served, no free "extras," and serving fruit on the line, allowing students to only come back for seconds on vegetables from the veggie bar.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
South OBrien Community School District (60990000)
On-Site Review Dates: December 11-14, 2018

1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	The SFA is required to request 2 health inspections annually from their local health inspector. If the inspector does not come at all before the December break, e-mail her and request both inspections. Keep your request on file.
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	Emailed the FSD information on how to best use the Share Table in Primghar. If time/temperature controlled items are placed on the share table the SFA needs a variance from the health inspector. A template was emailed to the FSD to use if they want to continue to share milk, etc. No items placed on the Share Table may be re-sold to students as part of a reimbursable meal. Instead, they can be given to an afterschool program, school nurse for student use as needed, food pantry, etc.

Org - Level Commendations

Description
All kitchen staff seem to have either completed or are on target to complete their required hours of Professional Standards training this school year. Training includes civil rights for kitchen staff.
Benefit documents were well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were determined within ten days. 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. Free meals are extended to all members in the household. Waivers are provided to applicants and indicate specific fees. Eligibility is kept confidential.
The And Justice for All civil rights poster was posted just outside the cafeteria. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Ethnic/racial information is collected and the summary form is completed. No discrimination was observed.
The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The applications selected for verification were confirmed prior to verification and benefits were changed appropriately.
The district had a positive balance in their school foodservice account as of January 31, 2018 so they were not required to raise their student lunch prices. April 2018 receipts showed that all purchases were allowable and appropriate. Reports are filed on time and the SFA keeps most records pertaining to the Child Nutrition Program on file for 3 years plus the current year.
The SFA had a current procurement plan and code of conduct on file. They limited their micropurchases to emergency use only as much as possible. For small purchases, the SFA did send out product specifications to 3 vendors for both bread and milk and they did receive a letter back from each vendor. Two district staff members did attend the regional procurement training offered during Fall 2018.

Site - Level Commendations South O'Brien Elementary School (0424)

Description
Meal counts during the on-site review were reasonable when compared to the November review month counts. Meal count totals for the month of November appeared accurate and complete. There was a point of service, POS, at the end of the line as approved in the SFA application. Students enter their PIN number directly into the POS. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
Menus met minimum component requirements and all students received a fully reimbursable meal during the on-site review. The school utilizes a fruit/veggie bar that the students pass by prior to getting their hot meal which, therefore, encourages intake. Water and cups were available at both breakfast and lunch as required. The FSD had CN labels and Product Formulation Statements on file for foods served. Food production records and salad bar records are complete. The FSD calculates calories and sodium on each menu. Many low sodium foods were noted in storage. The POS line was orderly. Kitchen staff ensure that each student has a reimbursable meal so students do not need to be sent back for more. Offer vs Serve was done correctly. The Primghar cafeteria had a lot of colorful nutrition education posters on the walls.
Smart Snacks at the Elementary level is limited to a second entrée at meals which is only offered to the older students. Students may also purchase a 2nd milk. Both of these items are allowed per Smart Snacks rules.

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

South OBrien Community School District (60990000)

On-Site Review Dates: December 11-14, 2018

The SFA has a district-wide written Food Safety plan that includes 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, food served, storeroom, thermometer calibration, food transport, and dishwasher. The kitchen and storage areas were orderly and clean.