

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Twin Rivers Community School District (65160000)
December 3-6, 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	<p>1. One student completed an income application that was determined to be reduced price when he was on the Direct Certification (DC) list as free. There are other students on the benefit issuance list that are listed in the point of service (POS) as eligible through income applications when they were on the DC list. The SFA must update how students are certified so that students are listed as DC if they are on the list. DC lists must be downloaded twice a month and kept on file. TA provided to the determining official on downloading the DC list twice monthly and ensuring that the students are entered into the POS with the correct eligibility status.</p> <p>2. The income applications on file contained the signatures, family member names, income and social security numbers. Some applications were missing the date received and therefore SA was</p>	<p>1. Send a copy of the letter of notification of eligibility status that was sent to the family to inform them that their benefits will be changed to free going back to the first day of school. The family may be reimbursed and the claim can be revised for all reimbursable meals. Attach a certification and benefit issuance list from the POS to show the student's eligibility status has been changed.</p> <p>2. Submit documentation that the determining official watched the Application Approval and Direct Certification 2018-2019 Part 1 and Part 2 webinars. Previously recorded webinars can be found on the IDOE website: https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition</p> <p>3. Describe who will be the person to do the independent review of applications for Twin Rivers.</p>	

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Twin Rivers Community School District (65160000)
December 3-6, 2018**

		<p>unable to determine if the application was processed within 10 days. There was one application in which there was a discrepancy in the processing date. The application states that it was processed on 8/18/18 and the point of service system states that benefits were started on 10/18/18. According to the determining official the application was not complete when it was initially turned in and therefore should not have been dated on 8/18/18. Prior to the on-site AR, the school reimbursed the family for the meals after their 30 day carryover expired and before the application was fully completed. The student meals were claimed as free during this time. There is no documentation on the application to indicate that the application was incomplete. TA provided to the determining official on making notes on the application when incomplete or when other changes are made. The determining official has not taken any training for her responsibilities within the school lunch program and must receive at least 4 hours of training in topics related to her responsibilities with the school nutrition program. In addition to annual training, there will need to be an independent review of applications during the 2019-2020 school year for the SFA since there is more than 8% errors of certification and benefit issuance. TA provided to the determining official and authorized representative.</p>		
800 - Civil	V-0800	The USDA and Iowa non-discrimination	Provide a copy of the menu with the	

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Twin Rivers Community School District (65160000)
December 3-6, 2018**

Rights		statements must be listed on all program materials. If there is not enough room on the form the abbreviated version can be used. The most current statements can be found on the IDOE website: https://www.educateiowa.gov/pk-12/nutrition-programs . The menu and parent handbook do not contain the correct statement. TA provided to the authorized representative and FSD.	correct non-discrimination statement.	
1000 - Local School Wellness Policy	V-1000	The wellness policy contains all required elements except for a policy on food and beverage marketing. The policy must be updated to include language on food and beverage marketing throughout campus. In addition to the policy the SFA must assess how the wellness policy goals are being implemented and this assessment must be made available to the public. Resources for implementing wellness policy goals and a sample progress/assessment report were provided. SFA's are also required to have a wellness committee in which a variety of stakeholders (School Board, parents, students, teachers, school nurse, food service staff, community members etc.) are invited to participate. No documentation is available to show a wellness committee has been formed. TA provided to the FSD, authorized representative, and superintendent.	<ol style="list-style-type: none"> 1. Describe how the SFA will create a wellness committee and when the first meeting will take place. 2. Describe when the SFA will revise their policy and assess the implementation of policy goals. 	
1200 - Professional Standards	V-1200	Neither the determining official nor the cashier received civil rights training or any other training. While the cashier does not need training in any topics other than civil	Send documentation that the cashier and determining official took civil rights training.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Twin Rivers Community School District (65160000)
December 3-6, 2018

		<p>rights (she is not determining the reimbursable meal status), the determining official must have at least 4 hours of training related to her school nutrition program responsibilities annually. All employees with responsibilities in the school nutrition program must receive civil rights training. Civil rights training can be found on the IDOE website at the following sites: https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/civil-rights-training or https://www.educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts TA provided to staff.</p>		
--	--	---	--	--

Site - Level Findings: Twin River Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	<p>During the observed lunch meal there was not a trained person at the end of the line to ensure that all students had a reimbursable meal and one student was counted and claimed as having a reimbursable meal when he did not have a ½ cup fruit/vegetable on his tray. TA provided to the head cook and the food service director.</p>	<p>Describe how the point of service will be modified so that there is a trained person at the end of the service line to ensure that all students have a reimbursable meal.</p>	
400 - Meal Components and Quantities -	V-0400	<p>Cereal packs, most of which credit for 1 oz. grain, are always a grain option at breakfast and although it meets the daily</p>	<p>Describe how you will ensure that students have a reimbursable breakfast if they pick the Kix cereal. Describe how you will ensure the cereal</p>	

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Twin Rivers Community School District (65160000)
December 3-6, 2018**

Breakfast		requirement it does not meet the weekly grain requirements for breakfast as observed during the month of review. The cereal options provided during the on-site review included Kix cereal pack which only credits as 0.5 oz. grain and does not meet the daily grain requirements. There were 5 students who took Kix and therefore did not meet the grain quantity required to make a reimbursable meal. TA provided to the food service staff and FSD.	option at breakfast meets the weekly requirements.	
400 - Meal Components and Quantities - Lunch	V-0400	SA was not able to determine if the chicken fajitas served during the review period provided enough meat/meat alternate to meet the daily meal pattern requirements since the unit of measurement did not align with the information provided on the CN label. For example, the chicken fajita serving size documented on the production record was 1/3 cup when the CN label is reported in ounces. TA provided to the FSD.	Weigh 1/3 cup chicken fajita meat to see how it credits towards meal pattern requirements and provide documentation of this weight. If the serving size needs to be adjusted to meet the meal pattern requirements describe the new serving size.	
2000 - Supplemental Special Milk Program (SMP)	V-2000	The Special Milk Program is only allowed for those students who do not participate in the NSLP or SBP. There are some preschool students who participate in the breakfast program and SMP. The SFA reports that they monitor the breakfast reports and do not claim students on the SMP claim if they ate breakfast. Upon review of breakfast and milk counts, there was one preschool student who ate breakfast and received a snack milk that was claimed on the SMP claim and one student who ate breakfast that was not included on the SMP claim for his snack	<ol style="list-style-type: none"> 1. Describe how your current process can be modified to ensure that students who eat breakfast are not claimed on the Special Milk Program claim. 2. Describe who will pay for the preschool milks provided during snack for students who eat breakfast and therefore not included on the Special Milk Program claim. 	

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Twin Rivers Community School District (65160000)
December 3-6, 2018**

		milk. Although both above students paid for their breakfast at the appropriate eligibility rate, no one paid for the snack milk. Students who eat breakfast and receive a snack milk, must pay for the snack milk and the appropriate amount, based on their eligibility status, for their breakfast meal. TA provided.		
--	--	---	--	--

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	110 Does the SFA use the direct certification notification letter provided by the State agency?	Families that complete an income application and are denied benefits must receive the letter of notification of eligibility. Direct Certification families must also receive a letter of notification of eligibility status. The SA template letter of notification of eligibility status is found in Download Forms. If the SFA does not use the SA letter, the SFA's letter must first be approved by the SA. TA provided to the determining official.
200 - Verification	202 Who serves as the confirming official? (Name and/or position title or software used is acceptable)	All applications selected for verification must be confirmed prior to notifying families that their application was selected for verification. A confirming official must confirm that the original determination of eligibility status is correct and then sign the income application in agreement. The confirming official cannot be the same person that made the original determination of eligibility. TA provided.
700 - Resource Management		The SFA has a negative balance policy but it is not provided to all families annually. A hard copy of the negative balance policy must be provided to families annually. Families must also be notified twice a year that they can apply for

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Twin Rivers Community School District (65160000)
December 3-6, 2018

		benefits. TA provided.
700 - Resource Management		<p>PROCUREMENT:</p> <ul style="list-style-type: none"> - The SFA must include all micro-purchases on their procurement plan and the SFA must spend their funds equitably throughout the community when making micro-purchases. - Bid documents must include all product specifications, and required terms and conditions including the Buy American provision and Equal employment Opportunity provision. The small purchase/ 3 Bids and a Buy template and other procurement resources are available in Download Forms. - The SFA must ensure that all vendors they conduct small or formal purchases with have not been debarred by the USDA. The debarment certification statement can be signed by a vendor representative and is found within the procurement plan template. This form must be signed annually for all small and formal purchases. - The SFA has a code of conduct that includes elements on the SFA's gift policy, checks and balances, and conflict of interest but does not provide details on the disciplinary action that will be taken if the code is violated. TA provided. - In review of the vendor paid list from 2017-2018, SA observed \$85 was spent at a local pizza place. The authorized representative reported that the SFA would occasionally order pizza for students but indicated that the practice was no longer occurring. The FSD was not aware of the practice. Unless the pizza is whole grain rich, within the sodium restriction, and has a product formulation statement or CN label to inform staff how it credits towards the meal pattern, this would not be a reimbursable meal or an allowable expense. The FSD confirms that this practice will not happen again and will review with staff.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Twin Rivers Community School District (65160000)
December 3-6, 2018

Site - Level Technical Assistance Twin River Elementary School (0409)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	When desserts are on the menu they are given to students who take a school lunch after kids have gone through the service line and are almost done with their meal because the students reportedly do not eat their meal if dessert is presented with the entrée. Based on the menu, desserts are offered 1-2 times per week. SA encourages the head cook and FSD to offer dessert with the meal in case the grain based dessert is to count towards the reimbursable meal, for food safety purposes, to decrease confusion with students who bring a sack lunch, and to support the division of responsibility with meal time. The FSD agrees to modify this practice at the SFA.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	If the SFA does not receive 2 food safety inspections they must contact their inspector to request one. SA suggests contacting them in February if they have not yet received their 2nd inspection. TA provided to the FSD.

Org - Level Commendations

Description
CERTIFICATION AND BENEFIT ISSUANCE AND VERIFICATION: • The SFA provides the 30 day carryover of eligibility status for students who received benefits in the previous year. • Benefits are extended to all students within the household. • The SFA has a backup determining official and their point of service system is also backed up. • All income applications are on file and income applications were determined accurately. • Benefits were accurately transferred from those received through income applications. - The SFA selected the correct number of applications to verify (1) and applications were selected from error prone first. - The verification process and report were completed on time. - The letter of notification of verification of selection and results contained all the correct information. - The benefit status was decreased in the appropriate timeframe.
CIVIL RIGHTS: - Civil rights training was provided to the nutrition staff. -The food service staff has diet modification forms on file documenting the special dietary needs of students. The SFA works with staff, 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. -

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Twin Rivers Community School District (65160000)
December 3-6, 2018

No discrimination was observed during the on-site review. -The racial ethnic form was completed to show that no discrimination was made when providing benefits. - A public release was sent to the local media outlet. - The SFA strives to communicate with people within the district who have Limited English Proficiency through translators and documents translated to the appropriate language.

FOOD SAFETY: • Food temperatures are monitored and recorded on the FPR. • The temperatures for all cooling equipment and the dishwasher are monitored and recorded. • The HACCP Plan is available and complete. • The food safety inspection report is posted in a public location. • The FSD and head cook are ServSafe certified. • Good food safety practices were observed.

LOCAL SCHOOL WELLNESS POLICY AND COMPETITIVE FOODS: - The wellness policy is made available to the public as it's on the district's website and has been updated within the past 3 years. - The SFA does not sell any competitive foods.

MEAL COUNTING AND CLAIMING: Edit checks match the claim submitted during the review period and the number of free, reduced and paid students claimed did not surpass the number of those students enrolled. - OVS was implemented accurately. - The number of students who received a reimbursable meal during the observed breakfast and lunch were reasonable when compared to the review month.

MEAL PATTERN REQUIREMENTS: - Food production records are available for all meals provided and are complete with all menu components including milk and condiments, the total quantity prepared, the planned and actual servings, the serving size, and leftovers. - The lunch menu made available during the observed meal met the daily meal pattern requirements. - At least two different types of milk are available. - The head cook provides 2 different types of vegetables daily and she does a good job of encouraging students to try the vegetables. - Signage is posted describing the menu and how it constitutes a reimbursable meal. - Posters promoting healthy foods and physical activity are posted throughout the cafeteria. - Free, potable water is made available to students. - The lunch menu served during the month of review meets the daily and weekly meal pattern requirements for the fruit, grain, milk, total vegetables and all vegetable subgroups. - The breakfast menu served during the month of review meets the daily and weekly meal pattern requirements for the fruit and milk and the daily grain requirements. - All grains served are whole grain rich.

PROCUREMENT: - The SFA has a procurement plan that includes the prime vendor, milk, bread, small wares, and some micro-purchases. - The SFA completed the off-site procurement review tool and provided the vendor paid list. - The SFA's purchases are compliant with the local purchasing thresholds. - The SFA has a procurement plan that includes all small and formal purchases. - Bid letters were sent out for all small purchases including bread, milk, uniform purchases, and small equipment to various vendors. The SFA picked the lowest price, responsive and reasonable vendor. - 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. - Products found in storage met the Buy American provision.

PROFESSIONAL STANDARDS: - The district hired a new FSD that met the hiring standards. -The FSD is ServSafe certified as of 6/02/2014 – 2019. The site has at least one staff member that is ServSafe certified. - The SFA tracks the training received by the authorized representative and the nutrition staff. - Documentation is available for all training received by the nutrition staff and authorized representative. - The FSD had additional training hours that rolled over into this school year and has met her training requirements for the school year.

RESOURCE MANAGEMENT: • The SFA has adequate funds in the school nutrition account and did not have to raise paid student lunch prices based on the PLE tool requirements. • The SFA has a separate bank account for the nutrition fund. • The school nutrition fund does not exceed 3 months of operating costs. • Purchases made during the review month are allowable. • The correct adult lunch price is being charged. • School nutrition documents are kept for 3 years plus the current year. • The SFA has a negative balance policy.

School Breakfast Program and Summer Food Service Program Outreach: -The SFA informs families of the SFSP and of SBP by posting information on their website,

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

Twin Rivers Community School District (65160000)

December 3-6, 2018

radio and newspaper ads, and emails/newsletters were sent to district families.