

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Carlisle Community School District (09810000)
Dates of Review: 1/7/2019 – 1/10/2019

Program Year: 2019
Month of Review: November
Lead Reviewer: Jean Easley
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Benefit issuance errors made when benefits were extended to students sharing the same address according to Infinite Campus. It was learned during review that some students shared an address in the system but do not share the same household.	<ol style="list-style-type: none"> How will you change the process of extending benefits to all students living in the same household? State your plan to include the "date received" on eligibility applications. 	
200 - Verification	V-0200	Eligibility applications selected for verification were not confirmed prior to beginning the verification process. (It is noted that all other eligibility applications had been confirmed appropriately.)	For your response, state your understanding that income applications selected for verification are required to be "confirmed" prior to beginning the verification process.	
800 - Civil Rights	V-0800	<ol style="list-style-type: none"> The USDA non-discrimination statement is required to be included on all school meal information. The menu and nutrition department web page are missing this information. It is acceptable to include the abbreviated statement on menus while the webpage could include a link to the complete statement. There is no communication to households about requesting diet modifications. No modifications are currently being provided. 	<ol style="list-style-type: none"> For your response, submit an updated menu showing the statement was added and describe your plan to include a link on the webpage. Describe your plan to accommodate diet modification requests. 	

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900 - SFA On Site Monitoring	V-0900	On-Site Monitoring was incomplete. Beginning SY17, SFAs must include 50% of breakfast sites. An updated form is available in Download Forms. Remember to include meal counts for free, reduced and paid.	For your response, submit completed On-Site Monitoring for all sites using the updated form and including a review of breakfast as required.	
1200 - Professional Standards	V-1200	A system is not in place to track training. SFAs must have a mechanism to track training. Training logs should include: employees name, position, title of training, topic, date training completed, creditable training hours. A sample training tracker was provided during review. Recommendations for annual training include meal pattern, offer vs serve, food safety/HACCP, smart snacks.	Develop and submit a training tracker you will use annually to track training for all nutrition employees, including Authorized Representative. Additionally, describe an annual plan for training nutrition employees and what topics will be presented annually.	

Site - Level Findings: Carlisle High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	<ol style="list-style-type: none"> 1. Short Meat/Meat Alternate. Peanut Butter & Jelly Jamwich does not meet daily M/MA meal pattern requirement for Grade 9 - 12 served in November. 2. Standardized Recipe and crediting documentation is missing for sandwiches offered as a daily alternate to the reimbursable entree. 3. Sack Lunch listed on November menu does not meet daily or weekly requirements to be a reimbursable meal. 4. Distributor product information sheets are unacceptable means of documentation. 5. Bernard Food products do not have 	<ol style="list-style-type: none"> 1. state your understanding that PBJ (1 M/MA and 1 Grain) does not meet requirements for Grade 9 - 12 as a reimbursable meal. Describe how you have changed this item to be offered at the high school. 2. Attach a standardized recipe for Turkey/Ham/Cheese Sandwich including how one serving credits towards the meal pattern. 3. Attach a "recipe" for the sack lunch, or your plan for providing sack lunches moving forward. 4. Describe your understanding that distributor product information sheets are unacceptable and a CN label, Product Formulation Statement and/or Standardized Recipe must include crediting 	

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		nutrition or product formulation statements available to prove compliance or creditable towards meal pattern.	information for meal pattern documentation.	
1100 - Smart Snacks in School	V-1100	Gatorade is not compliant with Smart Snack standards. Smart Snack documentation is missing for: 1) Pretzel & Cheese Sauce with 2 oz cheese sauce and 4 oz cheese sauce 2) Nacho Chips & Cheese Sauce with 2 oz cup cheese and 4 oz cheese. 3) Breadstick.	1. State your understanding that all a la carte, sides, extras and vending must meet smart snack standards for Grade 9 - 12 and documentation is to be maintained. 2. State your understanding Gatorade is not compliant, however G2 is compliant. Gatorade should be returned when delivered in error. 3. Submit calculator printouts showing compliance of items listed above, or decision not to sell.	
1400 - Food Safety	V-1400	On-site storage violation observed: boxes of food were stored on floor of freezer and storeroom instead of on pallets. Thermometers are not calibrated and documented according to HACCP plan. HACCP plan is outdated and must be consistent with standard operating procedures practiced.	For your response, 1) describe your plan for cases of food stored on the floor of freezer and store room. 2) attach the form you will use for thermometer calibration 3) describe your plan to update HACCP and share three revised SOPs.	

Site - Level Findings: Carlisle Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1300 - Water	V-1300	It is required to offer free potable water at breakfast and lunch. Water is not available at the elementary school due to the water fountain is not working.	For your response, describe your plan to provide water at this site for breakfast and lunch.	

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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance		CASE NUMBER: reviewed how to recognize a valid case number.
700 - Resource Management		PROCUREMENT: A Procurement Plan for school nutrition has been developed. Plan to review and update plan annually. 1. Debarment Certification Tab: Documentation is to be available to show SFA confirmed vendors are in good standing to do business with federal government. You must have a Debarment form on file for each vendor. 2. Continue efforts to organize and track documentation of procurement events, divided into areas of – micro purchases, small purchases and formal. 3. Refer to Small Purchase Template to include terms and conditions when preparing solicitation letter for Break and Milk. Small Purchase solicitation documents should use the language of "price quotations" instead of "bid". 4. BUY AMERICAN EXCEPTION LOG: SFA is to keep a log reporting any nondomestic agriculture products purchased with CN dollars. The Exemption Log should state date, product accepted and reason why they accepted it, i.e. domestic product was not available or significantly higher priced than the non-domestic product.
800 - Civil Rights	802 What services does the SFA provide to households comprised of persons with Limited English Proficiency (LEP)?	SFAs must offer assistance to those with limited English proficiency. Share Memo SP 37-2016 found on the DE website. School Meal Application translations can be found at http://www.fns.usda.gov/school-meals/translated-applications .
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	Complaints regarding school nutrition discrimination are to be directed to USDA. The process and the form is found here: http://www.fns.usda.gov/civil-rights .

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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 Wellness Policy and Assessment are both required to be made available to the public. The Assessment is posted on the website therefore the policy should be posted here as well.
1100 - Smart Snacks	1101 What is the SFA's process for determining compliance with non-packaged or recipe food items (combination foods that do not have a label)?	VENDING MACHINE: It is required to have a process to determine compliance for all foods sold on campus. Vending appears compliant as soda machine offering non-diet beverages is turned off during the school day. However, no documentation is available and there does not appear to be an individual at school who oversees products offered. The vending policy lists the building administrator as the contact person. The individual is to be identified during Exit Conference.
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	TRAINING TRACKER: A mechanism must be used to track training. Food Service Director should plan training annually including workshops, webinars, as well as training provided by site managers. Annual training should include meal pattern, crediting menu items, offer versus serve, food safety. Resources for training provided to director.
1600 - School Breakfast and SFSP Outreach	1600 Did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	WEBPAGE SHOULD INCLUDE: 1 - Include the breakfast menu 2 - link to complete Non Discrimination Statement 3 - Meal Prices, Meal Charge Policy, Diet Modification Form, Contact information 4 - Wellness Policy and Assessment.

Site - Level Technical Assistance Carlisle High School (0109)

Area	Question	Comments
1500 - Reporting and Recordkeeping		BUY AMERICAN EXCEPTION LOG: SFA is to keep a log reporting any nondomestic agriculture products purchased with CN dollars. The Exemption Log should state date, product accepted and reason why they accepted it, i.e.

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		domestic product was not available or significantly higher priced than the non-domestic product.
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Site - Level Technical Assistance Carlisle Elementary School (0409)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	409 Review production records and other supporting documentation.	BREAKFAST FOOD PRODUCTION RECORDS: 1- must include a count for planned and actual students served. 2 - Consistently include serving size for all items offered. Tip: pre-populate this column and make copies since you offer a weekly breakfast cycle 3 - Include name of school 4 - You do not have a Breakfast Menu posted on website or posted around school. This is the best promotion and outreach you can do! 5 - Staff Training annually - use Staff Training Webcast from state agency.

Org - Level Commendations

Description
APPLICATIONS: Benefit documents are 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. All applications were complete, signed and dated by the household member and SFA, were complete with SSN's. Access to benefit information is correctly limited. Waivers are provided to applicants and indicate specific fees. The SFA has a back-up system for benefit issuance documents and system.
CIVIL RIGHTS: Civil rights poster was posted in the cafeteria. Annual civil rights training was provided food service staff and documented. No discrimination was observed.
MEAL COUNTING and CLAIMS: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of November were accurate and complete. Point of Service (POS), counts and filed claims appear accurate. Infinite Campus is used as the school POS system. There is a POS for all students, and the POS was organized and orderly. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
No fiscal action as result of this review.
PROCUREMENT: a written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA also has a written Code of Ethics/Conduct which

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includes conflicts of interest, accepting items of monetary value, disciplinary actions. The SFA ensures that no vendors have been debarred or suspended by USDA. The SFA is part of the AEA purchasing group and has a signed agreement for (food, small wares and chemicals). FSD, Manager and Business Mgr all attended regional training.

RESOURCE MANAGEMENT: All expenditures reviewed appeared allowable. SFA has a separate financial account for nonprofit school food service and net cash resources do not exceed three operating months. Money is not transferred out of the account to support other programs.

Site - Level Commendations Carlisle High School (0109)

Description
Lunches observed met reimbursable guidelines. Staff and Cashier at High School are observed to be friendly, helpful and encouraging to student customers. Offer versus Serve is handled properly. Students are observed to have adequate time to eat.
Reimbursable meal line is separate from the a la carte line. There is only one point of service, students scan ID cards and reimbursable line moves fairly quickly without a la carte options. Students must purchase a la carte items at a window at any time during lunch, however, they must use cash. This is helpful for managing student accounts as well as maintaining an efficient serving line for reimbursable meals.
Smart Snacks documentation is well organized verifying most a la carte items sold are compliant. A folder is maintained with calculator printouts and product labels.

Site - Level Commendations Carlisle Elementary School (0409)

Description
All Breakfast meals observed were reimbursable. Breakfast signage is in place communicating what makes a reimbursable meal. Offer versus Serve is handled properly. Staff have a good understanding of a reimbursable meal. Students are observed to have adequate time to eat.