

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Treynor Comm School District (64530000)
SNP - Review ID: 5099

Program Year: 2019
Month of Review: November
Lead Reviewer: Brenda Windmuller
Org Representative(s): Carol Leaders

Site - Level Findings: Treynor Junior-Senior High School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
500 - Offer versus Serve	V-0500	The cashier has no way to confirm that students selecting salad bar have taken the minimum serving sizes of at least 3 components at lunch. The SFA was having students select components rather than items at breakfast for reimbursable meals.	SFA will 1. Explain the procedure they will use to ensure all students take the required minimum 3 components in their required portion and to ensure that each student has at least 1/2 cup fruits and or vegetables. 2. Provide a date for when OvS training will occur.	
1100 - Smart Snacks in School	V-1100	The SFA has a vending machine which is stocked with non-compliant items for the age group that it serves. 20 oz Power Ace beverages are currently accessible to middle school students.	The SFA will 1. Describe how the product in the machine will be brought into compliance. 2. Who will be monitoring the machine for compliance? 3. Provide a list of product to be stocked in the machine. 4. Submit the Smart Snacks Calculations for all product in the machine. And 5. Submit a picture of the vending machine after corrections have been made.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	The SFA only spent 85% of its allocated USDA Foods money (\$31,665.67 of \$37,164.9) in school year 2017-2018. The expectation is that SFAs spend at least 95% of the money.	The SFA will explain how they plan to spend at least 95% of the money in school year 2018-2019.	

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Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	207 a. Did the SFA complete verification?	<p>The SFA's NSLP Application states that the Determining Official is the Elementary Principal, the Confirming Official is the Superintendent's Secretary, and the Hearing Official is the Superintendent. However in 2018, the Superintendent acted as the Confirming Official and signed the application. The SFA should follow their outlined procedure.</p>
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. SFA did not select the low bid for bread in 17-18, this vendor does not supply delivery, so it was not a viable choice.</p> <p>17-18 agreements did not include terms and conditions and debarment statements were not on file.</p> <p>Two vendors were identified as micro purchases, but do not fit the standard of unplanned or one time purchase and does not allow for spreading the wealth as they were used for consistent purchase through the year. (Benards and Reinhart)</p> <p>Reinhart purchases exceeded the allowed threshold of \$3500 (\$5254). The Code of conduct should include Code 412.3 and 412.4 in addition to the policy numbers already referred to.</p> <p>The milk contract for 2018-2019 is valued at \$32,000, which is only \$3,000 below the local threshold for formal purchases. This should be monitored closely. If SFA believes there is any chance the purchase will exceed the threshold, they should use a formal procurement method.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>Must have signed debarment certifications kept on file.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p>

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		<p>Agreements valued at \$10,000 or more should have an exit clause.</p> <p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p> <p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none"><input type="checkbox"/> All price adjustments throughout the year<input type="checkbox"/> All invoices<input type="checkbox"/> All contracts and agreements<input type="checkbox"/> All bids solicited<input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)<input type="checkbox"/> Documentation of why you selected a specific vendor (Selection Rubrics)<input type="checkbox"/> Copies of bid solicitation<input type="checkbox"/> Debarment statements<input type="checkbox"/> CD provided by the AEA (if applicable) <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.</p>
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		<ul style="list-style-type: none"> <input type="checkbox"/> Track micro purchases, what purchased when and dollar amount. <input type="checkbox"/> Purchases should be distributed around community, not just one store. Small Purchases- Purchases that are under \$250,000 (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method. <input type="checkbox"/> Include all terms and conditions <input type="checkbox"/> Include terms: Buy American and Equal Opportunity <input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more <input type="checkbox"/> Attain Signed Debarment Statements <input type="checkbox"/> Awarded on lowest price (unless written documentation to justify) <input type="checkbox"/> Maintain documentation Formal Purchase- Purchases equal to and exceeding \$250,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used. <input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised. <input type="checkbox"/> Include all requirements of a small purchase <input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. <input type="checkbox"/> Everything must be in writing.
700 - Resource Management		Information was provided by the SA on opportunities for utilizing locally produced foods. The Superintendent was given contact information should they decide to peruse this avenue.

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700 - Resource Management		The SFA is not currently following their local Negative Balance Policy which state that students with a \$0 balance will not be allowed to charge a la carte items to their account. In practice, all students are allowed to charge continuously.
700 - Resource Management		The SFA spent only 85% of their USDA Foods Funds in 2017-2018. The goal should be to spend 95% or higher of this money. The FSD has been working with the SA's USDA Foods Consultant to correct this issue for the current school year.
1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	All employees working with the School Lunch Program must complete the required Professional Development hours by June 30, 2019. Food Service Director- 12 hours Full Time Employees-6 hours Part Time Employees (including all non-food service personnel working with the program)- 4 hours All employees working with the Lunch Program should have Civil Rights training every year.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The HACCP plan does not include the blood born pathogen and body fluid cleaning procedure. One is hanging on the bulletin board in the cafeteria. This should also be included in your binder.
RMCR - Revenue From Nonprogram Foods	5 If the SFA served adult meals at non-pricing sites and/or served adult meals free of charge to adults not directly involved in the meal service, determine how the nonprofit school food service was reimbursed in full for the cost of all adult meals served. Was the SFA's process for recovering the full cost of adult meals served sufficient?	Adults monitoring the three lunch shifts at the high school were allowed to eat lunch free of charge. These individuals did not contribute to the operation of the lunch nor performed any tasks to ease the burden of the Food Service Staff. These meals should be paid for by the individuals or another school account.

Site - Level Technical Assistance Treynor Junior-Senior High School (0172)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	There is opportunity for more students to have a reimbursable meal by adding a fruit or one item to their tray at breakfast. The cashier did ask, and when student

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		refused, charged them a la carte. (this is correct procedure) Changing student's mind sets to take a reimbursable meal could help with negative meal balances and increase breakfast participation rates.
400 - Meal Components and Quantities - Breakfast	407 a. Has the school offered the planned menu for the day of review?	The printed menu lacks clarity of what is being served. (breakfast on 1-9-19: Juice or Fruit, WG Cereal, Breakfast Bar K-5, Grab & Go 6-12)In actuality, Cereal was served only at K-5. (Daily menu posted at the door stated cereal was offered.)
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	The SFA needs to calculate how many onion rings it takes to make 1/2 cup (without the breading). Students were observed with 4-5 onion rings and no other fruit or vegetables. Other vegetables were offered beyond the POS, which do not count towards the reimbursable meal. Additional vegetables were also offered on the hot line. Consider relocating fruits and cold vegetables to the hot line area.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups? 404 b. Does signage promote water or any other beverage as an alternative selection to fluid milk throughout the food service area?	Orange juice is in similar packaging and kept in the same cooler as milk. Students may see this presentation as the two items being equal and a choice between the two. When in fact they are two separate components. The apple juice at breakfast is in this same cooler. The serving size of the orange juice was 8 oz. and the serving size for the apple juice was 6.75 oz. Juice may count for 1/2 of the total fruit requirement for lunch. Additional signage will help to make this clear.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Each student must have a minimum of three out of the five components in the minimum required quantity on their tray when they go through the POS at lunch. And 3 items at breakfast. One of the selections at breakfast and lunch must be 1/2 cup fruit or vegetables to count as a reimbursable meal. SA provided copies of OvS and the Meal Pattern. OvS training for staff is recommended.
500 - Offer versus Serve	502 Is there signage explaining what constitutes a reimbursable meal to students including the requirement to select at least 1/2 cup fruit or vegetable?	Menu signs should be updated daily to reflect the offerings of the day. The breakfast sign on January 9, 2018 stated that breakfast was cereal and Grab & Go. No cereal was served. Additional signs could be added to the salad bar to help guide students to selecting 3 components. FSD and SA

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		discussed ideas of how to accomplish this. Templates were provided by SA.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	The vending machine located in the weight room is accessible to both high school and middle school students. Therefore must meet the Smart Snacks standards for the Middle School Students. The machine is currently stocked with 20 oz. Power Ace drinks which do not meet the Smart Snacks standards for middle school.
Dietary Specifications Assessment Tool - Lunch	1 Are specifications considered when purchasing menu items and condiments to limit the following?	The premade soups are high in sodium (690 mg per serving). SFA should continue to monitor this. High school sodium levels should not exceed 740 mg at lunch per day.

Org - Level Commendations

Description
Benefit Issuance: All applications were approved correctly. Applications were processed within 10 days of receiving, all applications were complete with SS# and signatures. Direct Certification lists were downloaded as they became available. Benefit levels were modified quickly based on new DC lists. Benefits were extended to all members of households. A copy of benefit letters for each household was provided which made matching household members easy.
BREAKFAST & SUMMER PROMOTION (1600): The SFA does a good job of promoting breakfast. Breakfast has its own tab on the web site which includes information like why eating breakfast is important. Menus are posted in each cafeteria as well as the website. Summer Food Service Program, SFSP, outreach is shared via websites, and newsletters.
CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The "And Justice for All" poster is visible to program participants. The Off-Site monitoring was completed prior to February 1, 2019.
MEAL COUNTING & CLAIMING: 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. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records, were on file for all meals claimed for reimbursement for the review period.
Procurement: The SFA has had two representatives attend procurement training. While the 2017-2018 Procurement documentation reviewed did not include all required components, great steps were taken in 2018-2019. The 2018-2019 documents included the debarment statements, buy American and other terms and conditions required. Three solicitations were sent for milk and three were sent for bread. The Procurement Plan, Code of Conduct, Vendor Paid list and Off-Site Procurement Tool were all completed.
PROFESSIONAL STANDARDS (1200): Three members of the food service staff have completed ServeSafe training and received ServeSafe Certification. The FSD has completed her required Professional Development hours for 2018-2019. Several other staff members have completed their required hours or are close to completion.

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RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts reviewed indicated appropriate and allowable expenditures. The Paid Lunch Equity (PLE) too was completed and prices were increased as indicated by the PLE tool. Reports are filed on time, and all records are maintained for at least three years plus the current year. The SFA has a good procedure for processing invoices and rebates with checks and balances in place. The School Lunch Account maintains a healthy balance of funds. No Fiscal Action is expected at this time.

Verification: The Verification Collection Report was completed accurately and in a timely fashion. The correct number of applications were verified and selected from error prone applications. Correct information was collected, well documented and the process was completed 11-15-2018.

Wellness: The Wellness Policy was last updated 6-19-2017 and the Assessment was completed in December 2018. Both are made available to the public via the web site, handbook and newsletters. The Website is laid out nicely which allows people to find the policy easily. Meetings are held regularly and are very structured with good notes taken.

Site - Level Commendations Treynor Junior-Senior High School (0172)

Description
COMPETITIVE FOODS & SMART SNACKS (1100): Students may purchase a second entrée and other a la carte items at the high school. Documentation was available to show that all foods and beverages sold to students by the food service department during the school day met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte by the food service department.
Food Safety: The SFA does a great job of taking and recording temperatures of food as well as coolers, freezers and the dishwasher. The kitchen is well organized and extremely clean. Kitchen staff appear to take great pride in maintaining a clean and safe work environment.
MEAL PATTERN: Most students observed during the on-site visit had a reimbursable meal, the menu was complete with all food groups represented and served in their proper quantity. Menus for the month of review contained all required components. Water was available to all students during meal times.
MEAL REQUIREMENTS AND COMPONENTS: The Food Service Department does an excellent job of offering a variety of fruits and vegetables on the salad bar. This is an excellent way of offering required components at the same time allowing students the opportunity to choose vegetables that they enjoy eating.
SIGNS: The high school cafeteria has several signs explaining reimbursable meals and healthy food choices in general. A daily menu is located just outside of the door as students come into the serving area. Students are offered several choices including hot entrée or a soup and salad bar.