

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
George-Little Rock Comm School District (24570000)
On-Site Review Dates: January 8-10, 2019

Program Year: 2019
Month of Review: December
Lead Reviewer: Deann Murphy
Org Representative(s): Crystal deBoer

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Out of 124 applications reviewed there was 1 application error found.	The error was fixed and the household was notified during the on-site review so no further corrective action is required.	

Site - Level Findings: Little Rock Elementary School (0418)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Food production records (FPR) for the review week do not match the planned menu.	Submit a 1 week menu and corresponding FPR that match. FPR should show exactly what was served on the menu. If a substitution was made, please note the reason for the substitution as part of your response.	
600 - Dietary Specifications and Nutrient Analysis	V-0600	Based on the review week menus/food production records and the day of review observation, excess Meat/Meat Alternate is being offered at lunch and excess grains are being offered at breakfast which causes the SFA to offer students in grades 4-8 excess calories, putting their menus out of compliance.	Explain how you will ensure that planned menu offerings meet calorie requirements for both lunch and breakfast for 4-8 graders.	
1400 - Food Safety	V-1400	The SFA has not been recording temperatures for food, food storage or the dishwasher prior to December 2018.	The SFA will submit 2 weeks of food temperatures, dishwasher temperatures, and food storage temperatures, including milk coolers, walk-in refrigerator, reach-in refrigerator, freezer and any other food storage areas applicable in the Little Rock site.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	136 a. Are free and reduced price benefits provided to students in a manner that	If the SFA wishes to administer a local program only to free/reduced

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	assures confidentiality and prevents overt identification during meal service or at any other time in accordance with regulations and FNS Policy Memos?	students, they need to have a parent signature on a waiver or open up the program to all students.
200 - Verification	208 When a confirmation review was conducted:	A confirmation review is required on all verified applications. The confirmation official needs to determine the application for correctness/completeness and sign/date before anything is sent to the household asking for verification information. The confirmation official needs to receive 4 hours professional standards training annually.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Recommend the SFA develop a field trip standardized recipe so all staff are aware what needs to go into a sack lunch and that all components are included in their full quantities. Please ensure that a full 3/4 cup vegetables are included since the students do not have the option of OVS with field trip sack lunches.
700 - Resource Management		Much TA provided to district staff regarding procurement and allowable costs. Reviewed what should be charged as indirect vs. direct costs, what are allowable costs, and the need for State Agency permission to purchase equipment over \$5,000. Reviewed the Code of Conduct and the need to link the current policies discussing employee gifts and disciplinary actions to the Code of Conduct policy. Updated the current procurement plan and gave suggestions on a timeline for completing this each year. Also discussed the use of the small procurement template and what needs to be sent to vendors when obtaining price quotes. The FSD needs to spot-check her invoice prices with each vendors price quotes each month so ensure the SFA is getting charged appropriately for their products as a part of contract management. If errors are found, the business manager should be notified and payment held until errors are fixed. Last year the district used only 84% of their USDA Foods entitlement dollars allocated to them. The goal is to use at least 95%. Recommend applying for the DOD program which provides weekly deliveries of fresh fruits and vegetables to help meet this goal.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	In order to change the meal pattern, a student must have a diet modification form signed by a licensed medical professional. One student receives whole milk which is not allowed on the meal pattern with only a parent signature. The SFA must have the modification signed by a licensed medical professional in order to claim these meals as reimbursable. Also, one student has a signed order for Gluten free foods. The student is not being offered all 5 components and only took 2 components on her lunch tray which does not count as a reimbursable meal. The SFA should contact the student's parents to determine what can be offered in place of gluten containing foods. The student needs to take at least 3 components on her tray in order for it to be counted as reimbursable.
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 Assessment (Progress Report) should be dated. Stakeholders need to be invited but do not need to attend the meeting as long as they are given opportunity to contribute. The wellness committee should also include a school board member and a community member. Best practice is to have an assessment for each building since the wellness goals for the Elementary vs. MS vs. HS may be different.
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?	Non-nutrition staff (office/secretarial staff) need 4 hours professional standards training annually. Part of this training needs to be Civil Rights.

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		Full time (over 20 hours/week) kitchen staff need 6 hours training annually, Part time (under 20 hours/week) kitchen staff need 4 hours annually, staff hired after January 1 of the current school year only need 1/2 of the required hours.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	There were some duplicate policies in the food safety manual that can be taken out. Recommend the FSD read through each Standard Operating Procedure (SOP) to ensure that the staff is following them. If SOPs do not apply to this SFA or site, remove them. Also recommend using the food safety SOPs in training staff each year.
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 SFA needs to send out a summer feeding program flier to all households at the end of each school year so that families know where and when they can access free meals during the summer.

Site - Level Technical Assistance Little Rock Elementary School (0418)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	406 If the school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	Recommend standardizing portions so that all students K-8 receive the same portions since you are following a K-8 meal pattern.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The SFA needs to have standardized recipes for all foods that mix at least 2 or more food items together.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Staff cannot make students take both a fruit and a vegetable at lunch under offer vs. serve. Staff can encourage students to take fruits and vegetables, but students must be allowed to make their own meal choices as long as they take 3 components with one being 1/2 cup fruit/vegetable at lunch. At breakfast, students can also take whatever they want as long as they take 3 items with one being 1/2 cup fruit.
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?	Discussed menu planning, OVS and FPR with the Food service director. She was provided with examples/templates of FPRs that may help consolidate all required information.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The latest food safety inspection report needs to be posted in a public place. It is currently behind the door in the kitchen so it needs to be moved to somewhere that the public can read it.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Temperatures need to be taken on food, all food storage and the dishwasher daily. Food storage includes refrigerators, freezer, milk coolers.

Org - Level Commendations

Description
Based on the errors found during this Administrative Review, fiscal action will be less than the USDA \$600 disregard level. Therefore, there will not need to be any claim adjustments made.
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. Applications were complete with Social Security numbers and were

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determined within ten days. Income was only converted to annual when there was more than one frequency of income. Carry over 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.
Both breakfast and lunch menus met the minimum requirements and all vegetable subgroups were represented each week. Many low-fat, low-sodium foods were found in storage. Non-domestic food items purchased are noted in the SFA exemption log. No unallowed non-domestic foods were found in storage. Food production records were completed each day which included meal pricing. Pepper was available on the line for students to use. The fruit/veggie bar was a popular part of lunch. Free water was available at both lunch and breakfast as required. The FSD had CN labels and nutrition facts labels on file to support component contributions. Students seemed to have adequate time to eat their meals. Signage is posted to show students what they need to take to make a reimbursable meal. Staff give students a friendly prompt to encourage them to take a reimbursable meal.
District staff have met or are on track to meet their required professional standards training. Training is being tracked as required. Both the Authorized Rep and the FSD are new to their positions in school nutrition and both have exceeded their minimum training needs in order to learn the program requirements.
The And Justice for All civil rights poster was posted in the cafeteria at Little Rock. The public release was sent to the local media at the beginning of the school year. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided to staff and documented. The district has taken reasonable steps to ensure that students with special dietary needs are accommodated. Ethnic/racial information is collected and the summary form is completed. No discrimination was observed. SFA on-site monitoring was completed to ensure that both sites are meeting program requirements. The current state and federal non-discrimination statements are on both the posted menu and all household notification letters. There is a process in place if students/parents have a complaint about the school meals program.
The correct number of applications were verified and were correctly selected from error prone applications. The SFA used direct verification and found the student on E-Lookup so no verification documents were needed from the household. The verification process was completed and the report was filed prior to Nov. 15.
The district had a positive balance in their foodservice account as of January 31, 2018 so they did not need to complete their PLE tool. They did, however, and decided to raise their lunch prices accordingly. December receipts showed that most invoices were allowable and appropriate using Child Nutrition funds. The SFA uses the Diverted foods program since space is an issue to store all their commodity orders. Program records are kept for a minimum of 3 years + the current year. Non-program revenue covers non-program costs. The district has good records showing that catered expenses paid for from the nutrition account are reimbursed to the nutrition account.
The district has a procurement plan and Code of Conduct on file. They send specifications to multiple vendors if possible to get competitive price quotes. The FSD is using the micro-purchase log to help ensure that they spread the wealth between local vendors. The FSD attended 11 hours of procurement training this past year to learn more about the requirements.
The district has a recently reviewed copy of their Local Wellness Policy and assessment of the policy posted on their school website. They have an active wellness committee that meets regularly and includes many stakeholders. The policy has specific goals set for the 3 required areas of Nutrition Education and Promotion, Physical Activity and Other School based wellness activities.
The Food Service Director, School Nutrition Staff, Business manager, Central office secretary and Authorized Representative work well together to manage the school nutrition program.
The school does a good job in promoting breakfast with text messages and fliers home.

Site - Level Commendations Little Rock Elementary School (0418)

Description
Meal counts from the day of review were within reason when compared to the December review month. Meal counts from December seemed accurate and complete. There is a POS at the end of the line and the cashier has been trained to check trays to ensure meals are reimbursable. Students are not overtly identified as free/reduced/paid in line.
Older students are allowed to purchase an a la carte entrée if they have money in their account. The staff makes sure those that sign up have the funds available before lunch begins. The only a la carte being offered is the entrée sold at the reimbursable meal or milk, which both meet Smart Snacks requirements without further documentation.