### lowa Department of Education

### **Bureau of Nutrition and Health Services**

### **State Review Summary Report**

Cedar Valley Catholic School System (67958007)

Date of Review: February 5<sup>th</sup> - 7<sup>th</sup>, 2019

Program Year: 2019

Month of Review:DecemberLead Reviewer:Donna MatlockOrg Representative(s):Mary Jones

### **Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	SFA accidentally transferred benefits from the wrong column on the direct certification list resulting in decreasing from 'free to reduced' benefits.	Q 133 ca: For your response, indicate how you will ensure that direct certification benefits are transferred correctly to the POS benefit issuance list.	
700 - Resource Management	V-0700	SFA is not fully utilizing allocated funds supported by USDA Foods for current school year. SFA has only allocated 67.28% of funds towards foods for meals with \$12,621.00 remaining for usage. Only 72% of allocated PAL dollars were spent in 2017-2018 school year.  To support school nutrition programs the State requires SFA's to utilize USDA funds to its fullest capacity up to 100% usage.	Please contact Sarah White, USDA Consultant to set up a plan to spend down USDA funds. Please respond with a plan how SFA will incorporate ways to utilize USDA dollars moving forward.	

# Site - Level Findings: Sacred Heart (8005)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

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### **Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		SA discussed with SFA when procuring/soliciting to local distributors and businesses to include the Debarment Certification & Buy American disclaimer for using federal funds. These documents can be found in IowaCNP under "Download Forms".
RMCR - Indirect Costs	3 Did the SFA apply the correct indirect cost rate for the appropriate year?	SFA is charging the nutrition fund 50% of waste removal at Sacred Heart Elementary which has always been the process. The SA (State Agency) provided the FSD via email a Non-Public Indirect Cost Rate (IDCR) chart indicating if SFA's are charging nutrition fund an IDCR that it be no more than 10% and what is an allowable expenditure.
		On Sept. 4th, 2018, the general ledger report showed 4 separate charges of \$50.00 to the nutrition fund. It is difficult to divide these expenditures between departments and therefore not an allowable expenditure to the nutrition fund. The IDCR Manual can be found at this link: <a href="https://educateiowa.gov/indirect-cost-rate">https://educateiowa.gov/indirect-cost-rate</a>

### **Org - Level Commendations**

### Description

• Benefit documents, as well as all paperwork, were very 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. • The correct and current benefit issuance list was available. • All applications were correctly determined, signed and dated by the household member and the SFA, were complete with SSN's and case numbers, and all applications were determined within ten days. • Income was only converted to

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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. • Eligibility is kept confidential. • The SFA has a back-up system for benefit issuance documents and system.

- Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of December were accurate and complete. Point of Service (POS) counts and filed claims appear accurate. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. Cashiers are trained, and daily edit checks are performed. All students selected a reimbursable meal without having a prompt to select a ½ cup of fruit or vegetable as one of the three required components.
- The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification. The SFA had at least one person attend training. The verification report was completed accurately and on time.
- The district has a current wellness policy on file. The SFA's wellness policy was reviewed and revised on May 13, 2018. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The wellness policy and the most recent assessment of the policy are available to the public via website. The SFA completed an assessment of their wellness policy. Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.
- The Resource Management section of the Off-Site Assessment tool was completed on time. Financial records that were reviewed, indicated appropriate and allowable expenditures. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. There were no unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. Reports are filed on time, and all records are maintained for at least three years plus the current year.

# Site - Level Commendations Sacred Heart (8005)

# **Description**

• All meal components were available at the beginning of meal service on the days of observation and throughout meal service. • All meals observed met at least the minimum daily requirements. • Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption. • Menus included many homemade entrees, and standardized recipes are used for food production. • Free potable water is available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)? • At least two types of milk are offered. • Many low fat and low sodium food items were observed in storage. • Students had sufficient amount of time to eat after receiving meals. • Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch. A monthly menu is also posted. • Food service staff was polite and respectful to students, other staff, and each other. • Nutrient analysis was not required.

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- The "And Justice for All" civil rights poster was posted in the cafeteria. 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 food service staff and documented. A copy of the district's public release was on file, documenting that it was submitted to local media. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. Ethnic/racial information is collected and the form is completed. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and at least 50% were completed for breakfast prior to February 1st. The correct state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school's website.
- The Food Service Director completed the USDA menu worksheets for the week of January 7th-11th for breakfast and lunch at Sacred Heart Elementary. The worksheets showed the serving portions and component contributions meeting the meal pattern. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that Sacred Heart Elementary School is at low risk for (non) compliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, controlling the portion sizes of condiments, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats.
- The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. 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, dishwasher, and thermometer calibration. The kitchen and storage areas were orderly and clean. Food Service workers were proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed. FSD is very organized and training is done annually on SOP's.

FFVP: Good food safety procedures were observed in the preparation, holding, and distribution of the Fresh Fruit & Vegetable Program snacks. A nice variety of fresh fruits and vegetables are offered to students. Complete and accurate records are maintained to document both operational and administrative expenses. The Food Service Director has done a nice job of staying on target with the FFVP budget - completely utilizing the 1st allocation and on track for full utilization of the 2nd allocation. 75% of the claimed expenses are for the purchase of the fresh produce, meeting the goal of expending the majority of the grant on the produce for the program. Good overall management of the program.