

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Sigourney Comm School District (60120000)
SNP - Review ID: 5151

Program Year: January 15-17, 2019
Month of Review: December
Lead Reviewer: Cheryl Benson
Org Representative(s): Sigourney CSD

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	<p>(1) Over 200 students' benefits were reviewed and the following error was determined" There was no documentation for one student receiving free benefits. The student was entered as free by a building secretary. (2) Access to free and reduced benefits and the ability to change students' benefit levels should be strictly limited. Please refer to page 87 of the Eligibility Manual under "Need to Know" for further guidance. While principals and secretaries in the buildings may accept benefit applications from households, processing and entering the results should be strictly limited to avoid unintended overt identification, and to maintain the integrity of the process. (3) Verification was not correctly completed. All income on applications selected for verification must be documented by the household. On the application selected, there were four adults--one with zero income indicated and the other three had income indicated either weekly or every two weeks. When the household submitted documentation, they only submitted</p>	<p>(1) The letter of adverse action was sent to the household during the on-site review. No further response is required. (2) Indicate the date that access to Infinite Campus was limited so that building principals and secretaries cannot go into the system and change students' benefit levels. (3) Contact the household that was verified and obtain documentation of the other three income sources and submit copies. If the household does not respond or if the income documentation submitted puts the household over income limits, submit a copy of the letter of adverse action, and revise the Verification Report. (4) Converting income to annual was discussed on-site. No further response is required.</p>	

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		income documentation for the zero income adult. (4) When determining applications, the income is only converted to annual income if there is more than one frequency of income indicated on the application. If only one frequency is indicated (such as all the income is weekly), then the application must be determined as weekly income.		
900 - SFA On Site Monitoring	V-0900	Each year by February 1, SFAs must monitor every site where lunch is offered and 50% of the sites where breakfast is offered. The SFA has not conducted monitoring this year and did not conduct monitoring last year.	For your response, complete the monitor forms and submit copies.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	At the end of each year, the SFA must determine whether the percentage of revenue from non-program food sold is equal to or greater than the percentage of money spent on non-program food. There is a financial report on IowaCNP that calculates these percentages. The report is taken from the annual CAR along with calculations. The report currently states that there is insufficient revenue for non-program sales.	For your response, recalculate non-program food and revenue using the USDA Tool (attached) and submit the results. If the tool still indicates that more revenue is needed, also submit a plan to increase revenue and/or decrease food costs for non-program sales.	

Site - Level Findings: Sigourney Elementary (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	In order to ensure that accurate meal counts are taken, the count must be taken at the time and location of meal service. Pre-K students' meal counts are taken in the classroom in the morning as part of attendance. Since this practice can lead to overclaiming, it is not allowed.	The teacher was very cooperative and agreed to check off students in the cafeteria instead of the classroom. No further response is required. It is recommended that the director do occasional checks to ensure the correct counting procedure continues.	

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400 - Meal Components and Quantities - Lunch	V-0400	<p>(1) When replacing a menu item, the SFA must ensure that the meal pattern is still being followed. Due to a recall of Romaine lettuce on 12/4/18, the director replaced Romaine lettuce with additional meat and cheese sauce on the Nacho entrée instead of additional vegetable. This resulted in insufficient "other" vegetable sub-group for the week and insufficient vegetable for the day of meal service. In the last review, there was also one day that was short of vegetable. Replacing the Romaine with any other vegetable would have been the correct way to respond to the problem. (2) A Menu Certification Worksheet must be submitted for all grades in the reviewed building. The director submitted a worksheet for grades K-5 but not grade 6.</p>	<p>(1) Ordinarily a repeat meal pattern error would result in reimbursement for one day's meals being reclaimed. However, since this was due to a recall, the meals will not be reclaimed. If during the next review the menus are short of vegetable or short of "other" vegetable sub-group, then meals will be reclaimed regardless of the reason. For your response, indicate what could have been offered to students to replace the dark green vegetable. If there wasn't any other dark green vegetable available for that day, how could the week's menu be altered to include a dark green later in the week? What could you do if this happened on a Friday? The director must also complete the Meal Pattern module at Iowa Learning Online Professional Development website and submit a copy of the certificate. (2) Submit a Menu Certification Worksheet for grade 6.</p>	
500 - Offer versus Serve	V-0500	<p>When using Offer vs Serve, OVS, students must be able to decline two of the three components at lunch. During observation of meal service at the elementary, there was no indication that students in grades PK through 4th grade knew they could decline any of the food components. For example, refried beans were served to all of the students in those grades even though the majority of students did not eat any of the beans. Students could be prompted before entering the lunch line to indicate food they do not want, or line staff could ask students if they do or do not want food items, or staff could pre-plate different options such as trays with beans and without beans, trays with lettuce and without lettuce, etc. For breakfast OVS, students who already had a reimbursable meal were told to</p>	<p>For your response, indicate how Offer vs Serve will be changed and implemented so that it is apparent that students have choices as allowed by OVS. Have all line staff view the two webcasts Building a Healthy Lunch and Building a Healthy Breakfast, complete the quiz questions attached below, sign and date the quiz, and submit copies.</p>	

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		take another item. It is okay to encourage students to take cereal or to ask them if they forgot, but they cannot be required to take another item if they already have a reimbursable meal.		
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	103 At the beginning of the school year, how is benefit status handled for children who have not submitted an application for the current school year?	Whenever a household is being denied free or reduced meal benefits, or benefits are being decrease from free to reduced or free/reduced to denied, the household must be informed in writing via a Letter of Adverse Action. That letter must provide the household with 10 days to appeal and also provide the household with contact information for the Hearing Official. The Hearing Official must be someone other than either the Determining or Confirming Officials and must also be in a higher position.
100 - Certification and Benefit Issuance	105 How long does the application's approval take from the date the SFA receives the application from the household?	The SFA has ten days from when an application is accepted until the application is determined. Since households may sign and date an application and then not turn it in immediately, it can appear that the determination did not occur in a timely manner. The SFA should instruct anyone in the district who is accepting applications to date-stamp the application so that compliance with the ten day limit can be determined.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Technical assistance was provided on accommodating special diets. Accommodation has two main sections. The first is special diets that can be accommodated and still stay within guidelines for a reimbursable meal. For example, a student is allergic to strawberries so the SFA provides a different fruit for that student. In cases like this, there is no requirement for a Diet Modification Request Form. The school may decide to have the household submit the form or some other documentation, but it is not required by regulation. The SFA must accommodate the special diet as soon as possible and cannot wait until a form is submitted. The second section is diets that cannot be accommodated within the requirements of a reimbursable meal. For example, a student cannot have either regular

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		<p>milk or a nutritionally equal substitute milk. In this case, the SFA cannot accommodate the special diet until a Diet Modification Request Form that is signed by a medical professional who can prescribe medication is obtained. Finally, the modification forms do not have to be obtained annually. The SFA can follow up with households annually to determine whether there have been any changes. The SFA would only need to request a new form if there has been a change.</p>
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	<p>Technical assistance was provided on monitoring. Lunch must be monitored annually at each site, breakfast must be monitored at 50% of sites annually. The director is encouraged to take a serious look when completing the monitoring forms.</p>
1000 - Local School Wellness Policy	1004. How are potential stakeholders made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy?	<p>SFAs should ensure that the following stakeholders are invited and encouraged to participate on the Local Wellness Policy Committee: students, parents, administration, teachers of PE, school food service staff, school health professionals, board members, and the general public. Outreach can be done via websites, newsletters, local media, etc.</p>
1100 - Smart Snacks	1102 How does the SFA account for accompaniments when determining whether food items meet the Smart Snack standards?	<p>Documentation for Smart Snack items must include the label and print out from the nutrition calculator. Documentation provided by the vendor is not acceptable.</p>
1200 - Professional Standards		<p>Operating Child Nutrition Programs (CNP) is a time-consuming and complex job. When the Food Service Director is working every day in the kitchen plus completing required record-keeping duties, there is little time left for menu planning and innovation. It is recommended that if at all possible the FSD be relieved of kitchen duties all or part of the time in order to concentrate on the duties of a director of the programs. If that is done, the FSD should first concentrate on the meal pattern, organizing labels and other documentation, standardizing recipes, visiting other SFAs for ideas, offering more choices of entrees, fruits, and vegetables to students, looking at innovative ideas to increase participation such as Smarter Lunchroom movement, grab-and-go meals, last-chance service, additional a la carte offerings, etc. Once that is running</p>

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		then the director could begin to concentrate on other areas such as procurement.
1200 - Professional Standards	1211 Review an employee list for the day of the review and verify that the SFA's information from the Off-site matches the current (day of review) employee list.	It is recommended that regular professional development time be built into the schedule--weekly, monthly, or quarterly. Successes and problems can be discussed or a webinar can be scheduled, or training from a vendor can be presented. This way, staff will not have any problems getting required professional standards training hours.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	Technical assistance was provided on Professional Standards. There was a misunderstanding of what constitutes full-time and part-time for PS. The director was also told that in Iowa, the hours can be average over a two year period. The director has a plan to complete training hours for all employees. The director needs one hour, kitchen manager needs four hours, two staff members have completed training hours, two need 3.5 hours, and one needs four hours. The Iowa Tracking Tool was also shared with the director.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	SFAs are required to regularly review and revise their food safety plan. Food service staff also have a number of required hours of training each year. One way to satisfy both of those requirements is to have staff assist in reviewing and revising the food safety plan. Standard Operating Procedures can be divided among staff, reviewed, and then suggestions made to the entire review staff. Staff can also check the ISU Extension website for new SOP prototypes and determine whether they should be added to the SFA's plan
RMCR - Revenue From Nonprogram Foods	9 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	Technical assistance was provided on completing the Non-Program Revenue tool, NPR. There is a financial report on IowaCNP generated from the annual CAR. A form with information on calculations on the financial report was provided. It is recommended that the director and authorized representative get together and work on this for next year so that the separate NPR tool does not have to be completed. Also discussed was calculating program food costs and revenues then subtracting from total food costs and revenues to obtain nonprogram amounts.

Site - Level Technical Assistance Sigourney Elementary (0409)

Area	Question	Comments
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<p>400 - Meal Components and Quantities - Lunch</p>		<p>Offering choices to students can help increase participation. The more daily choices of fruits, vegetables, and entrees available, the more likely a student is to find something that would encourage him or her to participate. Cupping up multiple fruit and vegetable choices or offering a fruit/vegetable bar is appealing to many students. Offering a choice of entrees--main entrée plus a daily cold sandwich, salad, and 'lunchable' style meal is one way to do that. Offering a cereal-entrée meal to elementary students is an easy way to offer them another choice. Also look at the Smarter Lunchroom movement for ideas on promoting healthy food, and contact Team Nutrition staff in Des Moines for further ideas. The more you can make the cafeteria seem less like a school cafeteria and more like the type of place students buy food, the more likely you are to increase participation.</p> <p>Webinars and Webcasts that are available on our website, www.educateiowa.gov/pk-12/nutrition-programs under Learning Tools-Schools include: Marketing School Meals to Increase Participation, Smarter Lunchroom Resources, Menu Planning Resources, Rise and Shine-It's Time for Breakfast, Alternative Breakfasts, and Customer Service. There are also hundreds of training resources at professionalstandards.fns.usda.gov/</p>
<p>400 - Meal Components and Quantities - Lunch</p>	<p>402 Are the minimum daily quantity requirements met for the age/grade group being offered?</p>	<p>Technical assistance was provided on the meal pattern compliance at the junior-senior high school. Currently all students in grades 7-12 are receiving the same meal pattern. Calories and other guidelines for grades 9-12 do not overlap with any other grade level. If all students are being offered the same food in the same quantities, then the meal pattern is out of compliance for either grades 7-8 or for grades 9-12. The director must incorporate some differences between the grade groups in order to meet requirements. For example, grades 9-12 could be offered additional bread, chips, rolls, or occasional cookie using signage to indicate that the food is only for high school students. Cashiers can ensure that the students taking the additional food are in grades 9-12.</p>
<p>400 - Meal Components and Quantities - Lunch</p>	<p>403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?</p>	<p>When students cannot drink regular milk, milk substitutions that meet the nutrient standards of regular milk may be substituted. Lactose free milk is always an acceptable</p>

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		<p>replacement. When using soy milk, it must meet these minimum standards:</p> <p>Calcium 276 mg-27.6%; Protein 8 grams; Vitamin A 500 IU-10%; Vitamin D 100 IU-25%; Magnesium 24 mg-6%; Phosphorus 222 mg-22.2%; Potassium 349 mg-9.7%; Riboflavin .44 mg-25.9%; Vitamin B12 1.1 mcg-18.3%</p>
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Standardized Recipes are required by regulation for any food item that is altered in any way. A standardized recipe must include--name of the recipe, number of servings and the total yield of the recipe, ingredients, directions for preparation, serving size, component contribution and critical control points for food safety. Several recipes that were reviewed did not include all required information and/or the consultant was told that the recipe isn't what is actually being used. The director should work on recipes to make sure they are complete and accurate. There are many recipes out there that are already standardized that can be used.
400 - Meal Components and Quantities - Lunch	411 a. Did the school comply with the planned menu for the review period?	There are five vegetable sub-groups: starchy, red/orange, dark green, dried beans/legumes, and other. Since the most frequently shorted sub-groups are dark green, red/orange, and legumes, it is recommended that the SFA always have something in inventory in case a delivery doesn't come in or some other issue occurs. For example, frozen broccoli, canned carrots, and canned baked beans could be kept on hand.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	It is highly recommended that the results of thermometer calibration be logged as a way to ensure that the thermometers are checked and also as protection in case of a food borne illness outbreak.
Dietary Specifications Assessment Tool - Lunch	25 Larger portions and/or bonus items and/or seconds are offered (offering portion sizes that are inconsistent with the planned menu). Entrées sold a la carte are exempt.	Staff and other adults who purchase meals can be provided with the portions for grades 9-12 regardless of what grades are served in their building. However, they cannot be provided with larger portions than grades 9-12 without an additional charge. During lunch observation, all adults who purchased a meal were provided with double the meat portion that grades 9-12 receive plus additional food in other components. This is not an allowable use of Child Nutrition funds and must stop immediately. Food service staff must be firmly instructed to not do this, and the director

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		<p>should follow up to ensure that the practice has stopped. While staff sometimes erroneously believe that they are paying more for their meals and therefore should receive more, that is not true. The price for their meal is higher because their meals are not subsidized by the government while all student meals are subsidized. The Child Nutrition Programs are intended for the benefit of the students, and while adult participation is encouraged, it is not the main purpose of the Programs.</p>
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Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were 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. A correct and current benefit issuance list was available. Over 200 applications were reviewed and all but one application was correctly determined, most were signed and dated by both a household member and the SFA, applications were complete with SSN's and case numbers, and all applications were determined within ten days. Rollover applications were removed if the household did not apply within thirty days of the school year. Free meals are extended to all members in the household. Waivers are provided to applicants that indicate specific fees and were signed and dated by the household. The SFA has a back-up system for benefit issuance documents and system.</p>
<p>CIVIL RIGHTS: The And Justice for All civil rights poster was posted in the cafeteria in a location where participants can read information on the poster. Annual civil rights training was provided 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 has been completed and filed. No discrimination was observed. The current state and federal non-discrimination statements are provided on all material describing the program.</p>
<p>HACCP/FOOD SAFETY: 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 reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. The latest Health Inspection Report was posted in a publicly visible location, and two inspections have been requested for each serving site. There were no critical areas noted on the report. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and the dishwasher. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.</p>
<p>MEAL COUNTING & CLAIMING: 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 meal observation. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. All students observed selected a reimbursable meal.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, has created menus that meet the meal pattern for reimbursable meals. All meal components were available at the beginning of service and throughout meal service on the days of observation. Documentation such as food production records, labels, inventory, and purchase receipts indicated that meals was on file. A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal. Food service staff was polite and</p>

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respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheets for each school selected for review for a specified week during the review period. Nutrient analysis was not required.

PROCUREMENT: The off-site procurement tool was completed, and board purchasing policy, written procurement plan, and vendor paid lists were submitted. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. The district is a member of a Group Purchasing Organization. A signed agreement with the Group Purchasing Organization for SY 2017-2018 is on file. The signed agreement states that the school district agrees to procure food (excluding bread and milk) and non-food supplies through the Group's awarded Prime Vendor as well as vendors awarded the ware wash and small ware contracts. Bids for dairy and breads were also available.

PROFESSIONAL STANDARDS: The director maintains a tracking tool and documentation for some training. The director will be attending a week-long training in Mississippi sponsored by the Institute for Child Development which will increase her knowledge of Child Nutrition Program requirements and allow networking with other directors.

RESOURCE MANAGEMENT & RECORD KEEPING: Financial records that were reviewed, indicated appropriate and allowable expenditures. 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. The District had a positive balance in January 2018 and elected to not increase paid lunch prices. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for commodities. Reports are filed on time, and all records are maintained for at least three years plus the current year.

SBP & SFSP OUTREACH: School Breakfast Program, SBP, outreach was sent out at the beginning of the year to inform families of the availability of the program including times and locations. Reminders of the SBP were also sent out throughout the school year. Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer.

VERIFICATION: The correct number of applications were verified and were correctly selected from error prone applications, and the process was completed on time. The applications selected for verification were confirmed prior to verification to ensure the original determination was correct. The SFA had at least one person attend verification training.

WELLNESS POLICY: The district has a current wellness policy on file. 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 is available to the public. An assessment of policy goals and a review of the policy has been conducted in the last three years as required.