

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Spalding Catholic School System-Granville (41498000)**  
**On-Site Review Dates: January 15-16, 2019**

**Program Year:** 2019  
**Month of Review:** December  
**Lead Reviewer:** Deann Murphy  
**Org Representative(s):** Wendy Oetken

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	There was no confirmation review completed on the verified application as required.	Both the Determining Official and the Confirming Official will complete the tutorial on verification. Each Official will submit their certificate of completion to the State Agency. Tutorials can be found at <a href="http://ilopd.iowa.gov">http://ilopd.iowa.gov</a> . Scroll down to Iowa School Meal Programs Tutorials. You will need to create an account the first time by using the enrollment key <b>schoolmeals</b> .	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The SFA has excess funds in its Hot Lunch account and does not have a plan as to how to spend them down. USDA regulations allow cash on hand up to 3 months operating expenses.	The SFA will develop and submit to the State Agency for approval a plan to spend down their hot lunch account funds. The plan should detail specifically how the SFA plans to spend their money and give a timeline as to when they expect the cash balance will be at or below 3 month operating expenses.	

**Site - Level Findings: Spalding Catholic - Alton Center (8104)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	There must be a determining official signature and date on each application approved/denied for benefits.

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300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Students do not use Offer vs. Serve when eating Field trip sack lunches so all 5 components must be provided to each student in their full quantities, including 3/4 cup vegetables.
700 - Resource Management		Much TA was given on writing the SFA's SY2018-19 Procurement Plan and starting their SY2019-20 Procurement Plan. Discussed linking their policy describing planned disciplinary actions to their Foodservice Code of Conduct. Explained in detail how to use the Small Purchase template and what must be sent to vendors when obtaining price quotes. Also discussed using the micropurchase log to help track micropurchases in order to spread the wealth. Encouraged the FSD to begin spot checking invoices against bid prices for contract management.
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	Recommend completing Civil Rights training as a group using Download Form NSLP500 or NSLP501 and documenting training on a sign-in sheet. If training is done individually, recommend having each participant complete the quiz located at the back of the Iowa Civil Rights Manual and keep it on file for accountability.
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 and progress report must be made available to the public. The policy that is posted on the school website is outdated. Both the updated policy and the most recent progress report should be posted on the website or provided to district households in a newsletter, etc. Also, the current policy states that an assessment will be repeated every 5 years. USDA requires assessments be done at minimum every 3 years.
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?	The FSD needs to obtain another 6 hours Professional Standards training by June 30, 2019. Kitchen staff need 3-4 more hours and the Confirming Official needs another 3 hours training by June 30, 2019. Training topics should apply directly to the staff members job duties for the Child Nutrition Program.

**Site - Level Technical Assistance Spalding Catholic - Alton Center (8104)**

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable <b>lunch</b> to students for all applicable grade groups?	Signage was provided to the SFA by the State Agency to post at or near the beginning of the lunch line educating students what they must take to make a reimbursable meal.
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?	Discussed with the FSD the need to list the actual portion used on the Food Production Record so that it is clear what was actually served rather than the ounce equivalent that should be served. For example, list 5 chicken nuggets instead of 2 oz chicken nuggets. Also, if the standardized recipe does not reflect what is actually served, the recipe should be adjusted or the FPR should show the change.
1400 - Food Safety	1411 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	The SFA needs to have an exception log on site, noting all non-domestic foods that are accepted for use in the Child Nutrition Program. The log should note the date, non-domestic food accepted, country of origin and reason why the product was accepted.

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**Org - Level Commendations**

Description
Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used, student eligibility is checked using E-Lookup, 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. All applications were correctly determined, applications were complete with SSN and parent signature, and the applications were determined within ten days. 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. Eligibility is kept confidential.
Menus contained the required minimum components, all vegetable sub-groups were met and each component was provided in an adequate quantity. The SFA uses many commodity foods and has CN/Nutrition Facts labels to support minimums. The FSD tracked the calorie, sodium, etc. content of her review month menus which were in compliance of calorie ranges and maximum sodium levels. The SFA uses many fresh or frozen vegetables which the students seem to like. Standardized recipes and completed food production records are on file for foods served. Water is available to all students as required. Offer vs. Serve was done correctly so that students know they can decline some of the foods offered at lunch.
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 to Limited English Proficient households. Annual civil rights training was provided to staff and documented. Ethnic/racial information is collected and the summary form is complete. No discrimination was observed. SFA on-site monitoring was completed prior to Feb. 1 to ensure that the school is meeting program requirements. The current state and federal non-discrimination statements are listed on the posted menu and on all household notification letters.
The correct number of applications were verified and were chosen appropriately. Verification of income was correct. The process was completed prior to the November 15 deadline.
The SFA completed their PLE tool and increased prices accordingly. December 2017 expenses that were reviewed seemed to be allowable and appropriate. Non-program food revenue covers non-program food costs adequately. Records are kept for at least 3 years + the current year. State Agency reports are filed on time.
The SFA has a link to the summer feeding program's sites on its website and they plan to promote this further in their spring newsletter so that families know where they can access free summer meals.
The SFA has an active wellness committee that is excited about wellness activities. They want to meet every other month. Their local wellness policy and building assessment have been completed recently. All required areas have been addressed, including nutrition education and promotion, physical activity and other, student based wellness activities.
There was no fiscal action for this review so no claim adjustments will be needed.

**Site - Level Commendations Spalding Catholic - Alton Center (8104)**

Description
Meal counts during the on-site review were reasonable when compared to the December review month counts. Meal count totals for the month of December appeared accurate and complete. There was a point of service, POS, at the end of the line. Students give their PIN to the cashier who enters it into the POS. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
The only competitive food sold at the school is extra milk. This is allowable without further documentation.
The SFA has a written Food Safety plan that includes the required elements. The latest Health Inspection Report was posted in a publicly visible location in the cafeteria. Temperature logs are maintained for all coolers-including milk cooler, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean.