

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Trinity Lutheran School-Cedar Rapids (10538214)
Dates of Review: January 9 – 11, 2019

Program Year: 2019
Month of Review: November
Lead Reviewer: Deb Linderblood
Org Representative(s): Mark Mueller

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One student was receiving free meal benefits and should have been denied as the household income was over the income limit for free or reduced. Two students were receiving free meal benefits but there was not documentation supporting the free status (no application and students were not found on Elookup)	Send all three households a notification letter informing them that their student's benefit status will change to paid. TA provided that the households must be given 10 calendar days in which to appeal. The benefit status can then be changed within the 10 operating days following the appeal period. Attach the notification letters or provided letters to the State Agency while on-site. This was corrected while the State Agency was on-site. No further action is required.	
200 - Verification	V-0200	The Food Service Director was unable to find the income documents for the household that was selected for verification. This is a repeat violation from the Administrative Review conducted three years ago.	Attach the income documents for the household that was selected for verification once they are submitted. Also attach the notification letter which informed the household of the results of verification. This was completed while the State Agency was on-site so no further action is needed.	
200 - Verification	V-0200	The SFA did not send the household selected for verification the selection letter that is the State Agency prototype. The Food Service Director was unable to produce the letter that she did send.	State your intentions to use the State Agency selection letter to send to the household(s) that are selected for verification.	
800 - Civil Rights	V-0800	The SFA did not submit the Public Release to the local media. TA provided that the SFA does not need to pay for the Public Release to be published but does need to keep documentation showing that it was submitted to the local media.	State your intentions to submit the Pubic Release to the local media each school year.	
1000 - Local School Wellness Policy	V-1000	The SFA has a Wellness Policy however it does not have specific goals for Nutrition Education and Promotion. The Wellness Committee does not include parents or students. Also the SFA has not completed an assessment of their Wellness Policy. Provided a sample Wellness Policy that has Nutrition Education and Promotion goals that the SFA may select to add to their	State your plan and a timeframe for the following: 1.) when your Wellness Policy will be revised to include specific Nutrition Education and Promotion goals 2.) how and by when you will invite parents and students to be part of your Wellness Committee 3.) by when an assessment of your Wellness Policy will be completed 4.) how and by when you will make the assessment available to the public.	

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		policy. Provided the following: "Does Your Wellness Policy Measure Up" handout, Local Wellness Policy Progress Report template, and Non-Food Classroom Reward and Celebration Ideas handout.		
1200 - Professional Standards	V-1200	A new Food Service Director has been hired and starts her duties on 1/14/19 and only has a few month of experience in school nutrition.	Complete and attach a New School Nutrition Director Training Plan for the newly hired Food Service Director.	
1200 - Professional Standards	V-1200	The newly hired Food Service Director is not yet ServeSafe certified.	For the newly hired Food Service Director to become ServeSafe certified. Attach certificate of completion of food safety training.	
1400 - Food Safety	V-1400	The SFA does not have a Standard Operating Procedure for Cleaning and Disinfecting Body Fluid Spills.	Develop and attach a Standard Operating Procedure for Cleaning and Disinfecting Body Fluid Spills.	

Site - Level Findings: Trinity Lutheran School (8214)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	The SFA completed an Edit Check Report but did not do the section that has the attendance adjusted section.	Complete and attach an Edit Check Report with the attendance adjustment section completed for December, 2018.	
300 - Meal Counting and Claiming - Lunch	V-0300	One day the pre-school student's tickets did not get scanned into the POS system and thus these meals were never claimed for reimbursement.	Describe your plan for how you will make sure the pre-school meal tickets are entered into the POS system each day and claimed for reimbursement.	
400 - Meal Components and Quantities - Lunch	V-0400	For the week of menus used to complete the menu certification worksheets, the SFA was short on the quantity of vegetable on Monday (only 1/2 cup planned instead of 3/4 cup) and for the week the SFA was short on "Other" vegetables. Also, when completing Food Production Records the SFA is not indicating the amount prepared consistently, is not recording the planned servings for each grade group and is not recording the amount of milk leftover. TA provided that each day the SFA must plan for 3/4th cup of vegetable however with Offer vs. Serve, students only have to take 1/2 cup of vegetable. Reviewed that 1/2 cup of "Other Vegetable" is required each week. Encouraged the SFA to develop a cycle menu and to use the Menu template to assure that all components and vegetable sub-groups are planned correctly. TA also provided on how to find and use the USDA Food Buying Guide.	Using a different week than was used to complete the menu certification worksheets, complete and attach a Menu Template showing that all of the vegetables and vegetable sub-groups were offered in the required quantity. Attach the Food Production Records that correspond to the week used to complete the Menu Template showing that all required fields are completed.	
1100 - Smart Snacks in School	V-1100	The SFA once a month has a healthy snack sale. Some of these products are not Smart Snack compliant, such as the pretzels. The State Agency and the Food Service Director used the Smart Snack calculator and determined that the pretzels were not compliant. All foods sold to	Complete and attach the Smart Snacks Calculator page for four products that will be sold that meet the Smart Snack guidelines. State your intentions to only sell products and beverages from midnight until 30 minutes after the end of the school day that are Smart Snack compliant.	

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		students from midnight until a half hour after the end of the day must meet Smart Snack regulations and documentation of compliance with regulations must be available for review. Food sold to students includes the cafeteria, vending machines, school stores, fundraisers, etc.		
1400 - Food Safety	V-1400	In November dish machine temperatures were only taken on three days.	Have food service staff take and document dish machine temperatures each day school is in session. Attach the dish machine monitoring form showing that temperatures were taken.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	TA provided that income should only be reported as annual when the household reports annual or if income is reported in two different frequencies (for example: weekly and monthly).
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	TA provided that on the Verification Report, 3-2 is the number of students who are directly certified through SNAP. SNAP is Food Assistance in Iowa so all students with a number one under Food Assistance on the ELookup printouts should be counted in line 3-2. Assisted the Food Service Director in correcting the Verification Report.
200 - Verification	215 a. Did the SFA complete verification by November 15?	TA provided that the Verification Process is to be completed by November 15th each year.
700 - Resource Management		<ul style="list-style-type: none"> · Showed the in-coming Food Service Director how to find the Procurement Plan on IowaCNP. The procurement event page on the written procurement plan should be revised to reflect the upcoming school year's procurement events, correct procurement methods and contract award type. It is recommended that the procurement event page of the written procurement plan be reviewed annually (about February). It is best practice to keep a separate procurement event page for each school year. This practice will help ensure that the correct procurement method is identified based on the estimated value of a particular purchase. On the plan the SFA should identify if they will award based on line item or bottom line for any purchasing event using small or formal purchasing method. · TA also provided that the SFA needs to have debarment statements from vendors when using small or formal procurement methods. · Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a

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		<p>Buy) and formal methods of procurement. Please refer to the state-prototype templates posted on IA_CNP.</p> <ul style="list-style-type: none"> · When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." · When procuring milk and bread, along with specifications (descriptions) for all items to be procured, the estimated annual usage for each item should be provided. To ensure the district selects a responsive vendor with the overall lowest price (bottom line), the cost of each item on price quotation request should be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template that calculates extended cost for milk was provided. · For milk, other things to consider when requesting price from vendors are: is pricing requested for paper cartons or plastic bottles, coolers to be provided at no charge, Hazard Analysis Critical Control Plan (HACCP) plan to ensure clean crates and milk cartons are delivered, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should inform vendors whether a firm, fixed price or a fixed price with economic adjustment (escalator clause) is requested. · The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and the description of the product solicited by GPO. Prices on the invoice should match bid pricing or be lower unless SFA was given advance written notification per solicitation of any price increase. Food items procured by the SFA not on the GPO solicitation must be procured using appropriate procurement methods. · Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-domestic agricultural commodity is accepted. · The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification and be at equal or lesser price. · TA provided that the SFA should track rebates and credits. Provided a spreadsheet to use to do this tracking.
700 - Resource Management		<p>In school year 2017-2018 the SFA utilized 93.2% of their allotted USDA food dollars. They are participating in the Direct Distribution program and DOD. TA provided that the SFA should try to use as close to 100% of their</p>

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		allotted dollars each year as possible.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	TA provided that the short version of the USDA nondiscrimination statement should be on the monthly menu instead of a longer version that the SFA is currently using. The short version is: "This institution is an equal opportunity provider."
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	TA provided that if parents wish to file a complaint about any child nutrition program, the process that should be used can be found at the following web site: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	TA provided on where to find the Iowa Individual Training Tracker tool (educateiowa.gov/documents/professional-standards/2016/11/iowa-sfa-tracker-tool). Encouraged the Food Service Director to use this tool for tracking training.
1500 - Reporting and Recordkeeping	1501 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	TA provided to the in-coming Food Service Director that documents pertaining to the Child Nutrition Program must be kept for 3 years plus the current year.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	TA provided that even though the SFA does not have a Summer Food Service Program, they are still required to inform eligible families about the availability and location of program. Showed the Food Service Director where promotion materials on IowaCNP.

Site - Level Technical Assistance Trinity Lutheran School (8214)

Area	Question	Comments
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	TA provided that a second health inspection must be requested if one is not performed. The SFA needs to keep documentation showing that a second inspection was requested.
Infant and Pre-K Meal Pattern Checklist - Lunch	11 Was the appropriate milk type served?	TA provided that 3 to 5 years old students need to be served either skim or 1% unflavored milk at lunch.

Org - Level Commendations

Description
Certification and Benefit Issuance: The current application for free and reduced price meals/milk and income guidelines were used, ELookup is utilized, benefits are accurately and frequently transferred to the Point Of Service (POS) system, and denied applications were correctly determined. All applications were signed and dated by the household member and the SFA, were complete with Social Security Numbers 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. 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.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria, services are offered for Limited English Proficient households, annual civil rights training was provided for all food service staff and documented, including volunteer staff. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed.
Fiscal Action: Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for November seem to be needed.

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Food Safety: The SFA has a written Food Safety plan. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including the milk cooler, freezer and refrigerators. Food temperatures are documented on the food production records. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Opened foods are labeled and dated. Rose Heetland is ServeSafe certified.
Local Meal Charge Policy: The SFA developed and approved a meal charge policy on February 12, 2004 and it was last revised on December 27, 2017. The policy was distributed to all households and staff were informed of the policy.
Procurement: The SFA has a written Procurement Plan that includes federal and local thresholds, have listed procurement events and procurement methods for each event. The SFA is part of the AEA purchasing group. The signed agreement with AEA Purchasing 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. So far this school year, the SFA has used 50% of their allotted PAL dollars and is on track to utilize their Department of Defense Fresh Fruit and Direct Distribution allotments.
Professional Standards: All nutrition staff have started to obtain their required training for Professional Standards in school year 2019. The Food Service Director has completed 12 hours of her required 12 hours of training for school year 2019. A Training Spreadsheet is maintained showing which staff have been trained and meet required annual hours. There is planned training for the rest of the school year to assure staff meet the training requirements.
Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.
Resource Management: All expenditures that were reviewed appeared allowable. 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 Non-Program Revenue (NPR) tool was completed and no increase in prices were required. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs.
Verification: The correct number of applications were verified and were correctly selected from error prone applications. The application selected for verification was confirmed prior to verification.
Wellness Policy: The SFA's wellness policy was reviewed and revised on December 27, 2017. The following individuals are involved in reviewing and updating the LWP: Nutrition Services Director, the school board and the principal. There are guidelines for foods sold on the campus and goals for physical activity.

Site - Level Commendations Trinity Lutheran School (8214)

Description
Meal Components and Quantities: All meal components were available at the beginning of meal service on the day of observation and throughout meal service. All meals observed met at least the minimum daily requirements. The menus met weekly and daily meal pattern requirements for K-8th grade group. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch. Standardized recipes are used for food production. At least two types of milk are offered.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of November were accurate and complete. Point of Service (POS), counts and filed claims appear accurate. Power School is used as the school's POS system. 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. The cashier appeared to be aware of what constitutes a reimbursable meal. The edit checks report is completed monthly.
Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of November 5 - 9, 2018 for lunch. The worksheets showed that all meal components were offered. The Food Service Director also completed the Dietary Specifications Assessment tool for lunch which indicated that the school is at low risk for noncompliance 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, 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. A nutrient analysis was not required.
Offer vs. Serve: Offer vs. Serve is being implemented properly. All students observed selected 1/2 cup of fruit and/or vegetable. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable.
Pre-school Menus: Pre-school students are served the CACFP meal pattern in the correct quantities.
Water: Free potable water is available to all students for lunch in a water jug in the cafeteria with cups provided as well.