

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
LISBON CSD (37440000)
Dates of Review: January 15 – 18, 2019

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Free foster status was extended to two other siblings in the household. TA provided that free foster status does not extend to other students in the household. TA also provided that the household must be given 10 calendar days to appeal. The benefit status then needs to be changed to paid within 10 operating days following the appeal period.	Send the household a notification letter informing the household that foster free status does not extend to the other siblings in the household. Attach a copy of the completed notification letter or show to consultant on-site. The SFA supplied this during the on-site review. No further action is needed.	
200 - Verification	V-0200	The SFA verified an application that was not error prone and should have verified an application they had that was error prone as they were using the Standard process. TA provided that the SFA needs to check to be sure the information identified by Total K-12 is accurate when completing verification. In school year 2018-2019 Total K-12 selected an application to verify that was not error prone when there was an application that was error prone that should have been the one verified. TA provided that once the household responds the SFA will need to update their verification collection report with the results of this verification.	Verify the application that was found to be error prone. Attach the household selection letter or present the letter to the State Agency on-site showing that the household was notified that they were selected to be verified. The SFA presented the selection letter to the State Agency while on-site. No further action is needed.	
700 - Resource Management	V-0700	In school year 2017-2018 the SFA only utilized 63.5% of their allotted PAL dollars. The SFA is participating in the Direct Distribution program and DOD.	State your plan for how you will spend between 95 and 100% of your allotted PAL dollars in the future.	
1000 - Local School Wellness Policy	V-1000	The SFA does not have any students that participate on the Wellness Committee. There has been a partial assessment of the Wellness Policy but it did not assess all of the goals in the policy. TA provided on where to find sample wellness policy's that have examples of goals that can be incorporated into the SFA's Wellness Policy. Encouraged the SFA to select goals for their policy that are meaningful to them and that	State your plan and a timeline for 1.) when and how students will be invited to participate on the Wellness Committee 2.) when and how you will revise your wellness goals to be meaningful and measurable 3. when there will be an assessment of the new goals and that your intentions are for the committee to assess the goals.	

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		they want to achieve. Provided the handout "Does Your Wellness Policy Measure Up."	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA did not correctly calculate its nonprogram food ratio and its food cost ratio. TA provided with the Food Service Director and the Business Manager regarding: 1.) adult meal costs: determine an average cost of an adult breakfast and lunch and take these times the number of breakfasts and lunches sold 2.) LECC meal cost: determine an average cost of an LECC breakfast and lunch meal and take these times the number of breakfasts and lunches sold 3.) 2nd milks: determine the average cost of milk at take this times the number of milks sold 4.) a la carte foods: order a la carte foods on a separate invoice. All of these should be added together to come up with the SFA's nonprogram food cost. The SFA then should complete the non-program revenue tool which can be found on IowaCNP under download forms-NSLP150.	Complete and attach the non-program revenue tool for school year 2017-2018. If the tool shows that you need to bring in additional non-program revenue indicate below how this will be done.

Site - Level Findings: Lisbon High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The SFA is serving Silk as their milk substitute and it only contains 6 grams of protein per 8 ounces. TA provided that the milk substitute must have 8 grams of protein per 8 ounces. Provided a list of milk substitutes that are nutritionally comparable to cow's milk.	State the milk substitute that you will switch to and the date you will begin to use the new milk substitute. Attach a copy of the nutrition label showing that the milk substitute has 8 grams of protein per 8 ounces.	
400 - Meal Components and Quantities - Lunch	V-0400	For the week that the menu certification worksheets were completed for the 9 - 12th graders, the SFA was short grain on Wednesday (walking taco only 1.75 oz. eq.) and on Monday (French Toast only 1.5 grain). TA provided that 9 - 12th graders must be offered 2 oz. eq. daily. Recommended adding a cookie or chips for the 9-12th graders to meet their daily requirements. Instructed the Food Service Director on how to complete the Menu Template. TA also provided on how to use the Food Buying Guide. Also discussed with the Food Service Director and Manager that the Food Production Records need to have the planned servings recorded per age group. Provided a sample completed Food Production record. Also discussed that the Food Production Record needs to be clear as to what the serving size of the product is and what is the ounce equivalent of the product.	Select a week from your 6 week cycle menu that is a different week than was used to complete the menu certification worksheets. Complete and attach a Menu Template for 9-12th grade showing that the menu offers the correct amount of grain and meat on a daily and weekly basis. Also attach corresponding "CN" labels, Product Formulation Statements, recipes and production records (with planned servings per age group recorded and the ounces of product served identified as well as the ounce equivalents).	

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Org - Level Technical Assistance

Area	Question	Comments
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?	TA provided that the SFA should write in the date applications are received in the space on the application where it says "Date Received by SFA." This provided the documentation that applications are processed within 10 days of receipt of the application. TA also provided that the SFA needs to be sure all applications have the address where completed applications need to be sent or delivered.
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	Assisted the Food Service Director with correcting the SFA's Verification Report. TA provided that in 3-2 the SFA should count the number of students who are directly certified through Food Assistance. In 3-3 the SFA should count the number of students who are directly certified through other programs (FIP, Other free, homeless, migrant, runaway and foster on their direct certification list. Also assisted the SFA with organizing their applications so as to get an accurate count for their verification collection report.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	TA provided that once the SFA selects a household for verification they should attempt to find them on Elookup. If found the household is directly verified and a letter of selection does not need to be sent.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	TA provided that if the SFA provides sack lunches for student field trips then a Food Production Record (FPR) should be maintained. Emailed a sample FPR and a Standard Operating Procedure for Sack Lunches to the Food Service Director.
700 - Resource Management		<ul style="list-style-type: none"> · 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 provided that for equipment repair and preventive maintenance the SFA needs to use a unrestricted indirect cost rate to charge the nutrition account for these services. Showed the SFA where to locate their indirect cost rate on the Department of Education webpage. These expenses will not be listed on the Procurement Plan. · Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a Buy) and formal methods of procurement. Please refer to the state-prototype templates posted on IA CNP. Walked through

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		<p>how to complete the 3 bids and a buy form.</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." The SFA should keep a log of micro-purchases.· 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.· For bread, provide vendors with a package count/package weight/weight per serving for each bread product. Review current school year bread product purchases to include any regularly purchased items when requesting price quotes.· 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.
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		*Numerous items on invoices were not on the EIPG market basket. TA provided that the SFA should not be procuring items that are not on the market basket unless they are procured properly. This would mean getting three price quotations for these items and going with the vendor with the lowest price. This may not be feasible as the drop size may be too small for the vendor to make a delivery. It was recommended that the SFA request that items they want to procure be added to the market basket and once they are added then they can be procured properly.
700 - Resource Management		Worked with the SFA on establishing procedures to discontinue handling cash in the food service department. All cash will now be handled in the Business Office.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	Provided the Food Service Director with the most current USDA and Iowa non-discrimination statement via an e-mail. On the monthly menu the short statement used is "This is an Equal Opportunity Provider." TA provided that it needs to be "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?	The link for the USDA complaint process/form which should be used if parents wish to file a complaint about any child nutrition program is: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	TA provided on how to complete the Racial/Ethnic form. Assisted the SFA with completing the form.

Site - Level Technical Assistance Lisbon High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	TA provided that on the breakfast production records the SFA needs to be clear as to what the serving size of a product is and what is the ounce equivalent of a product. Discussed that the Food Service Director should have a breakfast binder that includes all of the "CN" labels, Product Formulation Statements and recipes that go along with her breakfast cycle menu. It was recommended that these items be organized per day of the week. Also, on the production records, staff should be recording the number of servings planned for each grade group of students.
Dietary Specifications Assessment Tool - Lunch	9 How often are bacon, bacon bits, pepperoni, chow mein noodles, pickles, olives, packaged crackers and/or croutons available to students?	TA provided that signage should be posted informing students that croutons/chow mein noodles are to go with the lettuce and that one scoop is allowed.

Org - Level Commendations

Description
Certification and Benefit Issuance: The current application for free and reduced price meals/milk and income guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the Point Of Service (POS) system, and denied applications were correctly determined. All applications were confirmed by a second individual, were signed and dated by

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<p>the household member and the SFA and were complete with Social Security Numbers. Income was only converted to 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. Waivers are provided to applicants. Eligibility is kept confidential. 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, services are offered for Limited English Proficient households, annual civil rights training was provided for food service staff and documented. The SFA submitted the annual Public Release to the local media (Mount Vernon Lisbon Sun). Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed.</p>
<p>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.</p>
<p>Food Safety: The SFA has a Food Safety plan that includes all required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers- including milk coolers, freezers and refrigerators. Food temperatures are documented on the Food Production Records. Dishwasher temperatures are taken, thermometers are calibrated and both are documented. Good food safety practices were observed. Food Service workers wore proper hair restraints and practiced good gloving procedures. The following individuals are ServeSafe Certified: Michele McCoy and Michelle Clark.</p>
<p>Local Meal Charge Policy; The SFA developed and approved a meal charge policy on January 20, 2017. The policy was e-mailed or mailed to all households and staff were informed of the policy. The policy is also posted on the district's web site several times each month.</p>
<p>Procurement: The Food Service Director and Authorized Representative attended the Regional Procurement Training in Grundy Center. The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, have listed procurement events and procurement methods for each event. There is a Code of Conduct Policy which references Board Policies for Code of Ethics. The SFA has debarment statement for vendors in which small and formal purchasing is used. The SFA is part of the Eastern Iowa Purchasing Group (EIPG). A review of invoices from the Prime Vendor showed the district was purchasing products from the market basket. The food service director spot checks invoices from the prime vendor to ensure products delivered match the order and the description of the product solicited by GPO.</p>
<p>Professional Standards: The Food Service Director has completed 9 hours of her required 12 hours of training and the Food Service Manager has completed 5 hours of her required 10 hours of training for school year 2018-2019. All nutrition staff have started to obtain required training for Professional Standards in school year 2018-2019 and additional training is planned. Organized Training Spreadsheets are maintained showing which staff have been trained and meet required annual hours.</p>
<p>Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.</p>
<p>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. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs.</p>
<p>School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach consists of promotions and menus being on the Lion Pride daily e-mail which goes to parents, staff, students and community members. It is also promoted in a quarterly newsletter. Summer Food Service Program (SFSP) outreach included hanging flyers around the school and putting information in The Daily Pride.</p>
<p>Verification: The application(s) selected for verification were confirmed prior to verification. The SFA had at least one person attend training.</p>
<p>Wellness Policy: The public is made aware of the SFA's wellness policy via the school's website and is also available at registration. The following individuals are involved in reviewing and updating the Local Wellness Policy: Nurse, Principals, Teachers, Curriculum Director, Special Education Teacher and Parents. Potential stake holders are made aware of their ability to participate in the Wellness Committee via an invitation in the Daily Pride. The SFA completed a partial assessment of their wellness policy. The assessment is posted in the Daily Pride and on the district's web site. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. .</p>

Site - Level Commendations Lisbon High School (0109)

Description
<p>Meal Components and Quantities: The Food Service Director and Manager do a god job of menu planning. 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. The menus met weekly and daily meal pattern requirements for each age/grade group. 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 are offered throughout the month for breakfast lunch—including many fresh fruits and vegetables. Standardized recipes are used for food production. Water was available as required. At least two types of milk are offered. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch.</p>
<p>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. Total K-12 is used as the school's POS system. There is one POS for breakfast and two for lunch and the POS stations were organized and orderly. 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</p>

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reimbursement for the review period. Cashiers are trained and appeared aware of what constitutes a reimbursable meal. 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.

Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of November 26 - 30, 2018 for breakfast and lunch. The worksheets showed that all meal components were offered. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and 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, controlling the portion sizes of condiments, offering numerous 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. Cafeteria staff have been trained on offer vs. serve. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at breakfast and lunch. Baskets of fruit are available near the POS stations so that a student can add fruit to their tray if they do not have 1/2 cup of fruit or vegetable upon getting to the cashier.

Smart Snacks: Students are able to purchase foods via a la carte sales. All foods sold meet the Smart Snack standards for nutrition content. Exempt leftover National School Lunch Program entrees are only sold the same day, or the day after, they are initially offered. Beverages sold meet the standards for the various age groups of students.

Water: Free potable water is available to all students for lunch and for breakfast via a water fountain in the cafeteria. Cups are provided as well.