

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Stratford Community School District (62460000)
January 8-24, 2019

Program Year: 2019
Month of Review: November
Lead Reviewer: Christine Crow
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One student was on the Direct Certification list as reduced in the July 2018 DC download but was on the DC list as free in the 9/4/18 DC download. The student's status was not updated in the point of service system. The SFA may reimburse the family for the reimbursable breakfast and lunch meals that this student has received and they may also revise their claim. TA provided to the determining official.	Submit a copy of the letter of notification of eligibility status to show that the family has been notified of the change in status from RP to Free. Submit a copy of the point of service system to show that the student's eligibility status has been updated.	
200 - Verification	V-0200	The letter of notification of verification results did not contain information on the appeal process. When benefits are decreased, the SFA must provide information on how the family can appeal the decision if they disagree with the process. Benefits must be reduced following the 10 operating day appeal period. The letter sent to the family did not contain information on the appeal process and the benefits were not reduced within the correct	Provide written confirmation that the verifying official will watch the verification webinar in SY19-20 and use the SA letter of notification of verification results.	

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		timeframe. TA provided and the verifying official provided a copy of the correct letter of notification of verification results while SA was on-site.		
300 - Meal Counting and Claiming	V-0300	The point of service edit check reports for the review period do not match the November 2018 claim submitted for breakfast or lunch for the paid, reduced price, or free students. The point of service edit check report is the report that must be generated for submitting the claim. After review of this discrepancy with the authorized representative, she discovered that the preschool student meals were not included in the breakfast or lunch claim. All preschool students must be charged the appropriate amount based on their eligibility status and all students must be included in the claim for reimbursement. TA provided.	Send a copy of the edit check reports for breakfast and lunch for November, December and January and revise the claim using these numbers.	
700 - Resource Management	V-0700	Procurement: <ul style="list-style-type: none"> - The procurement plan must be updated annually in the spring prior to sending out bid letters for the next year's small and/or formal purchases to ensure that all procurement events meet the federal procurement regulations. The plan must include a brief description of the procurement event, the value of the procurement event, the procurement method to be used, the contract type to be used, the 	Complete and submit a procurement plan for the 2019-2020 school year.	

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		duration of the contract, the evaluation method that will be used to award the bid and individuals that will be responsible for contract management. The SA has a procurement plan template located in Download Forms that can be used to meet requirements. TA provided.		
700 - Resource Management	V-0700	The SFA requests that 2 preschool teachers eat breakfast and lunch with the preschool students daily. No one is currently paying for those meals and preschool teacher meals are not an allowable school nutrition expense. The meals must be paid for with another funding source such as the general fund or preschool funds. TA provided to the authorized representative.	Provide a copy of the number of breakfast and lunch meals that were provided to the preschool teachers for November, December, and January. Decide how those meals will be paid, provide a bill to the appropriate fund, and proof of payment into the school nutrition account.	
800 - Civil Rights	V-0800	The USDA and Iowa non-discrimination statements must be included on all program materials including the student handbook, SFA's website and menus. The menu and handbook do not contain the most current nondiscrimination statements. The most current statements are listed on the IDOE Nutrition Programs website . If the whole statement does not fit on the handout the abbreviated statement can be used. TA provided.	Modify the menu to include the non-discrimination statement.	

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1000 - Local School Wellness Policy	V-1000	The wellness policy has all required elements but has out of date regulations for foods sold to students during the defined school day. Each SFA must conduct a triennial assessment to determine their progress on attaining the goals written in the wellness policy. The assessment should describe how the school is complying with the wellness policy goals and describe the progress that has been made in attaining those goals. The most recent assessment was done in the 2015-2016 school year. The assessment must be updated at least once every three years and must be made available to the public. TA provided to the superintendent and the principal/wellness leader.	Describe when the wellness policy will be updated and when the assessment of wellness policy goals will be conducted. Describe how the wellness policy assessment will be made available to the public.	
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Site - Level Findings: Stratford Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1100 - Smart Snacks in School	V-1100	During the observed lunch service, SA observed leftover entrée items being given away to students that came back to the service line after everyone went through the line. Any leftover item given away without charge to students is considered to be a part of the reimbursable meal and therefore must be included in the calorie and sodium limits. While additional vegetables and some fruits may be provided while staying within the calorie and sodium limits, 2nd entrée items would put the menu over the calorie and sodium	Describe what will be done with the leftover entrée items. If the SFA decides to sell 2nd entrees to students, provide the price in which 2nd entrees will be sold.	

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		restriction. Leftover entrée items can either be sold to students after the meal or offered to students as the entrée item of a reimbursable meal during the next day's lunch. TA provided to the food service director, superintendent, and principal.		
Infant and Pre-K Meal Pattern Checklist - Breakfast	V-IMPCB	As of October 1, 2017 preschool students must be offered the CACFP/preschool meal pattern unless they are co-mingled with the K-12th grade students. The preschool students currently eat in the same cafeteria as the K-6th grade students and are therefore comingled. Preschool students are currently offered a combination of the NSLP and CACFP meal pattern. The SFA cannot provide a combination of both meal patterns and must offer either NSLP or CACFP/Preschool meal pattern. TA provided.	Describe whether or not the preschool students will be offered the CACFP preschool meal pattern or the NSLP meal pattern. If the SFA decides to offer the CACFP meal pattern, describe how the grain requirement will be met for days that K-6th grade students receive grain based desserts and send labels for cereal that meets the CACFP cereal sugar requirement.	

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		Procurement TA Provided: - The local purchasing policy small purchase threshold written in the SFA's district wide purchasing policy does not align with the thresholds described in the written procurement policy for child nutrition programs. The federal thresholds can be used but if the SFA has a local purchasing threshold the most restrictive threshold must

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		<p>be used.</p> <ul style="list-style-type: none"> - The bid letters sent out to potential vendors must contain all products that the SFA is looking to purchase, product and delivery specifications, and any other service or item that the SFA will consider when awarding the bid. The letters must also contain all required terms and conditions including the Buy American Provision and the Equal Employment Opportunity provision. SA also encourages the SFA to include the estimated amount to be used as well. There is a small purchase/3 bids and a buy template located in Download Forms to help SFAs adhere with small purchase threshold requirements. - Contract management must be conducted to ensure all products delivered were the products ordered and that vendors are charging the price agreed upon in the bid. Monthly and/or weekly price lists must be saved for milk and prime vendor purchases in order to properly conduct contract management. TA provided.
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 child nutrition program civil rights complaint procedure and form must be updated to include the most current procedures. All complaints must be sent to USDA Office of the Assistant Secretary for Civil Rights. A procedure and form handout issued.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The SFA has a food safety HACCP Plan available on-site that contains many of the required elements but does not include a Standard Operating Procedure for some of the procedures that take place throughout the flow of food including, but not limited to, machine and manual ware washing, equipment cleaning and sanitizing, food donations, field trips, collecting and storing food samples,

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		<p>and visitors in the kitchen. A table of contents is also suggested so SOPs are easy to locate. Sample SOPs and additional information can be found at the Iowa State University Extension and Outreach website. TA provided to the FSD.</p>
<p>1400 - Food Safety</p>	<p>1403 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?</p>	<p>If the SFA purchases an agricultural item that violates the Buy American provision, they must keep a Buy American exception log to document the product and describe why the SFA did not purchase an American made product instead. Acceptable reasons to violate the Buy American provision would be if the product was not made or readily available in the USA or if the cost of the American product was significantly more expensive. TA provided.</p>
<p>RMCR - Revenue From Nonprogram Foods</p>	<p>10 If the SFA found that its revenue ratio was less than its food cost ratio, did the SFA take additional steps to sufficiently increase its nonprogram food prices, add sufficient funds to its nonprofit food service account, and/or take other actions to adequately resolve the problem?</p>	<p>The non-program food revenue must adequately cover the cost of non-program foods as a percentage of total revenue and total food cost. According to the 2017-2018 financial report, the revenue does not cover the cost. The current calculation of non-program food costs however, is not calculated accurately as it is based on a percentage of food sales. TA provided to the business manager on what a non-program food is and how to calculate the non-program food costs and revenue.</p> <p>Despite the calculation error, the school food service account is negative. The SFA is working with families and a credit agency to collect funds from negative school lunch accounts but according to the business manager, the account would still be negative if all lunch accounts were paid. Based on the SA observation, the SFA could work towards building the school food service lunch account balance by charging more for snacks sold to the after school snack program and/or participating in the After School Care Snack Program or charging for leftover entrees served to students. The school food service account charges the after school program \$0.25 for a snack which is not enough to cover the cost of the snack items provided and was giving leftover entrée items away for free to</p>

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		students at lunch. TA provided.
Other Federal Programs		Currently, the school food service provides a snack to the after school care program. Snacks provided typically consist of milk and either fruit, vegetables, or a leftover entrée item. SFAs may participate in USDA's After School Care Snack Program and get reimbursed for snacks provided to an after school program. Schools that have greater than 50% free/reduced price population are considered to be area eligible and can claim all snacks at the free rate. According to the site enrollment form, the SFA has 50% of their students at the free/reduced price status. TA and the handbook provided to the authorized representative on USDA's After School Care Snack program.

Site - Level Technical Assistance Stratford Elementary School (0409)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch		The food service director was interested in learning about different fruit and vegetables to introduce to students as she struggles to find options that her students like. Vegetables that fit into the various subgroups reviewed. SA encourages the FSD to continue to introduce new or unfamiliar foods to students as it takes numerous introductions for some students to try a food. SA also encourages the FSD to introduce fruits and vegetables in various ways such as through cafeteria coaching, taste testing, having a popular guest such as the principal or superintendent serve the new food, and to provide these new food items to the meals vended to the Early Learning Center so that those students are familiar with the food once they get to kindergarten.
400 - Meal Components and Quantities - Lunch	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	One of the diet modification forms on file requests a milk

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		<p>alternate (water) that is not nutritionally equivalent to cow's milk and is also not signed by a prescribing official. In order for a student to receive a milk alternate that is not nutritionally equivalent to cow's milk the SFA must have a diet modification statement on file from a prescribing official describing which milk alternate to provide. Currently the student is receiving a reimbursable meal by taking 3 components including ½ cup fruit or vegetable and then gets water from the water fountain. TA on special diet requirements provided and SA encourages the FSD to contact the parent to offer a milk alternate that is nutritionally equivalent to cow's milk and to document the response. There is an updated diet modification form found in Download Forms in IowaCNP. TA provided.</p>
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	<p>SFAs are required to have 2 food safety inspections per school year. If the health inspectors do not inspect the school's food service areas two times per school year, the SFA is required to contact their inspector and request a 2nd visit. TA provided to the authorized representative who emailed their inspector while SA was on-site.</p>
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	<p>The most recent food safety inspection reports must be on display in a public location. The most recent reports were not displayed in a public location during the observed meal service. TA provided and the food service director immediately moved the report to a public location.</p>

Org - Level Commendations

Description
<p>CERTIFICATION/BENEFIT ISSUANCE AND VERIFICATION: • The State Agency template letter of notification of eligibility prototype has been sent to families who applied for benefits and were denied as well as those families who were on the Direct Certification list. • The SFA offers the 30 day carryover of eligibility for students who received benefits in the previous school year. • Benefits have been extended to all students within the same household of other students receiving benefits. • Income applications for all students claimed as free and reduced are on file, determined correctly, and are complete with required dates, signatures, social security</p>

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information, and family information. • Benefits are accurately transferred to the point of service system in a timely manner. • Applications are processed within 10 days of the SFA receiving them. • The determining official downloads the DC lists twice a month and keeps the lists on file. • The SFA followed the standard verification process and selected the correct number (1) of applications to verify. • A confirming official confirmed the original determination of eligibility status prior to notifying the family they were selected for verification. • The verification process and report were completed on time. • The SA template letter of notification of verification selection was sent to the family selected for verification. • The verifying official followed up with the selected family after they did not respond by the specified date.

CIVIL RIGHTS: • The SFA offers translators, income applications and other program materials in other languages as needed. • The “And Justice For All” poster is on display in a public location. • The staff with responsibilities in the school nutrition program have received civil rights training. • The racial ethnic form has been completed to show that no discrimination was made in awarding benefits to students. • The SFA has a diet modification form signed by prescribing officials for students with dietary needs. The food service director works with the families and school staff to ensure the student gets what he needs. • The public release was sent to the local newspaper prior to school starting. • No discrimination was observed while SA was on-site.

FOOD SAFETY: - The food service staff monitor and record the temperatures for the high heat dishwasher, cooling equipment and hot foods. - The food service director is ServSafe certified. - All food in storage during the on-site review was stored properly. - Good food safety practices were observed - The HACCP Plan is available on-site and contains many required Standard Operating Procedures.

MEAL COUNTING AND CLAIMING: - The number of enrolled free, reduced price and paid students claimed did not surpass the number enrolled for breakfast and lunch during the review period. • All students received a reimbursable meal at the observed breakfast and lunch meal service. - Offer versus serve was conducted accurately. • The point of service line was organized during the observed lunch and breakfast meal service allowing staff to ensure all students received a reimbursable meal.

MEAL PATTERN REQUIREMENTS: • The food production records are complete with all required information including the meal components, total quantity served, portion sizes, planned and actual servings, leftover amounts, and comments. • All students had a reimbursable breakfast and lunch during the observed meal. • The daily and weekly meal pattern requirements were met for the meat/meat alternate, grain, fruit, total vegetable, vegetable subgroups, and milk at the lunch during the review period. • The daily and weekly meal pattern requirements were met for grains, fruit, and milk for the breakfast meals served during the week of review. • Breakfast and lunch signage is posted to inform students and staff what constitutes a reimbursable meal. • At least two different types of milk are made available to students for breakfast and lunch. • Grains served during the review period and on-site review were whole grain rich. • CN labels, product formulation statements and recipes were available for all items served during the on-site review and review period. • Offer versus serve was implemented accurately during the observed meal service. • The food service director and staff offer many homemade items throughout the month. • Free, potable water is available along with cups for any students who would like a glass of water.

NEGATIVE BALANCE POLICY: - The SFA has a negative balance policy that is provided to families at least once a year. The policy is provided in the student handbook that is given out at registration and is also included in a quarterly newsletter 1-2 times per year. - The SFA informs families that they can apply for free or reduced price benefits at least twice annually. - Students with a negative balance are not identified as such during the meal service.

PROCUREMENT: - The SFA has a code of conduct and signed debarment certification statements to ensure that vendors aren’t suspended by the USDA. - The SFA made their small purchases and micro-purchases in compliance with their local purchase thresholds. Documentation was available to show the entire procurement process including the letters sent to potential vendors and their responses. The SFA selected the correct milk vendor based on price. - Price lists from the prime vendor were saved. - Bid letters were sent to multiple vendors for milk. - Based on the 2017-2018 vendor paid list, the SFA equitably spent their money when making micro-purchases.

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PROFESSIONAL STANDARDS: • The authorized representative has documentation to show that she received the required amount of professional standards training hours, including civil rights training. • The food service director and part time food service staff have documentation on file to show that they received the required amount of professional standards training. • A tracking tool is on file for all employees with school nutrition program responsibilities. • The food service director is ServSafe certified.

RESOURCE MANAGEMENT: • The SFA spent 178.4% of their allotted PAL in the 2017-2018 school year. • The school food service account tracks all revenues and expenditures separately from other transactions. • The school food service account did not have more than 3 months of operating costs. • The SFA charges the correct paid student lunch price based on their PLE tool requirements. - The correct adult lunch price is charged. - School Nutrition documents were on file for 3 years plus the current year.

SCHOOL BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM OUTREACH: - The SFA informs families of the SFSP by sending home informational handouts at the end of the school year. - The SFA informs families about their School Breakfast Program by posting the menu on the website and throughout school as well as announcing the next day's menu during the morning announcements.

WELLNESS POLICY AND COMPETITIVE FOODS: - The SFA has a wellness policy that contains information on all required elements and is made available to the public. - The wellness policy committee contains various stakeholders and meets annually. - The SFA does not sell any competitive foods to students during the school day.