

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Griswold Comm School District (27180000)
SNP - Review ID: 5044

Program Year: 2019
Month of Review: December
Lead Reviewer: Brenda Windmuller
Org Representative(s): Nikki Sowers

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	The Wellness Assessment has not been completed in the past 3 years and has not been made available to the public.	The SFA will 1. Provide a date of when the assessment will be completed. 2. Explain how they will make the Wellness Assessment available to the public.	
1100 - Smart Snacks	V-1100	The LEA is holding a fundraiser with food items which do not comply with the Smart Snacks Standards. The NHS is selling Crush Soda for Valentine's Day.	The SFA will 1. Submit their plan to modify the fundraiser which has already been advertised. 2. Submit their plan to regulate these types of activities in the future.	
1100 - Smart Snacks	V-1100	Vending machines at HS are not Smart Snacks Compliant. 20oz vitamin water is currently available to all students (High School and Middle School) all day and 20oz soda and Powerade are available prior to 3:55 p.m.	The SFA will explain their plan to correct this issue and the date completed.	

Site - Level Findings: Elliott Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments

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100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	<p>The SFA must process all applications within 10 days of receiving them. It is advised that the SFA writes the received on date on each application as they come in to ensure compliance. One application was missing the received on date, the date processed exceed the 10 day window from the date the household completed the application.</p>
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. The milk bid included a summary to compare prices, however prices were not extended. A template was provided</p> <p>Bread was labeled as a micro purchase, but the process used was actually a small purchase.</p> <p>The SFA should be consistently checking the prices on invoices to ensure they match contracted prices.</p> <p>The SFA was unable to locate the AEA CD, FSD must gain access to the AEA website for information</p> <p>Ross Chemicals exceeded the micro purchase threshold, this must move to a small or formal bidding process</p> <p>The SFA should maintain a log with micro purchases.</p> <p>The SFA should maintain a log with any products receive which do not meet the Buy American Specification.</p> <p>All micro purchase vendors should show as separate line items on the vendor paid report.</p> <p>SFA should maintain documentation from all vendors contacted for small purchase, including documenting "no response".</p> <p>A template for small purchase solicitation was provided which outlines all requirements.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>Must have signed debarment certifications kept on file.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p>

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		<p>Agreements valued at \$10,000 or more should have an exit clause.</p> <p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p> <p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none">· All price adjustments throughout the year· All invoices· All contracts and agreements· All bids solicited· Documentation that a vendor did not reply to bid (if applicable)· Documentation of why you selected a specific vendor (Selection Rubrics)· Copies of bid solicitation· Debarment statements· CD provided by the AEA (if applicable) <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.</p>
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		<ul style="list-style-type: none"> • Track micro purchases, what purchased when and dollar amount. • Purchases should be distributed around community, not just one store. <p>Small Purchases- Purchases that are under \$250,000 (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none"> • Include all terms and conditions • Include terms: Buy American and Equal Opportunity • Include Termination for Cause and Convenience if \$10,000 or more • Attain Signed Debarment Statements • Awarded on lowest price (unless written documentation to justify) • Maintain documentation <p>Formal Purchase- Purchases equal to and exceeding \$250,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <ul style="list-style-type: none"> • Notice of accepting all types of formal purchase must be advertised. • Include all requirements of a small purchase • If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. • Everything must be in writing.
700 - Resource Management		The negative balance policy is not being followed. The policy currently states that students will no longer be able to

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		charge meals if their account falls to -\$6, in practice, they continue to charge meals. The SFA has the ability to modify their local Negative Balance policy if it is in their best interest.
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 Wellness Policy must be reviewed once every 3 years and must be made available to the public. An assessment of the wellness goals must also be completed at least once every 3 years and be available to the public. Templates and wellness regulation were provided by the SA.
1100 - Smart Snacks	1103 Who is responsible for tracking Smart Snacks compliance at the:	All foods sold on site from midnight until 30 minutes after school is released must meet Smart Snacks Standards. This includes all vending machines, fund raisers, school stores, concession stands, etc. School is released for the day at 3:25 p.m. and one vending machine is currently programmed to turn on at 3:45. This machine is stocked with 20 oz Coke products including Coke, Mr. Pibb, Cherry Coke and Powerade. The second machine is stocked with water and 20oz vitamin water. Because middle school students have access to the machine, it does not meet Smart Snacks standards. This was corrected on 2/7/2019. The daily announcements on February 6th advertised the sales of Crush soda for Valentine's Day. Upon investigation, this is a fund raiser for the National Honor Society. The SA suggested looking to see if Crush has a diet product which would be compliant or wait until 3:55 to distribute the valentines. The FCS and Business classes are working to open a coffee shop and school store in the commons area. The SFA was cautioned to ensure that the product served meets the Smart Snacks regulation. The SA emailed the Smart Snacks flyer and regulation to the SFA.
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.)	ANNUAL TRAINING: Food Service Director was advised to maintain a spreadsheet with all staff, tracking training classes attended, date attended and length of time for each class. All Food Service staff and SFA employees working with the School Lunch Program are required to have Civil Rights training annually. Training hours should meet the following guidelines:

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		<p>Director- 12 hours annually</p> <p>Manager- 10 hours annually</p> <p>Full-Time Staff- 6 hours annually</p> <p>Part-time Staff- 4 hours annually</p> <p>The SFA must have one designated person to review the annual training to ensure each person completes the required training.</p>
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	The SFA is required to promote breakfast two times annually. There is no evidence that this has occurred. SA provided ideas of ways to do this including National School Breakfast week March 4-8th.
RMCR - Indirect Costs	1 Did the SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency?	The SFA is not allowed to charge maintenance and repair items to the School Lunch account. It was noted that the SFA plans to move these charges at the end of the fiscal year. Information about allowable charges and Indirect Cost Rates was emailed to the SFA.

Site - Level Technical Assistance Elliott Elementary School (0409)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast		Students at the elementary are allowed to take 2 milks at breakfast. Three students were observed taking 2 milks, two of which did not consume the product. Each of these individuals took 1 chocolate and 1 strawberry flavored milk. The SFA must calculate these calories into their total calories for the menu planned on a daily basis. SA calculated total calories for the specific choice that the individuals made on the day of review were at the top of the calorie limit, but did not exceed the limit. However, different offerings and food selections could exceed the limit.
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	The SFA should post the daily breakfast menu as they do with the lunch menu. SA provided some templates.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The Health inspection report was hanging in the kitchen where it was visible, but too far away to read. It was moved to the customer side of the wall during the onsite review. A large bowl of margarine was stored in a cupboard at room

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		<p>temperature. There was no date on the product and it was not being kept under refrigeration. Several items in the freezer had been removed from the original box and had not been labeled and dated.</p>
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Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE (100): Benefit documents were well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, 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's and case numbers. 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.</p>
<p>CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The "And Justice for All" poster is visible to program participants.</p>
<p>LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years. The policy has nutrition education, physical activity and other wellness goals included. An assessment has been completed, but not dated. A wellness committee is in place to set goals and help assess the completion of the goals. The committee is made up of students, faculty, staff, and community members, utilizing the SIAC committee. The committee meets several times annually and minutes are kept.</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 appeared accurate and complete. There was a point of service (POS) at the point where meals are served for all students observed at lunch. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records, were on file for all meals claimed for reimbursement for the review period.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: The Food Service Director does an excellent job of menu planning and offering choices. Elementary students have at least two entrée choices per day. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file and well organized. Standardized recipes are used for food production. Water was available as required. The elementary cafeteria was well supervised, and staff interacted well with the students. Food service staff was polite and respectful to students, other staff, and each other.</p>
<p>On-site Monitoring (900): The on-site monitoring forms were completed for all of the SFA's sites for lunch and breakfast prior to February 1st.</p>
<p>PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds. 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.</p>
<p>PROFESSIONAL STANDARDS (1200): Tracking was provided that documents the progress each employee is making to complete their required Professional Development hours annually.</p>

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RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed and indicated appropriate and allowable expenditures. Reports are filed on time, and all records are maintained for at least three years plus the current year. The FSD spent 102% of the USDA Foods (Commodities) dollars allocated to them in 2017/2018. Errors fell below the \$600 disregard, no fiscal action will be required at this time.

SFSP Promotion: The SFA sends a flyer to households at the end of the school year, informing families about the state-wide Summer Food Service Program.

VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. The verification process was completed on time. The application selected for verification was confirmed prior to verification. Documentation was collected from households as required and processed correctly.

Site - Level Commendations Elliott Elementary School (0409)

Description
HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes most required elements. The latest Health Inspection Report was posted. Temperature logs are maintained for milk coolers, walk-in coolers, reach-in coolers, freezers, food served, and dishwasher. The site supervisor at the Elementary school in Elliott is in the process of reviewing and revising SOPs. Both employees working in the Elliot Elementary cafeteria are ServSafe certified.
The Elliott Elementary school participates in Team Nutrition. They have posters and are in contact with the SA's Team Nutrition Consultant about the program.