

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Iowa Mennonite School (42718506)**  
**SNP - Review ID: 4854**

**Program Year:** January 31-February 1, 2019  
**Month of Review:** December  
**Lead Reviewer:** Cheryl Benson  
**Org Representative(s):** Iowa Mennonite School

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	(1) Applications must be determined by the number of people named on the application, and not on the number of people indicated by the household on Step 3, F of the income application. The SFA determined four applications based on the number indicated by the household instead of the number of people listed on the application. One application will go from reduced to denied, one application became directly certified, the other two applications' determinations did not change. (2) One application was determined using only one income instead of both incomes indicated on the application. The household will go from free to denied. (3) When determining benefits, income on applications is only converted to annual when there is more than one frequency. Income on all applications was converted to annual. This is a repeat error from the last review. (4) The Hearing Official cannot be the same person as either the Determining or Confirming Official and must also be in a higher position than either of those two officials. The SFA's letters indicated that the Determining Official is also the Hearing Official. (5) SFAs that have over an 8% error rate on applications must conduct a Second Review of Applications the following year.	For your response, (1) contact the households to determine the correct number of people in the household. Add names when applicable, and initial and date the additions, and indicate in your response below the results. If the one household that will change from reduced to denied only has two people in the household, also submit a copy of the letter of adverse action. (NSLP381) (2) Submit a copy of the letter of adverse action for the household going from free to reduced. (3 and 4) These errors were discussed. No further action required. (5) Information on second review of applications will be sent in an email before the beginning of next year. No further response required.	
1200 - Professional Standards	V-1200	Training hours of food service staff must be tracked on a form, and documentation of each training must be maintained, such as certificates or agendas. There was no tracking of the director's training.	For your response, use the attached form to track training for the director and submit a copy. Be sure to track training each year on a separate sheet.	

**Site - Level Findings: Iowa Mennonite School (8506)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
------	-------------	---------------------	----------------------------	----------------------------

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Iowa Mennonite School (42718506)**  
**SNP - Review ID: 4854**

400 - Meal Components and Quantities - Lunch	V-0400	The meal pattern was not met on December 7. Students in grades 9-12 must be offered at least 2 ounce equivalents of grain per day, but they were only offered a single, 1 ounce equivalent muffin. This is a repeat error from the last review when a 3/4 ounce equivalent muffin was the only grain offered one day. Since this is a repeat error, the meals for that day will be added to the overclaim. A repeat of this error during the next review will result in the meals being reclaimed even if the \$600 disregard is not met.	For your response, review menus to ensure that the menu meets meal pattern requirements. It is recommended that all menus be entered into the spreadsheet that is attached below to check for compliance. A link to a webinar titled, "Crediting Grain in Child Nutrition Programs" was emailed. The director must view the video and then submit a copy of the final screen with the quiz score.	
1400 - Food Safety	V-1400	(1) A complete food safety (HACCP) plan includes a comprehensive collection of Standard Operating Procedures, SOPs, a Process List of menu items, Critical Control Points on recipes, complete temperature logs with corrective action indicated, annual training, and a plan to regularly review and revise the plan. The SFA does not have any SOPs. This is a repeat violation from the previous review. (2) Temperature logs for January were reviewed, and every log indicated that the temperature for that cooler or freezer was exactly the same every day that month. A couple coolers/freezers were missing internal thermometers which are much more accurate than external thermometers. Thermometer calibration is not being logged. Dishwasher sensor strips are not being used.	For your response, compile a comprehensive collection of Standard Operating Procedures that are applicable to your operation and submit a copy. Indicate the location where the SOPs will be filed in the kitchen for reference. Also indicate the date that internal thermometers were installed, when dishwasher strips were obtained, and how often thermometers will be calibrated and where the results will be logged.	

**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	<p>TA: Reviewing invoices from the Prime Vendor, no items found on invoices that were not on the bid, and no items had an invoice price that did not match the price on the original bid response or the monthly price list. The food service director or business manager should spot check invoices to ensure products delivered match the order and the specifications of the product solicited. Price on the invoice should match bid pricing. Items not in the bid specifications must be procured using the appropriate procurement methods.</p> <p>The 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. There are two exceptions to the Buy American provision: one is that the commodity is not</p>

Iowa Department of Education  
Bureau of Nutrition and Health Services  
State Review Summary Report  
Iowa Mennonite School (42718506)  
SNP - Review ID: 4854

		<p>available in sufficient quantities, such as pineapple; the second is that the price is significantly higher, such as some produce during the winter. The exception log should indicate date, product, price (if using price as the exception), and reason for the exception.</p> <p>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 at equal or lesser price.</p> <p>The school food service thresholds for Micro, Small Purchase, and Formal Procurement were discussed. The correct micro threshold is \$10,000, small purchase threshold is under \$10,000 and the correct formal threshold is \$10,000 and over. Micro purchase must be under \$10,000; Small Purchase must be between \$0 and \$9,999, while Formal can be used for any amount. Technical assistance was provided on completing the written procurement plan to correct estimated amounts, vendors, events, etc. Guidance was provided last school year from School Finances at the Iowa Department of Education that certain expenditures such as equipment repairs and maintenance, pest control, office supplies, postage, etc., are an indirect cost to school food service and not a direct cost. The district can contact School Finance at the Department of Education related to indirect cost questions.</p> <p>Purchases using the micro-purchase threshold (no competitive procurement required) should be kept to a minimum, and the purchases must be spread around to all possible vendors.</p> <p>The milk solicitation was reviewed to assess compliance with small purchase method. Required federal terms and conditions must be included in solicitations. Refer to the small purchase (3 Bids and a Buy). Include the full Buy American statement on all solicitations. It is recommended that milk bids multiply out the bid quantities times the price in order to get a true bottom line comparison of bids. The milk bid itself stated it was for the current year, but it has been renewed for three years. Other solicitations for milk besides Prairie Farms were not documented. Even if the vendor will not respond, the SFA must attempt to get more than one response. There is a letter that can be added to the solicitation for vendors to indicate they do not want to respond. Any and all expectations should be included in the bid, such as cooler temperatures, minimum bread/bun sizes, minimum amount of whole grain, cleanliness of crates and delivery vehicles, etc. All bids should also have a debarment statement that is signed by the vendor.</p> <p>Credits and Rebates must be tracked to ensure the SFA is receiving the money due. There is a form in download forms that can be used</p> <p>.</p>
--	--	---

**Iowa Department of Education  
Bureau of Nutrition and Health Services  
State Review Summary Report  
Iowa Mennonite School (42718506)  
SNP - Review ID: 4854**

800 - Civil Rights		The SFA utilizes student volunteers every day in its NSLP meal service which is a great way to save money and provide students with hands-on experience and responsibility. The SFA provides food safety training, and the students seem to enjoy the work. The students are offered a free meal in exchange for their work. While this is acceptable, it is not an equitable way to reimburse the students since paid students are saving several dollars while free students are not receiving anything for their efforts. If the SFA can come up with a more equitable system, that would be preferred.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	Even though one-building districts are not required to complete the on-site monitoring form, it is still recommended that it be completed as a check to ensure program integrity. The form can be found in download forms on IowaCNP.
1000 - Local School Wellness Policy	1004 How are potential stakeholders made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy?	The district is encouraged to conduct stronger outreach to potential stakeholders for the Wellness Policy committee. It's important to get a variety of voices on wellness issues. Having students, parents, and community members involved could help ensure that the policy is a working document. For more information, go to the DE website, click on the A-Z index, then 'W', and finally Wellness.
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?	Information was provided on outreach to households for the Summer Food Service Program including the 800 number for Hunger Free Hotline and a text number. The information can be shared via the website, flyers, posters, email, etc. For more resources, go to the DE website, A-Z index, click on "S" and then Summer Food Service Program.

**Site - Level Technical Assistance Iowa Mennonite School (8506)**

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Technical assistance was provided on crediting grains. Grains are credited by ounce equivalents and not simply by the number of ounces of the grain item. For example, a two ounce muffin contains many other ingredients besides grain. When a muffin is compared to a slice of bread of equal size, there is not the same amount of grain in the two foods. The bread will have more grain while the muffin will have additional sugar, fat, fruit, etc. To credit grains, either the item must have a CN label or a Product Formulation Statement. If neither of those are available, then crediting is done using the Bread/Grain Chart.
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?	Besides the sign that indicates the components, there should also be signage that indicates which food item fulfills each component. For example--sloppy joe for M/MA; bun for grain; apple for fruit; green beans and corn for vegetable; and milk for dairy. Signage was provided during the on-site review.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Ensuring that the meal pattern is met is a major responsibility of SFAs. To that end, labels must be collected, updated, and maintained. All food items, with the exception of fresh fruits and vegetables, should have an ingredient label and nutrition label. Any combination food such as pizza or chicken nuggets must also have either a CN label or a Product Formulation Statement in order to determine the creditable amounts of meat and grain. Grain products may also have a CN label or PFS in order to be able to credit the grain as more ounce equivalents than the bread/grain chart. SFAs can remove the labels directly from the containers,

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Iowa Mennonite School (42718506)**  
**SNP - Review ID: 4854**

		photograph or photocopy the labels, or obtain labels from the manufacturer. Labels obtained on-line or from vendors are not acceptable documentation.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Standardized recipes are required as part of HHFKA regulations. The SFA uses many standardized recipes, but several are not standardized. The easiest way to obtain the recipes is to start with one that is already standardized and then make changes to adapt it for local use. When doing that, be sure that the changes do not alter the crediting, or if the crediting is altered, that is indicated on the recipe. The SFA needs recipes for the Bagel Pizza and an updated recipe for Spanish Rice. It is recommended that all recipes be reviewed before the next AR to ensure accuracy.
400 - Meal Components and Quantities - Lunch	411 a. Did the school comply with the planned menu for the review period?	The monthly menu for February indicated two weeks of Cook's Choice for the entire menu. Be sure that at the end of the month there is a menu that reflects what was actually offered students as part of a reimbursable meal. It is highly recommended that Cook's Choice be limited as it can easily lead to meal pattern errors.
1100 - Smart Snacks in School	1106. Does the school hold fundraisers during the school day where students may purchase food or beverages?	Technical assistance was provided on Smart Snack requirements. Fundraisers where food is sold to students to be consumed during the day must meet nutrient standards. There is a Valentine's fundraiser coming up where students will be sold regular orange soda. Regular soda is not allowed. The students could sell diet soda instead. Other suggestions and resources were shared.
1300 - Water	1300 Is free potable water available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)?	Water must be provided free of charge during meal service. The regulations state that it must be in the location where meals are served or directly adjacent. The water fountains are down a short hallway, out a door and around a corner. The placement really does not fulfill requirements. It is suggested that water be offered in the cafeteria via pitchers or carboys.
1400 - Food Safety	1404 Is a copy of the written food safety plan site specific and available at each school?	Food Safety and the SFAs HACCP plan is probably the most important duty for a director. Nobody wants their school's name in the paper due to a food borne illness. To that end, the SFA must have a comprehensive plan. Be sure that recipes indicate CCPs, critical control points. CCPs indicate correct temperatures to ensure food safety. A process list is another way of indicating CCPs. Menu items should be separated into three columns--no cook, same day service, and complex food preparation. The HACCP Manual and other resources were provided.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	Technical assistance was provided on requesting Health Inspections. Federal regulations require that two inspections per year be requested. The SFA must keep documentation that the request was made.

**Org - Level Commendations**

Description
APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used, all reviewed applications were signed and dated by both a household member and the SFA, applications were complete with SSN's and 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.

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Iowa Mennonite School (42718506)**  
**SNP - Review ID: 4854**

<p><b>CIVIL RIGHTS:</b> The And Justice for All civil rights poster was posted in the cafeteria in a location where participants can read information on the poster. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided food service staff and documented. A copy of the district's public release was on file, documenting that it was submitted to local media. Ethnic/racial information is collected and the form has been completed and filed. No discrimination was observed.</p>
<p><b>HACCP/FOOD SAFETY:</b> The latest Health Inspection Report was posted in a publicly visible location, and two inspections have been requested for the current school year. The kitchen and storage areas were orderly and very clean. Student volunteers are given appropriate training on hand washing, gloving, etc.</p>
<p><b>MEAL COUNTING &amp; CLAIMING:</b> Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of December were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. There was a POS for all students, and the POS was organized and orderly. Students are not overtly identified as free, reduced, or paid during the meal counting process or during meal observation. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. All students observed selected a reimbursable meal.</p>
<p><b>MEAL REQUIREMENTS &amp; COMPONENTS:</b> All meal components were available at the beginning of service and throughout meal service on the days of observation. Food Production Records were on file and were complete. A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch. Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one or two of the five components. Students had sufficient time to eat after receiving meals. The director has several student volunteers who help serve lunch each day.</p>
<p><b>PROCUREMENT:</b> The off-site procurement tool was completed, and board purchasing policy and vendor paid lists were submitted. The written procurement plan for SY2019-20 was completed during the on-site review. The district is a member of a Group Purchasing Organization. A signed agreement with the Group Purchasing Organization for SY 2018-2019 is on file. The signed agreement states that the school district agrees to procure food and non-food supplies through the Group's awarded Prime Vendor. The SFA had copies of the contract and bid prices.</p>
<p><b>PROFESSIONAL STANDARDS:</b> The director attends various training sessions each summer, and she attended food safety training last June.</p>
<p><b>RESOURCE MANAGEMENT &amp; RECORD KEEPING:</b> Financial records that were reviewed, indicated appropriate and allowable expenditures. 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 Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool. The district does not charge indirect costs to the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for commodities. Reports are filed on time, and all records are maintained for at least three years plus the current year</p>
<p><b>VERIFICATION:</b> The correct number of applications were verified and were correctly selected. The application selected for verification was confirmed prior to verification, and the process was completed on time.</p>
<p><b>WELLNESS POLICY:</b> The district has a current wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The wellness policy, the latest review of the wellness policy, and the most recent assessment of policy goals are available to the public. Potential stakeholders are made aware of their ability to participate on the wellness committee.</p>