

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Grundy Center Comm School District (27270000)**  
**Dates of Review: February 5 – 8, 2019**

**Program Year:** 2019  
**Month of Review:** December  
**Lead Reviewer:** Deb Linderblood  
**Org Representative(s):** Chad Wagner

**Org - Level Findings**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
100 - Certification and Benefit Issuance	V-0100	The SFA has not been inserting a waiver statement onto their Free and Reduced Price Application or onto their direct certification notification letter. TA provided that if free and reduced price status are used to waive fees then households must be given the opportunity to sign a waiver statement. Provided the SFA with a sample waiver statement.	Attach a copy of your Free and Reduced Price Application and a copy of your direct certification notification letter with a waiver statement inserted into each document.	
200 - Verification	V-0200	A confirmation review was not completed prior to contacting the household that they had been selected for Verification. TA provided that a different individual than made the initial eligibility determination needs to confirm that the application was determined correctly. Since the SFA has an electronic application it was recommended that the SFA print the application and have the Determining Official sign and date each application and then the Confirming Official should sign and date the application prior to contacting the household.	State your intentions to begin to have application(s) selected for verification have a confirmation review completed prior to contacting the household. State how you will document that a confirmation review was completed.	
200 - Verification	V-0200	The SFA's verification notification letter does not include the Iowa non-discrimination statement.	Attach a copy of your Verification Notification letter with the Iowa non-discrimination statement added.	
700 - Resource Management	V-0700	The SFA has not completed their code of conduct policy for the nutrition department. TA provided that the code of conduct policy is part of the Procurement Plan spreadsheet. The SFA needs to insert the name and number of their Board policies that pertain to conduct, gifts, suspension and dismissal.	Complete and attach a code of conduct policy for the nutrition department.	
700 - Resource Management	V-0700	The SFA has only used \$5,336.17 of their allotted \$11,270.53 worth of diverted foods dollars to date. Some pounds have been taken away and given to other SFAs. There are numerous products that the SFA is behind on using. Sarah	State your plan for how you will use you allotted diverted foods dollars.	

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		White should be contacted if help is needed on what the SFA should be buying. Provided the Food Service Director with a list of the SFA's diverted foods which shows the percent usage of each item.	
1000 - Local School Wellness Policy	V-1000	The SFA has an active Wellness Committee and the minutes show that they have goals that are not indicated in the policy. The SFA has started an assessment of their wellness policy but does not include all of the goals. Currently there are no students on the Wellness Committee. Provided the following documents: 1.) Does Your Wellness Policy Measure Up 2.) Non-Food Rewards.	State your plan for: 1.) adding goals that the committee is working on to the Wellness policy 2.) how students will be invited to participate in the Wellness Committee 3.) when an assessment of the Wellness Policy will be completed and state your intention that the Wellness Committee will complete the assessment 4.) when and how the assessment will be made available to the public.

Site - Level Findings: Grundy Center Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA's breakfast signage does not specify how many items each food component provides. The signage also says that students can take juice or fruit. TA provided that the breakfast signage needs to identify the number of items the Food Service Director has planned for each food item so that students, servers and cashiers all know this information. Also discussed that students have to be able to take up to 1 cup of fruit/juice so signage should state that they can take juice and fruit.	Develop and attach one week's worth of breakfast signage showing how many items each food product is planned to provide. Also, show that the signage allows students to take up to 1 cup of fruit and/or juice or 1/2 cup of each.	
400 - Meal Components and Quantities - Breakfast	V-0400	During the week used to complete the menu certification worksheets for breakfast, the SFA was short on grain one day (Wednesday). TA provided that the Bread Grain chart needs to be used to determine how many ounce equivalents a product provides. Went over an example of using the Bread Grain chart. Provided the Food Service Director with the 2016 version of the Bread Grain chart.	Select a week of menus that are different than the week used to complete the menu certification worksheets and complete and attach a breakfast menu template showing that all of the breakfast components and quantities are met. Also attach "CN" labels, product formulation statements, standardized recipes and production records that correspond with this week.	
400 - Meal Components and Quantities - Lunch	V-0400	During the week used to complete the menu certification worksheets for lunch, the SFA was short on grain one day and also short grain for the week. TA provided that the Bread Grain chart needs to be used to determine how many ounce equivalents a product provides. Went over an example of using the Bread Grain chart. Provided the Food Service Director with the 2016 version of the Bread Grain chart.	Select a week of menus that are different than the week used to complete the menu certification worksheets and complete and attach a lunch menu template showing that all of the lunch components and quantities are met. Also attach "CN" labels, product formulation statements, standardized recipes and production records that correspond with this week.	
900 - SFA On Site Monitoring	V-0900	The SFA has not completed the on-site monitoring form (new version) for breakfast at 50% of their sites. TA provided that the State Agency has released a new version with one side	Complete and attach the new version of the on-site monitoring form for breakfast at one of your two sites.	

**Iowa Department of Education**  
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**State Review Summary Report**  
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		to be used for breakfast. The new version can be found on IowaCNP under download forms.	
1100 - Smart Snacks in School	V-1100	The SFA was selling sides at lunch that do not meet Smart Snack Standards. For example: French fries were being sold a la carte and when run through the calculator they did not meet Smart Snack standards.	State your intentions to only sell a la carte items that meet the Smart Snacks Standards.

**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 record the date each paper Free and Reduced Price Application is received at the school. This provides the documentation needed to show that applications are completed within 10 operating days.
100 - Certification and Benefit Issuance	120 How and when are the following changes made to the point of service and benefit issuance document:	TA provided that if the SFA's Point of Service system has students that no longer attend the school that these students should be made to be inactive. Advised the SFA to contact the vendor of their POS system to find out how to make students inactive.
200 - Verification	213 If applicable, did the SFA's notice of adverse action contain all required information, including notification of appeal rights?	TA provided that when giving a household the right to appeal they should be given 10 calendar days in which to appeal from the date of the letter. The student's benefit status is then to be reduced within 10 operating days following the appeal period.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Provided the Food Service Director with a sample Standard Operating Procedure for sack lunches as well as a Food Production Record to use with sack lunches.
700 - Resource Management		<ul style="list-style-type: none"> <li>· 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.</li> <li>· 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 if the nutrition account is going to be charged for these. These</li> </ul>

**Iowa Department of Education**  
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		<p>expenses will not be listed on the Procurement Plan.</p> <ul style="list-style-type: none"><li>· TA also provided that the SFA needs to have debarment statements from vendors when using small or formal procurement methods.</li><li>· The written code of conduct did not identify the specific board policies that make a reference to disciplinary action. A number of board approved policies that reference disciplinary action, gifts and ethics were identified. Write in the policy numbers and titles on the school food service code of conduct that would apply to officers and employees who violate procurement procedures.</li><li>· 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. Reviewed how to complete the 3 bids and a buy template that the State Agency has developed. The template can be found on IowaCNP under download forms. Also recommended that the SFA send the Vendor Statement of No Bid with the 3 Bids and a Buy document. Provided a copy of the Vendor Statement of No Bid.</li><li>· When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth. Discussed that in addition to the local grocery store that the SFA should spread the wealth and also purchase some from Casey's.</li><li>· 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.</li><li>· For milk, other things to consider when requesting prices 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.</li></ul> <p>* TA provided that if the SFA only wants price quotations for milk in plastic bottles, in their solicitation document they should</p>
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**Iowa Department of Education  
Bureau of Nutrition and Health Services  
State Review Summary Report  
Grundy Center Comm School District (27270000)  
Dates of Review: February 5 – 8, 2019**

		<p>inform vendors that the SFA has documentation that the students drink more milk when it is in plastic bottles vs. cartons. Without this information a vendor may think that the SFA is being too restrictive.</p> <ul style="list-style-type: none"> <li>· 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.</li> <li>· 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.</li> <li>· 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.</li> <li>· 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.</li> <li>* The SFA needs to keep an Exception Log listing items they have accepted that are non-domestic. The exception log needs to list the date that the non-domestic item was accepted, item name/description, and the reason it was accepted. Two reasons are valid for accepting non-domestic foods, i.e. 1). food is not available in the US or not available in adequate quantities in the US OR 2). the domestic product is significantly higher priced than the non-domestic product.</li> <li>* Provided a template for rebate and credit tracking and explained their use.</li> <li>* TA provided that if the SFA has a need to purchase items that are not on the Market Basket they should request that they be added. If not added, the SFA would need to either use micro-purchasing and spread the wealth (if under the micro-purchase threshold) or obtain price quotes from 2-3 vendors and purchase from the lowest bidder.</li> </ul>
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	The SFA currently has an old short version of the USDA non-discrimination statement on their monthly menus. TA provided that the updated short statement is "This institution is an equal opportunity provider" and that this statement should be placed on the monthly menus. TA provided that the most current long version of the USDA non-discrimination statement and also the Iowa non-discrimination statement can be found on IowaCNP under download forms.
800 - Civil Rights	802 What services does the SFA provide to households comprised of persons with Limited English Proficiency (LEP)?	TA provided that USDA has 49 translated Free and Reduced Price Applications and supporting documents at the following web site: <a href="http://www.fns.usda.gov/school-meals/translated-applications">http://www.fns.usda.gov/school-meals/translated-applications</a> .

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
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**Grundy Center Comm School District (27270000)**  
**Dates of Review: February 5 – 8, 2019**

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: <a href="http://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer">www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer</a> .
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 there is promotion materials on IowaCNP under download forms that can be used to inform families about the availability and location of Summer Food Service Programs.
RMCR - Revenue From Nonprogram Foods	5 If the SFA served adult meals at nonpricing sites and/or served adult meals free of charge to adults not directly involved in the meal service, determine how the nonprofit school food service was reimbursed in full for the cost of all adult meals served. Was the SFA's process for recovering the full cost of adult meals served sufficient?	TA provided that since the janitor's eat for free the SFA should keep track of how many meals they eat and money should be transferred from the General fund into the Nutrition account to cover these meals.

**Site - Level Technical Assistance Grundy Center Elementary School (0409)**

Area	Question	Comments
1400 - Food Safety		Just recently the SFA started to have a sharing table however they did not have a Standard Operating Procedure or monitoring established. TA provided that if they are going to allow food items that require temperature controls that they would need to petition for a variance from the Iowa Department of Inspections and Appeals. Gave the Food Service Director the following: Sharing Tables at School Fact Sheet, Sample Standard Operating Procedure and a Sample Petition for Waiver or Variance.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	TA provided that each school year the SFA needs to have two food safety inspections or at a minimum request a second inspection. Since the Elementary School is categorized as a Service Site they will most likely only be inspected once a year, but the SFA still needs to request that a second inspection be completed. The SFA should keep documentation showing that a second inspection was requested and also keep a copy of the e-mail if the Health Department states that they will only complete one inspection.

**Org - Level Commendations**

Description
Certification and Benefit Issuance: Benefit documents were organized. The SFA uses a Web-based application in addition to paper applications. 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 correctly determined, signed and dated by 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. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system. The Authorized Representative/Verifying Official and the two Determining Officials participated in the Application Approval and Direct Certification webinar.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria at the site reviewed. Annual civil rights training was provided for food service staff, Business Manager and the Determining Officials and was documented. The SFA submitted the annual Public Release to the local media (Grundy Register). 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: There is no fiscal action related to this review.

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
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<p><b>Food Safety:</b> The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site reviewed. 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 and documented. 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. The cafeteria tables are sanitized between groups of students eating. The following individuals at the site reviewed are ServeSafe Certified: Kathryn Patrick, Cory Johnson, Sheryl Wilson, Cheryl Stockdale and Jodi Petzer.</p>
<p><b>Local Meal Charge Policy:</b> The SFA developed and approved a meal charge policy on May 17, 2017 and revised the policy on November 21, 2018. The policy was distributed to all households and staff were informed of the policy. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.</p>
<p><b>On-site Monitoring:</b> The on-site monitoring forms were completed for 100% of the SFA's sites for lunch prior to February 1st.</p>
<p><b>Procurement:</b> The Food Service Director 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. 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. Review of invoices from the Prime Vendor showed the district was purchasing most products from the market basket and prices were validated. In school year 2017-2018 the SFA utilized 98.1% of their allotted PAL dollars. The SFA is participating in Direct Distribution, DOD and Diverted Foods. This school year, the SFA is on track to use all of their allotted direct distribution dollars and DOD dollars.</p>
<p><b>Professional Standards:</b> The Food Service Director has completed 19.5 hours of professional training of the required 12 hours for school year 2019. All nutrition staff have met required training for Professional Standards in school year 2019. An organized annual Training Spreadsheet is maintained showing a glance which staff have been trained and meet required annual hours. Non-nutrition staff who have responsibilities related to the nutrition department have completed their 4 hours of required professional training.</p>
<p><b>Reporting and Record Keeping:</b> Reports are filed on time and all records are maintained for at least three years plus the current year.</p>
<p><b>Resource Management:</b> 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 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.</p>
<p><b>School Breakfast and Summer Food Service Program Outreach:</b> School Breakfast Program (SBP) outreach was done by posting the breakfast menu on the district's web site, having a breakfast contest, putting out signs at the beginning of the school year, putting information in the school newsletter and having guest servers. Summer Food Service Program (SFSP) outreach included information being shared via the district's websites.</p>
<p><b>Verification:</b> The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was completed on time. The SFA had individuals participate in the Verification Process webinar. The verification report was completed accurately and on time.</p>
<p><b>Wellness Policy:</b> The SFA's wellness policy was reviewed and revised on June 21, 2017. The public is made aware of the SFA's wellness policy via the district's web site. The following individuals are involved in reviewing and updating the Local Wellness Policy: Parents, Teachers of Physical Education, School Administrators, School Health Professionals, Public, School Food Service and School Board Members. Potential stake holders are made aware of their ability to participate in the Wellness Committee. The SFA completed a partial assessment of their wellness policy. 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 Grundy Center Elementary School (0409)**

Description
<p><b>Meal Components and Quantities:</b> The Food Service Director does a god job of menu planning. She has developed a five week cycle menu. 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 the Kindergarten - 4th grade students. CN labels and Manufacturer's Statements were on file. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch. An attractive fruit/vegetable bar which includes many fresh fruits and vegetables is offered. Standardized recipes are used for food production. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals.</p>
<p><b>Meal Counting and 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. Infinite Campus 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 was trained and appeared aware of what constitutes a reimbursable meal. Edit checks are performed.</p>
<p><b>Nutritional Quality of School Meals:</b> The Food Service Director completed the USDA menu worksheets for the week of December 10 - 14, 2018 for breakfast and lunch at the elementary. 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 elementary 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, 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. Numerous nutrition related posters are displayed in the cafeteria. A nutrient analysis was not required.</p>

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
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**Dates of Review: February 5 – 8, 2019**

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.

Smart Snacks: Students are able to purchase foods via a la carte sales at the Elementary School. Exempt leftover National School Lunch Program entrees are only sold the same day they are initially offered. Beverages sold meet the standards for the K-4th grade group of students.

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