

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Iowa School For The Deaf (14768615)**  
**SNP - Review ID: 5086**

**Program Year:** 2019  
**Month of Review:** December  
**Lead Reviewer:** Brenda Windmuller  
**Org Representative(s):** TRACY WATSABAUGH

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	The SFA spent only 76.5% of the USDA Foods money allocated to them in 2017/2018.	The SFA will submit a plan of how they will monitor the USDA Foods allocation and spend at least 90% of the funds in the 2018/2019 school year.	
1000 - Local School Wellness Policy	V-1000	The Wellness policy provided to the SA was reviewed in October 2015. This policy must be reviewed once every three years at a minimum.	The SFA will provide a timeline of when the Wellness Policy will be reviewed.	

**Site - Level Findings: Iowa School For The Deaf (8615)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Org - Level Technical Assistance**

Area	Question	Comments
300 - Meal Counting and Claiming		TA was given that the SFA may claim meals missing components as long as there is a Diet Modification Form on file addressing either the foods not taken or a behavioral issue associated with taking the food offered.
700 - Resource Management		Procurement: The procurement plan did not identify the correct procurement method for each event. The administrative consultant provided technical assistance on the following:

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		<p>discussed with SFA the purchase thresholds and corresponding procurement methods discussed the IFB process and concept of sealed bids and bid opening discussed Point-of-Service (POS) software is their only qualifying sole source purchase that does not require prior approval from the state agency revise procurement plan to reflect accurately procurement method used. The procurement event page of the procurement plan must be reviewed and completed annually.</p> <p>Document all steps of the process and retain documentation of the procurement history for three (3) years plus the current year. Documentation should include all vendor responses.</p> <p>The administrative consultant could not find any school policy to support the \$15,000 small purchase threshold. Food service director too this threshold from the capital asset threshold policy. The food service director will confirm if the \$15,000 small purchase threshold is Iowa State University (ISU) or the Iowa Department of Administrative Services (DAS) policy. DAS policy for 2017 states any procurement above \$50,000 is a formal procurement, that is, Request for Proposals (RFP) or Invitation for Bids (IFB).</p> <p>The Food Service Director (FSD) compares meat prices between Omaha Steaks and Reinhart (Prime Vendor), then purchases items where she gets the better deal; with the exception of a couple of specialty items which were for a Christmas party. The price comparisons are not documented and should be.</p> <p>The school purchases fresh baked pizza in collaboration with Lewis Central Schools from a local pizza franchise. The price quotation document was not available for review (off-site review). The procurement for fresh baked pizza was completed in SY 2016-2017 and was renewed each year since then. The state agency is not sure if the original solicitation document contained any language on option to</p>
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		<p>renew the contract. The school must conduct a new procurement for fresh baked pizza in SY 2019-2020 if there was no option to renew in the solicitation conducted in SY 2016-2017. Refer to the small purchase (3 Bids and a Buy) and the Invitation for Bids (IFB) templates in download forms on IA_CNP.</p> <p>Maintain documentation received from all pizza vendors who responded including those who not awarded the contract. Provide vendors with an estimated annual usage for each type of pizza. This information should be used to calculate extended cost and arrive at lowest overall cost for procuring pizza.</p> <p>A review of invoices for fresh baked pizza showed the school is purchasing sausage pizza. Although the price is the same as that for cheese and sausage pizza, the item was not on the Request for Price Quotation. Add all pizza items to be procured on the Request for Price Quotation solicitation document.</p> <p>When micro-purchase method is used, purchases must be equitably distributed among vendors to "spread the wealth" and prices should be reasonable. Complete a quick online search to make sure price is reasonable when purchase is going to be made with only one vendor without soliciting price quotes from other vendors. Items for the May basket are not necessary, reasonable, or allowable cost for school nutrition. Nutrition funds cannot be used for these items. Catering or general funds should be used.</p> <p>Use a tracking tool for micro-purchases to ensure purchases are being equitably spread among vendors. A micro-purchase log template is available in download form on IA_CNP.</p> <p>There is no Request for Price Quotation (3 Bids and a Buy) documentation for fresh bread products. The procurement off-site tool states two vendors were contacted. There is no note on the off-site tool on responses received. Three invoices from 12/2017 were reviewed with the price list for SY 2016-2017. Prices for most bread products matched the price list except the list did not include price for Italian hard</p>
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		<p>roll purchased on 12/11/2017 and restaurant pack heavy hearth bread. Technical assistance provided to maintain documentation for a minimum of three prior years plus the current year.</p> <p>A review of dairy invoices showed the awarded vendor provided price for 4% fat cottage cheese and not 2% fat cottage cheese, as requested.</p> <p>Dairy prices are based on the milk market, the school should request a monthly price list for dairy products from the vendor.</p> <p>Formal procurement such as prime vendor requires a public notification be issued in a widely circulating newspaper. It is not clear if the school reached out directly to vendor to request response to proposal.</p> <p>Page 13 of the Request for Proposals (RFP) states the contract award type is a "fixed price (including all handling charges) per product. The RFP, however, has language on page 7 and 8 that is specific to cost reimbursable contracts.</p> <p>The response (dated August 4, 2016) from the vendor awarded the prime vendor contract states that the cost of a product will apply a "mark-up percentage as specified in the schedule." Per federal regulations at 2 CFR 200.323, cost plus percentage-of-cost is not allowable. The prime vendor contract was renewed for SY 2017-2018 and SY 2018 - 2019. For SY 2019 -2020, the school will be required to issue a new solicitation for prime vendor.</p> <p>The time between issue of RFP for prime vendor services and due date of response was only one week. This is not adequate time for response. Although not a federal requirement, it is best practice to allow a minimum of six weeks but best practice is to allow 8 -12 weeks lead time for vendors to submit a response.</p> <p>There should be a process established between the school and the vendor, where the vendor would suggest a domestic alternative product if the domestic product ordered is not available. There should be a Buy American exception</p>
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		<p>log maintained by the school to document exceptions to Buy American when a non-domestic product is purchased. The SFA food service director should approve the use of non-domestic food prior to delivery. A Buy American exception log sample template will be available soon in download forms on IA_CNP.</p> <p>It is not clear if written specification were provided to the vendor including estimated annual usage of each item. It is not clear if the school is getting monthly price lists for non-guaranteed price items and weekly price list for produce. A review of three invoices showed that price list did not have many products purchased.</p> <p><b>Other general procurement technical assistance:</b></p> <p>Have signed debarment certifications kept on file for all small purchase and formal procurement.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Agreements valued at \$10,000 or more should have a termination (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>For cost-reimbursable contracts, develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account? A prototype Rebates/Discount/Credits prototype log is available in download forms in IA_CNP.</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none"><li>· All price adjustments throughout the year</li><li>· All invoices</li></ul>
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		<ul style="list-style-type: none"><li>· All contracts and agreements</li><li>· All bids solicited</li><li>· Documentation that a vendor did not reply to bid (if applicable)</li><li>· Documentation of why you selected a specific vendor (Selection Rubrics)</li><li>· Copies of bid solicitation</li><li>· Debarment statements</li><li>· CD provided by the AEA (if applicable)</li></ul> <p>Three types of purchases, (Federal Thresholds):</p> <p><b>Micro-purchase-</b> under or equal to <b>\$10,000</b>(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <p>§ Track micro purchases, what purchased when and dollar amount.</p> <p>§ Purchases should be distributed around community, not just one store.</p> <p><b>Small Purchases-</b> Purchases that are <b>under \$250,000</b> (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> <p>§ Include all terms and conditions</p> <p>§ Include terms: Buy American and Equal Opportunity</p> <p>§ Include Termination for Cause and Convenience if \$10,000 or more</p> <p>§ Attain Signed Debarment Statements</p>
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		<p>§ Awarded on lowest price (unless written documentation to justify)</p> <p>§ Maintain documentation</p> <p><b>Formal Purchase-</b> Purchases equal to and <b>exceeding \$250,000</b> (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> <p>§ Notice of accepting all types of formal purchase must be advertised.</p> <p>§ Include all requirements of a small purchase</p> <p>§ If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</p> <p>§ Everything must be in writing.</p>
700 - Resource Management		The SFA was allocated \$4262.20 in USDA Foods (commodities) money in 2017/2018 and only spent \$3262.34. The SFA should aspire to use all of the funds allocated, with 90% being a minimum target.
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 was last updated in October 2015. The Wellness policy must be updated once every 3 years and it must be made available to the public.
1100 - Smart Snacks		SFA is considering adding vending machines to the campus for after school. SA provided information on Smart Snacks.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The food safety plan does not include a blood born pathogen and body fluid cleaning Standard Operating Procedure. The SA referred the FSD to some templates which can be found online.
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?	Breakfast Promotion: The USDA requires SFAs to promote their breakfast program at least 2 times annually to households. Promotion should include breakfast price, times available and should encourage all students to attend. National School Breakfast week is March 4-8, and is a good time to promote breakfast.

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		Summer Meal Promotion: The SFA should promote summer feeding programs to all students every spring to be sure that families are aware of the availability state-wide.
RMCR - Nonprofit School Food Srvc Acct	13 Did all recorded expenses represent an activity or function recognized as reasonable, necessary, allocable and otherwise compliant with the provisions of 2 CFR 200 Subpart E?	The SFA may not charge maintenance and repairs to the Lunch Program. Nearly \$11,000 in repairs maintenance was charged to the account in 2017/2018.

**Site - Level Technical Assistance Iowa School For The Deaf (8615)**

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	SA reminded FSD that with Offer vs. Serve students must take 3 items at breakfast and 3 components at lunch.
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	The And Justice for All" poster must be 11" X 17". The poster displayed was too small. The SA can supply posters at any time. The poster was replaced by the FSD during the on-site review. The SA and FSD discussed providing the poster in braille to serve the seeing impaired students. The SFA has a machine which could create this poster.

**Org - Level Commendations**

Description
<p><b>PROCUREMENT:</b> The SFA has a comprehensive written Procurement Plan and Code of Conduct policy for SY 2018-2019. The FSD attended a Regional Procurement Training in 2017. Two vendors were selected to review compliance with the micro-purchase vendor. Each transaction with the vendors was below the micro-purchase threshold. Prices for the items purchases were reasonable. Four vendors were selected to review compliance with small purchase method. Price quotation was requested from two and three vendors for pizza and milk, respectively. The Request for Price Quotation for milk included the estimated annual usage. For both pizza and milk, vendors submitted the following signed documents: no conflict of interest and no collusion statements, suspension and debarment certification statement, certificate of lobbying, assurance of compliance with Buy American provision, and Food Laws and HACCP certification statement. The pizza vendor submitted product and nutritional information for cheese and pepperoni pizza and a CN label for pepperoni. The procurement of prime vendor for food and non-food supplies (excluding bread and milk) was conducted in SY 2016- 2017. The RFP included the option of four - one year contract renewals. The solicitation was completed in collaboration with Lewis Central CSD. The RFP for prime vendor included the required federal terms and conditions. The evaluation criteria had cost as the primary factor for evaluation of vendor responses.</p>
<p><b>APPLICATIONS/BENEFIT ISSUANCE (100):</b> Benefit documents were well organized. The current application form and guidelines were used, all students are looked up on e-lookup, benefits are accurately transferred in a timely manner to the POS system. The correct and current benefit issuance list was available. All applications were correctly determined. Applications were complete with SSN's and case numbers, and all applications were determined within ten days. Access to benefit</p>



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information is correctly limited. The SFA works with other school districts to attain household information. Free meals are extended to all members in the household. Eligibility is kept confidential.
LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has nutrition education, physical activity and other wellness goals included and is posted on the school's website. An assessment has been completed and is posted on the school's website. 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. The committee meets several times annually and notes are taken. Faculty and students take advantage of the infrastructure on campus and near by to include walking and biking trails, playground equipment and an indoor pool.
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. Food Service Staff ensured each student received the required meal components.
PROFESSIONAL STANDARDS (1200): The SFA followed regulations for the district's size category when hiring a new director. Tracking was provided that documents that the director received the required 12 hours of annual training, full time staff received 6 hours of training, and all other staff have received at least 4 hours of annual training or have a plan in place to complete the training by June 30,2019. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.
REPORTING AND RECORD KEEPING (1500): Reports are filed on time, and all records are maintained for at least three years plus the current year.
RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed, indicated appropriate and allowable expenditures. Reports are filed on time, and all records are maintained for at least three years plus the current year. Errors fell below the \$600 disregard, no fiscal action will be required at this time.
VERIFICATION (200): The correct number of applications were verified. The SFA followed proper procedures and timeline. The SFA had at least one person attend training. The verification report was completed accurately and on time.

**Site - Level Commendations Iowa School For The Deaf (8615)**

Description
All staff at Iowa School For the Deaf are required to have some level of understanding of American Sign Language to better serve the population of hearing impaired students that it serves. All Food Service Staff were observed to interact very well with students and effectively communicate. Food Service staff appear to have a good rapport with students, staff and each other.
CIVIL RIGHTS (800): The And Justice for All civil rights poster was posted in the cafeteria. Menus and other information is posted in brail for the seeing impaired students. Annual civil rights training was provided food service staff and documented. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. Ethnic/racial information is collected and the form is completed. No discrimination was observed.
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 in a publicly visible location. Temperature logs are maintained for all coolers (including milk coolers, freezers) food served, and the dishwasher. Records for the past 4 years were available for review. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled.
MEAL REQUIREMENTS & COMPONENTS: The Food Service Director does an excellent job of menu planning and offering choices. Students have numerous choices which increases participation and provides opportunities for each student to find meal components for lunch and breakfast that they will eat. A fruit and vegetable bar is offered daily. 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. 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. There is regular staff training. Many low fat and low sodium food items

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were observed in storage. Signage was posted explaining what constitutes a reimbursable meal. A daily menu is also posted. All students were observed to have a reimbursable meal during the day of the review, with an occasional friendly prompt by staff to take a serving of fruit. Offer vs Serve is done correctly.