

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Essex Comm School District (21130000)
SNP - Review ID: 5074

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One application for free/reduced benefits was missing the last 4 digits of the social security number.	The SFA will explain their process to ensure all applications are complete prior to processing.	
700 - Resource Management	V-0700	The SFA spent only 80.5% of the USDA Foods money allocated to them in 2017/2018. The expectation is that a minimum of 85% of your funds are used and that you strive for 90%.	The SFA will outline their plan to increase spending of the USDA Foods money for the remainder of the 2018/2019 school year and how this will be better monitored in the 2019/2020 school year.	
1000 - Local School Wellness Policy	V-1000	The Wellness Policy has not been reviewed in the past 3 years. An assessment of the wellness goals has not been completed within the past three years.	The SFA will 1. Submit a date when the Wellness Policy will be reviewed. 2. Submit a date of when the wellness committee will complete the assessment. 3. How the assessment will be made available to the public.	

Site - Level Findings: Essex Junior-Senior High School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	One student was allowed to go through the line without 1/2 cup fruits and/or vegetables.	The SFA will describe their process to monitor that all students receive a reimbursable meal.	
400 - Meal Components and Quantities - Lunch	V-0400	The SFA had two deficiencies in the planned menu for December 17-21. 1. Vegetable sub-group beans were not served during the week and 2. High school students were short 1 oz equivalent grain on 12/17/2018.	The SFA will 1. Submit the March Lunch Menu to show that all vegetable sub-groups have been included in the menu planning. 2. Submit production records and CN labels for February 18-22, 2019 lunch, providing evidence that sufficient quantities	

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			of grain has been provided to high school students.	
1100 - Smart Snacks in School	V-1100	On the day of the on-site visit (February 14, 2019) the Student Council was selling candy bars which are not Smart Snacks Compliant.	The SFA will state their plan to better monitor student origination fundraisers and their intent to follow regulation set forth by the USDA.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	One application was missing the last four digits of the social security number. Applications missing information are considered incomplete. One application was missing the frequency of pay. The SFA was able to obtain this information from the parent to process the application; the SFA should mark this on the application. The SFA was using a combination of applications from 2017/2018 and 2018/2019. All households should use the current application.
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>The Code of Conduct should include board policy 413.3 and 413.4 to reference disciplinary action.</p> <p>Must have signed debarment certifications kept on file.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <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</p>

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		<p>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> <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</p>
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		<p>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 • f 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		<p>The SFA is expected to spend a minimum of 85% of the USDA Foods (commodities) money allocated to them each year. Only 80.5% was spent in 2017/2018. The SA shared some strategies to help stay on track with this spending and training opportunities were shared. The SA has connected the FSD to the USDA Foods Consultant at the SA.</p>

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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 be available to the public. The policy posted on the school's web site was last reviewed on February 10, 2016. An assessment of the wellness goals must be completed at minimum once every three years and be available to the public. Once a year is best practice. The SFA did not have a completed assessment on file or available to the public. Templates for the assessment were shared with the FSD and the Superintendent.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The Food Safety Plan contains most of the required elements, however some updates are necessary. Food Code 2005 is referenced throughout the plan. Iowa is currently using Food Code 2013. The Food Safety Plan does not have a standard operating procedure for blood borne pathogen and body fluid clean-up. The SOP is hanging on the bulletin board, the SFA should make a copy to include in the Food Safety Plan.

Site - Level Technical Assistance Essex Junior-Senior High School (0172)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	All students must select 3 food components at lunch under Offer vs Serve. One of those components must be a minimum of 1/2 cup fruits and/or vegetables. A member of the staff must monitor students to ensure that they have taken a reimbursable meal. One student slid by with an inadequate amount of vegetable on their tray.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The menu reviewed for the week of December 17-21 was missing the vegetable sub-group beans & legumes. All vegetable sub-groups must be present in their minimum required serving amount each week. The SA sent information outlining the requirement and what category each vegetable falls into. On Monday December 17th the popcorn chicken serving only contained 2 m/ma and 1 g. No additional grain was served that day, making the High School short 1oz equivalent for the day.
1100 - Smart Snacks in School	1104. Are students able to purchase foods during the school day?	SMART SNACKS: Competitive foods and beverages sold to students during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) must meet Smart Snack guidelines and

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State Review Summary Report
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		<p>nutrition standards.</p> <p>These items must be: whole grain-rich; first ingredient must be fruit, vegetable, dairy product or a protein; or be a combination food that contains at least ¼ cup of fruit and/or vegetable. Items must meet the calorie, sodium, fat and sugar standards. Items must also adhere to the size restrictions for each age group. A brochure was provided.</p>
1400 - Food Safety		<p>Foods placed on share tables are meant to be taken by other students during the same meal period or the next meal period. Food placed on the table should never be put back into the food service stock as it has the potential to cross contaminate other food. Once food is sold, all control is lost, by re-selling the same item the SFA becomes responsible for injury or illness as a result of contamination. Utilization of a share table containing potentially dangerous foods, which require refrigeration, must have a waiver from the Department of Inspection and Appeals. The SA provided Share Table information.</p>

Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE (100): Benefit documents, as well as all paperwork, 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 and all applications were determined within ten days. 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.</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 nutrition education, physical activity and other wellness goals included. 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 annually and minutes are kept. The Food Service Director and School Nurse have some great ideas and show enthusiasm around wellness initiatives. Activity of note include walking club where students are given pedometers, once they reach certain milestones, they are given prizes.</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.</p>
<p>MEAL PATTERN: Most students observed on the on-site visit had a reimbursable meal, the menu was complete with all food groups represented and served in their</p>

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Bureau of Nutrition and Health Services
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proper quantity. Offer vs. Serve was implemented properly. Water was available to all students during meal times.
PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events, and specifications were well-written and comprehensive. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, and checks and balances. The Food Service Director has attended Regional Procurement training.
PROFESSIONAL STANDARDS (1200): Tracking was provided that documents that the director received the required 12 hours of annual training, full time employees received the required 6 hours of training, and all other staff have received at least 4 hours of annual training in 2017/2018 and are well on their way to complete the required hours for 2018/2019.
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. Non-program revenue is calculated and tracked appropriately. Reports are filed on time, and all records are maintained for at least three years plus the current year.
VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. The verification process was completed on time.

Site - Level Commendations Essex Junior-Senior High School (0172)

Description
COMPETITIVE FOODS & SMART SNACKS (1100): Students may purchase a second entrée and other a la carte items at the high school level. Documentation was available to show that all foods and beverages sold to students by the food service department during the school day met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte by the food service department.
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, milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. There is a handwashing sink next to the dish return so students can wash their hands.
STANDARDIZED RECIPES: The Food Service Director and kitchen staff utilize standardized recipes which are well written and easy to follow. This standardization allows for consistency in products, making planning and production more efficient. CN labels were on file for menu items. Production records were available for review.
The SFA does a good job of promoting the Summer Food Service Program and the Breakfast Program. The SFA makes serving breakfast a priority, even on days with late starts, breakfast is provided to students.