

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Stanton Comm School District (61650000)
SNP - Review ID: 5107

Program Year: 2019
Month of Review: January
Lead Reviewer: Brenda Windmuller
Org Representative(s): Mindy Strough

Site - Level Findings: Stanton High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA is utilizing a recipe for banana bread/muffins which is lacking information for standardization. The recipe as is does not allow for consistency or proper figuring of grain servings. This information is essential for calculating total servings of grain for the day/week.	The SFA will submit a standardized recipe for the banana bread muffins and all variations which includes raw batter scoop size, recipe yield, serving size and grain oz. equivalent.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	The SFA is required to have a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances.	The SFA will submit a completed Code of Ethics/Conduct and all board policies which support the disciplinary action.	
1000 - Local School Wellness Policy	V-1000	The SFA is required to complete an assessment of the wellness goals once every three years and to make the Wellness Policy Assessment available to the public.	Submit a timeline and plan on when the assessment will be completed and how the SFA will make the Assessment available to the public and/or to the families it serves.	
1200 - Professional Standards	V-1200	The SFA has not been tracking professional development hours to ensure annual requirements are fulfilled.	The SFA will submit a completed training tracker spreadsheet for 2018/2019 which includes all employees working with the NSLP and SBP, documenting their training	

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			to date. The SFA will further submit a list of classes planned for individuals who have not yet completed their hours for the year.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA has not completed the Non-Program Revenue Tool and documents indicate that revenue does not cover the expenses of a la carte items.	SFA will complete and submit the Non-Program Revenue Tool. SFA will also submit a list of all non-program foods, the prices charged for each, and the purchase price per unit of each item.	

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	209 Based on the review of verified applications:	The Confirming Official must sign the application upon verification. Best practices is to keep all verification information (application selected, reports, letter sent to household, information submitted by household, etc.) together in a file.
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. Reviewed federal and local thresholds. The SFA must follow the most restrictive (or smallest) dollar amount. Use the drop-down boxes to help fill in some of the boxes on the plan.</p> <p>SA explained differences between micro, small and formal purchases.</p> <p>SFA should keep a log of micro purchases.</p> <p>Date your plan.</p> <p>SFA should utilize a rubric or matrix when determining which vendor to select for small purchases.</p> <p>Only items specified on bids may be purchased.</p> <p>Discussed why SFA utilizes two prime vendors and if it is to their benefit.</p> <p>Reinhart has not been properly procured, and purchases exceed \$10,000. Purchase should stop immediately.</p> <p>Maintenance and repairs are not allowed to be charged to the school lunch account.</p>

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		<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> <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"><input type="checkbox"/> All price adjustments throughout the year<input type="checkbox"/> All invoices<input type="checkbox"/> All contracts and agreements<input type="checkbox"/> All bids solicited<input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)<input type="checkbox"/> Documentation of why you selected a specific vendor (Selection Rubrics)<input type="checkbox"/> Copies of bid solicitation<input type="checkbox"/> Debarment statements<input type="checkbox"/> CD provided by the AEA (if applicable)
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		<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"><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.<input type="checkbox"/> 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"><input type="checkbox"/> Include all terms and conditions<input type="checkbox"/> Include terms: Buy American and Equal Opportunity<input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more<input type="checkbox"/> Attain Signed Debarment Statements<input type="checkbox"/> Awarded on lowest price (unless written documentation to justify)<input type="checkbox"/> 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"><input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised.<input type="checkbox"/> Include all requirements of a small purchase
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		<input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. <input type="checkbox"/> Everything must be in writing.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Students with diet modification forms signed by a doctor should be accommodated. Students unable to consume milk should be provided a substitution with equal nutritional value to cow's milk. The SA provided a list of preapproved products.
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?	<p>WELLNESS POLICY: Provided Technical Assistance, the district is required to invite stakeholders to participate in the wellness committee and/or have documentation of the invitation. Stakeholders should include: parents, teachers of physical education, school administrators, students, school health professionals, general public, school food service and school board members. Attendance records and meeting minutes should be kept.</p> <p>It is required for the SFA to review the Wellness Policy once every three years, the posted policy was reviewed on January 23, 2019. The date prior was August 14, 2014. The policy should be made available to the public.</p> <p>The district is required to complete an assessment of the wellness policy every three years and make the results public. Best practice is to assess the goals once a year. No assessment was available at the time of the Administrative review.</p> <p>The SA provided the Local Wellness Policy folder from Team Nutrition that includes the handout on the Summary of the LWP Final Rule, the "Does Your Wellness Policy Measure Up?" handout and the school Building Progress Report form. E-mailed additional resources to the SFA.</p>
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 track professional development hours of all staff. Training logs should include: employee's name, position, title of training, KEY Area (refer to learning objectives) training topics, date training completed, and creditable training

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		<p>hours. All Food Service staff and SFA employees working with the School Lunch Program are required to take Civil Rights annually. Training hours should meet the following guidelines:</p> <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>SFA's must have a system to track training and provide oversight to ensure required training is completed each year. Documentation of all training should be kept on file by the SFA. The SA provided a training tracker spreadsheet template and a copy of the requirements.</p>
1400 - Food Safety		<p>The SFA has an obligation to protect the food supply and equipment used for meals for students. It is advised that the SFA develops a Standard Operating Procedure for when the kitchen is to be used by the general public. This would include securing all food to prevent contamination and tracking who has access to the kitchen.</p>
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	<p>The HACCP manual was missing the blood born pathogen and body fluid clean up Standard Operating Procedures. This is a required element of the HACCP manual. The SA provided a link to a template for this policy.</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?	<p>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.</p> <p>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.</p>

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		No evidence of either of these was provided.
RMCR - Nonprofit School Food Srvc Acct	3 Did the SFA's net cash resources exceed its 3 month average monthly expenses?	The SFA is not allowed to have more than 3 months operating expense in their lunch account at any given time.
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	The SFA should evaluate price of goods annually to ensure a la carte prices are changed at a rate higher than the cost. The SFA must recoup all expenses connected to the product to include labor. The non-program revenue tool should also be completed to document this process has been completed and to demonstrate compliance.

Site - Level Technical Assistance Stanton High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	<p>Grains: Breadsticks during the month of review did not comply with the whole grain standards. In our discussion, we noted that the regulations have changed as of 2/11/19, the FSD misunderstood the timing of this change. The SFA is encouraged to keep up with communications from the SA as this was communicated several times including January 4, 2019.</p> <p>The FSD must use standardized recipes and the bread grain chart to determine proper crediting of scratch made items such as the muffins served daily.</p>
400 - Meal Components and Quantities - Lunch	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	<p>PRODUCTION RECORDS & STANDARDIZED RECIPES: Technical Assistance was given on creating standardized recipes for the district. Recipes should include ingredients, ingredient specifications, quantity of ingredients, serving size, scoop sizes, yield, mixing procedures, cooking procedures, times, temperatures, holding temperatures, procedures for leftovers.</p> <p>Production records should include all items served, and the serving sizes for each age level.</p> <p>CN Labels and Product Formulation Statements must be on file for all appropriate foods served for 3 years plus the current year.</p>

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500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	Staff did not demonstrate a good understanding of Offer vs. Serve. Posters were not present at breakfast or lunch to help students understand their choices and how to select a reimbursable meal. Posters and resources were provided on Offer vs Serve by SA. It is recommended that all kitchen staff and POS operators take Offer vs. Serve training. SA sent link to online training.
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	Product in the walk-in freezer was stored directly on the floor. Donuts and rolls stored in the deep freezer were not labeled and dated.
Dietary Specifications Assessment Tool - Breakfast	24 Students are offered salt:	The FSD inquired how to incorporate some of the student's favorite foods at breakfast as she struggles to find product low in sodium. Biscuits were specifically a concern we discussed several options, such as utilizing smaller serving size, making the biscuits from scratch and moving the item to lunch where there is a higher threshold for sodium.

Org - Level Commendations

Description
APPLICATIONS/BENEFIT ISSUANCE (100): The current application form and guidelines were used, direct certification is downloaded twice a month as required, and 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 information is correctly limited. Free meals are extended to all members in the household. Waivers are provided to applicants and indicate specific fees.
MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the (January) review month counts. Meal count totals for the month of January 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.
PROCUREMENT: The SFA has a written Procurement plan in place. This will be updated annually and used to make purchasing decisions. The SFA had 3 representatives attend Regional Procurement Training.
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: The FSD did a great job of managing the USDA Foods (commodities) money allocated to them in 2017/2018, spending 100.1% of the money. Errors during the Administrative Review fell below the \$600 disregard, no fiscal action is expected at this time.
VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification.

Site - Level Commendations Stanton High School (0109)

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Description
<p>COMPETITIVE FOODS & SMART SNACKS (1100): Students may purchase a second entrée and other a la carte items at the high school. 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.</p>
<p>FOOD SAFETY (1400): The SFA maintains a clean and well organized kitchen, following food safety standards. The latest health inspection report was posted in a publicly visible location. Food Service Staff took temperatures of food product and recorded the temperatures daily. Food Service staff wore hair nets and practiced good handwashing and glove use.</p>
<p>MEAL PATTERN: All students observed on the on-site visit had a reimbursable meal, the menu was complete with all food groups represented and served in their proper quantity. Water was available to all students during meal times. Menus for the month of review contained all required components.</p>