

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Maquoketa Valley Comm School District (40430000)
February 19, 2019

Program Year: 2019
Month of Review: December
Lead Reviewer: Sandra Fiegen
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One student, eligible for free meal status in prior year, was allowed to remain on free status past the thirty day carryover.	Students who do not re-apply for benefits, are not directly eligible in other approved methods or are not found on Direct Certification documentation must be moved to full pay status at the 31st day of school. The student who was not removed is part of a list of eligibility errors attached in a separate CA. In your corrective action response, please indicate how you will ensure that all students who are awarded meal benefits have the correct documentation on file.	
100 - Certification and Benefit Issuance	V-0100	Of the 188 eligibility determinations reviewed, 4 determinations contained errors in status or were missing information that made the application invalid. Several other applications contained more errors. A complete list of eligibility determination errors and problems is attached to this corrective action.	As part of the corrective action for this finding, please correct the incorrect eligibility determinations, or collect the missing information as indicated in the list of errors attached in the review attachments. Also, please note all the process/procedure information included in the list, and complete re-training on the process using the webinar and other resources posted in the Bureau website. As response, please indicate when the children indicated as receiving the wrong benefit were notified of the change in status. Adverse action requires a 10-day notice, and the family should be reminded that they can re-apply at any time if their income has changed. Make notations in the word document and reattach, as well as attaching the other information needed to show that all problems were corrected.	
300 - Meal Counting and Claiming	V-0300	On the day of review, the lunch meal service observed did not include a point of service meal count. Attendance sheets were used as a meal counting mechanism, and modified by two aides occasionally if they were not correct according to the information gathered in early morning. The person who functioned as a cashier at breakfast and for a brief period of the lunch meal service	The meal counting system utilized at the site observed is highly inaccurate and unacceptable. It is also not the system that was explained and approved in your annual agreement to participate in the meal programs. In your corrective action response, please indicate your plans to station a person who is solely responsible for ensuring reimbursability and counting each meal as it is served and adjusting student meal	

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		<p>was moved into a server position instead of doing the cashier work. Each meal claimed for reimbursement and each food item purchased as a la carte (milk in this service line) must be accurately counted. According to the other servers, the cashier is also the person responsible to ensure that the meal is a reimbursable meal, which could not be done when there is no cashier.</p>	<p>accounts for any a la carte purchases at the time that the purchase is made. Students must also provide a medium of exchange to the cashier when they receive their meal or purchase milk. The cashier cannot memorize their names and enter information on their behalf.</p>	
300 - Meal Counting and Claiming	V-0300	<p>In the test month data, one site's daily count of reduced price breakfast meals served exceeded the eligible number of students in that site. Daily edit checks are not completed for any site. Also, in the monthly claim for reimbursement in December for the same site, there were only 14 daily meal counts for lunch but 15 days indicated on the claim form.</p>	<p>In your corrective action plan, please indicate how you will ensure that daily meal counts for breakfast and lunch at each site are accurate prior to the end of each day, who will complete daily edit checks, and how you will document the activity. For more information about meal edit checks, please see item NSLP060 in download forms. Additionally, please indicate your plan for double-checking claim information prior to entry.</p>	
700 - Resource Management	V-0700	<p>The foodservice account is used to purchase food items and supplies for school activity groups. Also, childcare and headstart programs are contract meals through the school district; the contracted cost of the meals needs to be examined in order to determine if it is accurate (foodservice funds cannot support contracted meals).</p>	<p>The full cost of the preschool and headstart meals must be included in future contracts, and paid to the foodservice department. Also, other school activity and student groups cannot purchase items through the foodservice vendor contracts and must set up their own accounts with vendors. In your corrective action response, please indicate the steps taken to fully cost out the preschool/headstart meals, and steps taken to ensure that the foodservice account is only used to support allowable activity under the School Breakfast and National School Lunch Programs.</p>	
800 - Civil Rights	V-0800	<p>SFA is not aware of the USDA non-discrimination policies and statements.</p>	<p>Please re-train in correct Civil Rights procedures, and obtain the correct USDA non-discrimination statement, available at https://educateiowa.gov/pk-12/nutrition-programs. Please indicate where this statement will be placed or used in any program materials that are made available to the school community, and who will be re-trained.</p>	
800 - Civil Rights	V-0800	<p>All participants who request a special dietary accommodation have not returned an accommodations form, completed and signed by a medical authority, to the school district.</p>	<p>In your corrective action response, please indicate how you will ensure that the correct special dietary accommodations form will be obtained by all students who request special diets, and where these forms will be maintained.</p>	
1600 - School Breakfast and SFSP Outreach	V-1600	<p>No Summer Food Service Program outreach was conducted in prior year.</p>	<p>Even if the district does not sponsor a Summer Food Service Program, outreach is required. Resources for conducting outreach were left with the SFA. In your corrective action response, please indicate your plan for conducting outreach on the Summer Food Service Program and documenting outreach efforts.</p>	
RMCR - Revenue From	V-RMCR	<p>The nonprogram food revenue tool in the financial report available in IowaCNP indicates that the revenue received is not proportionally</p>	<p>Please complete and attach the USDA nonprogram revenue tool, and identify steps you have taken to ensure that the revenue received from nonprogram</p>	

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Nonprogram Foods		adequate to the nonprogram expenses, and the USDA Nonprogram food revenue tool has not been completed.	activity is adequate to cover the expenses and meet the requirements of the nonprogram revenue tool. Resources were left with the SFA at the review (green handout in the yellow folder), and others can be found at https://eduateiowa.gov/reporting-nonprogram-food-costs-how-and-why-may-2016 .	
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Site - Level Findings: Delhi Elementary School (0414)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Multiple choices were available for the grain/bread components of breakfast. One choice did not meet the minimum requirements (4 oz yogurt with small chewy granola bar).	All options for building a reimbursable breakfast meal must include at least the minimum items/components. The yogurt+granola bar did not contain at least 1 ounce equivalent of real grain. In your response, please indicate your plans for ensuring that all minimum combinations will provide a reimbursable meal, and list all the options that will be available for breakfast for the grain/bread items.	
400 - Meal Components and Quantities - Breakfast	V-0400	Menu signage is not available on the service line to explain reimbursable meals for either lunch or breakfast.	The daily breakfast and daily lunch meal must be available in signage placed on the service line. Several options for providing this signage were discussed. In your corrective action response, please indicate how you will ensure that signage is posted each day for breakfast and for lunch.	
900 - SFA On Site Monitoring	V-0900	Onsite monitoring not completed for any of the sites in district before February 1.	Annually, onsite monitoring must be completed and on file prior to February 1. The correct form to use is located in the download form area of IowaCNP. As corrective action, please complete the onsite monitoring for each site and attach a scanned copy to this review response. Additionally, please indicate how you will ensure that monitoring is completed annually and maintained on file.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	140 Did the SFA update benefit issuance documents accurately and in a timely manner upon receipt of Direct Certification updates?	When students are found on direct certification documentation after an income application has been processed for them, the benefit issuance list must be modified to note how the student is eligible.
200 - Verification	209 Based on the review of verified applications:	Verification request letter indicates the amount of information that a family must submit for the verification of the application. Please collect the information that is indicated according to the applications being verified (more than one 2 week paystub). Additionally, families who will experience a reduction in their benefits must receive 10 day notice before the reduction is implemented. The school is highly encouraged to attend the verification training webinar prior to starting verification efforts in the next

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		year. Additionally, it is suggested that a summary of activity be maintained, similar to the information collected in the last tab of the ICAVES workbook.
300 - Meal Counting and Claiming	303 How often are cashiers and substitute cashiers trained on the meal counting and claiming system (including the backup system)?	All administrative staff with foodservice duties, including cashiers, need to receive training on a regular basis and at least annually. Training must be tracked in professional development tracker.
700 - Resource Management	712 Were indirect costs* charged to the SFA's nonprofit school food service account?	Several equipment repairs were directly charged to the foodservice account in the previous year, and need to be paid through indirect costs. Resources and information about indirect costs were left with the business manager.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	Board of Education employment policies were indicated as being the non-discrimination complaint policies. We discussed where the correct procedures and forms are located for student and family participant use, and what the school district's responsibilities are in relation to receiving a complaint.
1100 - Smart Snacks	1101 What is the SFA's process for determining compliance with non-packaged or recipe food items (combination foods that do not have a label)?	We reviewed the compliance of items sold by the district to students, and use of the Alliance food calculator to determine whether items can be sold.
1100 - Smart Snacks	1102 How does the SFA account for accompaniments when determining whether food items meet the Smart Snack standards?	Clarified that the vendor is not the responsible party for determining compliance of smart snack items sold. The district is responsible for choosing beverages and food items to sell to students and must maintain the correct documentation.
1200 - Professional Standards	1209 Did the employees that work outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program receive training applicable to their duties related to the program?	All administrative staff with foodservice duties must receive training applicable to their duties and the training must be tracked on professional development tracking. Applicable training must be completed annually and must result in correct procedures being completed by staff.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	A complete HACCP plan is available, but needs some updating. SFA is encouraged to do so, and resources were shared.
1500 - Reporting and Recordkeeping	1501 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	Currently, some school foodservice records are kept offsite in a home office of the Authorized Representative. The SFA is encouraged to keep all records in school district property.
RMCR - Nonprofit School Food Srvc Acct	6 What internal controls has the SFA implemented to maintain effective oversight over federal funds and ensure charges to the nonprofit school food service are allowable (2 CFR 200.303)?	Encourage reviewing the Financial Report in the IowaCNP and using the resource available in download forms to reflect whether the foodservice funds are accurately represented. Also encouraged learning more about and left resources regarding allowable, unallowable costs and indirect costs.
RMCR - Revenue From Nonprogram Foods	2 For each of the categories selected, what process(es) did the SFA use to ensure that all funds received from the sale of nonprogram foods were deposited into the SFA's nonprofit school food service account?	Highly encouraged to process all invoices in a timely manner. One invoice from December 2018 had not yet been processed/presented for payment at the time of review.

Site - Level Technical Assistance Delhi Elementary School (0414)

Area	Question	Comments
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300 - Meal Counting and Claiming - Breakfast	318 At the selected school(s), does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	At breakfast, some students were passing the cashier without telling her their name or number. We talked about the students needing to present a medium of exchange in order to get their meal, and that the cashier cannot have their name or account number memorized.
400 - Meal Components and Quantities - Breakfast	407 a. Has the school offered the planned menu for the day of review?	Typed monthly menu that is available in website and other places in the building does not contain a list of all items available for breakfast. Highly encouraged to consider typed menus as marketing tools, and all items available for a reimbursable meal at either breakfast or lunch should be on the printed menu.
400 - Meal Components and Quantities - Breakfast	409 Review production records and other supporting documentation.	Food production records for both breakfast and lunch are generated from nutrikids, and in order to be accurate, all food items or recipes need to be available in nutrikids. You are highly encouraged to update recipes in the software to be accurate and to be an assistant in planning menus.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	Encouraged obtaining a full display frame or clear pocket for the inspection report. It was folded into a 5x7 frame.

Org - Level Commendations

Description
Free or reduced price meal benefits are extended to all students in the household when applicable.
Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. 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.
Students are not overtly identified as free, reduced, or paid during breakfast or lunch meal observation.
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 district is a recent Team Nutrition award winner.
The SFA has a written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for awarding, reviewing, documenting and monitoring procurement events.

Site - Level Commendations Delhi Elementary School (0414)

Description
All meal components were available at the beginning of lunch meal service and throughout meal service.
Free water was available as required during both breakfast and lunch meal service.
Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one or two of the five components at lunch, and can decline one of the four items at breakfast.
The food service staff were positive, happy and eager to visit with the students, and displayed pride in the important work that they are completing each day.

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