

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Sacred Heart School-Boone (07298103)**  
**Dates of Review: February 21 & 22, 2019**

**Program Year:** 2019  
**Month of Review:** January  
**Lead Reviewer:** Deb Linderblood  
**Org Representative(s):** Andrea Clauson

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The SFA uses some notification letters off of their JMC Point of Sale system. The notification letters have not been approved yearly by the State Agency. TA provided that the SFA needs to have their JMC notification letters approved on a yearly basis by the State Agency.	State your intentions to have your notification letters off of JMC approved by the State Agency on a yearly basis or state that you will use the State Agency prototype notification letter to notify all households of their eligibility status.	
200 - Verification	V-0200	SFA did not understand some of the documentation that the household presented for verification. When the household brought in their 1040 for their self-employment it resulted in zero additional income. Along with their other paystubs this household should have been changed from reduced to free status.	State your intentions to have the Verifying Official listen to the Verification Webinar next fall.	
700 - Resource Management	V-0700	In school year 2017-2018 the SFA only utilized 73.0% of their PAL dollars. The SFA only participates in the Direct Distribution portion of the program.	State what you are doing differently this year to use your direct distribution allotted dollars.	
700 - Resource Management	V-0700	The SFA does not have a Meal Charge Policy. TA provided that the policy needs to state that students who qualify for free meals shall never be denied a reimbursable meal. Provided the Principal and Food Service Director with information related to the New Iowa Legislation Related to Student Meal Debt and a handout called HF 2467 Student Meal Debt Q and A.	Developed and attach a meal charge policy. State how and by when the policy will be distributed to all households and how staff will be informed of the policy.	
1000 - Local School Wellness Policy	V-1000	The SFA currently does not have any students on their Wellness Committee. An assessment of their wellness policy has not been completed.	State how and by when: 1. Students will be invited to be a part of the Wellness Committee. 2. An assessment of the Wellness policy will be completed and state your intentions to have the Wellness Committee complete the assessment. 3. The assessment will be made available to the public.	
1200 - Professional	V-1200	The new Food Service Director <i>does not meet the hiring standards as she does not have prior</i>	Complete and attach a training plan. Gave the Food Service Director the training plan template.	

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Standards		<i>experience working in school nutrition programs.</i>		
1200 - Professional Standards	V-1200	One part-time employees has not started to obtain their required training for school year 2018-2019 (including Civil Rights Training) and the other has only had Civil Rights training,	Attach a sign in sheet showing that the one part-time employee has had Civil Rights training. State your plan for how both part-time employees will get 4 hours of training yet in school year 2018-2019.	
1400 - Food Safety	V-1400	The SFA does not have a Standard Operating Procedure for Cleaning and Disinfecting Body Fluid Spills. Provided the Food Service Director with a sample Standard Operating Procedure that they can tailor to match their actual procedures.	Develop and attach a Standard Operating Procedure for Cleaning and Disinfecting Body Fluid Spills.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA's nonprogram food revenue does not contribute adequately to total revenue. TA provided that the SFA should consider raising the price of second entrees and possibly milk.	State how you will bring in additional nonprogram revenue starting in SY 19-20.	

**Site - Level Findings: Sacred Heart School (8103)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**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 document on the Free and Reduced Price application the date that the application was received. This provides the documentation for determining if applications are approved within 10 operating days.
100 - Certification and Benefit Issuance	110 Does the SFA use the direct certification notification letter provided by the State agency?	The SFA used the State Agency prototype notification letter for some of their directly certified households but also for some households they used a letter off of their JMC system. The letter off of JMC was not the correct letter for notifying directly certified households. TA provided that the SFA should consistently use the State Agency prototype letter or find out how to print the correct direct certification notification letter off of JMC.
200 - Verification	204 Does the SFA use an electronic system to identify error-prone applications?	TA provided that the SFA needs to contact JMC to determine if their system identified error prone applications. When an application is error prone the SFA should flag this application as being error prone. Also showed the Food Service Director the web-based ICAVES and explained that it would identify error prone applications.
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 Standard Operating Procedure and a sample food production record for sack lunches to use on days that the nutrition department provides sack lunches to students.
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</li> </ul>

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		<p>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.</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>· 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 the 3 Bids and a Buy template with the Food Service Director. Recommended that she include the Vendor No Bid form when sending for price quotes.</li><li>· When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." Provided the Food Service Director with a micro-purchase log template to use to track her micro-purchases.</li><li>· When procuring milk, 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 price 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><li>· The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and</li></ul>
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		<p>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. TA provided that the Food Service Director should keep all price changes sent to her by AEA.</p> <ul style="list-style-type: none"> <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> </ul> <p>* The SFA needs to keep an Exception Log listing items they have accepted that are non-domestic. Examples of non-domestic foods often found in schools include mandarin oranges, bananas, pineapple, tuna and black olives. 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.</p>
700 - Resource Management	703 Excluding the purchase of equipment using equipment grant funds, if the SFA used food service funds to buy equipment* during the school year under review, did it receive prior approval from the State agency either directly or via the State's pre-approved equipment list?	TA provided that the State Agency has an Iowa pre-approved equipment list. Gave a copy to the Food Service Director. Explained that if a piece of equipment is on this list the SFA does not need to get approval to purchase the equipment. If the piece is not on the list then prior approval for purchase needs to be obtained from the State Agency.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	TA provided that the following short version of the USDA nondiscrimination statement needs to be on the SFA's monthly menu: "This institution is an equal opportunity provider."
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	The SFA put the public release in their newsletter but did not submit it to the media. TA provided that the SFA needs to submit the Public Release to the local media. The SFA does not have to pay to have the Public Release published.
800 - Civil Rights	802 What services does the SFA provide to households comprised of persons with Limited English Proficiency (LEP)?	TA provided that the State Agency has Spanish application materials on IowaCNP under download forms. USDA also has 49 different translated application materials at the web address that is on the free and reduced price application.
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> .
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	TA provided that the State Agency has a newly revised Diet Modification Form. Gave the Food Service Director a copy and explained that this form

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		should be used by households who have a student who needs a modification in their diet. Also provided a list of milk substitutes that are nutritionally equivalent to cow's milk if the SFA should need to provide a milk substitute.
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	TA proved that the SFA should have a sign-in sheet with the title of the class, date, time and topic when Civil Rights training is provided. Each participant should sign that they participated in the training. TA also provided that on IowaCNP in download forms there is a Civil Rights power point presentation and a game that the SFA can use for training.
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 even though the SFA does not offer a Summer Food Service Program they are still required to inform eligible families about the availability and location of programs. TA provided on where to find posters, bookmarks, etc. on IowaCNP under download forms.

**Site - Level Technical Assistance Sacred Heart School (8103)**

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable <b>lunch</b> to students for all applicable grade groups?	Provided the Food Service Director with signage which explains what constitutes a reimbursable meal. Signage is for schools that do not use OVS. Food Service Director had the signage laminated while the State Agency was on-site.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	TA provided that the SFA needs to request a second food safety inspection each year. Documentation should be kept that a second inspection was requested.

**Org - Level Commendations**

Description
Certification and Benefit Issuance: The current application for free and reduced price meals/milk and income guidelines were used, ElookUP is used to find students who are directly certified, and benefits are accurately and frequently transferred to the Point Of Service (POS) system. 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. The Food Service Director listened to the Application Approval and Direct Certification webinar prior to the start of school.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria, annual civil rights training was provided for all but one food service staff and non-nutrition employees who are involved in the program. Students with special dietary needs are accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The correct state and federal non-discrimination statements are provided on the free and reduced price application, notification letter and verification letters.
Fiscal Action: Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for January seem to be needed.
Food Safety: The SFA has a written Food Safety plan. 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 Record. Dishwasher temperatures are taken and documented. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Opened foods are labeled and dated. Food is stored at least 6 inches off of the floor. Chemicals are stored separate from food items. Food Service workers wore proper hair restraints and practiced good gloving procedures. The Food Service Director is ServeSafe Certified.
On-Site Monitoring: The SFA completed the On-Site Monitoring form prior to February 1st, 2019. No corrective action was required.

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<p>Procurement: The Principal and the Food Service Director attended the Regional Procurement Training in Des Moines. The SFA has a comprehensive written Procurement Plan, 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. This school year, the SFA is on track to use all of their allotted direct distribution and DOD dollars. The SFA has a Code of Conduct Policy and also has debarment statements for the vendors they use the formal or small purchase method.</p>
<p>Professional Standards: When the Food Service Director was hired she completed food safety training within 30 days of being hired. The Food Service Director has completed 15 hours of the required 12 hours of professional training for school year 2018-2019 and completed 25 hours of training in school year 2017-2018. All but one nutrition staff have started to met required training for Professional Standards in school year 2019. An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours.</p>
<p>Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.</p>
<p>Resource Management: 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 SFA had a positive balance on 1/31/18 so the SFA was not required to raise prices but increased them by .05. The Non-Program Revenue tool was completed. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs.</p>
<p>Verification: The correct number of applications were verified. All income sources were verified and the process was completed on time. The application selected for verification was confirmed prior to verification. The verification report was completed accurately and on time.</p>
<p>Wellness Policy: The SFA's wellness policy was reviewed and revised in February 2016. The public is made aware of the SFA's wellness policy via the school's web site. The following individuals are involved in reviewing and updating the Local Wellness Policy: Kitchen employees, School Board members, PE teacher, Principal and Parents. Potential stake holders are made aware of their ability to participate in the Wellness Committee. 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 Sacred Heart School (8103)**

<b>Description</b>
<p>Meal Components and Quantities: The Food Service Director does a god job of menu planning. 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 through 8th grade students. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch—including many fresh fruits and vegetables. 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>Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of January were accurate and complete. Point of Service (POS), counts and filed claims appear accurate. JMC is used as the school's POS system. The POS was organized and orderly. 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. Edit checks are performed. All students selected a reimbursable meal which includes five components as the SFA is a serve school.</p>
<p>Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of January 7 - 11, 2019. The worksheets showed that that all meal components were offered and in the correct quantities. The Food Service Director also completed the Dietary Specifications Assessment tool for lunch which indicated that the 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, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats. A nutrient analysis was not required.</p>
<p>Smart Snacks: Students are able to purchase foods via a la carte sales (milk and extra entrée). Exempt leftover National School Lunch Program entrees are only sold the same day they are initially offered. Beverages sold meet the standards for the various age groups of students (Kindergarten - 8th grade).</p>
<p>Water: Free potable water is available to all students for lunch via a water fountain just off of the cafeteria.</p>