

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Unity Christian High School (41498317)
On-Site Review Dates: February 19-21, 2019

Program Year: 2019
Month of Review: January
Lead Reviewer: Deann Murphy
Org Representative(s): Wayne Dykstra

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Out of 32 students reviewed, the State Agency found 5 Benefit Issuance errors. Based on these errors, the SFA had a 15.63% error rate in benefit issuance. Additionally, one student who was originally denied by the SFA should have received reduced benefits.	For your response, both the determining official and the confirming official will need to watch the webinars "Application Approval and Direct Certification 2018-2019, Part1" and "Part 2." They will submit a signed Professional Standards Certificate showing that they both viewed the webinars. The webinars and the documentation can be found at https://educateiowa.gov/pk-12/nutrition-programs/school-nutrition/income-eligibility-and-verification . All benefit errors were corrected on-site. Based on the error rate over 8% set by the State Agency, the SFA will need to conduct an Independent Review of Applications in SY2019-20 or until their error rate is less than 5% as outlined in the 2017 Eligibility Manual on page 51, and submit report FNS-874 to the State Agency as directed next fall.	
200 - Verification	V-0200	When completing verification, the SFA did not conduct a confirmation review prior to sending the household the request for income documentation. Income was not calculated correctly and the household should have had their benefits decreased. Verification was not completed prior to the November 15 deadline as required.	Both the Determining Official and the Confirming Official will watch the webinar "Preparing to Do Verification Fall 2018 Part 1 and Part 2" found at https://educateiowa.gov/pk-12/nutrition-programs/school-nutrition/income-eligibility-and-verification and will submit signed documentation showing that it was viewed. Documentation can be a screen shot of the first and last screen with staff signatures and date it was viewed.	
1000 - Local School Wellness Policy	V-1000	The SFA's posted wellness policy is not dated so it is unknown when it was last reviewed. They do not have an active wellness committee that reviews policy goals. All stakeholders of the wellness committee need to be able to have input into the schools wellness plan. Those stakeholders include representatives from the school board, administration, foodservice, PE teacher, RN if applicable, student, parent, community member. The SFA does not have an	The SFA will 1).submit to the State Agency an invitation to the members of the wellness committee for the next meeting which will be held during SY2018-19. The invitation needs to include all stakeholders listed in the finding, the date and time of the next meeting, and the agenda that will be discussed. 2).state the month in SY2018-19 that they expect to review/update their Local Wellness Policy. 3). state how they will communicate the assessment to households.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Unity Christian High School (41498317)
On-Site Review Dates: February 19-21, 2019

		assessment of their wellness policy goals that is made available to the public.		
RMCR - Indirect Costs	V-RMCR	Currently, the SFA charges the non-profit school foodservice account directly for utilities. This should be paid as an indirect cost. The SFA does not apply an approved indirect cost rate to the correct direct cost pool to properly calculate the amount the foodservice should pay.	The SFA will explain how and when they intend to properly charge the non-profit school foodservice account for indirect costs. If possible, please submit documentation showing how the charges will be calculated.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA has not properly assessed its compliance with the Revenue from Nonprogram Foods requirement to ensure that non-program food costs were adequately covered by non-program food revenue.	The SFA will complete and submit their non-program food revenue tool to the State Agency. If the tool shows that the SFA has not taken in adequate non-program food revenue to cover their non-program food costs, they will explain how they will fix this so that non-program foods are not being subsidized by program revenue.	

Site - Level Findings: Unity Christian High School (8317)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	On the day of review, the French fries ran out, the Green Bean Hotdish got very low and the buns ran out and were replaced with a 1 oz. dinner roll which was an inadequate grain portion. High School students must be offered at least the minimum portions of 1 cup vegetable, 2 oz eq. grains in order to claim meals as reimbursable.	The SFA will explain how they will ensure that students are offered their full minimum portion if the SFA runs short on any component during serving.	
400 - Meal Components and Quantities - Lunch	V-0400	During the review week, 1). the hot menu did not have adequate vegetables planned on 2 of the days, but students are allowed to take more than the set serving of vegetables on both days. 2). The daily salad bar option exceeds the recommended maximums with 9 oz. eq. M/MA, 6 oz. eq. grains (which increases the risk of exceeding calorie, sodium, saturated fat maximums), but does not offer any starchy vegetables or legumes as required. Most of the grains offered on the salad bar are not whole-grain rich as required.	1). Please explain how you will ensure that the full 1 cup of vegetable is planned for in the cheese omelet/hashbrown/carrot meal AND in the Pork Chop/Cheesy Potatoes/Green Bean meal. 2). Please explain how you will ensure that the recommended maximum oz. M/MA and Grain ounce equivalents will not be exceeded with the Salad Bar meal option (and, therefore, not exceeding calorie, etc. maximums), that all subgroups will be met each week and that all grains offered this year will be whole grain rich.	
1100 - Smart Snacks in School	V-1100	There is no documentation for many of the a la carte foods sold to students during lunch or for the foods/beverages sold in the vending machines. Some of the foods sold at lunch or in the morning snack bar that do have documentation are not Smart Snacks compliant, i.e. jello, sherbet.	Please provide calculator print-outs for all a la carte foods and beverages that you intend to sell in the cafeteria during lunch AND for the foods/beverages sold in the vending machine that is available to students between midnight and 4 pm.	

Org - Level Technical Assistance

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Unity Christian High School (41498317)
On-Site Review Dates: February 19-21, 2019

Area	Question	Comments
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	Only convert income to annual if there is annual income, self-employment income or a variety of incomes reported. If the household reports all the same income, use the proper tab on ICAVES when determining income. For example, if all household income is reported as monthly, use the monthly tab. This helps increase accuracy.
100 - Certification and Benefit Issuance	132 Does the direct certification list utilized by the SFA:	Four students were found on the "Other Free" list on E-Lookup that had submitted applications providing reduced benefits. The Determining Official was strongly encouraged to apply for and check E-lookup for students that may be eligible for benefits. If students are found on E-Lookup, households do not need to complete an income application to receive benefits and all students in the household are eligible for the same benefit level.
200 - Verification	212 Did the SFA meet the follow-up requirements if the household failed to respond to the request for verification?	The SFA needs to receive verification documentation of all income reported on the application. If the household earns a wage from an employer, they should provide pay stubs showing their current income, date and frequency of earnings. Information from last year's tax return is not current information and should not be used unless the household has self-employment income.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Currently the adult meal price is set below the State Agency minimum price and it needs to be increased. The State Agency sets the minimum price annually with the price set in SY2018-19 at \$3.63. Any meal that is sold to a visiting student or adult guest needs to be charged the adult price as well. Meals provided "free of charge" to visiting students or adults need to be paid for using another funding source.
700 - Resource Management		Technical Assistance was provided on the SFA's procurement documents and procurement process. The Code of Conduct is missing what disciplinary actions will be taken if the Code is violated and this needs to be added. If the school has an existing policy or verbiage that discusses discipline for non-teaching staff, they may link that onto the Code of Conduct policy. Discussed procurement events that need to be added to the Procurement plan next year. A SY2019-20 procurement plan needs to be completed prior to vendors being contacted with next years specifications. Also, reviewed the Small Purchase template and how to best proceed with bread, milk contracts so that the SFA meets USDA procurement requirements.
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	Prior to each school year, the SFA is required to submit their Public Release to the local media. The media does not have to print the Public Release and the SFA does not have to pay for it, but the SFA should keep documentation showing that it was submitted.
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 SFA was provided with both the Iowa Civil Rights and the USDA Civil Rights complaint procedure and forms in case they have a civil rights complaint regarding their School Nutrition Program. Also, everyone involved in the School meals program, both kitchen staff and non-kitchen staff, need to have Civil Rights training annually. Group Civil Rights training can be found on IowaCNP Download Form NSLP500 or NSLP501. Individual civil rights training can be done by reading the Iowa Civil Rights manual found at www.educateiowa.gov and taking the quiz found in the manual. The SFA should keep a copy of the quiz on file for accountability.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Unity Christian High School (41498317)
On-Site Review Dates: February 19-21, 2019

800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Students who need a special dietary accommodation outside of the normal meal pattern requirements need to have a signed medical provider's note stating what accommodation is needed and the reason for the accommodation. Meals provided that do not fit meal pattern requirements without proper documentation should not be claimed for reimbursement.
800 - Civil Rights	810 Review program materials.	The posted menu, both on-line and in the school, must have the shortened non-discrimination statement on it, "This Institution is an Equal Opportunity Employer."
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 Local Wellness Policy assessment template, the Final Rule, and a wellness checklist were e-mailed to the Head of School to help the SFA meet the wellness policy regulations.
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.)	Discussed with the FSD the need for all staff involved in the National School Lunch Program, both kitchen and non-kitchen staff, to have the required number of Professional Standards training hours annually (July 1 - June 30.) It is difficult to know and follow the NSLP regulations without proper and adequate training. The FSD needs 12 hours annually, kitchen employees working under 20 hours weekly need 4 hours annually, non-nutrition staff who work with the program; i.e. Determining Official, Confirming Official, need 4 hours annually. Part of this training needs to be on Civil Rights. The SFA needs to retain documentation of hours completed for all staff for 3 years + the current year. Training also needs to be tracked using a tracking tool. The State Agency sent the FSD a tracking tool template that the SFA can use. All staff involved need to be listed on the tracking tool annually to ensure their required hours are met.
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?	The USDA requires that all SFAs promote the summer feeding program, even if the SFA does not participate in it. Promotion materials can be found on Download Forms on IowaCNP and should be sent to households in late spring so that families know where, when and how to access free meals during the summer months. Also, the SFA may want to consider adding a breakfast program; surveying parents to see if they would support a reimbursable breakfast served at school.
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	The State Agency e-mailed both the Finance Director and the Foodservice Director directions, the template, and an example on how to properly calculate non-program food revenue and costs.
RMCR - Indirect Costs	1 Did the SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency?	E-mailed both the FSD and the Finance Director information detailing allowable direct vs. indirect costs and how the SFA should properly calculate indirect costs taken from the Foodservice account.

Site - Level Technical Assistance Unity Christian High School (8317)

Area	Question	Comments
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?	If a component runs out or is inadequate before all students receive a meal, the component needs to be fully replaced before subsequent meals can be claimed for reimbursement. The FSD should check her standardized recipes to ensure that they provide as many portions as they say.

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Unity Christian High School (41498317)
On-Site Review Dates: February 19-21, 2019**

400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The FSD needs to have appropriate documentation on hand showing how products credit. Processed Meat/Meat Alternates and mixed entrees (Meat/Grain components mixed) should either have a CN label or a Product Formulation Statement on file. Distributor specification sheets are not adequate documentation. Standardized recipes are also needed for products that combine 2 of more items together. The standardized recipe template and a component calculator were e-mailed to the FSD to assist her with this as needed.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	All foods and beverages sold to students during the school day, i.e. between midnight and 30 minutes after the last school bell must meet Smart Snacks standards. The SFA must have documentation showing that these foods/beverages are compliant. This includes second entrees if they were not sold the same day or the day after they were served as part of a reimbursable meal. Fat Free or 1% milk is allowed for all students without further documentation. Non-compliant foods should not be sold to students during the school day.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	The FSD needs to document daily milk temperatures. Recommend she visit with the health inspector about the best way and how often to take dish machine temps. Temperature records need to be kept on file for 6 months.
1400 - Food Safety	1411 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	Discussed with the FSD the need to keep an exception log of all foods that the SFA accepts that are non-domestic. The log should record the item accepted, date, country of origin, reason why it was accepted. This, like all Child Nutrition documentation, needs to be kept on file for 3 years + the current year.

Org - Level Commendations

Description
Based on review findings, fiscal action should be less than the USDA disregard level so no claim adjustment should be needed.
Benefit documents, as well as other paperwork, were well organized. The current application form and ICAVES were used in determining applications. Access to benefit information is correctly limited. Eligibility is kept confidential both at application approval and at the Point of Sale.
The correct number of applications were verified and were correctly selected from error prone applications.
The SFA had a positive balance in their foodservice account on January 31, 2018 so they did not need to increase student lunch prices, but they did raise them slightly for fiscal accountability.
The SFA had a written Code of Conduct and Comprehensive Procurement Plan for SY2018-19 on file. The FSD keeps her own micropurchase log and spreads the wealth fairly evenly between the 2 local grocery stores.
The SFA utilized only 69% of their USDA Foods entitlement in SY2017-18. This year they have already utilized 72% of their entitlement and have plans to continue to use more. They added the DOD program for fresh fruits and vegetables and are spending more of their Diverted Food allotment this year. The goal is to spend at least 95% of their USDA Foods entitlement money each year.

Site - Level Commendations Unity Christian High School (8317)

Description

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Unity Christian High School (41498317)
On-Site Review Dates: February 19-21, 2019

Both the "And Justice for All" poster and the latest health inspection were hung in a public place. The SFA had 2 health inspections last year as required and are expecting their second health inspection this year soon.

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 end of the line as approved on the SFA application. No discrimination was noted during the lunch service. Students and staff interacted well together. There were food production records on file for each day that meals were served.

The SFA has a written Food Safety plan that includes the required elements. Temperature logs are maintained for food served, refrigerators and freezers. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures.

There is good meal participation at lunch. Students can choose either the reimbursable hot meal option or the reimbursable salad bar option. All menu items are offered vs. served and students get to choose their own fruit/vegetable options from a cart located in the dining room. All students took a reimbursable meal without being sent back to get the required 1/2 cup fruit or vegetable. Water with cups is available in the lunchroom. There is signage to tell students what they must take to make a reimbursable meal and the monthly menu is posted.