

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

Orange City Christian School (41498308)

On-site Review Dates: January 29, 31, February 7, 2019

Program Year: 2019
 Month of Review: December
 Lead Reviewer: Deann Murphy
 Org Representative(s): Jason Alons

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	There were 7 student benefit issuance errors found out of 60 students reviewed. This results in an 11.67% error rate. An error rate over 8% requires the SFA to conduct an independent review of applications next year and continue until their error rate falls below 5%. Also, there were several errors noted with the process of application approval, i.e. not allowing carry over benefits, the SFAs household notification letter was not approved by the State Agency, using incorrect conversions factors in determining applications, errors made with verification, etc.	For your response, both the Determining Official and the Confirming Official will watch the webinars, "Application Approval and Direct Certification 2018-2019 parts 1 and 2" AND "Preparing to Do Verification Fall 2018 - Parts 1 and 2" located at https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition . They will submit signed documentation showing that they completed these webinar trainings. Starting SY2019-2020, you will need to conduct an Independent Review of Applications. See page 51 of the July 18, 2017 Eligibility Manual for School Meals which explains this process. All benefit errors were corrected on-site.	
700 - Resource Management	V-0700	In SY2017-18, the SFA used only 48% of their USDA Entitlement Dollars. The goal is to use at least 95% each year.	The SFA will explain how they intend to use at least 95% of their USDA Entitlement Dollars annually in the future.	
1000 - Local School Wellness Policy	V-1000	The current Local Wellness Policy does not meet the requirements in the following ways. 1. There are no specific goals set for nutrition promotion and education, physical activity and other school-based wellness activities that promote student wellness. 2. The policy is not dated and has not been reviewed at least every 3 years. 3. The SFA does not have an active wellness committee made up of a variety of stakeholders, i.e. parents, students, foodservice representative, PE teachers, school health professional, school board and administration. 4. The policy goals have not been assessed as required. 5. Neither the policy nor the assessment have been made public as required.	The SFA will show that they have begun the process to meet the regulations for their Local Wellness Policy by: 1) Submitting to the State Agency an invitation to stakeholders for a Local Wellness Policy Committee Meeting. The invitation needs to state when the meeting will be held, who is being invited and what topics will be covered at the meeting. If the meeting has already been held, the SFA should submit meeting minutes showing the same information. 2). Providing the State Agency with a date the SFA expects both the Local Wellness Policy AND the Policy Assessment to be completed. 3). State how the SFA intends to communicate both the Policy AND the Assessment to the public.	
RMCR - Indirect Costs	V-RMCR	The School is currently over-charging the school foodservice account for indirect costs. They are not applying an approved indirect cost rate to the	Please explain how the school will recover indirect costs appropriately going forward. Please provide documentation of a month's indirect cost charges that	

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		approved direct cost base.	are figured appropriately.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The State Agency sets the adult meal price annually. In SY2018-19, the price was set at \$3.63, but the SFA sells adult staff lunches at \$2.90. The school does not cover the price difference in another way.	Please describe how the SFA intends to recover the missing \$0.73 per adult staff meal charge for the entire 2018-19 School Year and how they intend to meet the minimum adult charge in the future. If possible, submit documentation from your accounting records showing the school foodservice fund has been reimbursed for the missing funds from the beginning of the school year.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA did not properly calculate its non-program food revenue or costs so the non-program food revenue tool is not correct.	The SFA will submit to the State Agency their SY2017-18 non-program food revenue tool that has been properly calculated. If the tool shows that the non-program food costs exceed the non-program food revenue, the SFA will explain how they intend to generate the increased revenue.	

Site - Level Findings: Orange City Christian School (8308)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	USDA meal patterns are grouped as K-5, 6-8 OR K-8. The SFA has student meal patterns grouped into grades K-4 and 5-8 with 5-8 graders receiving larger portions. This increases the risk that 5th graders will exceed their calorie, saturated fat and sodium limits.	The SFA will explain how they will change the meal pattern grade groupings so that they reflect the USDA meal patterns. Also, please submit 3 days of actual completed food production records showing the corrected meal pattern grade groupings.	
400 - Meal Components and Quantities - Lunch	V-0400	Neither the K-4, nor the 5-8 meal patterns were met based on the review week menu documentation that was submitted to the State Agency. Menus for all grades showed inadequate fruit portions served one day of the week, inadequate vegetable portions served 3 days of the week, inadequate meat portions planned for the week. Grades K-4 menus did not contain adequate dark green vegetables over the course of the week. Food Production Records did not show adequate information and the SFA is lacking standardized recipes for mixed foods, i.e. spaghetti with meat sauce, Walking tacos, chef salad, etc. Chip labels are not available to show what was actually served.	1). The SFA will re-write and submit sample Food Production Records (FPR) using the December review week that can serve as a template for correct FPR in the future. The updated FPRs need to show all foods, condiments, and extras that will be served during the next cycle of that week with adequate portions that meet the meal pattern minimums for all grades served. 2). The SFA needs to also submit a standardized recipe for the Spaghetti/meat sauce, Walking Taco and the Chef Salad that they plan to use. 3). Finally, the SFA needs to submit appropriate labels from the chips they plan to serve with the Build a Burger menu AND with the Walking Taco menu.	

Org - Level Technical Assistance

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?	Discussed and encouraged the SFA to use the web-based ICAVES, available on the Iowa Department of Education website, to determine applications for free/reduced benefits in order to reduce errors. If a

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		household reports the same income frequency, the SFA should calculate their benefit status based on that income frequency rather than changing them to annual frequencies. For example, if a household only reports monthly income, the SFA should determine benefits based on monthly income, rather than converting their income into annual.
100 - Certification and Benefit Issuance	129 Is household notification of eligibility consistent with the responses provided on the Off-Site Assessment Tool?	<p>According to 7 CFR 245.6(c)(2), an individual student's eligibility from the previous school year (before July 1) carries over for up to 30 operating days into the new school year, or until a new eligibility determination is made, whichever comes first. The 30 operating days begin on the first operating day of school and includes any day in which a reimbursable meal is provided by the school.</p> <p>Applications need to be approved within 10 operating days of when they are received by the SFA. There is a space on the application where the SFA can write the date they received the application.</p> <p>If the SFA chooses to use their own household notification letter, it must be approved annually by the State Agency to ensure that all required information is included in the letter. The SFA should send the letter they wish to use along with completed Download Form NSLP022 to Deb.Linderblood@iowa.gov prior to each new school year for approval. The SFA can also choose to use the State Agency template NSLP152 instead when notifying households of their benefit level.</p>
100 - Certification and Benefit Issuance	132 Does the direct certification list utilized by the SFA:	The SFA was strongly encouraged to apply for and use E-Lookup in order to find students who might be directly certified for free/reduced benefits in order to increase accuracy of benefits issued and decrease the amount of paperwork required. One family was found on E-Lookup by the State Agency that could have had better benefits than they received through their income application.
100 - Certification and Benefit Issuance	136 a. Are free and reduced price benefits provided to students in a manner that assures confidentiality and prevents overt identification during meal service or at any other time in accordance with regulations and FNS Policy Memos?	Students who work in the kitchen should log their hours and receive direct payment for their work instead of the foodservice account depositing money into an activity fund for the students to use later in the year (which is not an allowable use of Food Service Funds.)
100 - Certification and Benefit Issuance	138 Did the SFA update the benefit issuance document(s) accurately and in a timely manner, including those students that are new, transferred, or withdrawn?	Students who leave the district should be taken out of the POS or made inactive. Only current students should be listed in the active POS.
200 - Verification	208 When a confirmation review was conducted:	The confirming official needs to independently review all applications needing to be verified. Therefore, they need to ensure that all names are listed and household size matches the names listed, that income is accurately calculated, and that there is a SSN and parent signature on all income applications prior to signing/dating that a confirmation review has been completed. If the confirming official finds errors, the application should be fixed before the verification request is sent to the chosen household.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Your local meal charge policy needs to be communicated annually to all households and staff in the district, including new students to the school. This can be done through a mass e-mail, posting it on your school website, placing it in your student handbook, etc.
700 - Resource Management		Procurement:

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		<p>TA given for the SFA to keep all documentation from small purchases. The SFA needs to write up specs and give them to all vendors equally and take the lowest price. The State Agency reviewed in detail how to best use the Small Purchase (3 Bids and a Buy) template found on IowaCNP Download Forms.</p> <p>Encouraged the FSD to apply for the DOD program by February 15 in order to better utilize the SFAs USDA Entitlement Dollars next year.</p> <p>TA given to staff on their Written Procurement Plan, including its purpose, when it should be completed annually, and what should be included and not included.</p>
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	Both the USDA complaint procedure and Iowa Civil Rights form was e-mailed to the Principal to use in case the school gets a foodservice discrimination complaint.
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?	Much written and verbal TA was given to the Principal regarding the schools Local Wellness Policy, including the requirements found in the Final Rule, Wellness Policy Checklist, and policy goals template. Discussed setting up a wellness committee with requirements of who must be invited and recommendations on frequency of meetings.
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 staff who take part in the Child Nutrition Program need to be listed on the required Professional Standards tracker form. Staff outside of the kitchen who help with the program, i.e. POS operator, Determining Official, Confirming Official, etc. need to have 4 hours training annually (prior to June 30 each year), with part of this being in the area of Civil Rights. Other training needs to be in an area that applies to their job duties in the Child Nutrition Program.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Sample Standard Operating Procedures (SOPs) were sent to the FSD to add to her HACCP manual, specifically on handwashing procedures, washing fruits and vegetables, temperature logs, etc. All applicable SOPs should be added to the current manual and staff should be trained on these SOPs at least annually.
RMCR - Nonprofit School Food Srvc Acct	11 If Yes, was the equipment included on an approved State agency equipment list or did the SFA otherwise secure prior approval from the State agency before purchasing the equipment (per FNS Policy Memo SP 31-2014)?	The USDA requires SFAs to obtain State Agency permission prior to purchasing equipment over \$5000. An approved equipment list is currently being developed and will be sent out as soon as it is ready. Also, when completing the annual financial report on IowaCNP, the SFA should include the cash on hand they have in their savings account.
RMCR - Nonprofit School Food Srvc Acct	13 Did all recorded expenses represent an activity or function recognized as reasonable, necessary, allocable and otherwise compliant with the provisions of 2 CFR 200 Subpart E?	Items that are not compliant with the meal pattern should not be purchased using school foodservice funds, i.e. non-Whole Grain Rich buns/cinnamon rolls, dinner rolls, etc. were purchased last year in an emergency. Future non-compliant purchases may be subject to repayment.
RMCR - Revenue From Nonprogram Foods	7 If Yes, what process did the SFA use to calculate its compliance with the revenue from nonprogram food requirements in 7 CFR 210.14(f)?	The State Agency sent written instructions and an example showing the SFA how to calculate non-program food revenue and non-program food costs.
RMCR - Indirect Costs	3 Did the SFA apply the correct indirect cost rate for the appropriate year?	Both written and verbal instructions were provided to the SFA regarding allowable and unallowable direct and indirect costs. The School foodservice account can be charged a maximum of 10% of their direct cost base for indirect costs. The direct cost base consists of (Foodservice staff

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		salaries/benefits + foodservice supplies + travel). Indirect costs paid to the general fund cannot exceed the total amount of federal meal reimbursement.
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Site - Level Technical Assistance Orange City Christian School (8308)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	Signage was provided to the SFA on-site from the State Agency to post at or near the beginning of the line showing students what they must take to make a reimbursable meal.
600 - Dietary Specifications and Nutrient Analysis	605 Based on the Nutrient Analysis, did the school meet the Dietary Specifications (Calories, Saturated Fat, Sodium, and Trans Fat) for the appropriate age/grade group being served? <i>Select N/A if the site is "Low Risk"</i>	Multiple written resources were provided to the FSD to help develop menus and complete accurate food production records.
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	Both the And Justice for All poster and the latest Health Inspection need to be posted in a public place - not inside the kitchen. Please move them to an area where all can view these.
1100 - Smart Snacks in School	1104. Are students able to purchase foods during the school day?	Anything sold to students outside of the reimbursable meal needs to meet Smart Snacks standards and the SFA must have documentation on hand showing that these foods are compliant. This includes all fruits, vegetables, desserts that are sold as seconds that were first offered as part of the reimbursable meal. Entrees sold as seconds from the reimbursable meal are exempt and Fat Free and 1% milk are allowed for all grades so no further documentation is needed for these items.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Food temperatures need to be recorded daily on all hot foods and cold foods that are susceptible to food borne illness, i.e. cut vegetables, leafy vegetables, etc. Review Food Temperature SOPs. The SFA should be recording chemical levels on the low-temp dishwasher per Health Inspector instructions. Record other food storage temperatures daily.

Org - Level Commendations

Description
All kitchen staff have either met or are on track to meet their required Professional Standards training this school year. The FSD has developed her own tracking tool.
Annual civil rights training was provided to all child nutrition staff and documented. Ethnic/racial information was collected and the summary form has been completed and is on file. No discrimination was observed. The shortened non-discrimination statement is listed on the posted menu.
Based on review findings, the fiscal action for this review is less than the USDA Disregard level so no claim adjustments will need to be made.

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Benefit documents were well organized. The current application form and guidelines were used. All denied applications were correct and households were notified of the denial in writing as required. Access to benefit information is correctly limited and eligibility is kept confidential.
The correct number of applications were verified and were correctly selected at random. The verification process was completed prior to the November 15 deadline as required. The application selected for verification was confirmed prior to verification.
The Resource Management section of the Off-Site Assessment tool was completed on time. December receipts that were reviewed indicated mostly allowable expenditures. Even though the PLE tool was not required this year since the SFA had a positive balance in their foodservice account, the SFA raised their paid student lunch prices to help cover operating costs. Reports are filed on time, and all records are maintained for at least three years plus the current year.
The SFA has the required Procurement Plan and Code of Conduct on file for SY2018-19. The Code of Conduct includes the disciplinary actions that will be taken if the Code is violated. Micro-purchases seem to be spread equitably between 2 local stores. All purchases were under the purchase threshold and were reasonably priced. For formal procurement, the SFA has the AEA Purchasing disk with the RFP, etc. The FSD keeps price lists and spot-checks them against invoice prices as part of Contract Management. The SFA seems to be making better use of their USDA diverted food allotment this year than last.
The SFA plans to promote the summer meal program later this spring by providing information to families about free meals around the state.

Site - Level Commendations Orange City Christian School (8308)

Description
All meal components were available at the beginning of meal service on the day of observation and throughout the meal service. Students were offered bottles of water as well as were able to refill their own water bottles during the lunch period. The FSD had Food Production Records, many CN labels/Product Formulation Statements and some recipes on file which supported meal pattern requirements. Staff have received training. Students seemed to have adequate time to eat their lunch. Kitchen staff and student helpers did a nice job with offer vs. serve. The POS cashier checked meal trays and asked students to go back for more food if needed to make a reimbursable meal. All students had a reimbursable meal on the day of observation.
All students and staff had access to hand sanitizer placed at the beginning of the lunch line.
Meal counts during the on-site review were reasonable when compared to the (December) review month counts. Meal count totals for the month of December appeared accurate and complete. There was a point of service, POS, at the end of the line as approved on the SFA application. Students scan their cards at the POS with no errors noted. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
The SFA has a district-wide written Food Safety plan that includes several Standard Operating Procedures. Temperature logs are maintained for many foods and food storage areas. The kitchen and storage areas were orderly and clean. Student workers washed their hands prior to serving food.