

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Marion Independent School District (40860000)**  
**February 26-28, 2019**

**Program Year:** 2019  
**Month of Review:** January  
**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	The district posts a copy of the paper application on their website, but the parent letter and instructions are not posted. All parts of the eligibility information need to be available for parents or distributed to parents when paper applications forms are available. Currently, the district does not have an electronic application process.	In your corrective action plan, please indicate how you will be sure that all current eligibility information is made available on the website or distributed to all families, including the parent letter, full application form and instructions for completing the form.	
100 - Certification and Benefit Issuance	V-0100	At the time of review, the SFA was not aware of the Potentially eligible DC list available in the Portal. No potentially eligible children were identified unless they were already part of a household on another DC list or method of eligibility. Also, children who were identified in the ELookUp portion of the DC portal, were not added to the Download Cart to be identified in the system.	In your corrective action response, please indicate when you downloaded and checked all potentially eligible students from the beginning of the year forward, and that you will maintain the lists in your DC file along with the ELook Up Download cart printout.	
100 - Certification and Benefit Issuance	V-0100	Of the 380 benefit issuance determinations made, there were errors noted in 8 determinations.	The error rate for benefit issuance is below the percentage required for fiscal action or independent review of applications. The errors are noted in an attachment to this finding, and a response is required for the steps taken to correct the errors. Please indicate the date of notice to families who have status changed or the date that additional information was obtained for each error, and attach the information to this finding. Additionally, please indicate how you will ensure that all persons who conduct eligibility determination will receive annual training to reduce/eliminate errors.	
200 - Verification	V-0200	The confirming official did not sign the applications that were chosen for verification, so did not document that they confirmed the initial eligibility.	As part of verification activity, a person designated as the confirming official must check the initial eligibility determination to see if it was correctly done before the verification continues. The person who does this	

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			confirmation cannot be the person who initially determines the approval. The person who does the confirmation needs to sign the application on the pertinent line indicating that they did this step. In your corrective action response, please indicate how persons who conduct the verification activities re-train on the steps and procedures in correctly completing verification.	
200 - Verification	V-0200	Only one paystub was sent by each family that responded to verification activity, and that one paystub did not represent a full month's income as requested.	As part of verification activity, a full month of income is requested in the notice sent to the family about verification. In your corrective action response, please indicate how you will ensure that each family chosen for verification provides the information requested in the letter sent to them.	
700 - Resource Management	V-0700	The district USDA food allotment was underutilized in previous school year, and appears to be on track to be underutilized in the current year.	Utilizing the full USDA foods PAL (planned assistance level) each year is part of fiscal management, since it is revenue to the district that offsets expenditure for foods. While conducting the onsite portion of the administrative review, several methods to fully utilize this resource were discussed. In your corrective action plan, please indicate all methods that you will use to ensure that the PAL will be fully utilized in future years.	
700 - Resource Management	V-0700	The financial report in IowaCNP indicated that as a percentage, insufficient revenue was obtained compared to expenses for nonprogram food activity. The USDA nonprogram food revenue tool was not completed.	Complete the USDA nonprogram food revenue tool, and if the resulting information does not indicate that an adequate amount of revenue was received, please indicate your plans for increasing revenue or decreasing expenses. Resources on completing the nonprogram revenue tool are available at <a href="https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition">https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition</a> , are attached below, and were also left with the SFA at the time of the review.	
800 - Civil Rights	V-0800	Civil rights nondiscrimination statement is not being used on appropriate program materials, nor identified. Complaint procedure not identified.	In your corrective action response, please indicate your plans to re-train on civil rights compliance, indicate the nondiscrimination statement you will use on menus, and what you will use on websites and other areas. Civil rights Iowa manual and training materials can be found at <a href="https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/civil-rights-training">https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/civil-rights-training</a> .	
1000 - Local School Wellness Policy	V-1000	Local wellness committee is not meeting on a regular basis, and policy is not active. Assessment of goals has not been conducted and is not being made available to the public.	The local wellness policy indicates numerous goals that have not been assessed or implemented. It appears that a committee that possibly was developed when the policy was initially implemented has disbanded or has not been active. The policy states that assessment will occur every three years. In your corrective action response, please indicate the names and relationship of each committee member (parent, student, teacher, health professional, administrator, school foodservice representative, etc) of your wellness policy committee, the schedule to	

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			<p>convene a meeting of this group at least once prior to the end of the school year, plans to convene a meeting at least once next school year, plans to conduct an assessment of each goal in the policy, where the minutes of meetings will be maintained, and how the assessment will be shared with the school community. A tool to use in assessment was left with foodservice director at the time of the review, and additional information is available at <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-wellness">https://educateiowa.gov/pk-12/nutrition-programs/school-wellness</a>.</p>	
1100 - Smart Snacks	V-1100	<p>Food and beverage items are sold in two classrooms in the High School. Many items sold are not allowable under the Smart Snacks regulations. Several items were noted at previous review as being not allowed to be sold, and were still being sold at this review time.</p>	<p>All items sold must meet the nutrition standards of the Smart Snacks regulations, regardless of whether they are sold by the foodservice department or other teachers/groups in the high school. Information was distributed to the two classrooms that are selling non-allowed items and foodservice is facilitating learning about what items can be sold. The classroom teachers must take the initiative to learn and follow the requirements.</p> <p>In your corrective action response, please indicate the plans for oversight of the classroom sales to assure that they will be compliant in the future.</p>	
1200 - Professional Standards	V-1200	<p>Several training events were either conducted locally or attended, but no training tracker has been started that indicates the ongoing total hours earned or anticipated for each person. Documentation to date includes sign-in sheets and an outline for the training conducted onsite.</p>	<p>In your corrective action response, please complete the training tracker of your choice for the training hours to date for this school year (July 1, 2018 forward) for each foodservice employee and identify the administrative personnel who complete foodservice tasks and the training that they have or will complete. Information and resources including templates for training trackers, can be found at <a href="https://educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition">https://educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition</a>. (for those who have not completed the minimum required hours, be sure to indicate the plans for what and when their training will include--what month, what topic, how many hours of training)          Attach the completed tracker to this corrective action.</p>	
1400 - Food Safety	V-1400	<p>Resources for developing a food safety plan are onsite, but the complete food safety plan is not available.</p>	<p>In your corrective action plan, please indicate the index of the sections that your food safety/HACCP plan will contain, and your plans for completing the full HACCP plan, conducting training in food safety, and sharing the appropriate information with each site in the district.</p>	

**Site - Level Findings: Marion High School (0109)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	104 If the SFA has an electronic application approval system, answer the below questions.	We discussed whether the electronic point of service system maintains all eligibility and claim information for a full 3 years plus the current year. The district is encouraged to ask and ensure that this is happening.
100 - Certification and Benefit Issuance	107 a. When and how are households notified of students' certified eligibility?	We discussed the information that is part of the SA prototype for notification of eligibility and the language that is included in the letters currently used by the SFA. You are encouraged to add all the parts of the letter that seem to be missing (copy left with the SFA).
200 - Verification	203 Describe the SFA's verification process (including SFA's verification for cause process, deadlines, due dates, selection procedures, etc.).	We discussed the process of verification, and the district is encouraged to maintain a summary log of activity that includes the date of each step and communication, including the followup request for information when the family does not respond. A format/template for this summary can be found as the last tab in the ICAVES workbook in Download Forms.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	The district is encouraged to add the counts for students who receive a meal at a field trip after the students have actually been served/received their meals at the field trip.
300 - Meal Counting and Claiming	306 What procedures are used as internal controls to ensure the meal counts do not exceed enrollment or attendance adjusted enrollment?	The school is reminded that a daily edit check is required; each site's free, reduced and full pay meal counts must be viewed and a decision made as to whether it is an acceptable count for that day. Monthly edit checks are completed and documented.
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	Currently, a letter of understanding with a vendor for purchases of a la carte beverages has been in place. The procurement of this company to supply the beverages for the foodservice dept. to resell did not follow a competitive process. The district is highly encouraged to use correct procurement procedures for selecting the vendor to supply the a la carte beverages, and a new contract to start in the fall of 2019.
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	Equipment repair was directly paid from foodservice funds, and needs to be part of indirect cost payment. Resources were left with the district concerning allowable vs unallowable expenses and use of an indirect cost fund. See additional technical assistance posted under indirect costs.
700 - Resource Management	712 Were indirect costs* charged to the SFA's nonprofit school food service account?	Currently the school district does not apply the indirect cost rate to allowable expenses; information was left with the business manager and foodservice director, and is also available in the School Business Alerts, June and November 2017 editions, found here: <a href="https://educateiowa.gov/pk-12/school-business-finance/financial-management/school-business-alerts">https://educateiowa.gov/pk-12/school-business-finance/financial-management/school-business-alerts</a> .

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**Site - Level Technical Assistance Marion High School (0109)**

Area	Question	Comments
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Temperature and other monitoring logs were reviewed for the month of January 2019. The milk cooler and the dishwashing machine were not regularly monitored and logs maintained. We discussed needing to do so.
Dietary Specifications Assessment Tool - Lunch	19 Standardized recipes are followed: all ingredients are weighed or measured with standardized weight or measuring utensils.	Encouraged completing standardized recipes for all items with more than one ingredient or with different preparation method than the product packaging indicates. A standardized recipe form can be found at <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-meals/menu-planning-and-recipes">https://educateiowa.gov/pk-12/nutrition-programs/school-meals/menu-planning-and-recipes</a> .

**Org - Level Commendations**

Description
A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption.
At least two types of milk are offered. Free water is available in the cafeteria at both breakfast and lunch time. Reimbursable meal signage is easily read, attractive, and includes all the food components offered as part of a reimbursable breakfast or lunch including the encouragement to select at least 1/2 cup of fruit or vegetable.
Benefit documents, as well as all paperwork, were very well organized. Rollover eligibility determinations were removed if the household did not apply within thirty days of the school year. Free or reduced price meals are extended to all members in the household.
Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of January appear accurate and complete, and documentation from the point of service software is maintained each month to support claims.
Menus met weekly and daily meal pattern requirements for the High School meals examined as part of the review. 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.
SFA on-site monitoring was completed to ensure that all schools are meeting program requirements.
Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
The correct number of applications were verified and were correctly selected from error prone applications.
The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.
The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for most purchases, the plan indicates those responsible for awarding, reviewing, documenting and monitoring procurement events, and most specifications were well-written and comprehensive.
The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. Reports are filed on time, and all records are maintained for at least three years plus the current year. Money is not transferred out of the account to support other programs.

**Site - Level Commendations Marion High School (0109)**

Description

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Multiple entrée and fruit or vegetable choices are available for the High School students, and they are encouraged to purchase a reimbursable breakfast or lunch meal in appropriate methods.

Staff-student-foodservice interaction is polite, respectful and positive, and there seems to be a good relationship in the school community between foodservice and participants.