

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**St Josephs School-Marion (40868106)**  
**March 5-6, 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	E Look up and potential direct certification methods were not used by the SFA to identify children who may be eligible for benefits. At the time of the review, explanation was given and resources for learning were identified and shown to the persons who will use the system.	In your corrective action response, please explain how you will ensure that you fully use the DC system to find eligibility for enrolled preschool, daycare and students who are able to participate in the school meal program. Also, please use the system to look up all enrolled children (preschool, daycare and students) to ensure that none have been overlooked since the beginning of the school year. Please indicate with an attachment to this corrective action, any changes that need to be made in eligibility status.	
100 - Certification and Benefit Issuance	V-0100	Of the 24 eligibility determinations made, there were errors in the processes used or inadequate documentation for 8 determinations. Status changed for two students. An additional four students were not awarded Free or Reduced status because they were not identified through the DC processes at the time that they were enrolled.	The application errors are listed on the attachment in this corrective action. For each student, please indicate when the missing information was obtained and/or the eligibility status change made. In a separate corrective action, the school was directed to indicate any additional eligible students after doing a thorough search in the DC/Potential/ELookUp system. Because the number of errors in the processing of applications or awarding eligibility were greater than the threshold, an independent review of applications must be completed each year until the error rate is greatly reduced. The memo indicating the steps to take to conduct an independent review of applications is attached to this corrective action. If there are additional steps that you will take to increase accuracy in the eligibility process, please indicate them in the corrective action response below. This will include training conducted/received by persons responsible and other oversight activity.	
200 - Verification	V-0200	One income application was chosen for verification, but family did not supply all requested information to complete the verification. Additionally, the application was incomplete at approval time (no SSN indicated on an income based application).	Please complete your verification activity by requesting all income information and SSN from the family. When the total income (wages plus child support) is received, use the available information to correctly determine if the family is still eligible and send notification that verification is complete. If eligibility changes, please	

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			<p>revise the verification report online. The notification letter to the family is requested in a separate corrective action area.</p> <p>Also, in your response here, please indicate your plan and the steps you will take to review the procedure to conduct verification.</p>	
300 - Meal Counting and Claiming	V-0300	<p>Preschool and daycare meal counts are based on attendance information gathered earlier in the morning instead of meal counts taken at the time that the meal is served. Several overrides to the meal count are necessary and completed each day to adjust the count incorrectly taken earlier.</p>	<p>All meal counts, including meal counts for preschool and daycare children, must be taken at the time that the meal is served to the child. Use of a roster is acceptable, but the information needs to be collected during meal service and not before. In your corrective action response, please indicate how and when you will collect the count of children by name at mealtime. Please be specific as to when and where the count is taken.</p>	
300 - Meal Counting and Claiming	V-0300	<p>Cashiers may only receive training in operation of the point of service once, and daycare/preschool staff have not received training specific to meal counting.</p>	<p>Because meal counting responsibilities are critical to obtaining an accurate count each day, all cashiers or meal counters must receive annual training, and the training must be noted on professional development tracking. This includes the preschool and daycare staff who are counting the preschool and daycare meals as they are being served.</p> <p>In your corrective action response, please indicate the steps taken to train all persons who count and record meals served each day.</p>	
700 - Resource Management	V-0700	<p>The foodservice account balance exceeds three month's average expenditures.</p>	<p>According to financial management guidelines, the foodservice account cannot maintain a balance of more than three month's average expenditures. Please contact the Administrative Consultant at the Bureau of Nutrition Programs to determine how to create and submit a spend-down plan. In your corrective action response, please indicate when you contacted the Administrative Consultant to begin working on the plan.</p>	
700 - Resource Management	V-0700	<p>Currently, the foodservice department purchases milk that is also used for preschool/daycare milk snacks during the day, and parents are charged a set amount at registration that would cover the cost of milk for the year if the child took milk each day.</p> <p>The milk is not separately accounted for as the child receives it, so it is highly likely that it is not accurately paid for.</p>	<p>Each child should pay only for the milk that they consume as an a la carte purchase for accuracy. Foodservice must obtain an accurate count of the number of a la carte items (milk, second entrees, etc) that they sell in order to provide accurate financial information to complete the nonprogram revenue tool.</p> <p>In your corrective action response, please indicate the steps you will take to ensure that accurate income and expense information is obtained based on accurate count of items purchased and sold.</p>	
800 - Civil Rights	V-0800	<p>Only the Iowa Civil Rights statement is indicated on the offsite question.</p>	<p>The correct civil rights statement for use on all program materials is found at <a href="https://educatelowa.gov/pk-12/nutrition-programs">https://educatelowa.gov/pk-12/nutrition-programs</a>. The USDA statement must be used wherever the NSLP is mentioned, according to the training materials and the posted Civil Rights manual.</p>	

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			In your corrective action response, please indicate the statement that will be posted or placed, and a listing of the materials that will include the statement.	
1000 - Local School Wellness Policy	V-1000	Currently, the wellness policy committee membership does not include representatives from all groups, and the goals of the policy have not been assessed as required. Resources about local wellness policies are found at <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-wellness">https://educateiowa.gov/pk-12/nutrition-programs/school-wellness</a> .	In your corrective action response, please indicate how you will reach out to all required stakeholders to ensure that they are encouraged to participate in the wellness policy committee, and your plans for regular meetings of the committee. Also, please include your plans for assessing the specific goals in your wellness policy and how you will share the assessment with all families in the school.	
1100 - Smart Snacks	V-1100	Currently, there are snacks sold to students at the end of the school day, prior to 30 minutes after the last bell. The student council sells the foods and beverages.	All beverages and snacks sold to students, regardless of whether they are sold by foodservice or by other groups, must meet the guidelines of the Smart Snacks regulations. There are requirements for both beverages and for food items. The regulations and the calculator to assess whether items meet the guidelines are available at <a href="https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/smart-snacks-school">https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/smart-snacks-school</a> . In your corrective action response, please indicate the steps you will take to ensure that all food and beverage items sold to students meet the requirements, and where the smart snack calculator results will be maintained and updated at least annually.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The Revenue from Nonprogram Foods Tool and/or the financial report information on IowaCNP has not been completed.	Annually, the Revenue from Nonprogram Foods Tool or the financial report information on IowaCNP must be completed, and must indicate that adequate revenue is received to offset costs of nonprogram items. Information was left with the foodservice director on completing the financial report or the Revenue from Nonprogram Foods Tool. Please complete the financial report and if the results are not favorable, please indicate in your reply. Please indicate possible reasons for the report indicating 'no'.	

**Site - Level Findings: St Josephs School (8106)**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
400 - Meal Components and Quantities - Lunch	V-0400	Reviewed records for the month of January indicate that grain/bread items purchased were not credited correctly, and the sliced bread was not large enough to count for one ounce equivalent.	All grain items or grain contributions in processed foods such as chicken nuggets, must be correctly credited toward meeting the meal pattern requirements. The documentation that will help you with correct crediting is Child Nutrition (CN) labels, product formulation statements, and the grain/bread chart. For your corrective action response, please list all of the grain items or processed foods that contain a grain serving in the menu for March, and indicate the ounce	

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			equivalents of each of these items. Information on Child Nutrition labeling and product formulation statements can be found at <a href="https://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program">https://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program</a> .	
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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	108 Who is the hearing official? (Name and/or position title)	In the offsite review questions, the superintendent is listed as the hearing official. In the notification letter, the principal is indicated as the hearing official. Please note the correct person on all documents and in the application materials.
100 - Certification and Benefit Issuance	110 Does the SFA use the direct certification notification letter provided by the State agency?	In the notification letter, the appeal date is incorrect in most letters sent. The prototype indicates that the appeal date needs to be indicated as 10 days after the date the letter is sent.
100 - Certification and Benefit Issuance	119 Does the benefit issuance document indicate the date the eligibility status changes were made?	The benefit issuance system must indicate the date that changes are made and the date that they expire, as well as other information on each child.
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?	Provided information on allowable expenses and on setting up an indirect cost pool to the foodservice director at the time of the review. The school is encouraged to review expenditures to accurately identify them as allowable and to ensure that only allowable expenses that can be directly paid from foodservice are paid in this manner.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	At the time of the onsite visit, the forms for accommodating special dietary needs were reviewed. All disability or restrictions in eating patterns must be documented through using the form available in download forms (currently the one that the school has on file).
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	Racial and ethnic data must be collected annually, and can be accomplished through use of the eligibility forms and/or registration information collected. For information on the specific categories, please see the Civil Rights training materials.
1200 - Professional Standards	1201 List the employee count for each of the following:	All persons who are responsible for critical foodservice duties must receive training applicable to their duties. The training must be tracked. Attached in the review attachments is a professional standards clarification to help provide guidance in this area.
1200 - Professional Standards	1204 a. Did the School Nutrition Program Directors meet the training requirement?	As discussed, the foodservice director needs almost 9 hours of professional development training prior to June 30, 2019. Several opportunities were discussed and plans shared.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	HACCP/Food Safety plan consists of samples of monitoring and SOP's. At the time of the onsite visit, additional items were discussed that need to be included in the full plan. The guidance materials were looked at and suggestion for updating made.

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RMCR - Nonprofit School Food Srvc Acct	9 If the SFA encumbered bad debt from unpaid student meal accounts during the RM review period, how did it ensure that only allowable non-Federal revenues were used to restore operating losses? (Unpaid Meal Charges: Guidance and Q&A SP 23-2017)	Several student accounts are significantly negative, and at the time of onsite review, we discussed the negative balance policy in place and efforts to eliminate the negative debt.
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**Site - Level Technical Assistance St Josephs School (8106)**

Area	Question	Comments
Dietary Specifications Assessment Tool - Lunch	1 Are specifications considered when purchasing menu items and condiments to limit the following?	Trans fat are not allowed in NSLP operations, so specifications for items must always be monitored.
Dietary Specifications Assessment Tool - Lunch	15 Oil is used in recipes, rather than shortening, margarine, or butter.	best practice is to replace saturated fats such as shortening, margarine or butter, with oil when possible.
Dietary Specifications Assessment Tool - Lunch	22 Portion sizes for condiments (e.g. hot sauce, ketchup, mustard, salad dressing) are controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal.	On the day of review, catsup bottles were placed on the tables, and freely used. Condiments can be a large contributor to added sodium in meals, and it is recommended that condiments be portion controlled or served instead of freely available at the tables where meals are consumed.
Dietary Specifications Assessment Tool - Lunch	6 Reduced-fat, low fat, fat-free mayonnaise, sour cream, and/or salad dressings are offered instead of full-fat varieties.	Best practice is to purchase and offer reduced, low or fat free condiments.

**Org - Level Commendations**

Description
Standard Operating Procedures, SOPs, have been updated and reviewed on a regular basis, and implemented.
At least two types of milk are offered.
Free water was available as required, and the school has a bottle filler water fountain in the hallway. Several students were observed carrying their water bottles.
Meal counts during the on-site review were reasonable when compared to the review month counts.
Menus and Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. They are thoroughly completed and show that reimbursable meals are planned.
Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one or two of the five components offered, and all students chose at least 1/2 cup of fruit or vegetable for a reimbursable meal without being prompted.
Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer.
The correct number of applications were verified, and the confirmation official signed the application as required.
The current income eligibility application form and guidelines were used, and are also made available on the school's website. The full application, parent letter and instructions are included in the information shared online and as paper forms available at the time of registration. Families are notified that they may apply at any time during the year and the required second notice is made.
The Food Service Director, FSD, does a superior job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat.

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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. Students were also polite and displayed positive attitudes.

The school has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file.

The SFA effectively utilizes its USDA entitlement for commodities, which greatly influences the cost of meals to students.

**Site - Level Commendations St Josephs School (8106)**

**Description**

please see organization level commendations.