

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Dike-New Hartford Comm School District (17910000)
Dates of Review: February 26-28 and March 1, 2019

Program Year: 2019
Month of Review: January
Lead Reviewer: Deb Linderblood
Org Representative(s): Justin Stockdale

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	The SFA's Verification Report had 3 applications and 8 students listed as approved as categorically free (case number written on an application) and they did not have any of these. The SFA also reported that they had directly verified households when they had not and also reported having verified 3 applications for cause and they had not verified any household for cause.	State your intentions to have the Verifying Official participate in the Verification Reporting webinar next fall.	
700 - Resource Management	V-0700	The SFA does not have a nutrition Code of Conduct policy. TA provided that the Code of Conduct needs to identify the specific board policies that make reference to disciplinary action. A number of approved policies that reference disciplinary action, gifts, and ethics were identified. The SFA should write in the policy numbers and titles on the school food service code of conduct that would apply to officers and employees who violate procurement procedures.	Develop and attach a Nutrition Code of Conduct policy.	
700 - Resource Management	V-0700	The SFA has not distributed their Meal Charge policy to households or staff.	Describe how and by when you will distribute your Meal Charge Policy to all households and also how staff will be informed of the policy.	
1000 - Local School Wellness Policy	V-1000	The SFA has not completed an assessment of their Wellness Policy. TA provided on where to find the assessment template on the DE web site. https://educateiowa.gov/documents/team-nutrition/2018/04/school-wellness-policy-progress-report . TA also provided that the assessment needs to be completed by the Wellness Committee.	State when an assessment of your Local Wellness Policy will be completed and how it will be made available to the public.	
RMCR - Revenue From Nonprogram	V-RMCR	The SFA's Nonprogram Food Revenue does not contribute adequately to total revenue.	Describe how you will bring in additional nonprogram	

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Foods			food revenue.	
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Site - Level Findings: Dike-New Hartford Junior High School (0209)

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 needs to consistently record the date that applications are received by the school district. Pointed out on the application where the space is to record this date. Putting the received date provides documentation that the application was processed within 10 operating days.
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	TA provided that on ICAVES the annual income tab should only be used if a household reports an annual income or reports income in more than one frequency. If the household reports income as one frequency such as monthly then the monthly tab should be used.
200 - Verification	208 When a confirmation review was conducted:	TA provided that once the application(s) to be verified are selected, the Confirming Official needs to determine if the original benefit status was determined correctly. After it is confirmed then the household can be notified that they were selected for verification. The Confirming Official should sign and date the bottom of the application where specified.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	TA provided that after the SFA selects households for verification they should try to find the household using ELookup. If any of the students are found on ELookup the household is directly verified and a letter of selection does not need to be sent to the household. This household would be directly verified.
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 sample Standard Operating Procedure for sack lunches as well as a food production record to use when sack lunches are served to students.
700 - Resource Management		<ul style="list-style-type: none"> · 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 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

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		<p>purchasing method.</p> <ul style="list-style-type: none">· TA provided that for equipment repair and preventive maintenance the SFA needs to use an unrestricted indirect cost rate to charge the nutrition account for these services. Explained where to locate their indirect cost rate on the Department of Education webpage. These expenses will not be listed on the Procurement Plan.· TA also provided that the SFA needs to have debarment statements from vendors when using small or formal procurement methods.· 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 how to complete the small purchase template that the State Agency has made available on IowaCNP in download forms. The SFA should include a No response form with the template so that vendors who decide not to send quotes can sign and return this form.· When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth."· When procuring milk and bread, 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 is available on IowaCNP under download forms.· 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.· For bread, provide vendors with a package count/package weight/weight per serving for each bread product. Review current school year bread product purchases to include any regularly
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		<p>purchased items when requesting price quotes.</p> <ul style="list-style-type: none">· The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and 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.· 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. <p>*The SFA needs to keep an Exception Log listing items they have accepted that are non-domestic. Examples of non-domestic foods found in storage 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> <p>* TA provided that the SFA should track rebates and credits. Provided a template for each and showed SFA how to find electronic version on IowaCNP.</p> <p>* 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.</p> <p>* TA provided that the food service department cannot purchase water and juice from Atlantic Bottlers because the district's signed agreement signed with the vendor is not as a result of a competitive procurement process. It is an agreement written by Atlantic Bottlers and the district signs on it. Upon renewal food service should not be included in this procurement. The SFA agreed to purchase juice and water through their Prime Vendor in the future.</p>
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	TA provided that the short version of the USDA nondiscrimination statement "This institution is an equal opportunity provider" should be on the SFA's monthly menus.

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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 eligibility documents on IowaCNP under download forms. The Free and Reduced Price Application also has a link to 49 translated materials that USDA makes available.
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: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Provided the Food Service Director with a sample Standard Operating Procedure for Cleaning and Disinfecting Body Fluid Spills.
RMCR - Nonprofit School Food Srvc Acct	10 Excluding equipment purchases made with USDA grants, did the SFA purchase equipment during the RM review period that cost at or above the capitalization level established by the State or SFA for financial statement purposes or at or above \$5,000 (whichever was less)?	As per USDA policy SP31-2014, the SFA needs State Agency approval prior to purchasing equipment over their local equipment threshold or over \$5,000, whichever is less. A list of pre-approved equipment was provided to the Food Service Director. Items found on this list do not need State Agency approval before they are purchased. If not on this list, State Agency approval is needed prior to purchasing the piece of equipment.

Site - Level Technical Assistance Dike-New Hartford Junior High School (0209)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	TA provided that when the Food Service Director puts a combination vegetable on the menu in order to credit the various vegetables in the product a product formulation statement is needed which shows the breakdown of the various sub-groups. If a product formulation statement is not available the vegetables would credit toward "Additional" vegetables.
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	TA provided that milk crates with milk in them need to be up off of the floor by 6 inches. Recommended placing on an empty crate or obtaining pallets.
Dietary Specifications Assessment Tool - Lunch	9 How often are bacon, bacon bits, pepperoni, chow mein noodles, pickles, olives, packaged crackers and/or croutons available to students?	TA provided that on the Salad Bar the Food Service Director should plan mostly fruits and vegetables and eliminate high sodium, high fat foods such as cottage cheese, olives, etc. If these items are offered there should be signage stating how much a student can take (ex. one scoop and make the scoop a small size).

Org - Level Commendations

Description
Certification and Benefit Issuance: Benefit documents were very well organized. The current application for free and reduced price meals/milk and income guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the Point Of Service (POS) system, and denied applications were correctly determined. All applications were correctly determined, signed and dated by the household member and the SFA and were complete with Social Security Numbers. 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. Waivers are provided to applicants. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.

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<p>Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria at the site reviewed, annual civil rights training was provided for all food service staff and documented. The SFA submitted the annual Public Release to the local media (Parkersburg Eclipse and Grundy Center Register). Students with special dietary needs are correctly documented and 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 notification letter, verification letters and on the Free and Reduced Price Application.</p>
<p>Fiscal Action: No fiscal action is associated with this review so no claim adjustments for January will be needed.</p>
<p>Food Safety: The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site reviewed. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including freezers and refrigerators. Food temperatures are documented on the Food Production Records. Dishwasher temperatures are taken and documented. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Opened food items are labeled and dated. Food Service workers wore proper hair restraints and practiced good gloving procedures. The Food Service Director is ServeSafe Certified.</p>
<p>Local Meal Charge Policy; The SFA developed and approved a meal charge policy on June 12, 2017. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.</p>
<p>On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and breakfast prior to February 1st.</p>
<p>Procurement: The Food Service Director and Superintendent's secretary attended the Regional Procurement Training in Grundy Center. The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, 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. Review of invoices from the Prime Vendor showed the district was purchasing products from the market basket and prices were validated. In school year 2017-2018 the SFA utilized 101.9% of their allotted PAL dollars. The SFA participates in Direct Distribution, DOD and Diverted Foods. This school year, the SFA is on track to utilize their Diverted Foods, Department of Defense Fresh Fruit and Vegetable and Diverted Foods allotments.</p>
<p>Professional Standards: The Food Service Director has completed 22.5 hours of Professional Training in school year 2019 of the required 12 hours. All nutrition staff have met required training for Professional Standards in school year 2019 except one employee that still needs 1 additional hour. 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 so student paid prices were not raised. The Non-Program Revenue (NPR) 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>School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach includes putting the menu on the district's web site, offering free breakfast for a week a few times each year and putting the menu in the monthly newsletter. Summer Food Service Program (SFSP) outreach included fliers being sent home with students along with emails district wide. The information for finding summer sites was on the district's website along with sending out blasts on Facebook.</p>
<p>Verification: The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was completed on time. The Verifying Official participated in the Verification Webinar. The verification report was completed on time.</p>
<p>Wellness Policy: The SFA's wellness policy was reviewed and revised on June 12, 2017. The public is made aware of the SFA's wellness policy via the district's web site. The following individuals are involved in reviewing and updating the LWP: Parents, Community Members, Teachers, Board Members, Students, Faculty and Food Service Director. 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 Dike-New Hartford Junior High School (0209)

Description
<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 K-2nd & 5-8th grade group. 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. A variety of entrees, fruits, and vegetables are offered throughout the month—including many fresh fruits and vegetables on a fruit/vegetable bar at lunch. Three different entrée selections are offered each day at lunch. Standardized recipes are used for food production. Water was available as required. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch.</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. Infinite Campus is used as the school's POS system. The POS was organized and orderly. Students are not overtly identified as free, reduced, or paid</p>

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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. Food Service staff are trained and appeared aware of what constitutes a reimbursable meal. Edit checks are performed.

Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of January 7 - 11, 2019 for breakfast and lunch at the Jr High School. The worksheets showed that all components were offered in the proper quantities. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Junior High 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, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week, serving fruits that are packed in juice or lite syrup and draining fat from browned meats. A nutrient analysis was not required.

Offer vs. Serve: Offer vs. Serve is being implemented properly. All students observed selected 1/2 cup of fruit and/or vegetable. Cafeteria staff have been trained on offer vs. serve. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at breakfast and lunch.

Smart Snacks: Students are able to purchase foods via a la carte sales. All foods sold meet the Smart Snack standards for nutrition content. Exempt leftover National School Lunch Program entrees are not sold. Beverages sold meet the standards for the various age groups of students. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.

Water: Free potable water is available to all students for lunch and for breakfast via a water fountain in the hall off of the cafeteria.