

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Fairfield Comm School District (21690000)
SNP - Review ID: 5058

Program Year: February 26-28, 2019
Month of Review: January
Lead Reviewer: Cheryl Benson
Org Representative(s): Fairfield CSD

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Out of approximately 400 reviewed applications, two errors were found. One household went from reduced to denied due to income being incorrectly entered as monthly instead of every two weeks. The second household was determined reduced via direct certification but was entered into the POS as free.	Letters of adverse action were sent to households during the on-site review. No further action is required.	
300 - Meal Counting and Claiming	V-0300	The POS system that the SFA uses has two monthly reports. One is a summary report and the other is an edit check report. The director has been using the summary report for monthly claims which resulted in under-claiming.	The director revised claims back to the beginning of the school year and will use the edit check report in the future. No further action is required.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	At the end of each year, the SFA must determine whether the percentage of revenue (NPR) from non-program food sold is equal to or greater than the percentage of money spent on non-program food. According to the NPR calculation on the SFA's financial report on IowaCNP, the SFA is not collecting sufficient revenue.	For your response, recalculate non-program revenue and food costs, enter them into the NPR tool that was provided, and attach a copy below. If the tool still indicates that insufficient revenue is collected, indicate your plan to increase revenue and/or decrease food costs for non-program sales.	

Site - Level Findings: Fairfield High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
500 - Offer versus Serve	V-0500	For Offer vs Serve, OVS, at breakfast, students must be offered at least four items from three components and must select at least three items one of which must be a half-cup of fruit or vegetable. On the day of observation, the cashier did not consider grain items that were worth two grains to be two items, therefore the only way a student could select a reimbursable	For your response, indicate how you will ensure that OVS is correctly implemented at breakfast. Indicate what additional training, resources, and/or monitoring will be conducted.	

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Fairfield Comm School District (21690000)
SNP - Review ID: 5058**

		meal was to take all four--grain, milk, fruit or juice, or to take the grain and both fruit and juice.		
--	--	--	--	--

Site - Level Findings: Pence Elementary School (0487)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		Requirements for Child Nutrition Programs continues to increase and become more complex and time consuming. It is difficult for one person to not only keep up with all the requirements for menus, applications, verification, Smart Snacks, food safety, staff training, Civil Rights, Procurement, claims, etc., and also work on continually improving the CN programs for the participants. Fairfield is fortunate to have a director who is passionate about the programs, and who is innovative. Often districts the size of Fairfield have a nutrition secretary to help, or someone other than the director is responsible for benefit applications. Any assistance that could be made available to the director is always useful and appreciated.
700 - Resource Management		<p>The current Food Service Director (FSD) started employment in beginning of SY 2016 -2017. All food service related procurement was completed for that SY prior to her start date. It was assumed that chemical contract was procured competitively, however, the FSD could not find the procurement documents for chemicals when preparing to issue RFPs for prime vendor, bread, and milk for SY 2018-2019. Chemical specifications were then added to the 2018-2019 prime vendor RFP.</p> <p>The state prototype Request for Proposals (RFP) was used to procure prime vendor for food (excluding dairy and fresh bread products), non-food supplies, and chemicals. The RFP for prime vendor was a collaborative solicitation of five School Food Authorities (SFA) collectively called the Southeast Iowa Purchasing Group. It is recommended when issuing any formal contract to estimate the total dollar value of the solicitation.</p> <p>Although not a federal requirement, it is recommended to give a minimum of six weeks before due date of solicitation to allow vendors adequate time to prepare a competitive proposal.</p> <p>It is highly recommended when a formal method is used to include a pre-solicitation conference for vendors to ask questions. Responses to vendor questions should be shared with all vendors including those who do not attend the pre-solicitation conference.</p> <p>When brand name products are included in solicitation for which the buying group will not consider an "equivalent" product, there should be a process</p>

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Fairfield Comm School District (21690000)
SNP - Review ID: 5058

		<p>on how these products were selected.</p> <p>The prime vendor solicitation is a fixed price contract and not a cost reimbursable contract as stated in the RFP. The buying group requested item cost and fixed fee reported separately. The SFA does not get rebates or discounts from the prime vendor. The SFA enrolled in a rebate program with IPS rebates. Rebates are sent directly to the SFA by IPS rebates. It is recommended that the contract be amended to state this is a fixed price contract with economic price adjustment tied to an appropriate index for products for which manufacturer cannot provide a "good through date" till the end of the school year such as fresh produce (weekly price change).</p> <p>Although the RFP included requirements regarding Buy American, the exception log does not have sufficient information to determine the vendor provided documentation requesting SFA consideration on the use of domestic alternative foods before the SFA considered an exception. The exception log does not have sufficient information to determine whether exception was due to significantly higher cost of alternative domestic food or domestic food is not available in sufficient and reasonably available quantity. Please refer to the state prototype Buy American exception log which will be available soon on IA_CNP.</p> <p>The state agency RFP for cost reimbursable contracts was used for dairy and fresh bread/buns solicitation. Technical assistance was provided to use the State Agency prototype Invitation for Bid (IFB) as both the contracts are fixed price. It can be stated in the IFB for dairy that a fixed price with economic adjustment contract will be awarded.</p> <p>Based on last school year annual dairy product expenses, the SFA may use the small purchase method for the procurement of fresh bread products. This procurement method is less formal than issuing a formal bid which requires a public notification and public opening.</p> <p>The SY 2017-2018, the vendor paid list showed direct charges to nutrition funds for equipment repairs and maintenance. School Finance provided guidance to business managers on how indirect costs are calculated. This guidance disallows school food service equipment and maintenance to be charged directly to school nutrition funds. Further guidance on whether a cost is a direct or indirect cost was provided through school meals monthly memos and updates in October 2018. Please refer to these documents to determine if a cost is direct or indirect. Contact school finance if there are any questions.</p>
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?	<p>All costs to the Child Nutrition account are either Direct or Indirect. The Department of Education determines the Indirect Cost Rate, and anything that is included in that calculation cannot be charged directly. For the CN account, this includes equipment repair, fees for online payment systems such as RevTrak and PaySchools, office supplies and printing, fire suppression recharging, vehicle maintenance and gas, utilities, janitorial services, etc. All of these costs must be paid from the General Fund. If the LEA wants to recoup the costs, they must do it via Indirect Costs. If indirect costs are charged to the CN account, then they must also be charged to all other federal programs in the district, such as Head Start and Title programs. The total of direct and indirect costs cannot exceed</p>

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Fairfield Comm School District (21690000)
SNP - Review ID: 5058

		federal and state reimbursement for the year. A flowchart to determine whether a cost is direct or indirect was provided.
1200 - Professional Standards	1207 a. Has the State Agency allowed the SFA flexibility to complete annual training requirements over a 2-year period?	Iowa does allow SFAs to complete required professional standards training hours over a two-year period. The two years must be clearly indicated on the tracking tool, and at least some hours of training must be offered each year. The hours required would be doubled for the two year period.

Site - Level Technical Assistance Fairfield High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Technical assistance was provided on correctly documenting meal crediting via CN labels and Manufacturer Formulation Statements. A memo concerning CN labels was emailed that indicates the actual CN label must be obtained or the SFA can take a photo or make a copy of the label and keep it on file. For the formulation statements, a checklist was sent to help the director ensure that the statements are complete.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Technical assistance was provided on whole fruit crediting. Clementines, fresh mandarin oranges, and tangerines do not credit for a half-cup of fruit, so students must take two (or take additional other fruit or vegetable) to have a reimbursable meal.

Site - Level Technical Assistance Pence Elementary School (0487)

Area	Question	Comments
1700 - Afterschool Snack	1706 Review production records for a minimum of 5 days from the review period.	Production records for afterschool snack need to indicate portion sizes so that compliance with the meal pattern can be determined. Records must document that at least the following minimum amounts of any two of these components are offered: 1 ounce equivalent of meat/meat alternate; 1/2 ounce equivalent of grain, 3/4 cup of fruit/vegetable, and 1 cup of fluid milk.

Org - Level Commendations

Description
AFTERSCHOOL SNACK: Counts the day of observation were reasonable when compared to test month counts. The SFA is maintaining production records and conducting on-site monitoring. There are enrichment activities attached to the snack. The And Justice for All poster was visible at the location of the snack.
APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were very well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are transferred to the POS system in a timely manner, and denied applications were correctly determined. A correct and current benefit issuance list was available. Approximately 400 applications were reviewed and all reviewed applications were correctly except for two. All reviewed applications were signed and dated by both a household member and the SFA, applications were complete with SSN's and case numbers, and all applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. 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 that indicate specific fees and were signed and dated by the household. The SFA has a back-up system for benefit issuance documents and system.
BREAKFAST: The SFA offers several daily Grab and Go breakfast options as well as a daily hot breakfast which provides many choices for students and increases participation. Breakfast is offered even when school is delayed for due to weather to ensure that students have a meal to start their day. Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. Signage at both breakfast and lunch was exemplary.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Fairfield Comm School District (21690000)
SNP - Review ID: 5058

CIVIL RIGHTS: The And Justice for All civil rights poster was posted in the cafeteria in a location where participants can read information on the poster. Annual civil rights training was provided food service staff and documented. A copy of the district's public release was on file, documenting that it was submitted to local media. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. Ethnic/racial information is collected and the form has been completed and filed. No discrimination was observed. The current state and federal non-discrimination statements are provided on all material describing the program including the school's website.

COMPETITIVE FOODS (SMART SNACKS/HKA): Students may purchase a second entrée, some a la carte snack items, and/or a second milk at lunch. Second entrees are correctly documented on production records. Documentation was available to show that all foods and beverages sold to students during the school day met Smart Snack and Healthy Kids Act standards, including food sold in the cafeteria and vending machines. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte along with ingredient and nutrient labels. The SFA has taken on the responsibility of ensuring that vending machines are in compliance even though the proceeds do not go to food service.

HACCP/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, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. The latest Health Inspection Report was posted in a publicly visible location, and two inspections have been requested for each serving site. There were no critical areas noted on the report. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. 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.

MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. There was a POS for all students, and the POS was organized and orderly. Students are not overtly identified as free, reduced, or paid during the meal counting process or during meal observation. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. SFA on-site monitoring was completed to ensure that meal counts are accurate at all schools and that the sites are meeting program requirements. Often this is done as a desk audit to fulfill requirements, but it was obvious that the director takes this seriously and uses the requirement as a way to ensure program integrity.

MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, has created menus that meet the meal pattern for reimbursable meals. All meal components were available at the beginning of service and throughout meal service on the days of observation. Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation, such as food production records, indicated that meals contained the required components and quantities. 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 entrees, fruits and vegetables plus a variety of entrees offered throughout the month, encourages student consumption. The SFA provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal. Water was available as required, and at least two types of milk were offered. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. A monthly menu is also posted. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheets the school selected for review for a specified week during the review period. Nutrient analysis was not required.

PROCUREMENT: The Food Service Director attended the State Agency's Regional Procurement Training in Fairfield in September 2018. The written procurement plan for SY 18-19 is completed. The local micro-purchase and small purchase thresholds were correctly identified. The procurement event page of the written procurement plan for school year 2018-2019 was completed. The use of micro-purchase method is minimal. All purchase invoices reviewed were one-time purchases of small equipment all from different vendors. An open front cooler and some small wares were purchased at two separate auctions. The FSD conducted an online price search for the items prior the auctions. A review of invoices validated the School Food Authority (SFA) is compliant with micro-purchase threshold and costs were reasonable. The small purchase method was used to purchase a reach-in refrigerator and freezer units using equipment grant dollars. Price quotations was requested from three vendors. A review of invoice validated the items solicited were purchased. The formal procurement method is used for Prime Vendor which includes chemicals, Milk, and Bread. The FSD took the lead in developing and issuing the procurement for prime vendor for food, non-food supplies and chemicals. The prime vendor procurement was in collaboration with four other school food authorities (collectively named the Southeast Iowa Purchasing Group). Milk and bread are procured independently. Specifications allow pricing to be submitted for an equal product, thereby keeping the procurement process open and competitive. The Prime vendor contract included all of the required Federal terms and conditions. The Request For Proposal for Prime Vendor had evaluation criteria identified with price being the primary factor. The Food Service Director maintains sufficient records for all Procurement activities. The Food Service Director and her administrative staff monitor invoices to ensure contract terms and conditions are being met. The Food Service Director is doing an excellent job using the allotted Planned Assistance Level (PAL) for USDA Foods. In SY 2017-2018, 112% of the Planned Assistance Level (PAL) for USDA Foods was utilized.

PROFESSIONAL STANDARDS: The SFA followed regulations for the district's size category when hiring a new director. Tracking was provided that documents that the director received the required 12 hours of annual training, managers received the required 10 hours of training, other full-time staff have received at least 6 hours of training, or will have 6 hours by the end of the school year, and other part-time staff have received at least 4 hours of annual training. The staff training agenda covered many important topics and shows a commitment to ensure food program compliance. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented. The director also goes an extra step and tracks training for non-food service staff who have food service duties.

RESOURCE MANAGEMENT & RECORD KEEPING: Financial records that were reviewed, indicated appropriate and allowable expenditures. 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 Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool. The district does not charge indirect costs to the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for commodities. Reports are filed on time, and all records are maintained for at least three years plus the current year

SBP & SFSP OUTREACH: School Breakfast Program, SBP, outreach was sent out at the beginning of the year to inform families of the availability of the program including times and locations. Reminders of the SBP were also sent out throughout the school year. 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 information was shared via website, lunch menus, flyers, social media, television coverage, and signs outside of serving sites.

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 applications selected for verification were confirmed prior to verification to ensure the original determination was correct. The SFA had at least one person attend verification training.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Fairfield Comm School District (21690000)
SNP - Review ID: 5058

WELLNESS POLICY: The district has a current wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The wellness policy, the latest review of the wellness policy, and the most recent assessment of policy goals are available to the public. Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated. The district is fortunate to have people serving on the committee who are passionate about school wellness.