

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Iowa Valley Comm School District (31540000)**  
**SNP - Review ID: 5057**

**Program Year:** March 5-7, 2019  
**Month of Review:** January  
**Lead Reviewer:** Cheryl Benson  
**Org Representative(s):** Iowa Valley CSD

**Org - Level Findings**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
200 - Verification	V-0200	Benefits for the household selected for verification went from reduced to paid status on 12/5/18, but it was not changed in the Point of Sale, POS, system until 1/3/19 due to an error in the POS system.	The household was already changed to paid status; no further action is required.	
700 - Resource Management	V-0700	(1) Each year, the SFA must complete a Written Procurement Plan. The plan indicates federal, local, and SFA purchasing thresholds, each procurement event that will be paid from the Child Nutrition account, and how that procurement event will be conducted--micro, small purchase, formal, with a buying group or not, approximate amount, etc. A letter was sent in September requesting the written plan, but it has not been submitted yet. (2) Another part of the plan is a Code of Conduct for staff who procure using federal dollars. A code was submitted, but it did not include disciplinary procedures in case someone violates the code.	(1) For your response, complete the written plan for SY2019-2020 and attach below using vendor amounts from the current year as approximate dollar values. (Instructions for completing the plan are attached below.) (2) Indicate below or attach a copy of disciplinary actions that would be taken if the Code of Conduct is violated.	
700 - Resource Management	V-0700	The SFA has a milk cooler in a public hallway at the elementary that is never locked against theft or tampering. This practice does not protect Child Nutrition resources sufficiently, and it could lead to legal issues.	For your response, indicate how this will be corrected. For example, the cooler will be locked and keys given to staff as needed, or (as discussed during the review) the cooler will be moved inside the cafeteria. Please indicate how this was resolved and the date the change was made. Also please ensure that all coolers are locked at night.	
1000 - Local School Wellness Policy	V-1000	Part of the Local Wellness Policy, LWP, off-site questions were not completed, documentation of the latest review of the policy (either by the Board or by the Committee) was not provided, and the assessment of LWP goals has not been completed and shared with the public.	For your response, complete the off-site questions, #1002 through 1006, upload a copy of the latest review of the LWP below as well as a copy of the assessment of LWP goals. Finally, indicate how the assessment of goals will be shared with the public and when they will be shared.	

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1200 - Professional Standards	V-1200	Professional Standards hours are not tracked correctly. This is a repeat error from the last review in 2015-16. At that time a tracking tool was shared and the SFA was required to complete a tracking tool and submit. Again this review, there is not list of staff, their positions, average number of hours worked per week, and documentation of training. Individual sheets for staff were provided with dates of training and title of training dating back to August 2015. The SFA must have a single, annual tracking tool for all food service staff and must be able to provide documentation such as sign-in sheets and certificates.	For your response, submit a single tracking tool for all school food service staff that indicates name, position (director, manager, other), full or part-time (20 hours or more a week on average is full-time), number of hours required for each staff member (12-director; 10-manager; 6-full time other; 4-part time other); and year staff member began working in school food service. List training hours completed, and submit documentation for completed training hours (sign-in sheets, certificates, etc.) If any staff have not completed the minimum required hours, indicate how those hours will be met. (Note: Since IVCS D has a small number of school food service staff, it is acceptable to continue to use the current individual spreadsheets if they contain all of the required information listed above and are kept by school year. If you decide to do that, upload the revised spreadsheets along with documentation.)	
RMCR - Revenue From Nonprogram Foods	V-RMCR	At the end of each year, the SFA must determine whether the percentage of revenue from non-program food sold is equal to or greater than the percentage of money spent on non-program food. According to the financial report on IowaCNP, the SFA is charging less than 50% of what is needed to cover food costs. The calculation could be wrong, or the SFA could be running sales to people or groups through its CN account without adding a fee, or the revenue is insufficient and/or food costs are too high for non-program food sold.	For your response, recalculate compliance, complete the Non-Program Revenue (NPR) tool that was provided, and attach below. If the tool still indicates that revenue is insufficient, also submit a plan to either increase revenue of NPR sales, decrease food costs of NPR sales, or both.	

**Site - Level Findings: Iowa Valley Elementary School (0409)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Food Production Records, FPR, for breakfast and lunch are not complete. This is a repeat error from the last Administrative Review. Information was again provided on correctly completing FPRs. They must include date, school, all menu items that are included in the meal (including condiments and milk); total amount prepared for each item for all students, adults, and a la carte seconds; serving sizes for all food items for all student grade groups and adults; leftovers for each food item; and actual number of meals for each student grade group and adults.	For your response, complete one week of Food Production Records for the elementary school for both breakfast and lunch, that include all of the required information as indicated above. Attach copies below. Also view the webcast titled Food Production Records available at the address in Special Instructions below, then complete questions 1 through 8 of the activity attached below for one day of the FPRs you are submitting and attach your answers below.	
400 - Meal Components and Quantities - Lunch	V-0400	SFAs are required by regulation to use Standardized Recipes in order to ensure correct component contribution, consistency, and food safety. Standardized recipes must include the recipe name, total number of servings, serving size, total recipe yield, component contribution,	For your response, attach copies of standardized recipes for Poor Man's Pizza, Turkey Gravy, Hamburger Gravy, Hot Pork Gravy, Turkey Tacos, Walking Tacos, Coleslaw, Chilly Dilly, Baked Beans, and PBJ Sandwich. (Note: finding already	

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		ingredients, weight/measure, directions, and critical control points.	standardized recipes and adapting them is easier than creating your own.)	
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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	141 Does the SFA account for benefits that have been extended to students living in a household that is receiving SNAP, TANF, or FDIPIR benefits?	All students receiving free or reduced benefits must have some documentation on file to show how benefits were determined. For other students living in a household where one student has been directly certified for benefits, but the other students have not, the SFA must somehow indicate those other students in the household. That can be done by writing the names next to the student on the direct certification list or by maintaining a separate form with the matching names.
700 - Resource Management		<p><b>PROCUREMENT:</b>  Thresholds--The federal micro threshold is \$10,000, and the district's micro threshold is \$5,000, so the SFA must follow the district micro threshold of \$5,000 since it is more restrictive. The federal small purchase threshold is \$250,000 so anything under that amount can be procured via small purchase and anything over must use formal procurement which means an IFB or RFP. (Formal procurement is the only method that can be used for any dollar amount.) The district has a small purchase threshold of \$25,000, so the SFA must follow the district threshold of \$25,000. This is a fairly low amount and means that the SFA should have been using Formal Procurement for its milk bid. It is recommended that the district be encouraged to increase the threshold for purchases made using Child Nutrition funds.</p> <p><b>FORMAL PROCUREMENT:</b>  The SFA is part of the Iowa City purchasing group. SFAs that procure as part of a group are still responsible for every part of procurement just as if they had conducted the procurement themselves. The SFA should have copies of the RFP, Contract, Advertisement, any amendments or addendums, all price lists for the last three years, all documents that went into the decision to select the vendor, etc. The SFA was unable to provide the RFP, Contract, and advertisement, and was unaware of any amendments or addendums. These documents should all be obtained and kept on file.</p> <p>When conducting formal procurement, there must be precise specifications, the RFP must be advertised, all required terms and conditions must be included such as Buy American, termination for cause, Debarment statement, etc. For an RFP, rebates must be tracked. There is a form in download forms that can be used to track rebates, discounts, and credits. That form can then be filed with invoices at the end of the year. Prices should be spot-checked to ensure that the bid prices are followed. A check of invoices indicated that canned fruit prices were almost always higher than the bid price. The SFA should follow-up on those items with the vendor and should also alert the purchasing group. The SFA also cannot purchase items that were not on the bid price list. Items bought off-bid must be properly procured.</p> <p><b>SMALL PURCHASE:</b></p>

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		<p>The SFA can use small purchase for any procurement event that is less than \$25,000. At least two vendors must be contacted for prices, but contacting at least three vendors is recommended. The SFA must maintain an even playing field so written specifications and documentation is encouraged. It is recommended that the 3 Bids &amp; a Buy template in download forms be used since it has all of the required terms, such as Buy American and termination for cause or convenience. There are terms that are required at different dollar amounts, and using the template allows you to see those terms. Neither the bread nor the dairy bids included the Buy American provision or Debarment letter, and the dairy bid should have also had the termination for cause included. Bids should also include any conditions that are required, such as sanitized milk crates, delivery hours and locations, locking milk coolers that maintain specific temperatures, etc. Product Specifications should be clear--for example, using a range of grams for a hamburger bun, indicating that it must be at least 50% whole grain and all other grain must be enriched, the packaging sizes, etc. For assistance with specifications, use Choice Plus which is available on the DE website. It is also recommended Prices should be spot-checked. In checking bread prices, it was discovered that the vendor delivered non-whole grain rich hot dog buns twice in January that were not even a product listed on the price proposal from the vendor. Those products should have been returned. (The SFA could include in the next bid that substitutions must be approved before delivered and that unacceptable substitutions will be replaced by the SFA and if the cost is higher than the bid price, the vendor will pay the overcharge.) The vendor awarded the bread contract was not responsive to the bid request. The bid request was for 100% whole grain products while the vendor bid 51% whole grain products. Had the other vendor been told they could bid less than 100% whole grain products, the bid award could have been different. For bottom-line bids that were used for bread and dairy, it is recommended that the amount of the bid be multiplied times the projected number to be purchased and then all totals be added together to get a true bottom-line comparison. There is a spreadsheet form in download forms that can be used for this purpose.</p> <p><b>MICRO PURCHASING:</b></p> <p>The SFA can use micro purchasing for procurement events up to \$5,000. That does not mean that any purchase under 5,000 is automatically micro. If prices are checked then it isn't micro, it's small purchase. Micro purchase has three requirements--it must be under the threshold, the prices must be reasonable, and you must spread the purchases between all vendors in the area to the extent possible. Purchases from the local grocery were under the threshold and the prices were reasonable, but there was no attempt to spread purchases around to other vendors. While the other vendors in the area have limited inventory, it would have been possible to buy some things from them. Also, all purchases for the district are lumped into one total. The SFA must keep a separate account of purchases from the grocery store. It is recommended that the Micro Purchasing Log in download forms be used for this purpose. The other micro purchase reviewed was for the dishwasher. That is clearly an on-going contract and not a proper use of micro purchasing. Plus, the fee is used for maintenance of the machine which is not an allowable direct expense from the CN account--especially since the district is recouping money via indirect costs.</p> <p><b>USDA FOODS/COMMODITIES:</b> There is 100% of the chicken set-aside in</p>
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		Diverted Foods left to utilize. The SFA should contact the state office to discuss either using it or moving it to be utilized elsewhere.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Technical assistance was provided on accommodating special diets. All special diet requests for medical reasons (allergy, intolerance, disability) must be accommodated. For special diets that can be accommodated and still follow the meal pattern, the SFA must implement accommodation as soon as possible. For special diets that cannot be accommodated and still follow the meal pattern, the SFA must obtain a Diet Modification Request Form that is completed by a medical professional who can prescribe medicine before the modification can be accommodated and the meals claimed for reimbursement.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	The Ethnic/Racial Distribution Form was not completed correctly. For each ethnic identity and racial identity, the total in the first column (titled Total Students on Applications/DC List) must equal the number of students awarded free status plus students awarded reduced status plus students who did not qualify. It appears that the students who did not qualify for free or reduced benefits were not included in the Total Students on Application/DC list count.
800 - Civil Rights	810 Review program materials.	Add the USDA and Iowa non-discrimination statements to website where menus, meal payment, and registration materials are located. You can provide a link to the statements instead of having them on each page.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	The SFA completed the monitor review forms for lunch and breakfast at both the high school and elementary school. SFAs are only required to review breakfast at each site every other year. It is certainly acceptable to review the breakfast every year instead of every other year, and it's a good practice, but it isn't required.
1100 - Smart Snacks	1101 What is the SFA's process for determining compliance with non-packaged or recipe food items (combination foods that do not have a label)?	In answer to one of the off-site questions--When an SFA sells non-packaged items a la carte, such as items made from recipes instead of commercially prepared, the nutrients must be run through the Smart Snack calculator to determine compliance.
1600 - School Breakfast and SFSP Outreach	1600 Did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	Technical assistance was provided on breakfast (SBP) and summer (SFSP) outreach. Breakfast outreach must be done at the beginning of the school year with reminders throughout the year. Outreach should include locations and times of meal service and can be shared via website, newsletters, emails, flyers, posters, etc. Summer food outreach can be achieved in many ways--Hunger Free Hotline number, there is a text number that households can use to find any free summer food location, the district can share on its website, social media, flyers, etc. Information on SFSP must be sent home at the end of the school year. For more information, check out the SFSP page on the DE website.
Other Federal Programs		Pre-K students who do not have access to either breakfast or lunch are eligible to participate in the Special Milk Program. Information was provided on the program should the SFA decide to participate.

**Site - Level Technical Assistance Iowa Valley Elementary School (0409)**

Area	Question	Comments
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300 - Meal Counting and Claiming - Lunch	317 a. Based on meal observation, does the meal counting system as implemented prevent overt identification of students receiving free and reduced price benefits?	Students should not be overtly identified as free, reduced, or paid at the Point of Service, POS. To that end, it is recommended that the POS computer display be changed so that the symbol and account balances are either smaller or removed. The SFA could also purchase overlays that prevent casual viewing of the screen by people other than the cashier.
400 - Meal Components and Quantities - Breakfast	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	When Pre-K students are co-mingled in the cafeteria with other grades, the SFA can choose to follow either the CACFP meal pattern or the NSLP meal pattern. If Pre-K students are fed in the classroom, or otherwise not co-mingled with other grades, then they must be offered the CACFP meal pattern. On the day of observation, Pre-K students who are co-mingled were originally offered a combination of CACFP and NSLP meal pattern which is not allowed. The error was immediately corrected. The SFA will follow the NSLP meal pattern for Pre-K, and there should be no difference in how offer vs serve is implemented for Pre-K than for other grades. Pre-K students should not be led to take less food or offered less food than other grades.
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable <b>breakfast</b> to students for all applicable grade groups?	Technical assistance was provided on breakfast signage. Signage at breakfast must indicate how many 'items' each food offered credits for. For example, milk and juice would each credit as one item, while an egg sandwich would credit as two items. The signage must also indicate that students must take at least 3 items for a reimbursable breakfast and at least one of those items must be a 1/2 cup of fruit/juice.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	On the day of observation, condiment usage was not monitored for most of the time, and several students were observed taking large amounts of catsup and dressing. Squeeze bottles of condiments are located on a table that is placed after the POS and behind the person at the POS. It is highly recommended that either the table is monitored during meal service by an adult, or the POS is moved so that the condiment table can be monitored by the person at the POS.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	SFAs must request two health inspections for all sites and keep documentation of the request. It is recommended that the requests be made earlier in the school year instead of waiting for April. Information on health inspections and requests was discussed during the on-site review.
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	Even when digital thermometers are used that cannot be calibrated, the SFA should still follow the procedure for calibrating thermometers in order to ensure they are accurate. Thermometers should be checked at least once a week, and the results logged. The procedure should also be followed anytime a thermometer is dropped or there is a question of accuracy.

**Org - Level Commendations**

Description
APPLICATIONS/BENEFIT ISSUANCE: Benefit documents were organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. A correct and current benefit issuance list was available. 236 applications were reviewed all were correctly determined. All 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

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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.

**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. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided food service staff, and to other staff who assist in food service duties. A copy of the district's public release was on file, documenting that it was submitted to local media. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements.

**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 there were no critical areas noted on the report. Temperature logs are maintained for all coolers-including milk coolers and freezers. 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. Meal count totals for the month of January were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. There was a POS for all students, and the POS was organized and orderly. Food Production Records, FPRs, were on file for all lunches claimed for reimbursement for the review period. All students observed selected a reimbursable meal.

**MEAL REQUIREMENTS & COMPONENTS:** Menus reviewed met 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. Nutrition, CN, and ingredient labels are on file. A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, Water was available as required, and at least two types of milk were offered. Offer vs. Serve, OVS, was correctly implemented. Several low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. Food service staff was polite and respectful to students, other staff, and each other. The Menu Worksheets for the elementary was completed and was very accurate.

**PROCUREMENT:** The off-site procurement tool was completed, and board purchasing policy and vendor paid lists were submitted. The district is a member of a Group Purchasing Organization. A signed agreement with the Group Purchasing Organization for SY 2018-2019 is on file. The signed agreement states that the school district agrees to procure food (excluding bread and milk) and non-food supplies through the Group's awarded Prime Vendor. Bread and milk bids were also available for review.

**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 District had a positive balance in January 2018 and elected to not increase paid lunch prices. 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 and Summer Food Service Program, SFSP, outreach were conducted.

**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.

**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 is available to the public on the district's website. Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.