

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Sioux Comm School District (69900000)
On-Site Review Dates: February 12-14, 2019

Program Year: 2019
Month of Review: January
Lead Reviewer: Deann Murphy
Org Representative(s): Tami Degen

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Out of 276 students reviewed by the State Agency, there were 19 errors found.	All errors have been corrected so no further corrective action is required for this review.	
200 - Verification	V-0200	The following verification errors were noted: The SFA verified too many applications this year due to an error with how the determining information was entered into JMC, and attempts to follow-up with households that did not respond to the SFAs verification request were not documented.	The Verifying Official will complete the tutorial "Verifying Eligibility," found at https://educateiowa.gov/pk-12/nutrition-programs/iowa-school-meal-programs-web-based-tutorials-webcast , and submit their Certificate of Completion to the State Agency.	
1000 - Local School Wellness Policy	V-1000	The Local Wellness Policy has not been reviewed since April, 2013. The final rule states that this must be reviewed at least every 3 years. The SFA does not have an active wellness committee made up of required stakeholders, including at minimum school board, Administration, Foodservice representative, PE teacher, RN, parent, student, and community member, that meets regularly. They have not made their assessment of policy goals public.	The SFA will 1).submit to the State Agency an invitation to the members of the wellness committee for the next meeting which will be held during SY2018-19. The invitation needs to include all stakeholders listed in the finding, the date and time of the next meeting, and the agenda that will be discussed. 2).state the month in SY2018-19 that they expect to update their Local Wellness Policy. 3). state how they will communicate the assessment to households.	
RMCR - Indirect Costs	V-RMCR	The SFA is not applying their approved indirect cost rate to their direct cost base to determine how much to charge the Foodservice account for their indirect costs. The SFA does not have documentation to support how they are charging indirect costs.	Please explain how the school will recover indirect costs appropriately going forward starting in February, 2019. Please provide documentation of a month's indirect cost charges that are figured appropriately.	

Site - Level Findings: Hawarden Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
900 - SFA On Site Monitoring	V-0900	SFAs that have multiple sites must complete the on-site monitoring form (Download Form NSLP260) annually no later than February 1. The SFA completed a district-wide on-site monitoring form, but did not go to the individual	The SFA will complete the On-site monitoring form (Download Form NSLP260) for lunch at each of their 3 sites and for at least 2 breakfast sites and will submit the completed forms to the State Agency. If any corrective action needs to be taken by the SFA at any	

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		sites, observe both lunch and breakfast, and complete the required forms prior to the Feb. 1 due date.	site, that will be done, followed up and documented before the forms are sent to the State Agency.	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	Based on the multiple errors found with applications, recommend the confirming official review all applications after registration is over, acting as a fresh set of eyes on each one, checking to ensure that all necessary information is listed on the application, i.e., names and number of all household members, compute all income provided, parent social security number, parent signature, address and date. All staff who serve as the confirming official needs to receive adequate training (4 hours annually with some of that being Civil Rights training) on how to properly determine applications.
200 - Verification	207 a. Did the SFA complete verification?	Based on the incorrect number of applications chosen to be verified this year due to an error in how the applications were determined being entered into JMC, recommend the SFA manually determine how many applications they need to verify next year as a way to double check JMC. The SFA must document that they have given households at least 1 follow-up contact during the verification process before they change student's benefit status. Verification must be completed on or prior to November 15 annually.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Field trip sack lunches are pre-packed for the students so the minimum component requirements must be given to all students, i.e. 1 oz. Meat/Meat Alternate, 1 oz. eq. grain, 1/2 cup fruit, 3/4 cup vegetables, 1 cup milk (Grades K-8).
700 - Resource Management		The SFA combined small and formal practices by sending out minimal specs with no terms and conditions, they published a written notice in their local newspaper after they solicited bids from 2 companies, they accepted quotes and did not complete an RFP or IFB and did not conduct a public bid opening, they took the higher bid due to their preference for being local and giving good service, but had no documentation showing that the low bid vendor was not responsive or responsible. Discussed with the FSD and the Superintendent the need to follow proper formal procurement practices as required by their local formal threshold of >\$5,000 OR change their local policy to allow a higher threshold for their Child Nutrition Program. The Federal Formal threshold is >\$250,000. Also, The SFA only used 89% of their USDA Entitlement dollars in SY2017-18. Currently, the SFA still has 11% of their USDA Foods dollars to use. Strongly encouraged the FSD to sign up for the DOD program as a way to better utilize the SFAs USDA entitlement.
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	The SFA is required to submit the Public Release to the local media annually before school starts. The media does not have to print the public release, but the SFA should keep documentation showing that they sent it.

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1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements?	The Final Rule for the Local Wellness Policy and the assessment template was emailed to the Authorized Representative. The requirements for the wellness policy and recommendations on how often the wellness committee could meet were discussed.
1100 - Smart Snacks	1100 What are the SFA's food sale policies?	All fundraisers involving food sold to students must meet Smart Snacks regulations and have documentation showing that the foods sold are compliant. Foods sold that are meant to be consumed after school, i.e. Frozen Pizza, etc. may be sold as a fundraiser.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	Discussed with the SFA ways to promote breakfast to households in the district. The USDA requires that breakfast promotion be done at least twice annually. This can be done each semester, at PT conferences, during School Breakfast Week in March, etc. Promotion should include encouragement for kids to come to school to eat breakfast, the menu, price, and times available. Also, during the on-site review, it was noted that some elementary students seemed rushed to eat breakfast due to having to get onto a bus to go to another building. Discussed alternate methods of ensuring that students can eat if needed, i.e. grab and go breakfasts, breakfast in the classroom, breakfast after the bell, etc.
RMCR - Indirect Costs	1 Did the SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency?	Discussed with the Business Manager and e-mailed him information regarding allowable direct and indirect costs, how and where to find the SFA's indirect cost rate and how to calculate the direct cost pool.

Site - Level Technical Assistance Hawarden Elementary School (0409)

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	324 a. Were there patterns in the free, reduced or paid meal counts which appear questionable?	Errors were noted between monthly claim check and claim submitted to the State Agency. Recommend the Authorized Rep. check the edit check record at least weekly to verify meal count accuracy and again at the end of each month before the claim is submitted.
400 - Meal Components and Quantities - Breakfast	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Oranges wedges were served at breakfast during the on-site review. Staff allows students to take 0-4 wedges. It takes 4 full wedges to equal 1/2 cup fruit so if students take less than 4 wedges, the fruit component does not count and they must take all other 3 items offered at breakfast (cereal bar, juice, milk).
400 - Meal Components and Quantities - Lunch	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	Without a medical provider's signed order for 2% lactose free milk, the SFA must follow the meal pattern which allows only 1% or FF lactose free milk. Discussed with the RN and the FSD that the SFA should provide the milk for the student and they either need to provide the allowed milk OR obtain a Dr. order and reason for the alternate product. The family should not be required to provide the milk for the student.

Org - Level Commendations

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Description
Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are transferred in a timely manner to the POS system, and denied applications were correctly determined. All applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Free meals are extended to all members in the household. Waivers are provided to applicants and indicate specific fees. Eligibility is kept confidential.
December 2017 receipts that were reviewed indicated appropriate and allowable expenditures. The SFA had sufficient funds in their account in January, 2018 so that they did not need to raise paid student lunch prices. Non-program food revenue adequately covered non-program food costs. Reports are filed on time, and all records are maintained for at least three years plus the current year.
Fiscal action for this review seems to be under the USDA disregard level so no claim adjustments should be needed.
Professional Standards training was met or on track to be met for all staff involved in the Child Nutrition Program. Foodservice staff have recently had Serve Safe training.
The And Justice for All civil rights poster was posted in the Elementary cafeteria. The district has taken reasonable steps to ensure access to services are offered to Limited English Proficient households. Annual civil rights training was provided to staff and documented. Ethnic/racial information is collected and the summary form is completed. No discrimination was observed. The current state and federal non-discrimination statements are listed on household notification letters and the shortened statement is on the posted menu.
The Foodservice Director (FSD) does a good job in menu planning. Menus are simple and contain all required components in their minimum quantities. They seem to meet the calorie, sodium and saturated fat requirements. The Elementary has good participation at lunch. Breakfast signage is posted showing students what they need to take to make a reimbursable meal. Staff properly offer students each component, and encourage them to try less popular menu items. There are completed food production records for all meals served and CN/Product Formulation Statements labels and standardized recipes are available to support required components and quantities. Many foods lower in fat, sodium and sugar were found in storage. Working water fountains are just outside the cafeteria and the SFA provides students with cups if they are requested. All students were observed to have a reimbursable lunch on the day of review.
The SFA has a written procurement plan and Code of Conduct. The SFA makes minimal purchases from the single grocery store in town. It is not practical for them to go out of town for emergency purchases.
Verification was completed on error prone applications. The SFA conducted direct verification. All income sources provided were properly verified and benefits were changed appropriately. Applications were confirmed prior to verification requests being sent to households.

Site - Level Commendations Hawarden Elementary School (0409)

Description
The SFA has a district-wide written Food Safety plan that was provided to all three sites. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and 3 dish sink. The kitchen and storage areas were orderly and clean. Staff practiced good gloving procedures.