

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Atlantic Comm School District (03870000)**  
**SNP - Review ID: 5000**

**Program Year:** 2019  
**Month of Review:** January  
**Lead Reviewer:** Brenda Windmuller  
**Org Representative(s):** Natalie Ritter

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	The SFA should have a completed Code of Conduct which includes the disciplinary action to be taken should someone violate the code.	The SFA will submit the revised Code of Conduct which includes the school board policy number referencing the disciplinary action. The SFA should also attach a copy of that school board policy.	
700 - Resource Management	V-0700	The SFA was allocated \$62,729.42 in USDA Foods (Commodities) money in 2017/2018. The SFA only spent \$52,298.12 (83.4%) of this money.	The SFA will report their current spending of USDA Foods money thus far in 2018/2019 and outline a plan to spend 90-100% of their USDA money in 2019/2020.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA did not complete an assessment of compliance with regulation for Revenue from Nonprogram Foods.	The SFA will complete and submit the Nonprogram Revenue Tool Or submit the SFA's Revenue Ratio and Food Cost Ratio with supporting documentation.	

**Site - Level Findings: Schuler Elementary School (0427)**

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?	All Free/ Reduced applications must be processed within 10 days of receiving them. Best practice includes writing the "received on" date on paper applications which come in to

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		document the day the application came into your possession.
200 - Verification	208 When a confirmation review was conducted:	The confirming official should sign the applications being verified upon confirming that the application was initially processed correctly.
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan.</p> <p>Procurement Plan must be completed annually Code of Conduct must be completed annually and reference policy for disciplinary action.</p> <p>Must have signed debarment certifications kept on file.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Agreements valued at \$10,000 or more should have an exit clause.</p> <p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p> <p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> All price adjustments throughout the year</li> <li><input type="checkbox"/> All invoices</li> <li><input type="checkbox"/> All contracts and agreements</li> </ul>

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		<ul style="list-style-type: none"><li><input type="checkbox"/> All bids solicited</li><li><input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)</li><li><input type="checkbox"/> Documentation of why you selected a specific vendor (Selection Rubrics)</li><li><input type="checkbox"/> Copies of bid solicitation</li><li><input type="checkbox"/> Debarment statements</li><li><input type="checkbox"/> CD provided by the AEA (if applicable)</li></ul> <p>Three types of purchases, (Federal Thresholds):</p> <p><b>Micro-purchase-</b> under or equal to <b>\$10,000</b>(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><li><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.</li><li><input type="checkbox"/> Purchases should be distributed around community, not just one store.</li></ul> <p><b>Small Purchases-</b> Purchases that are <b>under \$250,000</b> (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none"><li><input type="checkbox"/> Include all terms and conditions</li><li><input type="checkbox"/> Include terms: Buy American and Equal Opportunity</li><li><input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more</li><li><input type="checkbox"/> Attain Signed Debarment Statements</li><li><input type="checkbox"/> Awarded on lowest price (unless written documentation to justify)</li></ul>
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		<input type="checkbox"/> Maintain documentation <b>Formal Purchase-</b> Purchases equal to and <b>exceeding \$250,000</b> (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used. <input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised. <input type="checkbox"/> Include all requirements of a small purchase <input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. <input type="checkbox"/> Everything must be in writing.
700 - Resource Management		<p>USDA Foods: The SFA utilized only 83.4% of the USDA Foods (Commodities) money allocated to them in 2017/2018. The SFA should aspire to spend a minimum of 90% of this money each year. The SA recommended that the SFA reach out to the SA's USDA Foods Consultant for ideas of how to better monitor this.</p>
1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	<p>All employees working with the School Lunch Program must complete Professional Development hours each year, including those who do not work in the kitchen. The Food Service Director should complete 12 hours, Head Cooks/Managers 10 hours, full time staff 6 hours and part time staff 4 hours each year. Civil Rights training should be included in this training every year.</p>
RMCR - Nonprofit School Food Srvc Acct	4 If Yes, did the SFA develop a spend down plan approved by the State agency?	<p>The SFA has more than 3 months operating expense in the School Nutrition account. The SFA should develop a plan to spend the money in the account down as the current balance exceeds the 3 month limit. Options may include the purchase of new equipment, hire additional staff, and purchase additional higher cost food items like fresh fruits and vegetables.</p>
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	<p>The SFA should review prices annually of all non-program items to include a la carte, catering, vending machine items, and adult meals. The prices should at a minimum cover all expenses for the item. Documentation of compliance should be submitted at the time of an Administrative Review.</p>

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**Site - Level Technical Assistance Schuler Elementary School (0427)**

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	325 a. For the review period, complete S-1, 17.	JMC report printed on 3/12/19 does not match the report printed 2/1/19. The report printed in March stated: free-1376, reduced- 184, paid- 1669. The report printed in February states: free-1375, reduced- 184, paid- 1670. The SFA should contact JMC to report the problem.
500 - Offer versus Serve	502 Is there signage explaining what constitutes a reimbursable meal to students including the requirement to select at least 1/2 cup fruit or vegetable?	SA provided SFA with a poster explaining Offer vs Serve and item/component selection.

**Org - Level Commendations**

Description
ACCESS AND REIMBURSEMENT (100): Benefit documents, as well as all paperwork, were well organized. The SFA uses an online application which was pre-approved by the SA, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS, and denied applications were correctly handled. The SFA has publicized the availability of free/reduced applications twice during the 2018/2019 school year.
BREAKFAST & SUMMER PROMOTION (1600): The SFA does an excellent job of promoting breakfast with posters, signs and messages on the web site. Breakfast menus are posted in each cafeteria as well as the website. Summer Food Service Program outreach for the local SFSP program and sites state-wide is shared via websites, newsletters, and flyers.
CIVIL RIGHTS (800): The And Justice for All civil rights poster was posted. Annual civil rights training was provided to food service staff and documented. 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 is completed. No discrimination was observed.
COMPETITIVE FOODS & SMART SNACKS (1100): Students at Schuler elementary may purchase a la carte milk or other limited items. On the day of review a slushy was available. Documentation was available to show that all foods and beverages sold to students by the food service department during the school day met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold.
LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years. The policy has nutrition education, physical activity and other wellness goals included. An assessment has been completed and is posted on the school's website. A wellness committee is in place to set goals and help assess the completion of the goals. The committee is made up of students, faculty, staff, and community members. The committee meets several times annually and minutes are kept. The SFA is active in Farm to School and has creative wellness programming including mapping out distances for specific walking routes within the school building.
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 appeared accurate and complete. There was a point of service (POS) at the point where meals are served for all students observed at lunch. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.

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**MEAL PATTERN:** All students observed during the on-site visit had a reimbursable meal, the menu was complete with all food groups represented and served in their proper quantity. Offer vs. Serve was implemented properly and staff was monitoring food items on trays. Water was available to all students during meal times. Menus for the month of review contained all required components. Production records were on file as well as CN labels and all other supporting documentation.

**On-site Monitoring (900):** The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and breakfast prior to February 1st.

**PROCUREMENT:** The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases. The FSD has attended a Regional Procurement class.

**PROFESSIONAL STANDARDS (1200):** 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, full time staff have received 6 hours and all other staff have received at least 4 hours of annual training. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training and tracking of training was correctly documented.

**RESOURCE MANAGEMENT (700):** The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed and indicated appropriate and allowable expenditures. Reports are filed on time, and all records are maintained for at least three years plus the current year. Errors fell below the \$600 disregard, no fiscal action is expected at this time.

**VERIFICATION (200):** The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification. The process was completed on time.

**Site - Level Commendations Schuler Elementary School (0427)**

Description
<p><b>HACCP/FOOD SAFETY (1400):</b> The SFA has a district-wide written Food Safety plan that includes all required elements. 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, and dishwasher. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Food Service workers wore proper hair restraints and practiced good gloving procedures.</p>
<p>The Food Service staff are all friendly and have positive interactions with students, thanking them by name and asking them about their day. The staff are dressed professionally and present themselves and the food that they serve with pride. The department was shorthanded all three days of the on-site visit due to illness. They function well as a team to complete all daily tasks while keeping a smile on their faces. There is great communication among team members.</p>