

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
East Mills CSD (39780000)
SNP - Review ID: 5080**

Program Year: 2019
Month of Review: January
Lead Reviewer: Brenda Windmuller
Org Representative(s): Karen Gage

Org - Level Findings

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|---|--|----------------------------|
| 100 - Certification and Benefit Issuance | V-0100 | All web based applications must be approved by the SFA prior to making them "live" for use by households. | The SFA will state their intentions to submit their web based application to the SA and receive approval prior to making it available to families in the future. | |
| 200 - Verification | V-0200 | The SFA verified two applications and only one was required. | The SFA will complete verification training. Submit the date and the name of the person(s) to complete the training. | |
| 700 - Resource Management | V-0700 | The SFA's Code of Conduct related to the procurement policy must address disciplinary action to be taken should someone behave unethically. | The SFA will submit the corrected Code of Conduct with the School Board Policy number(s) which address the disciplinary action. | |

Site - Level Findings: East Mills Elementary (0427)

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|---|--|----------------------------|
| 300 - Meal Counting and Claiming - Breakfast | V-0300 | The January claim did not match the Edit Check Report generated by the SFA's POS. | The SFA will modify the January claim to match the numbers on the Edit Check Report. | |

Org - Level Technical Assistance

| Area | Question | Comments |
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| 100 - Certification and Benefit Issuance | | All SFAs are required to notify households of the availability of free/reduced applications two times each year. To date, this has only been done once in 2018/2019. |

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| 100 - Certification and Benefit Issuance | 126 a. Certification and Benefit Issuance Review Method: | One application was missing the social security number. Applications are considered incomplete without this information and should not be processed. Two applications were not processed within 10 days of the date on the application. SA recommended that the SFA write the received on date on each application to document when the SFA took possession of the application. One application was processed based on an application and qualified via the DC list. The online application was not approved by the SA prior to posting and implementing the application. |
| 200 - Verification | 207 a. Did the SFA complete verification? | The SFA is advised to maintain a separate folder for verification with all documentation to include, application, ICaves print out, and letter sent indicating selection, information submitted by the household, verification report and letter sent to the household at the conclusion of verification process. SA gave TA on the verification process. The application for verification should be selected from error prone applications. Formal training is advised. A link to a webinar training was sent. |
| 700 - Resource Management | | <p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. The SFA should extend prices when awarding bids. The Code of Conduct must point to disciplinary action that will be taken should the policy be broken. (413.4 & 413.3) Chemicals are being procured from Meyer Laboratories for the dish machine. The SFA must ensure that they are following the guidelines for proper procurement on this item. Either spread the money around (micro) or take bids (small) for the product.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</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> |

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| | | <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"><input type="checkbox"/> All price adjustments throughout the year<input type="checkbox"/> All invoices<input type="checkbox"/> All contracts and agreements<input type="checkbox"/> All bids solicited<input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)<input type="checkbox"/> Documentation of why you selected a specific vendor (Selection Rubrics)<input type="checkbox"/> Copies of bid solicitation<input type="checkbox"/> Debarment statements<input type="checkbox"/> CD provided by the AEA (if applicable) <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount. |
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| | | <p><input type="checkbox"/> Purchases should be distributed around community, not just one store.</p> <p>Small Purchases- Purchases that are under \$250,000 (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> <p><input type="checkbox"/> Include all terms and conditions</p> <p><input type="checkbox"/> Include terms: Buy American and Equal Opportunity</p> <p><input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more</p> <p><input type="checkbox"/> Attain Signed Debarment Statements</p> <p><input type="checkbox"/> Awarded on lowest price (unless written documentation to justify)</p> <p><input type="checkbox"/> Maintain documentation</p> <p>Formal Purchase- Purchases equal to and exceeding \$250,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <p><input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised.</p> <p><input type="checkbox"/> Include all requirements of a small purchase</p> <p><input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</p> <p><input type="checkbox"/> Everything must be in writing.</p> |
| 700 - Resource Management | | The SFA is only allowed to have 3 months of operating expenses on hand in the school lunch account. |
| 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? | Wellness: Both the Wellness Policy and the Assessment should be made available to the public. The Wellness Policy must be updated once every three years. The Wellness Assessment must be updated at a minimum once every three years, once a year is best practices. The |

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| | | Wellness committee should be comprised of faculty, staff, students and community members. |
| RMCR - Nonprofit School Food Srvc Acct | 13 Did all recorded expenses represent an activity or function recognized as reasonable, necessary, allocable and otherwise compliant with the provisions of 2 CFR 200 Subpart E? | The SFA is not allowed to use School Nutrition money to pay for equipment repairs and maintenance. |

Site - Level Technical Assistance East Mills Elementary (0427)

| Area | Question | Comments |
|---|---|--|
| 300 - Meal Counting and Claiming - Breakfast | 325 a. For the review period, complete S-1, 17. | The January 2019 claim does not match the numbers on the Edit Check Report. 253 Paid meals were claimed at breakfast, and the Edit Check Report has a total of 251. TA was given to double check numbers for accurate reporting. |
| 400 - Meal Components and Quantities - Lunch | | Production records should document the serving size of each component. Example: 5 chicken nuggets or 1/2 breadstick. These serving sizes are used in conjunction with the CN labels to determine ounce equivalent of each item served. |
| Infant and Pre-K Meal Pattern Checklist - Breakfast | 11 Was the appropriate milk type served? | TA was given that because the pre-school students are not co-mingled with other students during breakfast, they may not have the flavored milk. This practice was corrected prior to the start of service on the day of review. |

Org - Level Commendations

| Description |
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| APPLICATIONS/BENEFIT ISSUANCE (100): The correct and current benefit issuance list was available. Access to benefit information is correctly limited. Free meals are extended to all members in the household. DC lists are downloaded monthly. |
| BREAKFAST & SUMMER PROMOTION (1600): The SFA does a good job of promoting breakfast with postings on the website. Menus are posted in each cafeteria as well as the website. Summer Food Service Program, SFSP, outreach for the SFSP program state-wide is shared via websites and flyers. |
| CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The "And Justice for All" poster is visible to program participants. |
| 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. |
| MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, does an excellent job of menu planning. Menus met weekly and daily meal pattern requirements for each age/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 and well organized. |

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Standardized recipes are used for food production. Water was available as required. 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 principal helps serve lunch to all students. All students were observed to have a reimbursable meal during the day of the review. Offer vs Serve is done correctly.

PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for awarding, reviewing, documenting and monitoring procurement events, and specifications were well-written and comprehensive. All bids include a Buy American Provision. The SFA ensures that no vendors have been debarred or suspended by USDA. The FSD is doing a great job of monitoring prices to ensure compliance with contracts. The FSD has attended Regional Procurement training.

PROFESSIONAL STANDARDS (1200): Tracking was available which documented that the FSD has received the required 12 hours of training, all full time staff have completed 6 hours and all other staff have received at least 4 hours of annual training. (Or state that there is a plan, and they are on-track to complete hours by the end of the year.)

RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed, 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.

Site - Level Commendations East Mills Elementary (0427)

Description

COMPETITIVE FOODS & SMART SNACKS (1100): 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 a la carte by the food service department.

HACCP/FOOD SAFETY: The SFA has a district-wide written Food Safety plan that includes required elements. The latest Health Inspection Report was posted in a publicly visible location at all three sites. 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.

On-site Monitoring (900): The on-site monitoring forms were completed for lunch and breakfast prior to February 1st.