Iowa Department of Education Bureau of Nutrition and Health Services State Review Summary Report John F Kennedy Cath Sch (16118115) March 5-6, 2019

Program Year:	2019
Month of Review:	February
Lead Reviewer:	Shea Cook
Org Representative(s):	Meredith Ash

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	application to be free when it should have been	For your response please upload a copy of the letter notifying the family of reduction in benefits. Additionally, please identify the date in which the benefits were corrected in the system.	
700 - Resource Management	V-0700	Current negative balance policy is not compliant with HR2467.	For your response please indicate your timeline for revision of your local negative balance policy.	
800 - Civil Rights	V-0800	The abbreviated nondiscrimination statement does not appear on menus and the full USDA nondiscrimination statement is not on the nutrition portion of the website.	For your response please submit a copy of your menu that includes the abbreviated civil rights statement. Additionally, please provide a link to the location where the full USDA statement can be found on your website.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	Account is in excess of the allowed three month operating balance.	For your response please describe your plan for spending down your account balance to be compliant with the three month operating balance requirement.	

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Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1400 - Food Safety		for all freezers, refrigerators, and milk coolers there was no record maintained for the dish	For your response please describe your plan for recording the temperature of your dish machine, who will be responsible for completing the testing, and where you will keep a record of the test strips.	

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		Procurement TA was offered in the following areas:
		Small Purchase:

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		• Detailed product specifications should be included in all price requests. Pricing requests for milk should include things like milk types, packaging type, size, delivery expectations, etc. You should also indicate whether or not you want fixed pricing or pricing with economic adjustment.
		 When requesting pricing you should include estimated annual usage in request documents to get best pricing.
		• SFA was advised that vendors should be given a minimum or 4 weeks to respond to requests for pricing. SFA encouraged SA to allow to use best practice and allow a minimum of 6 weeks to respond.
		• Small purchases must be awarded to the bidder with the lowest price. In order to calculate lowest cost all items should be evaluated based on approximate annual usage. If lowest bidder is not chosen you must have documentation that explains the award (i.e. documentation of student acceptance, emergency purchase, etc.).
		 It is best practice to include a school calendar with pricing requests so the vendor has the information for delivery.
		• Price request should include applicable terms and conditions based on the value of the purchase. A number of terms and conditions were absent from the pricing requests including Buy American, Debarment statement, termination for cause and convenience, equal opportunity, small business, etc.
		• SA recommends using Three Bids and a Buy form for small purchases.
		• All price requests and quote documentation should be retained.
		Formal Purchases:
		• SFA does exercise contract management by price checking invoices. SFA was encouraged to continue price checks and to include a variety or food and non-food items from the bid in those checks and to document which items were checked on the invoices.
700 - Resource Management	712 Were indirect costs* charged to the SFA's nonprofit school food service account?	SA provided clarification on indirect costs and allowable direct costs.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	SFA does have a HACCP plan and a number of the SOPs that are included have been reviewed regularly, but could use some updating. SA encourages the SFA to evaluate their existing plan and update it. HACCP resources for schools are available at https://www.extension.iastate.edu/foodsafety/haccp-school-foodservice . It is the expectation that a completed and updated HACCP plan will be in place at the next Administrative Review.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	SA encouraged SFA to conduct additional outreach for SFSP. A number of free materials can be found at http://bestpractices.nokidhungry.org/programs/summer-meals/promote-summer-meals#summer-meals-outreach-resource-toolkit

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Area	Question	Comments
•	serving period on all meal service lines?	A number of diet modification request forms that were completed by physicians noted Almond Milk as the replacement that should be offered. SA reminded SFA that Almond Milk is not an allowable substitute for fluid milk and should not be offered unless specifically listed by a physician.

Org - Level Commendations

Description
CERTIFICATION AND BENEFIT ISSUANCE: • The 30 days of eligibility status is provided to all families who were eligible for benefits in the previous school year. • The approved letter of notification of eligibility is sent to all families who apply for benefits including those families who were denied benefits. • Applications are processed and benefits are administered within 10 operating days of the application being received. • Direct certification lists are downloaded in a timely manner and kept on file. All students in the household are extended benefits. • Income applications are complete with parent signatures, income information, names of all family members and social security numbers. • Denied applications were determined accurately. • The correct income guidelines were used and the conversion rates were used properly.
CIVIL RIGHTS: The correct public release was sent to a local media outlet and published. • Diet modification forms are completed and on file for students with special dietary needs. An approved milk alternate is made available for students with a dairy intolerance. • All staff with responsibilities in the school nutrition program received civil rights training, including all non-food service staff and substitutes. Documentation is on file. • The "And Justice For All" poster is on display. • The racial ethnic form was completed and shows that students were not discriminated against when applying for free or reduce price meals. • The SFA follows the USDA's complaint procedure as needed.
FISCAL ACTION: Fiscal action for this review is less than the allowed USDA disregard for NSLP so no claims adjustments are needed.
FOOD SAFETY: The temperatures for hot foods are monitored and recorded on the food production records. • Temperatures are monitored and recorded for the refrigerators, freezers and milk coolers. • The food safety inspection report is on display in a public location. • The SFA's HACCP plan is available on site. • The food service director is ServSafe certified. • Good food safety practices were observed while SA was on-site. • Foods are stored properly.
MEAL COUNTING AND CLAIMING: The point of service line for lunch is organized and orderly which allows staff to ensure all students receive a reimbursable meal. • All students at the selected sites had a reimbursable meal at the lunch observed. • The edit check reports matched the claim. • The day of review meal counts were reasonable with the review period counts.
MEAL PATTERN AND NUTRITION QUALITY: The menu offers a variety of vegetables, fruits and entrees. • The cafeteria has posters encouraging healthy foods and activity. • Signage is made available informing students of how the menu constitutes a reimbursable meal. • The lunch menu met the daily and weekly meal pattern requirements for fruit, grain, meat/meat alternate, and milk, dark green, red/orange other and starchy vegetable subgroups. • Food production records, CN labels, and standardized recipes were on file for all meals served during the review period. • Condiments are proportioned and limited to control calories and sodium. • The SFA purchases many low or reduced fat, low sodium products. • The SFA offers 2 different and approved types of milk to students. • The food service director completed the menu certification worksheets. • Foods found in storage met the Buy American provision. • Free, potable water is available for students during their meal times.
PROCUREMENT: The SFA conducts contract management as staff ensures orders received are what was delivered and that prices match what was written on the bid. • Micro purchases were conducted accurately as funds were spent evenly throughout the community. • Small purchases were made according to the SFA's local purchasing thresholds. • The SFA completed the off-site procurement questionnaire and the food service director attended the regional procurement training. • The SFA has a procurement plan.
PROFESSIONAL STANDARDS: Training hours are tracked for all staff with school nutrition responsibilities. • Civil rights training was provided to all staff with school nutrition program responsibilities. • Documentation is on file for all training received. • Full and part time school nutrition employees have received the required number of training hours for the school year. • Substitute employees received civil rights training and training applicable to their job responsibilities. • Non-food service employees received civil rights training and training based on the school nutrition program responsibilities.
RESOURCE MANAGEMENT: The non-program food revenue adequately covers the cost of the non-program foods. • The SFA charges the correct paid student lunch price according to the required PLE tool

and the correct adult lunch price. • Expenses made during the review period were allowable. • Revenues received went directly into the school food service line item account and there are numerous checks and balances to ensure the process is followed. • Records are kept for 3 years plus the current year.

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SCHOOL WELLNESS POLICY: The wellness policy contains all of the required elements and has been updated in the past 3 years as required. • The wellness policy and assessment are made available to members of the public as they are both posted on the district's website. • The general public is invited to participate in the wellness committee as meeting information is posted on the district's website and principal's newsletter.

SUMMER FOOD SERVICE PROGRAM OUTREACH: • Families are informed of the Summer Food Service Program through social media and school announcements.

VERIFICATION: The verification report and process were completed on time. • The correct information was collected from parents and eligibility status was determined correctly. • Families were notified of verification selection and the verification results with a letter that contained the correct information including information on their ability to appeal if they disagree with the results. • The application selected for verification was confirmed and signed to show that the original eligibility status was determined correctly.

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Civil Rights: The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.

Offer vs. Serve: Offer vs. Serve is being implemented properly. • All students observed selected 1/2 cup of fruit and/or vegetable. • Cafeteria staff have been trained on offer vs. serve.