

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Trinity Lutheran School-Boone (07298204)
Dates of Review: March 12 – 14, 2019

Program Year: 2019
Month of Review: January
Lead Reviewer: Deb Linderblood
Org Representative(s): Rose Holbrook

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The SFA does not have a back-up individual to cover for the Determining Official.	State who will be trained to serve as a back-up for the Determining Official. State by when this individual will be trained.	
700 - Resource Management	V-0700	The SFA does not have a nutrition Code of Conduct policy. TA provided that the Code of Conduct needs to identify the specific board policies that make reference to disciplinary action, gifts and ethics. The SFA should write in the policy numbers and titles on the school food service code of conduct that would apply to officers and employees who violate procurement procedures. Showed the SFA where to find the Code of Conduct template on the Procurement Plan excel spreadsheets. Also provided sample ethics, gifts and disciplinary action policies.	State your intentions to develop a Nutrition Code of Conduct policy once board policies are in place for ethics, gifts and disciplinary action.	
700 - Resource Management	V-0700	The SFA does not have a Procurement Plan.	Develop and attach a Procurement Plan for school year 2019-2020.	
700 - Resource Management	V-0700	The SFA's meal charge policy has not been distributed to households or staff.	State how and by when you will distribute your meal charge policy to all households and staff.	
1200 - Professional Standards	V-1200	The new Food Service Director does not have previous school nutrition experience and thus has not met the hiring standards.	Complete and attach a "New School Nutrition Director Training Plan." TA provided on how to complete the plan. Provided an electronic version of the plan to the Food Service Director.	

Site - Level Findings: Trinity Lutheran School (8204)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The SFA's Food Production Records are not complete. They are missing the planned servings, amount prepared, adult serving size and planned servings, total a la carte sales and leftovers. TA provided on how to accurately complete the food production records.	Complete and attach one week's worth of Food Production Records that have all of the required fields documented.	

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600 - Dietary Specifications and Nutrient Analysis	V-0600	When completing the menu certification worksheets it was found that the SFA does not have a standardized recipe for Hot Ham and Cheese Sandwiches and Spaghetti with Meat Sauce. TA provided that standardized recipes which include the menu contributions are needed for all combination foods. Provided the Food Service Director with a link to the Iowa Gold Star Recipes and the Healthier Kansas Recipes.	Attach 3 standardized recipes for food items that you routinely serve, showing the menu contributions.	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	TA provided that the annual tab on ICAVES should only be used if the household reports an annual income or reports income in more than one frequency. If income is reported in one frequency (i.e. monthly) then the monthly income tab should be used to determine eligibility.
100 - Certification and Benefit Issuance	135 Are the Direct Certification lists retained on file by the SFA?	TA provided that best practice is to use print screen and print a copy of each student the SFA finds using ELookup.
200 - Verification	203 Describe the SFA's verification process (including SFA's verification for cause process, deadlines, due dates, selection procedures, etc.).	TA provided that Verification for Cause is when the SFA questions the accuracy of an application. If this occurs the SFA should verify this application by sending a Letter of selection and proceed with the verification process as usual. Also discussed that the SFA needs to select their household(s) to verify on October 1st of each year.
200 - Verification	204 Does the SFA use an electronic system to identify error-prone applications?	TA provided that the State Agency now has a web-based ICAVES. Showed the Determining Official how to access this tool and walked through how to use it.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	TA provided that upon selecting a household for verification that SFA should see if the student(s) can be found on Elookup. If found, this household would be directly verified and the letter of selection would not need to be sent to the household.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Provided the FSD with a sample Standard Operating Procedure and sample Food Production Record to use when they prepare sack lunches.
700 - Resource Management		<ul style="list-style-type: none"> · The procurement event page on the written procurement plan should be revised to reflect the upcoming school year's procurement events, correct procurement methods and contract award type. It is recommended that the procurement event page of the written procurement plan be reviewed annually (about February). It is best practice to keep a separate procurement event page for each school year. This practice will help ensure that the correct procurement method is identified based on the estimated value of a particular purchase. On the plan the SFA should identify if they will award based on line item or bottom line for any purchasing event using small or formal

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		<p>purchasing method.</p> <ul style="list-style-type: none">· TA also provided that the SFA needs to have debarment statements from vendors when using small or formal procurement methods. For local stores the SFA should check on https://sam.gov/SAM and see if the vendor is debarred.· Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a Buy) and formal methods of procurement. Please refer to the state-prototype templates posted on IA_CNP. Reviewed how to complete the small purchase template.· When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth."· When procuring milk, along with specifications (descriptions) for all items to be procured, the estimated annual usage for each item should be provided. To ensure the district selects a responsive vendor with the overall lowest price (bottom line), the cost of each item on price quotation request should be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template that calculates extended cost for milk was provided.· For milk, other things to consider when requesting price from vendors are: is pricing requested for paper cartons or plastic bottles, coolers to be provided at no charge, Hazard Analysis Critical Control Plan (HACCP) plan to ensure clean crates and milk cartons are delivered, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should inform vendors whether a firm, fixed price or a fixed price with economic adjustment (escalator clause) is requested.· The food service director should spot check invoices from the vendor to ensure products delivered match the order and the description of the product solicited. Prices on the invoice should match bid pricing or be lower unless SFA was given advance written notification per solicitation of any price increase.· Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-domestic agricultural commodity is accepted. <p>*The SFA needs to keep an Exception Log listing items they have accepted that are non-domestic. Examples of non-domestic foods found in</p>
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		storage include mandarin oranges, bananas, pineapple, tuna and black olives. The exception log needs to list the date that the non-domestic item was accepted, item name/description, and the reason it was accepted. Two reasons are valid for accepting non-domestic foods, i.e. 1). food is not available in the US or not available in adequate quantities in the US OR 2). the domestic product is significantly higher priced than the non-domestic product.
700 - Resource Management		TA provided that the State Agency now has a Pre-Approved Equipment list that is equipment SFAs can purchase without getting State Agency approval. Provided a copy of the list. If the equipment is not on this list, then approval would be needed from the State Agency.
800 - Civil Rights	802 What services does the SFA provide to households comprised of persons with Limited English Proficiency (LEP)?	TA provided that the State Agency makes eligibility documents available on IowaCNP in Spanish. Additional translated eligibility documents are available at http://www.fns.usda.gov/school-meals/translated-applications .
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The link for the USDA complaint process/form which should be used if parents wish to file a complaint about any child nutrition program is: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
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?	TA provided that the SFA should invite students to participate on their Wellness Committee. Encouraged the SFA to expand their nutrition education and nutrition promotion goals and to select goals that are meaningful to them. Provided the SFA with a sample Wellness Policy that provides examples of goals they may want to incorporate. Provided the following handouts: "Does Your Wellness Policy Measure Up?" and Non-Food Classroom Rewards and Celebration Ideas.

Site - Level Technical Assistance Trinity Lutheran School (8204)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch		TA provided on how to find the USDA Food Buying Guide. Reviewed how to navigate the tool.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	TA provided that on January 9, 2019 the SFA served 1 1/2 cups of Berry Romaine Salad which only credited as 1/2 cup of dark green vegetable and thus the SFA was short 1/4th cup of vegetable on this day. The Food Service Director realized that she had made a math error. TA provided that 3/4th of a cup of vegetable is a lot for younger students to eat and that the Food Service Director should consider serving 1/2 cup of one vegetable and 1/4th cup of another vegetable. The Food Service Director agreed to start to do this so no corrective action was required. Due to the Food Service Director being new and this being a math error, even though this was a repeat finding, meals were not denied.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Discussed the advantages of Offer vs. Serve (OVS) with the SFA. Pointed out that OVS can save money as there is not as much food waste. Provided the Food Service Director with the OVS manual. Encouraged the Food Service Director to attend the Healthy Meals Workshop to learn more about the meal pattern as well as OVS.
Dietary Specifications Assessment Tool - Lunch	24 Students are offered salt:	TA provided that salt should not be provided for students. The SFA offers a flavor station so students should use these items in place of salt.

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Org - Level Commendations

Description
Certification and Benefit Issuance: Benefit documents were very well organized. The current application for free and reduced price meals/milk and income guidelines were used, Elookup is used to determine students who are directly certified, and denied applications were correctly determined. All applications were correctly determined, signed and dated by the household member and the SFA, were complete with Social Security Numbers and all applications were determined within ten days. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Eligibility is kept confidential.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria, annual civil rights training was provided for food service staff and the Determining Official and was documented. The SFA submitted the annual Public Release to the local media (Boone News Republican). Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The correct state and federal non-discrimination statements are provided on all material describing the program.
Fiscal Action: No fiscal action will be assessed, thus no claim adjustments for January will be needed.
Food Safety: The SFA has a 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. Food temperatures are documented on the Food Production Records. Dishwasher temperatures are taken and documented. Good food safety procedures were observed. The kitchen is very clean and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. The Food Service Director is ServeSafe Certified.
Local Meal Charge Policy; The SFA developed and approved a meal charge policy on 5/26/1996 and it was reviewed/revise on 2/23/2016.
Procurement: The Authorized Representative and the Food Service Director attended the Regional Procurement Training in Des Moines. In school year 2017-2018 the SFA utilized 123.1% of their allotted PAL dollars. They are participating in the Direct Distribution portion of the program. This school year the SFA has used all of their allotted direct distribution dollars.
Professional Standards: The newly hired Food Service Director has completed 18.5 hour of professional training of the required 12 hours, the part-time staff has completed 5.5 hours of the required 4 hours and the Authorized Representative/Determining Official has completed 10.5 hours of the required 4 hours of training for school year 2019. An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours.
Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.
Resource Management: All expenditures that were reviewed appeared allowable. 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 SFA had a positive balance as of 1/31/18 but still raised paid lunch prices. The Non-Program Revenue (NPR) tool was completed. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs.
Summer Food Service Program (SFSP) outreach was completed via flyers being sent home with the students before school dismissed for the summer. Flyers are also posted on doors of the building.
Verification: The correct number of applications were verified. The SFA used the alternate one process and randomly selected from all applications. All income sources were verified. The application selected for verification was confirmed prior to verification. The SFA had one person attend training. The verification report was completed accurately and on time.
Wellness Policy: The SFA's wellness policy was reviewed and revised on January 29, 2019. The public is made aware of the SFA's wellness policy and assessments via the school policy manual. Elements of the policy are also shared in the newsletter.. The following individuals are involved in reviewing and updating the LWP: School Board, the principal, parents, faculty. Potential stake holders are made aware of their ability to participate in the Wellness Committee. The SFA completed an assessment of their wellness policy on January 29, 2019. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.

Site - Level Commendations Trinity Lutheran School (8204)

Description
Meal Components and Quantities: The new Food Service Director does a god job of menu planning. She completes a menu template each week to be sure she has planned all components and vegetable sub-groups. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. All meals observed met at least the minimum daily requirements. The menus met weekly and daily meal pattern requirements for each age/grade group. CN labels and Manufacturer's Statements used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch. Standardized recipes are used for food production. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals.
Meal Counting and 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. Meal counts are taken on a paper roster. Roster counts and filed claims appear accurate. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.

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Food Production Records were on file for all meals claimed for reimbursement for the review period. Edit checks are performed.

Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of January 7 - 11, 2019 for lunch. The worksheets showed that all components were served as well as vegetable sub-groups. The Food Service Director also completed the Dietary Specifications Assessment tool for lunch which indicated that the school is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, controlling the portion sizes of condiments by having teachers portion these, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats. A nutrient analysis was not required.

Smart Snacks: Students are able to purchase 2nd milks. Exempt leftover National School Lunch Program entrees are not sold. Beverages sold meet the standards for the various age groups of students.

Special Milk Program: Milk is stored in a refrigerator in the class room in order to keep it cold until time of service. Teachers mark a roster at the point of service. The January claim for milk appears to be accurate.

Water: Free potable water is available to all students for lunch. A water pitcher is provided along with cups.