

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Wayne Comm. School District (68540000)
February 13-14, 2019

Program Year: 2019
Month of Review: December
Lead Reviewer: Shea Cook
Org Representative(s): Kelley Lavelly, Cynthia Comer

Site - Level Findings: Wayne Elementary School (0418)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Meals served on 12/13/18 did not meet the daily minimum requirement for M/MA. CN label documentation indicate that 1 sausage link serving only provides a .5 oz. serving of M/MA for the day. SFA indicated that product was a replacement product and not the product traditionally ordered for this menu item. That substitution was likely the cause of the error. Error did not result in inadequate quantities of M/MA for the week.	For your response please indicate what changes you will make to insure that a full 1 oz. daily serving of M/MA is provided if you continue to use the replacement product.	
1700 - Afterschool Snack	V-1700	Review of production records indicates that the claim for reimbursement is inaccurate. Claim numbers indicate that snacks were claimed when both components were not taken. Additionally, a discrepancy between roster count and production records indicates that claims were based on the number of students in attendance and not the number of students who received both components for a reimbursable snack.	For your response: 1) Please indicate your training plan for Afterschool Snack staff and the date in which that training will be completed. Indicate the name of the person doing the training and the name of the staff members who are receiving the training. 2) Submit one week's worth of production records and daily snack count forms for a week after training has been provided. 3) Indicate a date when a follow up observation is planned to make sure training is being properly implemented. 4) Edit your January Afterschool Snack claim to accurately reflect the number of students who received a reimbursable snack.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	The SY 2018-2019 procurement plan including the Code of Conduct was completed prior to the review. There were a number of errors on the procurement event page. The Food Service Director (FSD) did attend Regional Procurement training last Fall where participants were allowed	The Food Service Director (FSD) will revise the procurement event page for SY 2018 -2019 and re-submit for review. This will facilitate completing SY 2019 -2020 procurement plan. We highly recommend the FSD participate in regional training again in fall.	

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		time to work on the procurement plans. Following procurement review guidance was provided via email on how to complete the procurement event page.		
800 - Civil Rights	V-0800	The complete USDA Nondiscrimination Statement is not included on the nutrition web page.	For your response please demonstrate that the USDA Nondiscrimination Statement has been added to the nutrition web page by providing the web address for verification.	
1000 - Local School Wellness Policy	V-1000	1) Under the final rule of the Healthy, Hunger-Free Kids school districts are required to conduct a triennial assessment of local wellness policy implementation. There is no documentation to demonstrate that an assessment has been completed. In addition, results of the triennial assessments must be made available to the public. 2) Language in the existing wellness policy indicates that junior high students are allowed to purchase sports drinks and caffeinated beverages. Under Smart Snack guidelines junior high students are not allowed to purchase sports drinks or caffeinated beverages.	1) For your response please submit a timeline for completing an assessment of the local wellness policy and how you will make the information available to the public once it is complete. It is the expectation that a wellness assessment and corresponding documentation will be on file and available to the public by the start of the 19/20 school year. 2) For your response please give a timeline for updating the language in your wellness policy.	
1100 - Smart Snacks	V-1100	The vending machine in the Jr. Sr. High School building is accessible to students in graded 7-8 and included an 18.5 oz. iced tea that is not allowable for those students under the Smart Snack guidelines.	For your response please indicate how when the unallowable beverage will be removed and who will be responsible for its removal.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	SFA is in excess of its 3 month operating balance.	For your response please provide your plan for spending your excess balance and coming into compliance with the three month operating balance requirement.	

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		Technical assistance was provided that when micro-purchase method is used, purchases should be equitably spread among qualified vendors. Last school year, wire shelves for dry storage were purchased from the School Food Authority's (SFA) broadline distributor. It is recommended that when developing formal procurement documents to include any anticipated purchases of small wares. Otherwise use the small purchase (3 Bids and a Buy) method and request price quotation from the SFAs broadline distributor and well as other vendors. This would demonstrate that the SFA made a reasonable effort to procure items/services competitively. It is recommended that micro-purchases method be limited for emergency purchases such as when a food supply is running short on day of service.

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		<p>Last School Year (SY), the district received a donation of hogs. Nutrition funds were used to purchase feed for the hogs. According to USDA memo SP 06-2015, feed just like seeds to grow food in school farms and gardens is an allowable expense from the school nutrition funds. Feed is an allowable expense if it is used to raise livestock by the school district that are then served as part of a reimbursable school meal. Because school nutrition funds are used to purchase the feed, the school district is required to purchase the feed following proper federal procurement regulations. If the micro-purchase method is used, then requirement for this method must be met. The requirements are that the price of the feed is reasonable and that the purchase of feed must be distributed equitably among qualified suppliers to maximize competition. If purchasing the feed from multiple vendors is not practical, the district must document that the feed price from the vendor is reasonable and reason for not equitably distributing purchase among other qualified vendors.</p> <p>The district currently is raising nineteen hogs and purchasing feed from the same vendor as last year. If the district plans to continue to raise hogs to serve in a school meal program, proper procurement procedures for the procurement method selected must be followed or the cost will be unallowable.</p> <p>The Food Service Director (FSD) purchased a total of sixteen cafeteria bench and swivel chair seat combinations in a booth banquet arrangement and three-compartment waste receptacle. Search was conducted online for cafeteria booth and bench systems as well as contacting the Prison Industries. No documentation was maintained from the online searches. Technical assistance provided to maintain documentation from online searches to include clear specifications and price for items and any freight, if applicable.</p> <p>The FSD states that the cafeteria is not used as a study hall. There is a study hall in the high school library. During the year there are some events when cafeteria is used, such as the dancethon, FFA banquet, etc. A time study should be conducted and the cost of the cafeteria bench/swivel chair be prorated between the nutrition funds and the general funds.</p> <p>Last SY, vendor was hired to remove and replace the floor in the elementary school cafeteria. Three vendors were contacted, two vendors responded with price quotes. There was no response from third vendor. The replacement of the floor was paid out of the nutrition funds. This is not an allowable expense as this is a change made to the school building. The district must pay for this expense through the Physical Plant and Equipment Levy (PPEL) or SAVE funds. Please refer to <i>Is this Cost Direct or Indirect</i> guidance emailed to SFA authorized representative and food service directors from the Bureau of Nutrition and Health Services in October 2018.</p> <p>The Request for Proposals (RFP) for Primary Vendor for Food and Non-Food Expendable Supplies was sent to four vendors. Only one vendor responded, there was no response from two, and one sent a "no bid" letter with request for future consideration." In addition, the same solicitation was sent to vendors who solely sell dairy products. It is recommended that language be added that clarifies that contracts will be awarded to vendor</p>
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		<p>with overall lowest cost per category. This would allow vendor(s) to provide pricing only for products and/or category(ies) they stock.</p> <p>The Food Service Director (FSD) may want to consider adding additional language for dairy such as the need for coolers, maintaining par levels, and any special delivery needs, etc.</p> <p>The Food Service Director (FSD) has issued solicitation for prime vendor, dairy, and bread products annually. It was suggested that this is not required and that the solicitation language include the option to renew contract annually for a year with the option of four additional years provided the terms, conditions, and pricing is mutually agreed upon by both parties. Refer to the state agency RFP/IFB template for language. The current contract does include any renewal language, therefore, the FSD will be required to issue a new solicitation for SY 2019-2020. Maintain a copy of the invoice from the Des Moines Register on file with the solicitation to document a public notification was sent.</p> <p>Vendors were not clearly informed that a firm-fixed price contract would be awarded based on overall lowest cost. Further vendors should be informed that the dairy category would be evaluated separately from other product categories and a fixed price with economic adjustment (escalator clause) would be awarded to the responsive vendor with overall lowest cost.</p> <p>Along with clear descriptions (specifications) for all items to be procured, the estimated annual usage for each item should be provided to vendor. To ensure the SFA selects a responsive vendor with the overall lowest cost, the cost of each item must be extended by multiplying the unit cost per item 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 cost (bottom line). Please refer to the templates to calculate extended cost for milk and the <i>Official Pricing Spreadsheet</i> on IA_CNP.</p> <p>Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A Buy American exception log should be maintained.</p> <p>Although the RFP included requirements regarding Buy American, there was no documentation to determine the vendor requested SFA consideration to purchase a domestic alternative food item prior to the SFA decision to purchase a non-domestic item. The exception log should have sufficient information to determine whether SFA decision to purchase non-domestic food was due to significantly higher cost of the domestic alternative food or the domestic alternative food is not available in sufficient and reasonably available quantity. Please refer to the state prototype Buy American exception log which will be available soon on IA_CNP.</p> <p>Specifications provided with the formal proposal for food and dairy included many brand name items. The specification list appeared to be one more of a vendor order list. If for items, the SFA requests pricing only for brand products, there should be a process on how these were selected to keep the procurement competitive.</p> <p>No component contribution per serving size was listed for meat/meat</p>
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		<p>alternates and combination foods, whole grain-rich products did provide vendors adequate information of USDA requirements - see USDA memo SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program, products were not grouped by category such as dairy, bread, supplies, frozen. Refer to state agency <i>Official Pricing Spreadsheet</i> template in Excel in download forms on IA_CNP.</p> <p>Some products showed an estimated annual usage of just one case. FSD stated she included these products so that if she were to use these items during the school year then she would get "school pricing" from the vendor. TA provided to include language in solicitation related to adding new products as new products become available, products are discontinued and alternate products are added. Refer to state agency RFP template.</p> <p>The solicitation document states vendor to provide usage reports monthly. Vendor has not provided these reports and FSD has not followed up with vendor to get these. The statement may need revision to request usage reports quarterly, semi-annually, or annually.</p> <p>The vendor has not provided weekly produce pricing and pricing for items which are not guaranteed by manufacturer through June 30, 2019 (end of current school year). Produce pricing could not be validated. The FSD will work with vendor to get weekly produce price list as well as monthly prices for items with no guarantee pricing through the end of school year. The weekly produce and monthly price list will be maintained with bid price list.</p>
700 - Resource Management	712 Were indirect costs* charged to the SFA's nonprofit school food service account?	SA provided technical assistance on allowable and unallowable direct charges to the nutrition account.
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?	SFA was instructed to keep training documentation that demonstrates that Confirming and Hearing Officials complete yearly USDA Civil Rights training at minimum.

Site - Level Technical Assistance Wayne Elementary School (0418)

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	SA strongly encourages SFA to implement OVS for grades PreK-2 at the elementary school to match the rest of the population. While on site SA observed substantially more food waste among the PreK-2 population. Waste that would decline if students were allowed to decline components. Additionally, if students are serve only they must take milk for the meal to be reimbursable even if they do not want it. That also increases food waste and by extension cost to the program. Most troubling, during on site observation SA observed a first grade student who did not want one of the meal components. Because PreK-2 students are serve only his tray had to include the component to be reimbursable. As a result the student spent the entire lunch period crying and did not eat a single bite of anything on his tray. Situations like this can be avoided entirely if students are given the opportunity to decline items that they do not want. Additionally mixing serve only and OVS presents challenges for training of nutrition staff and challenges for monitoring for a reimbursable meal.

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1400 - Food Safety	1411 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	Produce items from Mexico were observed in storage. SA offered technical assistance on keeping a log to document any non-domestic agricultural products that are received from the vendor.
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Org - Level Commendations

Description
<p>CERTIFICATION AND BENEFIT ISSUANCE: • Documents are well organized and were error free. • 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.</p>
<p>CIVIL RIGHTS: • The correct public release was sent to a local media outlet and published. • The SFA provides forms in other languages as needed for Limited English Proficient households including income applications, verification information and the negative balance policy. • The SFA works closely with the school nurses, students and families to ensure that all students have their special dietary needs met. • Diet modification forms are completed and on file for students with special dietary needs, including special menus. • 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 in all cafeterias. • 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.</p>
<p>COMPETITIVE FOODS: • Nutrition calculator printouts are on file for all a la carte foods and beverages and vending machine items sold. • All competitive foods sold during the on-site review meet the Smart Snack requirements.</p>
<p>FISCAL ACTION: Potential fiscal action for this review is less than the allowed USDA disregard.</p>
<p>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 temperatures for the dishwasher are also monitored and recorded. • The food safety inspection report is on display in a public location. • The food service director emailed the health inspector requesting a 2nd inspection. • The SFA's HACCP plan is available at each site. • The food service director, head cooks at each site and many food service staff are ServSafe certified. • Good food safety practices were observed while SA was on-site. • Foods are stored properly.</p>
<p>MEAL COUNTING AND CLAIMING: • The point of service line for breakfast and 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 breakfast, lunch and snack meals observed. • The edit check reports matched the claim. • The day of review meal counts were reasonable with the review period counts.</p>
<p>MEAL PATTERN AND NUTRITION QUALITY: • The menu offers a variety of vegetables, fruits and entrees. • The cafeteria has many posters encouraging healthy foods and activity. • Signage is made available informing students of how the menu constitutes a reimbursable meal. • The breakfast menu provided during the review period met the daily and weekly meal pattern requirements for all grade groups. • The lunch menu met the daily and weekly meal pattern requirements for fruit, grain, 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 3 different and approved types of milk to students. • The food service director completed the menu certification worksheets. • Free, potable water is available for students during their meal times.</p>
<p>ON-SITE MONITORING: • On-site monitoring forms have been completed for all sites in the district for lunch. • On-site monitoring forms have been completed for 50% of the breakfast sites.</p>
<p>PROCUREMENT: The Food Service Director attended State Agency Regional Procurement Training in Corydon. The procurement review period was SY 2017-2018, therefore, vendors paid using nutrition fund from previous school year were selected to review compliance with procurement regulations. Two vendors were selected for review of compliance with the micro-purchase method. Each transaction with the vendor was below the micro-purchase threshold (\$3,500 for SY 2017-2018). The School Food Authority (SFA) collaborated with the FFA program to raise hogs (given to the school district) which were slaughtered and processed into pork patties for use in the district's school meal programs. The small purchase method was used for the purchase of cafeteria bench and swivel chair seat combinations in a booth banquet arrangement as well as a three compartment waste receptacle. The correct procurement method was used for this purchase. The FSD contacted the Prison Industries and conducted price comparisons online before selecting the vendor. A review of invoice validated the items solicited were purchased. The formal procurement method- Invitation for Bids (IFB) method was used for Prime Vendor for food (including bread and milk) and non-food supplies, small wares, and chemicals. Public notification was issued in the Des Moines Register. In addition, the solicitation was mailed to each vendor via certified mail return receipt requested. The Prime vendor contract included most of the required federal terms and conditions including the Buy American Provision. A review of the invoices validated that invoice pricing matched bid pricing for items whose pricing was guaranteed through end of the school year. The School Food Authority did not and does not participate in the USDA Foods - Diverted Foods program, the SFA used the Planned Assistance Level (PAL) to the Direct Distribution (Brown Box) and DoD Fresh Programs. The FSD did an excellent job utilizing all the allocated PAL and some more (102 percent).</p>

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<p>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.</p>
<p>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. • The SFA has a negative balance policy to address negative student lunch accounts. • 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. • 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.</p>
<p>SCHOOL BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM OUTREACH: • Families are informed of the school breakfast program and the Summer Food Service Program through the district's website, social media and school announcements.</p>
<p>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 is made available to members of the public via post on the district's website. • The general public is invited to participate in the wellness committee.</p>
<p>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 applications selected for verification were confirmed and signed to show that the original eligibility status was determined correctly.</p>

Site - Level Commendations Wayne Elementary School (0418)

Description
<p>Civil Rights: The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.</p>
<p>Food Safety: A copy of the written food safety plan was available on site. • The latest Health Inspection Report was posted in a publicly visible location. • Temperature logs are maintained for all coolers-including milk coolers, freezers, refrigerators and for the dishwasher. • Food temperatures are recorded on the daily food production record. • Good food safety procedures were observed. • Opened food products were labeled and dated. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Staff are ServSafe certified. • Lunchroom supervisory not directly associated with the food service program were observed following food safety procedures by wearing gloves when helping students in the lunchroom.</p>
<p>General: Lunchroom was well supervised and school administration was actively involved in maintaining order and cleanliness in the cafeteria.</p>
<p>Meal Counting and Claiming: The Point of Service is at the end of the line and students tell the POS operator their unique number which is entered into a computerized system. • 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. • Point of Service 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. • Cashiers are trained and appeared aware of what constitutes a reimbursable meal. • Edit checks are performed.</p>
<p>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. • There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at breakfast and lunch.</p>
<p>Water: Free potable water is available to all students for lunch.</p>