

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Beckman High School (69618146)**  
**March 13-14, 2019**

**Program Year:** 2019  
**Month of Review:** December  
**Lead Reviewer:** Sandra Fiegen  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Of the 49 eligibility determinations made, 12 were incorrect. Income was incorrectly determined for several, and five eligibilities were awarded without current year documentation.	The application errors are listed on the attachment in this corrective action. For each student, please indicate when the missing information was obtained and/or the eligibility status change made. Because the number of errors in the processing of applications or awarding eligibility were greater than the threshold, an independent review of applications must be completed each year until the error rate is greatly reduced. The memo indicating the steps to take to conduct an independent review of applications is attached to this corrective action. If there are additional steps that you will take to increase accuracy in the eligibility process, please indicate them in the corrective action response below. This will include training conducted/received by persons responsible and other oversight activity.	
700 - Resource Management	V-0700	The net cash resources in the foodservice account exceed three month's expenses.	According to financial management guidelines, the foodservice account cannot maintain a balance of more than three month's average expenditures. Please contact the Administrative Consultant at the Bureau of Nutrition Programs to determine how to create and submit a spend-down plan. In your corrective action response, please indicate when you contacted the Administrative Consultant to begin working on the plan.	
700 - Resource Management	V-0700	Some expenses paid from the foodservice account as direct expenses and not allowable as direct expenses. An indirect cost pool must be established to pay any allowable cost that is not solely a direct expense to foodservice.	At the time of the review, guidance on direct versus indirect expenses and allowable expenses was left with the foodservice director and the business manager. In your corrective action response, please indicate how you will examine each expense that has been attributable to the foodservice department and determine if they meet the criteria of allowability, and determine if they can be paid directly or need to be paid indirectly.	

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1100 - Smart Snacks	V-1100	Food and beverage items sold by student groups do not meet the Smart Snack criteria. Regardless of whether the foodservice department is selling items or if the items are sold in another place in school building, the items must be compliant. On a recent holiday, full-sugar pop was sold to students to give to another student. Because the school is a 7-12 grade building, sales must meet the criteria for the youngest students. This is a repeat finding.	For more information on compliance with food and beverage sales throughout the building and during the full school day, see information under 'nutrition guidelines' at <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-wellness">https://educateiowa.gov/pk-12/nutrition-programs/school-wellness</a> and <a href="https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/smart-snacks-school">https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/smart-snacks-school</a> . In your corrective action, please list all student groups who conduct sales to other students, the name of the teacher or group's adult supervisor, and the items that they will sell at some time in the year. All adults who make decisions about food or beverage sales to students during the school day must notify the administrative office as to what, when will be sold, and must complete the nutrition calculator for the items prior to sale. The administrative office must maintain the information on who, what, when was sold in the year.	
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**Site - Level Findings: Beckman High School (8146)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	On the day of review, the grain/bread minimum requirements were not met in the offered meal. The chicken tenders had 1 ounce equivalent per serving and the cookie contained 1/2 ounce equivalent. Each high school meal offered must contain at least 2 ounce equivalents. Also, in review week, insufficient grain is planned on chicken nugget day, and insufficient legumes planned in week (less than 1/8 cup per student). All of these are repeat findings. Meal reimbursement for Monday, March 11 cannot be claimed.	In your corrective action reply, please provide a full month's (four weeks) April menu complete with serving sizes, recipes, labels, and the menu templates that demonstrates your ability to plan correct lunch meals for 7-8 and 9-12 grade students. Various types of labels may need to be sent including Child Nutrition labels, ingredient statements, and nutrition facts labels. In lieu of providing a Child Nutrition label for a combination food item, a product formulation statement may be sent. for more guidance on Child Nutrition labeling and product formulation statements, see <a href="http://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program">http://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program</a> . Recipes must be complete with accurate serving sizes, crediting information and must correspond to the menu template information regarding how it counts in meeting meal pattern requirements. In addition, Please complete the meal planning template for each week of April and attach to the corrective action. A blank template is attached here for your use. Also, provide meal count documentation that shows the number of meals that will not be claimed for March 11.	
400 - Meal Components and Quantities -	V-0400	Meals planned for the review week did not contain 2 ounce equivalents of grain/bread. On the chicken nugget meal, only 1/3 cup of	In a separate corrective action, the school is required to submit menus and supporting documentation for the month of April that proves the minimum grain and	

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Lunch		macaroni plus 1 ounce equivalent of grain in nuggets was offered. Also, insufficient dried beans/peas vegetable subgroup was planned. Chili is the only meal item that contains a legume in the week, and only 1/8 cup legumes were planned per student. These errors are repeat findings, and fiscal action will be assessed.	vegetable subgroup requirements are offered in each reimbursable meal. Additional corrective action is not required in this area.	
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**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		The original contract for the AEA coop was not included in documentation, and information regarding activity to contact vendors in the bread and milk bids was not complete either. Please see the directions and information included in 'three bids and a buy' in download forms for documenting small informal contracting, and the attachments in download forms for conducting formal bids. The procurement letter sent to the school to help them gather items also includes the list of minimum documentation that must be maintained for each contract according to type, and should be kept to help you gather and maintain this information.
700 - Resource Management	700 Did the SFA have the ability to accurately track all revenues and expenditures for the nonprofit school food service separately from all other transactions?	At the time of the review, the ICaves Financial Report was viewed with the business manager and food service director. The resource available in download forms to assist in completing the financial report was explained and the school is encouraged to use this tool to track the financial health of the foodservice account. The report also indicated that adequate revenue is generated in nonprogram foods.
700 - Resource Management	706 Did the SFA use the USDA Paid Lunch Equity Tool or a comparable mechanism to evaluate its need to raise its paid lunch prices?	Because the school has a positive balance in the foodservice account, the full pay student meal price does not need to be determined using the PLE tool. See the waiver information sent by the Lead Consultant for more information.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Encouraged foodservice having a copy of all 'accommodating students with dietary needs' forms. At this time, several students are identifying that they have a lactose intolerance, and juice was given as a free beverage substitute. We discussed that juice is not nutritionally equivalent to milk, and students must be offered a lactose or dairy free milk equivalent, or they can purchase a juice, or they can drink water.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	Currently, the racial and ethnic data is not collected correctly. At the time of the review, it was explained that these are separate questions (as illustrated on page 2 of the income eligibility form). Each person needs to be determined as Hispanic or not, and then as to their racial status.

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1000 - Local School Wellness Policy	1005 <i>Provide a copy of the most recent assessment on the implementation of the local school wellness policy.</i>	Assessment completed does not actually assess the policy goals. At the time of the review, we identified and discussed the actual goals, and how to use the tool to assess these goals. We also discussed where the assessment could be posted or how distributed to the school community.
1200 - Professional Standards	1204 a. Did the School Nutrition Program Directors meet the training requirement?	School foodservice director must complete 12 hours of training each year. At the time of the review, the training tracker information indicated that the director had completed some but that more was needed. The foodservice director is encouraged to complete more training concerning the meal pattern, offer versus serve, and label reading.
1200 - Professional Standards	1209 Did the employees that work outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program receive training applicable to their duties related to the program?	The school business manager and administrative staff complete foodservice duties that include supervision of students in cafeteria and foodservice account management, as well as involvement in meal eligibility activities. The business manager has completed training in related areas, and is encouraged to give the information as to number of hours, topic and date to the foodservice director to be included in the training tracking log. Administrative staff must receive annual training in food safety, civil rights and other related areas as part of their duties of supervision. The hours of training must be completed prior to the end of the year and added to the training tracking.
1500 - Reporting and Recordkeeping	1501 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	We discussed maintaining and using the most recent market basket of food items available for purchase in the coop. All market basket updates must be on file either electronically or printed, to be used in regular monitoring activity.

**Site - Level Technical Assistance Beckman High School (8146)**

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	During the observed meal, a 1/2 cup scoop was used for both the fruit and the vegetable. In order to accurately offer students a full component, the person serving the fruit and the vegetable must ask them if they want 'one or two' scoops of each item. The school is encouraged to allow students to self-serve as many fruit and vegetable items as possible, and there needs to be signage to indicate that one full cup of fruit and one full cup of vegetable can be taken as part of the meal.
400 - Meal Components and Quantities - Lunch	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	As noted in prior TA, Juice cannot be substituted for milk.
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?	The printed weekly menu is used as a point of service signage, and does not include information about the salad bar (when the salad bar is offered before the point of service and therefore can count), and did not include the cookie that was served on the day of review. The printed weekly menu also does not contain the advice to students that they must take 1/2 cup of fruit or vegetable at a minimum. There was a sign by the fruit and vegetable that indicated this need. The school is encouraged to think of this signage requirement as a way to market the meal to students, and it must include all items every day.
600 - Dietary Specifications and Nutrient Analysis	605 Based on the Nutrient Analysis, did the school meet the Dietary Specifications (Calories, Saturated Fat, Sodium, and Trans Fat) for the appropriate age/grade group being served?	During the onsite portion of the review, a lengthy conversation was held regarding the variety of food components and items that are included in reimbursable meals. Several suggestions were given to increase the

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	Select N/A if the site is "Low Risk"	variety, including ideas for alternate main entrees. Currently the variety of fruit and vegetables as well as main entrees is very restricted, and it was suggested that only the things that all students like are planned. Several menus include only one fruit and one vegetable offering. The school is highly encouraged to offer at least 2 fruit and 2 vegetable items each day, and to increase variety overall. When servings are restricted, it becomes difficult to meet the vegetable subgroup plan as well, and this is evident with the repeat corrective action that was required.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	The dishwasher temperature gauge is not functioning and is approximately 20 degrees off. The logs used to monitor acceptable end rinse temperature did not reflect an accurate temperature. The school is encouraged to use interior temperature test strips to record a sanitizing final rinse is attained.

**Org - Level Commendations**

Description
At least two types of milk are offered.
Many homemade food items are menued, including homemade pizza.
Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of December were accurate and complete.
Students had a sufficient amount of time to eat after receiving meals.
The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided food service staff and documented.
The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined.
The district has a current wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.
The latest Health Inspection Report was posted in a publicly visible location. There were no critical areas noted on the report.
The SFA effectively utilizes its USDA entitlement for commodities.
The SFA has a 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.

**Site - Level Commendations Beckman High School (8146)**

Description
please see organization level commendations.

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