Bureau of Nutrition and Health Services

State Review Summary Report

South Tama County Comm School District (60980000)

March 14-15, 2019

Program Year: 2019
Month of Review: March

Lead Reviewer:Shea CookOrg Representative(s):Sandra Jantzen

Org - Level Findings

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|---|-------------|---|---|----------------------------|
| 1000 - Local School Wellness Policy | V-1000 | Under the final rule of the Healthy, Hunger-Free Kids Act school districts are required to make the results of triennial assessments available to the public. | For your response please provide a link to the webpage where the wellness assessment has been made available to the public. | |
| 1200 - Professional Standards | V-1200 | SFAs must have a system in place to track yearly training hours. Training logs should include employees name, position (director, manager, full time staff, part time staff, etc.), title of training, training topic, date of training, and number of creditable training hours. | For your response, please attach a completed tracking tool that includes all professional development hours for all staff for the current 18/19SY. | |
| 1200 - Professional Standards | V-1200 | Employees outside of school nutrition serve as the verifying and hearing official. There is no documentation that shows that these individuals have completed civil rights training. | For your response, please submit documentation that demonstrates that the identified school employees outside of the nutrition program who have duties within the nutrition program have completed civil rights training. In addition, please indicate who will be responsible for making sure that these individuals complete the required training on a yearly basis. | |
| RMCR - Revenue From Nonprogram Foods | V-RMCR | Nonprogram foods are defined as any food sold during the school day that is not part of a reimbursable meal to a student. Provision 206 of the Healthy Hunger Free Kids Act requires that nonprogram foods raise revenue sufficient to cover the costs of the food. The financial report on lowaCNP indicates the district is not currently raising enough revenue from the sale of its nonprogram foods. | For your response please complete and submit the nonprogram revenue tool. If the tool indicates that additional nonprogram revenue is needed please describe your plan to increase nonprogram revenue. | |

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Site - Level Findings: STC Elementary (0439)

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|------|-------------|---------------------|----------------------------|----------------------------|
| | | | | |

Org - Level Technical Assistance

| Area | Question | Comments |
|---------------------------|----------|---|
| 700 - Resource Management | | SFA should continue to update their written procurement plan on a yearly basis. Technical Assistance for Procurement was given in the following areas: |
| | | Micro Purchase: |
| | | · TA was not needed in this area. SFA uses the micro-purchase method minimally and follows all requirements. |
| | | Small Purchase: |
| | | Guidance was given on writing more specific product specifications in price request documents including but not limited to size, nutritional information, delivery expectations, etc. |
| | | · SFA was advised that vendors should be given a minimum of 4 weeks to respond to a request for pricing. SA encouraged SFA to exercise best practice of at least 6 weeks response time. |
| | | · SA was reminded that a number of terms and conditions must be included on requests for pricing including Buy American, debarment statement, termination for cause and convenience, equal opportunity, small business, etc. SA encouraged the use of state prototype Three Bids and a Buy form to make sure terms were included as required. |
| | | SA reminded SFA to keep a copy of all documents associated with the procurement of goods in the nutrition program including any communications with local merchants, even if there is no response. No response should be noted on materials and they should be saved. |
| | | Formal Purchase: |
| | | SFA does exercise contract management by price checking invoices. SFA was encouraged to continue price checks and to include a variety of food and non-food items from the bid in those checks. SA clarified that Keck does not need to be included in list of formal |

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| | | procurements. SA provided SFA with a list of known bread and milk vendors to send RFPs to. As with many schools in the state, SFA struggles to receive more than one response for milk and bread bids. SA reminded SFA to keep a copy of all documents associated with the procurement of goods in the nutrition program including escalator letters for milk contracts and updated monthly price lists. |
|--|---|---|
| 700 - Resource Management | | SA recommends SFA update their negative balance policy. Update should include twice yearly notifications and should reflect actual practice. |
| 800 - Civil Rights | 803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs? | SFAs must have a written procedure in place for receiving civil rights complaints. At minimum the procedure should include whether an allegation is made verbally or in person, the person receiving the allegation must transcribe the complaint; procedures for receiving a complaint cannot prevent a complaint from being accepted; outside agencies forwarded complaints must be identified; procedures must not indicate that there was an attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Individuals with a complaint may be directing to the following website - www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer. |
| 800 - Civil Rights | 807 a. How does the SFA collect racial/ethnic data? | SA offer guidance on completing USDA racial ethnic form. |
| 1000 - Local School Wellness Policy | 1005 Provide a copy of the most recent assessment on the implementation of the local school wellness policy. | Wellness policy assessments should be done at each individual building. It is the expectation that individual building assessments will be in place at the next Administrative Review. |
| 1600 - School Breakfast and SFSP Outreach | 1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements? | SA encourages additional summer outreach. Free outreach materials in English and Spanish can be found at http://bestpractices.nokidhungry.org/programs/summer-meals/promote-summer-meals#summer-meals-outreach-resource-toolkit. |

Site - Level Technical Assistance STC Elementary (0439)

| Area | Question | Comments |
|------|---|---|
| | serving period on all meal service lines? | During meal observation SA observed teaching staff supervising in the lunchroom sending students back for milk. STC Elementary is an Offer vs Serve school and students are not required to take a milk as part of a reimbursable meal. Food service staff indicated that they have instructed the staff supervising the lunchroom that students are not required to take milk, but their instructions have been disregarded. Meal observation indicated that nutrition staff have a very good understanding of what constitutes a reimbursable meal under Offer vs Serve as no non-reimbursable meals were observed. Supervising staff in the lunchroom should not instruct students to return to the serving line for additional items. |

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| | | It confuses the students, it creates backup in the serving line that results in slower service, and their instructions do not follow regulation. |
|--------------------------|--|---|
| 500 - Offer versus Serve | 501 Has the cafeteria staff been trained on Offer vs. Serve? | SA recommends additional training on OVS for breakfast. |
| 1400 - Food Safety | , | During observation a member of the teaching staff was observed walking through the kitchen behind the serving line during meal service to use a microwave to heat their personal lunch. Only nutrition staff members should be behind the serving line due to sanitation and safety concerns. |

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. • 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. 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. 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.

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. • Administration at each site is informed of the Smart Snack regulations to ensure that vending items are compliant.

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 SFA's HACCP plan is available at each site. • The food service director, head cooks at each site and most food service staff are 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 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 and lunch meals 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 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, 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 4 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.

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.

PROFESSIONAL STANDARDS: 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.

RESOURCE MANAGEMENT: 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. • Records are kept for 3 years plus the current year.

SCHOOL BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM OUTREACH: Families are informed of the school breakfast program and the Summer Food Service Program through school announcements and newsletters.

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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. • An assessment of the wellness policy has been completed and is on file.

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.

FISCAL ACTION: There is no fiscal action for this review.

Site - Level Commendations STC Elementary (0439)

Description

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

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. • Digital thermometers are used. • 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.

Meal Counting and Claiming: The Point of Service is at the end of the line and students punch their unique number into a key pad or give POS operator a meal card with a unique barcode. • Meal counts during the on-site review were reasonable when compared to the review month counts. • Meal count totals for the month of February 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.