

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Denver Comm School District (17190000)**  
**Date of Review: January 22<sup>nd</sup> – 25<sup>th</sup>, 2019**

**Program Year:** 2019  
**Month of Review:** December  
**Lead Reviewer:** Donna Matlock  
**Org Representative(s):** Kendra Knowles

**Site - Level Findings: Denver Senior High School (0109)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	All meals observed on the day of review counted for reimbursement did not contain all of the required meal components. As indicated in site application; POS (Point of Service) is at the beginning of the line and food service staff will check trays to ensure that all meals are reimbursable when students leave the line. <i>7 students walked away without the minimum 1/2 cup fruit or vegetable.</i>	Provide a plan describing how meals will be adequately monitored to ensure all meals are reimbursable. SA recommends having POS at the end of the line if possible for cashier to monitor trays.	

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	SFA is not fully utilizing current school years allocated funds supported by USDA Foods. SFA has only allocated 45.67% of funds towards foods for meals with \$19,920.00 remaining for	Contact Sarah White, USDA Consultant, to set up a plan to spend down funds. Describe in a plan how SFA will incorporate ways to utilize USDA dollars moving forward. Please include date when SFA contacted Sarah White to set up a	

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	usage. <i>Last school year, 2017-2018, SFA only utilized 56.30% leaving a balance of \$15,502.00 to spend.</i>	plan. <i>Utilizing these funds provides SFA's with additional funds to improve the quality of foods, salaries, equipment &amp; operations for an improved environment &amp; morale.</i>	
	To support school nutrition programs the State requires SFA's to utilize USDA funds to its fullest capacity up to 100% usage.		

**Org - Level Technical Assistance**

<b>Area</b>	<b>Question</b>	<b>Comments</b>
100 - Certification and Benefit Issuance	110 Does the SFA use the direct certification notification letter provided by the State agency?	SFA indicated families on direct certification are not notified with letter. SA discussed notification is required to share all information and process of whether a family chooses to decline benefits.
1000 - Local School Wellness Policy	1002 When and how does the review and update of the Local School Wellness Policy occur?	Discussed with SFA that USDA requires a review and assessment of LWP (Local Wellness Policy) goals every three (3) years. SFA will need to update LWP to indicate three years rather than five years.
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?	Discussed with SFA that USDA requires all schools to promote the SFSP (Summer Food Service Program) regardless if participating or not.
RMCR - Revenue From Non-program Foods	6 Did the SFA assess its compliance with the Revenue from Non-program Foods requirements?	SFA needs to examine the non-program (a la carte, adult meals, 2nd entrée/milk, catering, vending) food costs & revenue. Non-program revenue (10%) is not adequately contributing to the non-program food costs (19%) indicating price increases are necessary.  SFA can go to this link <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-meals/administrative-reviews/preparing-review">https://educateiowa.gov/pk-12/nutrition-programs/school-meals/administrative-reviews/preparing-review</a> , scroll down to "Resource

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		Management" to access Non-Program reporting requirements and handouts.
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**Site - Level Technical Assistance Denver Senior High School (0109)**

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	325 a. For the review period, complete S-1, 17.	SFA consolidates meal counts by age groups; K-5 + 6-12th. Error in addition occurred by manually adding both edit check reports for a total meal count under one site.
400 - Meal Components and Quantities - Breakfast	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	All components were available for breakfast; however, 1/2 cup of fruit was available. Discussed with FSD that 1 cup needs to be available if students decide they want a cup.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	SA found some technical errors on certification worksheets which was discussed during visit.

**Org - Level Commendations**

Description
<ul style="list-style-type: none"> <li>• Benefit documents, as well as all paperwork, were very well organized.</li> <li>• 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.</li> <li>• The correct and current benefit issuance list was available.</li> <li>• All applications were correctly determined, signed and dated by the household member and the SFA, were complete with SSN's and case numbers, and all applications were determined within ten days.</li> <li>• Income was only converted to annual when there was more than one frequency of income.</li> <li>• Rollover applications were removed if the household did not apply within thirty days of the school year.</li> <li>• Access to benefit information is correctly limited.</li> <li>• Free meals are extended to all members in the household.</li> <li>• Waivers are provided to applicants and indicate specific fees.</li> <li>• Eligibility is kept confidential.</li> <li>• The SFA has a back-up system for benefit issuance documents and system.</li> </ul>
<ul style="list-style-type: none"> <li>• 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.</li> <li>• Point of Service (POS) counts and filed claims appear accurate.</li> <li>• Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.</li> <li>• Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period.</li> <li>• Cashiers are trained, and daily edit checks are performed.</li> </ul>

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• The correct number of applications were verified and were correctly selected from error prone applications. • All income sources were verified with at least one month’s income, and the process was completed on time. • The application(s) selected for verification were confirmed prior to verification. • The SFA had at least one person attend training. • The verification report was completed accurately and on time.

• The district has a current wellness policy on file. • The SFA’s wellness policy was reviewed and revised on August 9, 2017. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. • The wellness policy are available to the public via district website.

• The Resource Management section of the Off-Site Assessment tool was completed on time. • Financial records that were reviewed, indicated appropriate and allowable expenditures. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. • 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. • Money is not transferred out of the account to support other programs. • Reports are filed on time, and all records are maintained for at least three years plus the current year. • The SFA developed and approved a meal charge policy. The policy was mailed (emailed) to all households and staff were informed of the policy.

**Site - Level Commendations Denver Senior High School (0109)**

**Description**

• The “And Justice for All” civil rights poster was posted in the cafeteria. • Annual civil rights training was provided to food service staff and documented. • A copy of the district’s public release was on file, documenting that it was submitted to local media. • The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. • Ethnic/racial information is collected and the form is completed. • No discrimination was observed. • SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. • The on-site monitoring forms were completed for 100% of the SFA’s sites for lunch and at least 50% were completed for breakfast prior to February 1st. • The correct state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school’s website.

• The Food Service Director completed the USDA menu worksheets for the week of December 3rd-7th for breakfast and lunch at Denver Senior H.S. The worksheets showed the serving portions and component contributions meeting the meal pattern. • The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated the school is at low risk for (non)compliance 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, offering some reduced-fat, low-fat and fat-free salad dressings, 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.

• The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat. • 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. • Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer’s Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and

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vegetables encourages student consumption. The SFA provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal. • Standardized recipes are used for food production. • Free potable water is available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)? • Offer vs. Serve (OVS) was being implemented properly. Students have the option to decline any one or two of the five components. • At least two types of milk are offered. • Many low fat and low sodium food items were observed in storage. • Students had sufficient amount of time to eat after receiving meals. • Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch. A monthly menu is also posted. • Food service staff was polite and respectful to students, other staff, and each other. • Nutrient analysis was not required.

• The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events, and specifications were well-written and comprehensive. • The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. • IFBs and RFPs are advertised. • All bids include a Buy American Provision. • The SFA ensures that no vendors have been debarred or suspended by USDA.

• The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. • The latest Health Inspection Report was posted in a publicly visible location. • Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Good food safety procedures were observed.