

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Sioux Center Christian School (60308314)
On-Site Review Dates: March 5-7, 2019

Program Year: 2019
Month of Review: January
Lead Reviewer: Deann Murphy
Org Representative(s): Nancy Bonnema

Site - Level Findings: Sioux Center Christian School (8314)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The review week menu provides an inadequate quantity of the Meat/Meat Alternate (M/MA) component for the week for K-5 graders and an inadequate quantity of the grain component for K-5 graders on one day.	The SFA will describe to the State Agency how they will ensure that adequate quantities of M/MA and Grains are served to all students to meet the minimum quantities offered for the day and for the week. Specifically, the SFA will use the review week menu to describe how they will increase the amount of M/MA to K-5 graders to the minimum required 8 oz. eq. M/MA for the week. Also, describe how they will increase the amount of Grains to the K-5 graders on Friday (Chicken Nugget meal).	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1400 - Food Safety	V-1400	There are no Standard Operating Procedures (SOPs) in the SFAs HACCP manual explaining exactly how staff should complete various food safety tasks.	The FSD will submit a table of contents showing a list of her updated HACCP manual's SOPs. Also, the FSD will submit 3 of the SOPs she has put into her manual.	
RMCR - Indirect Costs	V-RMCR	Currently, the SFA is paying for indirect costs incorrectly. They pay a percentage of utility, garbage, support staff time and benefits, etc. instead of applying an approved indirect cost rate to the approved direct cost base.	The SFA will describe how they will properly pay for indirect costs for the rest of SY2018-19 and in the future. If possible, the SFA will provide documentation showing their corrected indirect cost calculations. At the end of SY2018-19, the SFA will need to recover any funds charged inappropriately to the school foodservice account.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The SFA has net cash resources exceeding the allowed amount of 3 months operating expenses. They do not have a plan approved by the State Agency to spend this down.	The SFA will submit their plan as to how they intend to spend down their net cash resources to no more than 3 months worth of operating expenses. Their plan should show specifically how they plan to spend down their balance and a timeline in which this will happen. For example, if they intend to purchase equipment, the SFA needs to state what equipment they plan to purchase, give an approximate cost of each piece of equipment and state when they plan to purchase this equipment. All purchases need to be allowable	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Sioux Center Christian School (60308314)
On-Site Review Dates: March 5-7, 2019

			when using funds from the non-profit School Foodservice Account.	
--	--	--	--	--

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?	When using ICAVES, the SFA should use the appropriate tab that reflects the income frequency the household gives instead of changing all income to an Annual frequency. For example, if the household reports only monthly income, the SFA should use the monthly tab to determine income rather than the Annual tab. This increases accuracy in determining applications. The FSD was shown the web-based ICAVES which won't work unless the correct frequency is used.
100 - Certification and Benefit Issuance	141 Does the SFA account for benefits that have been extended to students living in a household that is receiving SNAP, TANF, or FDPIR benefits?	The State Agency assisted the SFA in obtaining access to Direct Certification. Students found in E-Lookup that qualify for free benefits should be given those benefits within 3 days and households should be notified of the change with an opportunity to appeal the change.
700 - Resource Management		Procurement: Much TA was provided to the FSD regarding procurement including the need to specify where disciplinary actions can be found in the Code of Conduct. Also, reviewed the findings from the on-site procurement review, the 3 Bids and a Buy template and the No Bid form found in Download Forms on IowaCNP, and gave the SFA assistance in developing their 2019-2020 Procurement Plan. Regarding on-site procurement findings: Micropurchases: When spreading different procurement events equitably, do this by procurement event. For example, spread food purchases equitably amongst 3 vendors. Also, spread office supply purchases equitably amongst 3 vendors. Small purchases: The SFA needs to start the procurement process by sending their detailed specs to 3 vendors. All records need to be kept on file for 3 years + current year. The SFA must take the lowest price quoted unless the SFA has documentation showing that vendor is neither responsible or responsive. Formal Purchases: All records pertaining to the AEA Purchasing contract, including the original disk sent to the SFA need to be kept for 3 years + the current year. USDA Foods: The SFA used only 76% of their USDA Foods entitlement dollars in SY2017-18. The goal is to use at least 95% of these funds annually. The SFA has signed up for and been accepted to participate in DOD for SY2019-20. They are doing better in SY2018-19, having already used over 100% of their allowed entitlement.
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	The SFA needs to send their Public Release to their local media prior to the beginning of each school year. The media does not need to print it and the SFA is not required to pay for it, but documentation should be kept showing that the SFA has submitted it as required.
800 - Civil Rights	810 Review program materials.	All materials posted or sent to households regarding the Child Nutrition

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Sioux Center Christian School (60308314)
On-Site Review Dates: March 5-7, 2019

		Program need to have the non-discrimination statement on it. The menu may list the shortened statement, "This Institution is an Equal Opportunity Employer."
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?	The Local Wellness Committee needs to include stakeholders from the following areas: School Board, Administration, Foodservice, PE, RN, parent, student, community. The committee should meet at minimum every 3 years to review both the wellness policy and the assessment. Both the policy and the assessment need to be dated and made available to the public. The assessment needs to assess the policy goals actually listed in the policy. Currently, the SFA needs to expand their wellness committee, date and update the assessment and make it available to the public.
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?	The 3 non-nutrition staff who assist with the National School Lunch Program, i.e. the Head of School, the Business Manager and the cashier, need to complete their 4 required hours of Professional Standards training for SY2018-19. Training must be applicable to their duties related to the program. Training must also include Civil Rights. These 3 individuals may complete either group Civil Rights training using Download Form NSLP500 or NSLP501 and complete a sign-in sheet showing they completed the training OR they can read the Iowa Civil Rights manual and each take the quiz available as documentation of the training. All staff must have documentation showing that they completed the training and all training must be tracked. The SFA should designate 1 staff person to track all training and ensure the minimum hours are completed annually. A tracker template was e-mailed to the FSD to use if desired.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	A link to the Iowa State Extension website was shared with the FSD. The link shows templates for multiple Standard Operating Procedures (SOPs). The FSD was encouraged to determine which of them would apply to her program and add them to her HACCP manual. Staff should be trained on these SOPs annually as part of professional development training.
1400 - Food Safety	1403 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?	The SFA routinely procures bananas, pineapple, mandarin oranges, etc. that are non-domestic products. These, and other non-domestic foods that the SFA accepts, need to be logged in an exception log. The log needs to show the name and date the item was accepted, the country of origin and the reason it was accepted. A template for this is currently being developed by the State Agency.
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?	The USDA requires SFAs to help promote the summer meals program. There are templates that the SFA can use on IowaCNP Download Forms that tell households where, when and how they can obtain free meals during the summer months. Promotion needs to be provided to households annually.
RMCR - Nonprofit School Food Srvc Acct	11 If Yes, was the equipment included on an approved State agency equipment list or did the SFA otherwise secure prior approval from the State agency before purchasing the equipment (per FNS Policy Memo SP 31-2014)?	The USDA requires that SFAs that purchase equipment costing over \$5000 either obtain State Agency permission prior to purchasing the equipment or only purchasing items found on the State Agency's approved equipment list which was shared with the SFA on-site.
RMCR - Nonprofit School Food Srvc Acct	13 Did all recorded expenses represent an activity or function recognized as reasonable, necessary, allocable and otherwise compliant with the provisions of 2 CFR 200 Subpart E?	Much discussion occurred between the SFA and the State Agency regarding allowable vs. unallowable costs. The SFA was e-mailed a copy of the Indirect cost guidance manual and a flow chart showing whether to charge costs directly or indirectly. We also discussed that foods that are

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Sioux Center Christian School (60308314)
On-Site Review Dates: March 5-7, 2019

		not compliant with the meal pattern requirements, i.e. non-whole grain rich cinnamon rolls, etc. should not be purchased with school foodservice funds.
--	--	---

Site - Level Technical Assistance Sioux Center Christian School (8314)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	325 a. For the review period, complete S-1, 17.	An upward claim adjustment for January was completed by the State Agency. The claim error was the result a non-systemic math error. The FSD might consider using an excel spreadsheet to compile daily meal counts in order to decrease the risk of human error in the future.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The menu must contain at least the minimum quantities of each of the 5 major components. The FSD was encouraged to consider serving the standard portion of each entrée item so that all quantities are met for all age groups. The Food Production Records should clearly show the practical portion that is to be served for each food item, i.e. 1 slice of pizza, 1 bun, 1/2 apple, etc. instead of 2 oz pizza, 2 oz bun, etc. All processed and/or mixed entrees need either a CN label or a Product Formulation Statement and all homemade foods that combine 2 or more foods together need a standardized recipe.
Dietary Specifications Assessment Tool - Lunch	14 Other seasonings, such as herbs and spices, are substituted for salt.	Recommend discontinuing the salt based seasonings at the flavor station and remove ketchup from the tables. USDA has mandated that the sodium allowances will be decreasing in SY2024-25. It is difficult to decrease sodium when high sodium seasonings/sauces are provided freely to students.

Org - Level Commendations

Description
Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used. All applications were correctly determined, applications were complete with SSN's and parent signatures and denied applications were correctly determined. Access to benefit information is correctly limited. Eligibility is kept confidential.
Procurement: Micropurchases: The FSD keeps a micropurchase log showing where products were purchased and she is trying to spread purchases equitably. Prices on products purchased were under the federal threshold as required and each purchase made was reasonably priced. Small Purchases: The milk vendor does provide monthly price change updates to the SFA. Invoice pricing matches these prices. Formal Purchases: The FSD keeps all her invoice pricing from Martin Brothers on her computer. She checks her orders for each delivery and spot-checks all invoices for discrepancies with pricing. She keeps track of her rebates and any credits before she pays the bill. The SFA did have a procurement plan for SY2017-18 and a code of conduct on file.
The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The application selected for verification was confirmed prior to verification. The SFA had at least one person attend training.
The district has a current wellness policy on file which is posted on the school website. There are goals in the policy to promote student health, nutrition promotion, nutrition education, and physical activity. The SFA has a wellness committee made up of several stakeholders.

Site - Level Commendations Sioux Center Christian School (8314)

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Sioux Center Christian School (60308314)
On-Site Review Dates: March 5-7, 2019

Description
Meal counts on the day of review seemed to be recorded accurately and were within reason when compared with the review month (January) meal counts. Students were not identified at the POS as Free/Reduced/Paid status. The POS was at the end of the line as approved on the SFA application. Students gave their name to the POS operator in exchange for their meal.
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. Ethnic/racial information was collected and the summary form is completed and on file. No discrimination was observed. SFA on-site monitoring was completed to ensure that the school is meeting program requirements.
The latest Health Inspection Report was posted in a publicly visible location in the cafeteria. Temperature logs are maintained for the coolers-including milk cooler, freezer, both hot and cold food served on the line and the salad bar, and dishwasher. The kitchen and storage areas were orderly and clean. Food Service workers practiced good gloving procedures.
The monthly menu is posted in the cafeteria and the daily menu is posted inside the kitchen with colorful pictures to especially help younger children know what is being offered. There is hand sanitizer both at the cafeteria door and at the POS so students and teachers can sanitize their hands before eating. The SFA has made accommodations that allow students with disabilities an easier time to eat. There is free water with cups available in the cafeteria. The fruit/veggie bar is a popular addition to the lunchroom where students can often choose fresh produce. There is a flavor station in the center of the cafeteria for students to use. Offer vs. Serve is being done correctly. Many low sodium foods were found in the storeroom. The menu's calories, sodium and saturated fat levels seem to be within limits. All students took a fully reimbursable meal during the on-site review. There are food production records available for all meals served. The only a la carte item sold is milk which is allowable for all students.