Iowa Department of Education Bureau of Nutrition and Health Services State Review Summary Report Newton Community School District (47250000) Week of Review: 3/11/2019 – 3/14/2019

Program Year:2019Month of Review:FebruaryLead Reviewer:Jean Easley

Org Representative(s):

Site - Level Findings: Thomas Jefferson Elem School (0454)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1300 - Water		Free potable water is not available to all students for breakfast and lunch at this site.	Describe your plan to offer free potable water.	

Site - Level Findings: Berg Middle School (0218)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1700 -	V-1700	Food Production Records were not	Food Production Records were put into place	
Afterschool		completed daily for the Afterschool Snack	during the on-site review. No further action is	
Snack		Program.	necessary. State your understanding that	
			production records are to be maintained in	
			addition to menu and tally sheets.	

Site - Level Findings: Emerson Hough Elementary School (0432)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1900 - Fresh	V-1900	Documentation of administrative labor	Identify plan to document administrative labor	
Fruit and		must be completed via either a time study	expenses. Submit a copy of the time study/	
Vegetable		or use of a time sheet/time log. FSD	time log for March administrative labor costs.	
Program		currently does not document FFVP		
(FFVP)		administrative labor time.		

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
RMCR - Revenue From Nonprogram Foods		received for nonprogram food sales (10%) does not equal or exceed the percentage	For your response, either complete a non- program revenue tool proving compliance; and/or describe two strategies you have or will be implementing to improve nonprogram revenue percentage.	

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Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	213 If applicable, did the SFA's notice of adverse action contain all required information, including notification of appeal rights?	LETTER of ADVERSE ACTION: Dates on one letter did not give proper dates for appeal and lowering benefits. Technical Assistance reviewed: Give 10 calendar days from date of letter to appeal; the date to change (reduce) benefit may take place the following day, or no later than 2 operating weeks following this date. Additionally, it is recommended to maintain some documentation of how calculations were completed to verify income such as maintaining a copy of ICAVES.
700 - Resource Management		BUY AMERICAN EXCEPTION LOG: SFA has put into practice an exception log reporting any nondomestic agriculture products purchased with CN dollars. Continue and expand training with managers at central kitchens. The Exemption Log should state date, product accepted and reason why they accepted it, i.e. domestic product was not available or significantly higher priced than the non-domestic product.
700 - Resource Management		CODE of CONDUCT: A Code of Conduct which pertains to Nutrition must be in place which include conflicts of interest, accepting items of monetary value, disciplinary actions and financial checks and balances. Technical Assistance shared a template on state agency procurement template.
700 - Resource Management		 PROCUREMENT: The solicitation document for Dairy and Bread includes minimal terms and conditions. Technical Assistance to include terms and conditions - including required - Buy American, Debarment, Termination for Cause and Convenience (\$10,00 or more) and Byrd Anti-Lobbying Amendment (\$100,000 or more). Refer to prototype/templates in Download Forms in IowaCNP for Small and Formal Purchase Solicitation. Documentation: Continue efforts to organize documentation of annual procurement events and maintain a log of micro purchases and small purchases made annually.

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700 - Resource Management		VEHICLE PURCHASE: A vehicle to be used solely by school nutrition was recently purchased. It was presented at the Exit Meeting that a purchase of vehicles for Nutrition should be paid using PPEL funds. This guidance was provided by School Finance at the Iowa Department of Education. Questions should be directed to School Finance. The Indirect Cost Flow Chart from 10.26.18 was shared for guidance in determining what can be charged directly to Nutrition and what can be recovered though indirect costs. Additionally, expenses such as repairs, tires, service and gas are part of the vehicle operation and maintenance function. These should be a General Fund expense. Questions should be directed to School Finance at the Iowa Department of Education.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	COMPLAINTS USDA Civil Rights: Here is the process to be used if civil rights complaints regarding school meal programs. <u>https://www.ascr.usda.gov/filing-program-</u> <u>discrimination-complaint-usda-customer</u>
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	HACCP PLAN: Thermometers are to be calibrated; Begin documentation of thermometer calibration as stated in your local HACCP plan. Written information provided on thermometer calibration.
Area	Question	Comments
Dietary Specifications Assessment Tool - Lunch	22 Portion sizes for condiments (e.g. hot sauce, ketchup, mustard, salad dressing) are controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal.	CONDIMENTS: all food served, including condiments, count towards nutrition and dietary specifications - specifically sodium. The condiment procedure at Emerson was observed to not be an optimal nutrition practice for younger students. FSD should study procedure to ensure condiments are portioned and better controlled. It was observed that young students stood in line after receiving their trays "waiting" for an adult to put condiments on their tray – the result was a shortened time to eat and a sense that condiments were required. Consultant recommended on-site to allow students to sit down and begin eating once they receive their tray and students could raise their hands if a condiment was desired. The overall idea is to give students more time to eat and encourage them to try food before an adult automatically put condiments on their tray.

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Site - Level Technical Assistance Thomas Jefferson Elem School (0454)

Area	Question	Comments
1400 - Food Safety		HACCP: Refrigeration temperature logs are used for the freezers. No freezer logs are found in the HACCP plan. Update both HACCP and site with appropriate freezer log which include guidance of appropriate temperature reference. Corrected during on-site review.

Org - Level Commendations

BENEFIT ISSUANCE: No errors found in review of eligibility applications. On-line applications were offered beginning this school year which is a convenient benefit to households. Direct Certification is downloaded twice monthly as required and documents are maintained. Benefit Issuance and verification documents were well-organized.

CIVIL RIGHTS: posters are posted in cafeterias, annual CR training provided to nutrition staff, SFA submitted annual Public Release to local media. Students with special dietary needs are correctly documented and accommodated. No discrimination observed. USDA and Iowa non-discrimination statements are provided on materials describing program including letters, menus and website.

Description

FFVP: A wide variety of both fresh fruits and vegetables are offered as part of the program, meeting the goal to expand the variety of fruits and vegetables that children experience. Good sanitation practices are in place. Nice integration of the FFVP snack service with standard classroom activities. Terrific support of the program noted by both food service staff and teachers.

FOOD SAFETY/HACCP: SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at sites reviewed. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators.

MENU and NUTRITION: Director does an exceptional job of menu planning. The focus week of the review was found to meet all meal pattern and nutrition requirements. Elementary students have an alternative entrée choice daily. Documentation is properly maintained for CN labels, Product Formulation Statements and Food Production Records are maintained as required.

OUTREACH: School Breakfast and Summer Food Service Program outreach is conducted as required. SFA recently promoted National School Breakfast Week. Summer Food Service Program (SFSP) outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer. Nutrition Department webpage includes helpful information for families, including menus, prices, current diet modification form, wellness information and non-discrimination statements.

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PROCUREMENT: A procurement plan has been developed for school nutrition which includes federal and local thresholds. Plan to review and update annually. SFA is a member of the AEA Purchasing Group. Nutrition Director attended the State Agency training and does an excellent job keeping informed of procurement regulation.

PROFESSIONAL STANDARDS: An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours. Director implements an organized training plan for all working in nutrition. Director regularly attends training offered by State Agency and is a mentor for other directors in the state.

RESOURCE MANAGEMENT: A local Meal Charge Policy is in place and has been shared with households as required. USDA FOODS: Nutrition Director uses 100% (or more, when possible) of using the allotted Planned Assistance Level (PAL) for USDA Food. No fiscal action is required as result of review.

WELLNESS: A local wellness policy is in place. Assessment/Progress Report is posted on website which communicates the policy and a progress report to the public which is required.

Site - Level Commendations Berg Middle School (0218)

Description

AFTERSCHOOL SNACK PROGRAM: Nutritional snacks are offered afterschool as a reimbursable program. During the focus month of February snacks planned meet meal pattern requirements.

Site - Level Commendations Emerson Hough Elementary School (0432)

Description

All meals were observed to be reimbursable. Students are observed to have adequate time to eat meals. Offer versus Serve is handled correctly. Nutrition staff demonstrate understanding of meal pattern requirements and are positive and encouraging to student customers.

Signage showing how to build a reimbursable meal is displayed as required. Nutrition posters and School Breakfast Week promotion is displayed at the serving area.

Site leader is ServSafe certified. Serving area is clean and organized. Proper food safety practices are observed.

Site - Level Commendations Thomas Jefferson Elem School (0454)

Description Nutrition staff are ServSafe certified. All meals were observed to be reimbursable. Students are observed to have adequate time to eat meals. Offer versus Serve is handled correctly. Nutrition staff demonstrate understanding of meal pattern requirements and are positive and encouraging to student customers.

SPECIAL MILK PROGRAM: a reimbursable milk program is offered to preschool students who do not have access to breakfast or lunch.