

**Iowa Department of Education  
Bureau of Nutrition and Health Services  
State Review Summary Report  
Sioux Central Community School District (60350000)  
March 4 – 6, 2019**

**Program Year:** 2019  
**Month of Review:** January  
**Lead Reviewer:** Christine Crow  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One student enrolled at Midwest Christian Services (MCS) was not on the Direct Certification list and did not have an application on file to show that he was free. The student enrolled at MCS on 2/1/2019. Since the student is currently living at MCS, he is a household of one and can complete an income application. TA provided to the determining official on the RCCI applications and documentation. While SA was onsite, the SFA completed the RCCI income application for residential students to verify that the student should be claimed for free. No further action needed.	No further action needed.	
800 - Civil Rights	V-0800	The non-discrimination statements on the website and other program materials must be the current, full USDA and Iowa statements. The website currently has the abbreviated statement which is only acceptable if there is not enough room for the full statement, such as a hard copy of the menu. The full statements can be found on the IDOE Nutrition Programs website: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs">https://www.educateiowa.gov/pk-12/nutrition-programs</a>	Put the full USDA and Iowa non-discrimination statements on your district's nutrition website and submit the link.	
1000 - Local	V-1000	The local wellness policy contains all	Describe when the assessment of the	

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School Wellness Policy		required elements but the progress on how goals are being implemented has not been assessed. The assessment must be conducted at least once every 3 years and be made available to the public. TA on the wellness policy requirements provided to the superintendent.	implementation of wellness policy goals will be completed.	
1600 - School Breakfast and SFSP Outreach	V-1600	Even if the SFA does not offer the Summer Food Service Program (SFSP), they still must inform families of the program every year prior to summer break. Students who travel into a different community may have access to a SFSP and may benefit from the program information. Promotional materials and TA were provided to the FSD and authorized representative.	Describe how you will promote the Summer Food Service Program this year before summer break.	

**Site - Level Findings: Sioux Central High (0109)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	<p>According to the food production records, the K-3rd grade students did not receive the required amount of daily vegetables. The K-3rd grade students need 3/4 cup vegetable made available to them daily. Since they do not have access to the fruit/vegetable bar, they only had 1/2 cup vegetables made available to them and were short on their daily and weekly total vegetable requirements as well as their red/orange and other vegetable subgroups. This is a repeat finding and fiscal action may be taken.</p> <p>The 9-12th grade students are required to have 2 oz. grain equivalents made available to them daily. Although all other meal component requirements have been met, they 9-12th grade menu was short on daily</p>	<p>Send one week (5 consecutive days) of lunch food production records to show that all meal pattern requirements are met for all grade groups.</p> <p>Send documentation that all food service staff received training on meal pattern requirements for all grade groups and food production record documentation.</p>	

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		<p>grain requirements for 2 days during the week of review. Therefore they were also short on meeting their weekly grain requirements. This is a repeat menu finding and fiscal action may be taken.</p> <p>Although all other students that were counted and claimed as having a reimbursable meal had everything they needed on their tray during the onsite review, one student was counted and claimed even though he only had 2 components on his tray instead of the required 3. This meal is not reimbursable. TA provided to the FSD on food production records, meal pattern requirements for all grade groups and labels.</p>		
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**Site - Level Findings: Midwest Christian Services (6035)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1400 - Food Safety	V-1400	The Midwest Christian Services site has not received a health inspection. The food service director (FSD) was unaware of a health inspection occurring and no documentation could be found by SA or the FSD. All sites that serve food within an SFA are required to have 2 food safety health inspections twice per school year. If the SFA does not receive 2 health inspections they must request one. TA provided.	Provide a copy of the letter or email sent to your food safety health inspector requesting an inspection and provide a copy of their response.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	130 Is household notification of denied benefits consistent with FNS requirements?	When a family turns in an income application that is over income guidelines and denied, the SFA must inform the family of their

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		denied status in writing by sending the family a letter of notification of eligibility. TA provided to the determining official.
200 - Verification	214 If a student's eligibility changed due to verification,	One family selected for verification had their benefits reduced. The letter of notification of verification results informed the family that their benefits would be reduced following the 10 day appeal period. According to the dates listed in the point of service system, benefits were not reduced until 11 days after the appeal period written in the letter of results. TA provided on the timeline for reducing benefits.
700 - Resource Management		The 2017-2018 vendor paid list indicates that the non-profit school nutrition fund directly paid for items that are now considered to be indirect costs and must be paid for by the general fund. Examples include equipment repair and office supplies. Other items that are now part of the indirect costs include utilities, postage, preventative maintenance, pest control, administrative and custodian salaries. TA and handouts provided to the FSD, authorized representative and business manager on allowable direct expenses, indirect cost rate, and how the general fund can recover the costs of these expenses.
700 - Resource Management		<p>PROCUREMENT:</p> <ul style="list-style-type: none"> <li>· The procurement plan must be completed annually and include all purchases that the SFA plans to make in the next school year including micro and small purchases.</li> <li>· The milk was purchased using a small purchase method. According to the local purchase threshold, the milk must be procured using a formal procurement method. TA provided to the FSD and authorized representative on local purchasing thresholds and procurement methods. Informal purchases must include product and delivery specifications and required terms and conditions. TA provided on requirements and resources available in Download Forms (Small Purchase, 3 Bids and a Buy Template and RFP and IFB Formal Procurement templates).</li> </ul>

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		<ul style="list-style-type: none"> <li>· Contract management reviewed with the FSD and authorized representative. SFAs must review delivered products to ensure items ordered were delivered and that items charged on the invoices are charged at the agreed upon prices. Monthly and weekly price lists from the milk vendor and prime vendor must be saved.</li> <li>· A micropurchase log and Buy American exemption log must be kept to document all micropurchases and violations of the Buy American provision. A micropurchase log must include micropurchase events, locations, dates, items purchased and their prices. Itemized receipts are acceptable instead of listing all items purchased. The Buy American exemption log must include items that do not adhere to the Buy American provision, the date of purchase and the rationale that describes why American products were not purchased. Templates available in Download Forms.</li> </ul>
700 - Resource Management		<p><b>NEGATIVE BALANCE POLICY:</b> SFAs are required to provide all families a hard copy of the negative balance policy every year. TA provided to the authorized representative on making the policy a part of the registration packet so all families receive it upon registration. SFAs are also required to inform families twice a year that they can apply for benefits. TA provided on informing families through newsletter, mass emails, and/or on the district's website.</p>
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	<p>The food service director and food service staff have not completed their 12 and 6 required hours of professional standards training yet for this school year. SA encourages training webinars on food production records, CACFP meal pattern, the NSLP and SBP meal pattern and offer versus serve. Training resources shared with the FSD who plans on having staff watch webinars to accomplish the remainder of the training hours. In addition, SA also encourages the FSD and some food service staff to attend the Healthy School Meals summer course on July 30-31, 2019 which would contribute to the training requirements for SY 2020.</p>

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1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The HACCP food safety plan is not located at the Midwest Christian Services site. TA provided to the FSD who agrees to put a copy of the plan at the MCS site in the office space outside of the kitchen area.
RMCR - Revenue From Nonprogram Foods	8 Did the SFA:	According to the financial report for SY 2017-2018 in the IowaCNP, the nonprogram food revenue does not adequately cover the nonprogram food cost possibly due to miscalculation. The financial report indicates that the nonprogram food costs are equal to the nonprogram food revenue even though the few items that are sold are done so at a higher rate than their cost. The nonprogram foods served are adult meals, 2nd entrées, 2nd milks, and sale of some food items to student groups throughout the year. TA provided on what a nonprogram food is and how to calculate the nonprogram food cost. Handout provided to the business manager.

**Site - Level Technical Assistance Sioux Central High (0109)**

Area	Question	Comments
Infant and Pre-K Meal Pattern Checklist - Lunch		SA provides TA to the food service director and staff on the CACFP meal pattern including the sugar restriction for cereal, yogurt, flavored milk and grain based desserts. The SFA provides the CACFP meal pattern to the preschool students and is compliant with all aspects of the CACFP meal pattern.

**Org - Level Commendations**

Description
<p>CERTIFICATION AND BENEFIT ISSUANCE: • Income applications are processed within 10 days of receiving. • The SA template letter of notification of eligibility that is sent to families on the DC list. • Benefits are extended to all students within a household when appropriate. • Students who received benefits in the previous school year are provided the 30 day carryover of their eligibility status. • All income applications were determined accurately and contained the required information including social security information, signatures, dates, family members and income. • Eligibility status was correctly transferred to the point of service system. • The racial ethnic form was completed to show that no discrimination was made in providing benefits to students. • The determining official downloads the DC list twice a month and keeps lists on file. • The correct income guidelines and conversion factors are used.</p>
<p>CIVIL RIGHTS: • The SFA sent a public release to the local media outlet at the beginning of the year. • Civil rights training was provided to all staff with school nutrition program responsibilities at the beginning of the school year. • Income applications were provided in different languages as needed for families. • The “And Justice for All” poster is on display in a public location. • The SFA has diet modification forms on file for students with special dietary needs. The FSD works with families to offer them the foods needed to meet the special</p>

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dietary needs of their student. • The racial ethnic form is completed to show that no discrimination was made in providing benefits.

**FOOD SAFETY:** - All food service staff, including the FSD, are ServSafe certified. - The HACCP food safety plan is onsite and contains the required standard operating procedures. - Food was stored properly in the freezers, dry storage, and coolers. - Temperatures are monitored and recorded for the milk coolers, refrigerators, and freezers at Sioux Central High School. Food temperatures are also monitored and recorded. - The health inspection report was posted in a public location. • The MCS staff monitor and record the temperatures for the refrigerator as well as the temperatures of the food when it arrives and before it is served.

**LOCAL WELLNESS POLICY AND COMPETITIVE FOODS:** - The Local Wellness Policy contains all required elements, has been updated in the past 3 years and is made available to the public as it is on the district website. - No competitive foods are available. The SFA only sells 2nd milks and 2nd entrees. The only vending machine in the building is off during the defined school day.

**MEAL COUNTING AND CLAIMING:** • The edit check report matches the claim submitted. • The number of free and reduced students claimed each day does not surpass the total number enrolled. • The MCS site tracks their lunch count manually at the point of service and their records match the claim during the review period. • The point of service line is organized and orderly to ensure all students receive a reimbursable meal at breakfast and lunch at Sioux Central. • All students counted and claimed for breakfast at Sioux Central had a reimbursable meal.

**NUTRITION & MEAL PATTERN REQUIREMENTS:** - Free, potable water is available during meals and cups are available for students who would like a glass of water with their meals. - The breakfast and lunch menus served during the on-site review met all daily meal pattern requirements for all grade groups served. - Food production records contained information for the grain, meat/meat alternate, fruit, vegetable, milk, condiments and the fruit and vegetable bar items. The FPR contained all grade groups being served including the Midwest Christian Services students and preschool students. - All grains served during the review period and on-site review are whole grain rich. - At least 2 different types of milk are offered to students. - Preschool students receive the CACFP meal pattern. - Signage is on display to inform staff and students on how the menu constitutes a reimbursable meal. Signage is also on display that promotes healthy eating. - The lunch menu served during the review period met the daily and weekly meal pattern requirements for the fruit, total vegetable, vegetable subgroups, meat/meat alternate, and milk for 4-12th grade students. - The lunch menu served during the review period for the K-3rd grade students met the daily and weekly meal pattern requirements for the fruit, milk, meat/meat alternate and grain. - The lunch menu served to the preschool students met all the CACFP meal pattern requirements during the review period. - The breakfast menu served during the review period met all the daily and weekly meal pattern requirements for the preschool, and K-12th grade students. -

**ONSITE MONITORING:** Onsite monitoring has been completed for both sites prior to February 1, 2019.

**PROCUREMENT:** - The SFA has a code of conduct that has all required elements. - The SFA has a procurement plan that includes formal, small, and micropurchases. - Bid letters are on file for small purchase events and include all items that the SFA wants to procure and delivery specifications. - Bread and micropurchases were procured according to local purchase thresholds.

**PROFESSIONAL STANDARDS:** - The SFA has a tracking tool to track the professional standards training for all school nutrition program employees. - The authorized representative received all required training hours, including civil rights training, as evidenced by documentation. - Documentation in the form of certificates and attendance logs are available for all training provided to food service staff. - Food service staff are all ServSafe certified.

**RESOURCE MANAGEMENT:** • The correct paid student lunch price is charged based on the PLE tool requirements. • The correct adult lunch price is being charged. • The SFA spent 110% of their USDA foods • The school nutrition account has less than 3 months of operating costs. • The SFA has internal controls in place to ensure more than 1 person has financial oversight. • The SFA saves all documents for 3 years plus the current year. • All revenue made during the review month was deposited into the school nutrition fund.

**SCHOOL BREAKFAST PROGRAM OUTREACH:** - The SFA promotes their breakfast program by informing families of it at registration and through their website.

**VERIFICATION:** • The SFA selected the correct number of applications to verify (2) based on the total number of applications on file. The SFA picked from error prone applications first. The verification process and report were completed on time. • The SFA followed up with families selected for verification if they did not respond to the first letter of notification. • The correct letter of notification of verification selection and results were sent to families. For families that had their benefits reduced, the letter informed them of their right to

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appeal. • Income information provided by the family was processed accurately.

**Site - Level Commendations Midwest Christian Services (6035)**

Description
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MCS: The meal served during the onsite review met the daily meal pattern requirements. Students had access to 2 different types of milk and condiment portions were controlled. Students are being counted at the point of service. The "And Justice For All" poster was on display in a public location. Free, potable water is available. Food is stored properly. Temperatures logs are available for the freezer, refrigerator, and for all hot foods prepared.
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