

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Creston Comm. School District (15030000)
April 1-3, 2019

Program Year: 2019
Month of Review: February
Lead Reviewer: Shea Cook
Org Representative(s): Nora Sprague

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	11 household applications were incorrectly determined. Additionally, six students were receiving benefits although there was no documentation on file to justify the benefit. This is a repeat finding.	For our response please do the following: 1) Identify the individual who will be watching parts 1 and 2 of the "Application Approval and Direct Certification" webinar located here: https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition Print the screen from the title page of the webinar and have the individual who watched the webinar sign and date the printed page and upload it here. 2) Submit copies of all letters notifying households of a reduction in benefits. 3) Identify the individual who will be watching the Application Approval and Direct Webinar for SY19/20 in the fall.	
100 - Certification and Benefit Issuance	V-0100	Eligibility benefits were not correctly transferred from determination of free, reduced, or paid to the Point of Service, POS.	For your response, please indicate how benefits will be correctly transferred to the POS in the future and who will be responsible for entering the information.	
200 - Verification	V-0200	SFA did not choose the correct number of applications to be verified.	For your response please do the following: 1) Watch part 1 of the verification webinar, which explains how to calculate the number of applications that should be selected. That webinar is located here: https://educateiowa.eduvision.tv/directplayer.aspx?q=CT1wecDsedBNBxW2k6c1xZ9jQS%252fNr2VI9sLZiRleNgZ3yQYbCZBxq4DAp4YzJcpU Print the title screen from the webinar and have the individual who watched the webinar sign and date the page and upload it here as a part of your corrective action. 2) Provide the name and title of the individual(s) who will be participating in the verification webinar for SY19/20 to take place in the fall. 3) Describe your plan to verify the correct number of applications based on your verification sample size.	
200 - Verification	V-0200	The SFA did not make updates to the eligibility status on the benefit issuance list when a student's eligibility changed due to verification. This is a repeat finding.	Identify who will be responsible for making updates to the eligibility status on the benefit issuance list when a student's eligibility changes due to verification.	

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300 - Meal Counting and Claiming	V-0300	The application packet for the high school indicates that meal counts are being taken at the beginning of the line for lunch service. On observation meal counts at lunch are being taken at the end of the line.	For your response please edit your application packet to accurately reflect where meal counts are being taken.	
800 - Civil Rights	V-0800	SFA indicated in off-site responses that no public release had been published.	For your response, please indicate who will be responsible for sending the public release to local media and what their plan is for doing so.	
800 - Civil Rights	V-0800	Yearly civil rights training must be documented. Although SFA indicates that training was offered, there is no documentation to verify that training occurred. Civil rights training is required for all individuals who have duties related to the nutrition program, even if they are not employees of school nutrition. Anyone who helps with application collection and determination of applications or acts as hearing or confirming official is also required to complete civil rights training.	For your response please identify who will be responsible for conducting yearly civil rights training for all staff who have duties in the nutrition program. Additionally please describe how you will document that training has occurred and who will be responsible for keeping that documentation on file.	
800 - Civil Rights	V-0800	SFA has not completed USDA Racial Ethnic form.	For your response please complete the USDA Racial Ethnic form and attach completed form.	
900 - SFA On Site Monitoring	V-0900	There is no documentation to verify that on-site monitoring was conducted. SFA completed monitoring forms in the office after being asked, however, this does not qualify as on-site monitoring. On-site monitoring includes observation of meal counting and claiming, which cannot be done from a desk review. This is a repeat finding.	For your response complete on-site monitoring at each building and upload completed on-site monitoring forms.	
1000 - Local School Wellness Policy	V-1000	Under the final rule of the Healthy, Hunger-Free Kids school districts are required to conduct a triennial assessment of local wellness policy implementation. There is no documentation to demonstrate that an assessment has been completed. In addition, results of the triennial assessments must be made available to the public.	For your response please submit a timeline for completing an assessment of the local wellness policy, how you will make the information available to the public once it is complete, and who will be responsible for conducting the assessment. It is the expectation that a wellness assessment and corresponding documentation will be on file and available to the public by the start of the 19/20 school year.	
RMCR - Nonprofit School Food Svc Acct	V-RMCR	SFA's account balance exceeds its three month operating expenses.	For your response please provide a detailed plan on how you intend to bring your account balance into compliance with the three month operating requirement.	

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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 IowaCNP 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: Creston High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Meal count for breakfast is taken at the beginning of the line. Due to the layout of the kitchen and the setup of the POS it is difficult to see if all students are taking a full reimbursable breakfast. On observation 18 students did not take a full reimbursable breakfast but were counted as taking a full reimbursable breakfast.	For your response please describe your plan for moving the POS to the end of the line for breakfast service and how you will ensure that all students take a full reimbursable breakfast.	
400 - Meal Components and Quantities - Breakfast	V-0400	There was no signage explaining what constitutes a reimbursable breakfast to students. Additionally, there was no posted breakfast menu. This is a repeat finding.	For your response please do the following: 1) Indicate who will be responsible for placing breakfast signage on the serving line daily. 2) Submit a copy of the May breakfast menu that will be posted in the cafeteria. 2) Upload a photo that shows breakfast signage in place.	
400 - Meal Components and Quantities - Breakfast	V-0400	Federal regulation requires all SFAs maintain food production records (FPR). FPRs must provide enough documentation to determine how meals meet the meal pattern for each age group. FPRs for the review period do not include much of the required information such as planned serving size, component contributions, specific food prepared, and the amount of each item to be served.	For your response please do the following: 1) Identify the person who will be responsible for watching the food production records training webcast found at the following location: https://educateiowa.edu/vision.tv/default.aspx?q=CT1wecDsedDnculQvbTupA%253d%253d Print the title screen from the webcast and have the individual who watched the webcast sign and date the page and upload it here as a part of your corrective action. 2) Attach one week's worth of completed breakfast food production records.	
400 - Meal Components and Quantities - Lunch	V-0400	Based on documentation submitted, the SFA's menu for the targeted menu review week was short in the starchy vegetable subgroup. A starchy vegetable was only offered on one day during the week. That offering was a 1/2 cup serving in a blend with another	For your response please attach two weeks' worth of completed food production records for lunch. Records should be complete and accurately reflect serving measurements/quantities.	

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		vegetable from the red/orange subgroup resulting in approximately only one 1/4 cup starchy vegetable serving for the week. Additionally, based on documents submitted SFA's menu was short on meat/meat alternate on one day during the review week. Serving size of chicken fajita strips did not offer 2 oz. of meat/meat alternate.		
500 - Offer versus Serve	V-0500	Signage explaining what constitutes a reimbursable meal to students, including the specific requirement of 1/2 cup of fruit or vegetable, is required at the beginning of each service line.	For your response please identify who will be responsible for placing signage in the service line and identify the locations where it will be placed.	
1100 - Smart Snacks in School	V-1100	A la carte items at the High School appear to meet Smart Snack guidelines, however, there is insufficient documentation to confirm this. Minimal documentation from AEA Purchasing was provided for some items. This is a repeat finding.	For your response please do the following: 1) Identify who will be responsible for maintaining documentation of Smart Snack requirements for a la carte items. 2) Identify where the documents will be kept (e.g. administrative office, at individual sites, etc.) and how you will organize them. 2) Upload calculator print outs for three beverage items and three snack items currently being offered for a la carte purchase.	
1400 - Food Safety	V-1400	Written Standard Operating Procedures (SOPs) have not been developed that are site specific to the High School. What HACCP documentation is in place is not a written HACCO plan, it is a training manual for best HACCP practices. This is a repeat finding.	For your response please do the following: 1) State who will be responsible for developing the HACCP plan. 2) State your plan for developing a complete HACCP plan, including site specific information for each building. 3) State your timeline for developing the plan. 4) Submit a minimum of 3 completed SOPs. It is the expectation that a completed, site specific plan will be in place for each location by the next administrative review.	

Site - Level Findings: Creston Elementary Middle School (0218)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1700 - Afterschool Snack	V-1700	Documentation of compliance with meal pattern requirements and production records are required to receive reimbursement for the afterschool snack program.	For your response please submit a week's worth of completed food production records for the afterschool snack program.	
1700 - Afterschool Snack	V-1700	Menu items offered for Afterschool snack do not meet the snack meal pattern. Every day of the review month of February a non-creditable food item was used as one of the two components offered for snack. Fruit snacks and pudding are not creditable foods. Additionally, according to the	For your response please submit 2 weeks' worth of menus or a completed cycle menu that reflect that the correct components are being offered to meet the snack meal pattern requirements.	

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		documentation provided, the graham crackers offered as a grain component on several serving days were not offered in sufficient quantities to equal 1 ounce of grain.	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	SA offered technical assistance in processing applications by highlighting application errors found on site including incorrect household size, incomplete information, etc. SA also encouraged SFA to keep additional documentation when directly certifying students, including printing the screen when students are verified by elook-up. SFA was also encouraged to fill out application completely, especially income amounts located on bottom of application to better identify errors.
200 - Verification	208 When a confirmation review was conducted:	When conducting a confirmation review, the confirming official should fill out the information completely, including date.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	Abbreviated menu statement is incorrect. Statement should read "This institution is an equal opportunity provider."
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	SA explained the requirement to track racial and ethnic data.
1000 - Local School Wellness Policy	1000 Provide a copy or appropriate web address of the current Local School Wellness Policy.	While the wellness policy is compliant, during the next revision SA recommends updating language in the following areas: 1) Under Section C. Monitoring - the policy references USDA School Meal Initiative. SMI is no longer used and has been replaced with the Administrative Review. 2) Nutrition guidelines listed for snacks seem to be modeled after existing Smart Snack guidelines, but they are inaccurate. They list portion sizes, but Smart Snack guidelines do not include portion sizes. Most district policies reference Smart Snack guidelines by name and do not list the specific requirements. 3) Policy states that carbonated beverages will not be offered. There are a number 100% fruit juice carbonated beverages that are allowable under the Smart Snack guidelines, some of which are currently being sold in a la carte to students in the district. Recommend removing this language if policy isn't being followed. 4) The wellness policy states that the district will provide a list of suggested healthy snack items to students and families. Is this actually being provided and if so where?
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	Districts must permit participation by the general public and the school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in the wellness policy process.

Site - Level Technical Assistance Creston High School (0109)

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Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	On observation there were two fruit options - 1/2 c servings of fruit juice and whole pears. While there was sufficient quantities of fruit juice on hand for students to take two juice items each, there was, at most, 20 pieces of whole fruit available. SA encourages SFA to provide more fruit options for students to choose from. At least a full cup of fruit must be offered to students at breakfast.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	Additional signage that clearly states that all lunch meals must include a 1/2 cup of fruit or vegetable is needed. During observation several students were sent back to the line for fruits or vegetables to complete a reimbursable meal. Although there was one sign, that is inadequate for two serving lines and it was not located in an area that is easily viewable by students in the line.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Documentation provided for the targeted review week does not indicate that sufficient quantities of the starchy vegetable subgroup were offered to meet the weekly requirement. SA encouraged SFA not to utilize a vegetable blend when trying to meet subgroup requirements. The only starchy vegetable offered for the week was in a blend with a red/orange vegetable in a 1/2 cup serving size. Food production records are also unclear due to ambiguous serving size as to whether or not students were offered the minimum amount of M/MA for Thursday. SA discussed documenting serving sizes accurately on food production records.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	SA recommends that SFA conduct refresher training on OVS. Specifically, observation indicated that additional breakfast training is needed.
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	While there is a poster and it can be seen, is currently behind the serving line in a location that is not accessible to someone who may want the information. SA instructed staff to move the poster to a more visible location.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	If a school does not receive two health inspections per year it is their responsibility to request a second inspection and document that that request has been made. SFA should keep a copy of the request on file to confirm that the request has been made. SFA generated letter while on site.
Dietary Specifications Assessment Tool - Lunch	24 Students are offered salt:	Although not observed during meal service, the SFA answered that students are offered salt if they ask for it and at the condiment station. Students are absolutely not allowed to have salt. Remove all salt from areas accessible to students and do not provide salt to students who ask for it.

Site - Level Technical Assistance Creston Elementary Middle School (0218)

Area	Question	Comments
1700 - Afterschool Snack		According to the menu, students participating in afterschool snack are never offered milk as part of the program. SA encouraged SFA to offer milk as one of the two daily components.

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Org - Level Commendations

Description
CERTIFICATION AND BENEFIT ISSUANCE: 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.
CIVIL RIGHTS: The SFA provides forms in other languages as needed for Limited English Proficient households including income applications, verification information and the negative balance policy. • An approved milk alternate is made available for students with a dairy intolerance. • The "And Justice For All" poster is on display.
FOOD SAFETY: 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 food service director, head cooks at each site and many 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 edit check reports matched the claim. • The day of review meal counts were reasonable with the review period counts.
PROCUREMENT: The district is a member of a Group Purchasing Organization which helps keep prices down. • The food service does an excellent job utilizing USDA Foods Planned Assistance Level (PAL). • FSD attended regional procurement training.
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 the district's website and school announcements.
SCHOOL WELLNESS POLICY: The wellness policy contains all of the required elements and has been updated in the past 3 years as required. • The wellness policy is available to members of the public as it is posted on the district's website.
VERIFICATION: The verification report and process were completed on time. • 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.

Site - Level Commendations Creston High School (0109)

Description
Civil Rights: No discrimination was observed.
Meal Counting and Claiming: The Point of Service for lunch is at the end of the line and students punch their unique number into a key pad. • 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.
Water: Free potable water is available to all students for lunch. Water is provided in a container along with cups.