

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Guthrie Center Comm School District (27540000)**  
**SNP - Review ID: 5103**

**Program Year:** 2019  
**Month of Review:** February  
**Lead Reviewer:** Brenda Windmuller  
**Org Representative(s):** Patricia Simpson

**Org - Level Findings**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
100 - Certification and Benefit Issuance	V-0100	Benefit eligibility for homeless & foster children should be determined by the SFAs homeless liaison or other appropriate officials (see TA), and official documentation should be on file for these students.	The SFA will have a representative complete benefit issuance training and submit the date to be completed.	
300 - Meal Counting and Claiming	V-0300	The SFA's NSLP application indicates that they are operating serve only for grades K-3 and Offer vs. Serve for grades 4-6 at lunch. In practice, K-6 is serve only.	The SFA must implement OvS for grades 4-6 OR change the application to reflect the current practice. The SFA's response will describe how they have corrected this issue.	
700 - Resource Management	V-0700	The SFA spent only 64.3% of the USDA Foods (commodities) funds allocated to them in 2017/2018. It is the expectation that a minimum of 85% of the money is spent annually.	The SFA will: 1. Watch the USDA Foods webinar posted on the SA's website and submit the date completed. 2. Submit a plan on how they will spend at least 85% of the funds allocated to them in 2018/2019.	
1200 - Professional Standards	V-1200	The Food Service Director and staff lacks knowledge of some of the program fundamentals such as the meal pattern and Offer vs. Serve.	The FSD will complete the following training before the start of the 2019/2020 school year and submit the date that the training will be completed. Training: Offer vs. Serve, Meal Pattern Production Records and Procurement. The FSD will also attend the New Managers Orientation in the summer of 2019 and submit the registration.	

**Site - Level Findings: Guthrie Center Elementary School (0409)**

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Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The SFA was 1/4 c short on vegetables on February 8, 2019 as documented by the menu and production records.	The SFA will 1. Submit the planned menu for April 2019. 2. Submit certification worksheets for the elementary for the week of April 15-19. 3. Submit production records for April 15-19.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance		BENEFIT ISSUANCE: Applications must be processed within 10 days of receiving them. Technical assistance was given to write the date received on each application to assist in tracking.
100 - Certification and Benefit Issuance	132 Does the direct certification list utilized by the SFA:	The SFA must have documentation on file from the appropriate agency for homeless and foster children.  Foster Child: An other source categorical eligibility program designation for a child who is formally placed by a court or a state child welfare agency. The state must retain legal custody of the child. This definition does not apply to informal arrangements or permanent guardianship placement that may exist outside of the state or court based system. Homeless: An other source categorically eligible program designation for a child who is identified by the LEA's homeless liaison or by an official of a homeless shelter as lacking a fixed, regular, and adequate nighttime residence.
300 - Meal Counting and Claiming		All student meals must be counted at the point of sale in the cafeteria. The pre-school and first grade students are currently being counted in the classroom in the morning. Meals may not be counted until confirmation is made that each child has a reimbursable meal at the point of service. The SA shared some ideas of how to this.
300 - Meal Counting and Claiming	314 Is the SFA following their approved SFA-SA Agreement/application (including POS)?	The SFA is practicing serve only for all grade levels at the elementary school which conflicts with the information submitted on the application. TA was given to change the application or to start implementing Offer vs Serve for 4th - 6th grade as the application states. Information was provided to the SFA on what Offer vs Serve is.
700 - Resource Management		PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. The off-site procurement tool was not completed and submitted prior to the on-site review. Not all vendors were accounted for on the procurement plan. The SA and SFA went through the list together. The SFA has several maintenance and repair expenses on the vendor paid list for 2017. These expense are no longer allowed to be charged to the School Nutrition Fund. The SFA is ordering items outside of the market basket. Micro purchases are not being done properly. The SFA must spread the money around and may not consistently go to the same vendor for a single item. (Capital Sanitary)

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JMC software updates should be added to the plan as a sole source.  
SA gave an overview of the procurement methods.

Procurement Plan and Code of Conduct must be completed annually.

Must have signed debarment certifications kept on file.

Include Buy American Clause in all Small and Formal Purchase agreements.

Agreements valued at \$10,000 or more should have an exit clause.

A designated member of the staff should be comparing prices on invoices to contract prices to ensure accuracy.

A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.

Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?

SFA should keep on file:

- All price adjustments throughout the year
- All invoices
- All contracts and agreements
- All bids solicited
- Documentation that a vendor did not reply to bid (if applicable)
- Documentation of why you selected a specific vendor (Selection Rubrics)
- Copies of bid solicitation
- Debarment statements
- CD provided by the AEA (if applicable)

Three types of purchases, (Federal Thresholds):

**Micro-purchase-** under or equal to **\$10,000**(or local purchasing threshold if more restrictive) can be made without a quotation.

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		<ul style="list-style-type: none"> <li><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.</li> <li><input type="checkbox"/> Purchases should be distributed around community, not just one store.</li> </ul> <p><b>Small Purchases-</b> Purchases that are <b>under \$250,000</b> (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Include all terms and conditions</li> <li><input type="checkbox"/> Include terms: Buy American and Equal Opportunity</li> <li><input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more</li> <li><input type="checkbox"/> Attain Signed Debarment Statements</li> <li><input type="checkbox"/> Awarded on lowest price (unless written documentation to justify)</li> <li><input type="checkbox"/> Maintain documentation</li> </ul> <p><b>Formal Purchase-</b> Purchases equal to and <b>exceeding \$250,000</b> (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised.</li> <li><input type="checkbox"/> Include all requirements of a small purchase</li> <li><input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</li> <li><input type="checkbox"/> Everything must be in writing.</li> </ul>
700 - Resource Management		The SFA spent only 64.3% of the USDA Foods (commodities) money allocated to them in the 2017/2018 school year. SFAs must spend a minimum of 85% of this money annually. The SFA shared some ways to monitor this money closer and provided contact information to the SA's USDA Foods Consultant for additional guidance.
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?	<b>WELLNESS POLICY:</b> Provided Technical Assistance, to make both the wellness policy and assessment available to the public. Both are currently on the district's web site, the SFA plans to relocate the policy so that they are together. SA provided the Wellness Policy Final Rule and flyer to the SFA for a reference. SA answered questions about Smart Snacks and sent the Smart Snacks flyer to the SFA. Contact information for the SA's Team Nutrition consultant was also provided.

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1200 - Professional Standards		<p>ANNUAL TRAINING: All Food Service staff and SFA employees working with the School Lunch Program are required to complete Professional Development annually to include Civil Rights training. This includes people working part time with the program helping to do dishes or run the POS. Training hours should meet the following guidelines:</p> <p>Director- 12 hours annually</p> <p>Manager- 10 hours annually</p> <p>Full-Time Staff- 6 hours annually</p> <p>Part-time Staff- 4 hours annually</p>
1200 - Professional Standards	1214 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.	<p>The FSD does not demonstrate a comprehensive working knowledge of the NSLP program, specifically tasks which fall under her immediate responsibilities such as menu writing, meal service, and ordering (Procurement). It is recommended that she attend the New Manager Orientation July 30- August 1 and complete other training as outlined.</p> <p>Meal Pattern- <a href="https://educateiowa.eduvision.tv/directplayer.aspx?q=CT1wecDsedDJy5tq9nJPP59jQS%252fNr2VI7O18fNFld0Q%253d">https://educateiowa.eduvision.tv/directplayer.aspx?q=CT1wecDsedDJy5tq9nJPP59jQS%252fNr2VI7O18fNFld0Q%253d</a>  Offer vs. Serve-  <a href="https://educateiowa.eduvision.tv/directplayer.aspx?q=CT1wecDsedCd8PboRpGzcZ9jQS%252fNr2VI9sLZiRleNgZ3yQYbCZBxq4DAp4YzJcpU">https://educateiowa.eduvision.tv/directplayer.aspx?q=CT1wecDsedCd8PboRpGzcZ9jQS%252fNr2VI9sLZiRleNgZ3yQYbCZBxq4DAp4YzJcpU</a>  Production Records- <a href="https://educateiowa.eduvision.tv/default.aspx?q=CT1wecDsedDncuIQvbTupA%253d%253d">https://educateiowa.eduvision.tv/default.aspx?q=CT1wecDsedDncuIQvbTupA%253d%253d</a>  Procurement- Face to Face training fall 2019 (dates TBD)</p>
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	<p>The SFA's HACCP plan is missing standard operating procedures on blood born pathogen and body fluid clean up. The SA shared some resources to help develop these policies. The SFA has a district policy which will be placed in the binder.</p>
RMCR - Nonprofit School Food Svc Acct	10 Excluding equipment purchases made with USDA grants, did the SFA purchase equipment during the RM review period that cost at or above the capitalization level established by the State or SFA for financial statement purposes or at or above \$5,000 (whichever was less)?	<p>When purchasing equipment valued above \$5000, the SFA should first look to see if the item is on the pre-approved list provided by the SA. If it is not, the SFA should consult with the State Agency prior to purchasing the equipment item.</p>
RMCR - Nonprofit School Food Svc Acct	4 If Yes, did the SFA develop a spend down plan approved by the State agency?	<p>The SFA is not allowed to have more than 3 months operating expense in their Lunch account at any given time. The SFA currently has a surplus of \$7334 (February 2019 balance statement) and should work to identify methods to spend the extra money.</p>

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**Site - Level Technical Assistance Guthrie Center Elementary School (0409)**

Area	Question	Comments
400 - Meal Components and Quantities - Lunch		Technical assistance was given that any food product provided to the students outside of the reimbursable meal must be paid for by the student as an a la carte item. The SFA was providing toast as a free "second" during the AR.
400 - Meal Components and Quantities - Lunch	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	Production Records: Production records evaluated from the review period do not include quantities produced, or planned quantities for each age level. These numbers should be recorded daily and kept for three years plus the current year. Standardized recipes should be used for all menu items that combine two or more ingredients to ensure consistency and compliance with guidelines.
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	AGE GROUP MENUS: Provided technical assistance on age/grade group menus. When combining grades, the maximum calories and sodium must comply with the lower grade group while the minimum meat/grain must comply with the older grade group. Production records should reflect the serving size for each age group. TA was also give regarding vegetables: 1. lettuce counts as 1/2 of the serving size ( 1 cup lettuce = 1/2 cup serving). Vegetable serving on 2-8 was short was 1/4 cup. 2. Substitutions of vegetables should be in the same vegetable sub-group. The SA provided the SFA copies of the meal pattern.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	The SFA's NSLP application states that students K-3 are serve only and grades 4-6 are Offer vs. Serve. In practice, the entire elementary is operating as serve only. The SFA must follow the practice chosen on the application. The SA provided information on Offer vs Serve and a link to online training.
1400 - Food Safety		Foods served to students may not be returned to the kitchen for re-sale. Some items such as pre-packaged, shelf stable items may be collected and donated to food pantries and other programs. Keep these items separated from the product to be used by food service to avoid cross contamination.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The most recent health inspection report should be posted in a location visible to the public. The report was hanging in the kitchen at the time of the AR. The SA advised the Head Cook to relocate the report to the dining room.
Infant and Pre-K Meal Pattern Checklist - Breakfast	4 Does all the cereal served to Pre-K meet the Pre-K meal requirements (no more than 6 grams of sugar per dry ounce)?	TA was given that cereal served to pre-school students are limited to 6 g sugar per 1 oz dry weight of cereal. Current offerings exceed this limit.
Infant and Pre-K Meal Pattern Checklist - Lunch	2 Is the SFA using the meal pattern flexibility and offering one menu when Pre-K students are co-	Pre-School: SA reminded the SFA that pre-school students are only allowed to have flavored milk if they are co-mingled with older children at meals. Currently, first graders do enter the cafeteria for lunch while pre-school students are eating.

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	mingled in the meal service area?	
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**Org - Level Commendations**

Description
<p>APPLICATIONS/BENEFIT ISSUANCE (100): Benefit documents were well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. Applications were complete with SSN's and case numbers. Income was only converted to annual when there was more than one frequency of income. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential.</p>
<p>BREAKFAST &amp; SUMMER PROMOTION (1600): The SFA promotes breakfast by posting menus in each cafeteria as well as the website. The summer Food Service Program, is also promoted through inclusion in local Dollar General store weekly ads.</p>
<p>CIVIL RIGHTS (800): The And Justice for All civil rights poster was posted in the cafeteria. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided to full time food service staff and documented. 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 non-discrimination statement is on all printed materials.</p>
<p>LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years. The policy has nutrition education, physical activity and other wellness goals included. An assessment has been completed and is posted on the school's website. A wellness committee is in place to set goals and help assess the completion of the goals. The committee is made up of students, faculty, staff, and community members. The committee meets annually and minutes are kept. The SFA is active and doing a good job of tracking activities with the district. They have a link to "my plate" on the website.</p>
<p>MEAL COUNTING &amp; CLAIMING: Meal counts during the on-site review were reasonable when compared to the (February) review month counts. Meal count totals for the month of February appeared accurate and complete. There was a point of service, POS, at the point where meals are served for all students observed. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.</p>
<p>PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases. The SFA maintains a micro purchase log. One representative of the SFA attended regional procurement training. The Code of Conduct was complete and included the board policy on disciplinary action.</p>
<p>RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed, indicated appropriate and allowable expenditures. Reports are filed on time, and all records are maintained for at least three years plus the current year. Errors fell below the \$600 disregard, no fiscal action is expected at this time.</p>
<p>SMART SNACKS (1100): The SFA does not allow elementary school students the option to purchase a la care items other than milk. There are no vending machines present.</p>
<p>VERIFICATION (200): 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.</p>

**Site - Level Commendations Guthrie Center Elementary School (0409)**

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Description
Elementary: The head cook at the elementary school tracks and calculates the food cost of all meals on a daily basis. All condiments at the elementary are served in proportioned cups and monitored by teachers. The elementary school has great signage explaining reimbursable meals, the breakfast sign explains each food and how it contributes to the reimbursable meal. The cafeteria is colorful and has a positive energy. Staff are friendly and genuine concern to follow the regulations and care for the students they serve.
HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes most required elements. Temperature logs are maintained for milk coolers, walk-in cooler, reach-in coolers, freezers, and the dishwasher. The kitchen staff records all food temperatures 3 times per day. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Food Service workers wore proper hair restraints and practiced good gloving procedures.