

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Okoboji Comm School District (48900000)
On-Site Review Dates: March 12-14, 2019

Program Year: 2019
Month of Review: February
Lead Reviewer: Deann Murphy
Org Representative(s): Joan Brown

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Two students out of the 271 students reviewed had applications that were missing a parent social security number.	Applications were corrected on-site. No further corrective action needed.	
700 - Resource Management	V-0700	The SFA does not have a proper Code of Conduct on file for foodservice employees who may be involved in the procurement of goods and services using non-profit school foodservice funds.	The SFA needs to submit their completed Code of Conduct for foodservice to the State Agency. The Code of Conduct should have disciplinary actions listed or a link to an existing disciplinary policy in their district.	
700 - Resource Management	V-0700	The number of lunch meals billed to the SFA by the FSMC did not match the monthly claim submitted by the SFA. It was determined that the FSMC was using the incorrect report (summary report) to generate meal totals for billing, instead of the correct report (edit check) which did match the claim.	For your response please submit documentation reflecting that the SFA has been credited by the FSMC for the overcharge in meals from August 2018 through February 2019.	
700 - Resource Management	V-0700	SFAs that contract with FSMCs must establish and advisory board consisting of parents, students, and teachers that meets twice per year to assist in menu planning. Documentation on file does not indicate that the advisory board has met twice yearly. Only one meeting has taken place for SY19 and no meeting minutes were available for SY18.	For your response please indicate the date for your second advisory board meeting for the current school year. In addition, please indicate who will be responsible for recording the meeting minutes. It is the expectation that two meetings will be documented yearly and that documentation will be available at the next Administrative Review.	
1000 - Local School Wellness Policy	V-1000	The SFA does not have an active wellness committee made up of stakeholders from the School Board, Administration, Foodservice, PE, school nurse, student, parent, and community;	The SFA will show that they have begun the process to meet the regulations for their Local Wellness Policy by: 1) Submitting to the State Agency an invitation to all required stakeholders noted in the finding for a	

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		they have not assessed their policy goals as is required and the policy assessment has not been made available to the public.	Local Wellness Policy Committee Meeting. The invitation needs to state when the meeting will be held, what stakeholders are being invited and what topics will be covered at the meeting. If the meeting has already been held, the SFA should submit meeting minutes showing the same information. 2). Providing the State Agency with a date the SFA expects the Wellness Assessment to be completed. 3). State how the SFA intends to communicate the Assessment to the public.	
1200 - Professional Standards	V-1200	The non-nutrition staff who serve as cashiers for lunch have not had any Professional Standards training this year or in the past year. They are each required to have 4 hours training annually with some of that training being in the area of Civil Rights.	Please explain how you plan to provide 4 hours of training to all cashiers in the district during SY2018-19. Part of this training needs to be on Civil Rights and the rest should be applicable to their job responsibilities, i.e. knowing how to ensure a reimbursable meal has been taken by students, meal charge policies, customer service, etc.	
RMCR - Indirect Costs	V-RMCR	The indirect cost rate the SFA used for FY2018 was incorrect. Instead of applying the rate set for FY18, the SFA applied the FY19 rate when calculating indirect costs for FY18. The school overcharged the foodservice account for indirect costs in FY18.	The School will need to reimburse the Foodservice account for the amount that was overcharged in FY18 as a FY19 upward or downward adjustment. Please provide documentation showing that this reimbursement was completed.	
RMCR - Indirect Costs	V-RMCR	The SY18 micro-purchase of the dishwasher table skirt was an allowable direct cost for nutrition funds, but the duct and labor would be considered equipment repair which was an indirect cost. Paying directly for the duct and labor costs and taking the full amount of indirect costs allowed is an example of "double dipping" and is not allowed.	The Schools general fund needs to refund the nutrition fund the full amount paid for the duct and labor costs. See invoice attached to this finding for the amount owed. The SFA needs to provide documentation to the State Agency showing that the costs incurred were refunded to the nutrition fund.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The SFA has an excess cash balance on hand and do not currently have an approved State Agency plan to spend the excess.	The SFA will document their plan of how and when they will spend down their net cash balance to no more than 3 months operating expenses. For corrective action, the SFA will submit the plan to the State Agency.	

Site - Level Findings: Okoboji High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments

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200 - Verification	208 When a confirmation review was conducted:	The confirmation review for all verified applications needs to be completed, signed and dated prior to the SFA sending information to households requesting income documentation. The purpose of the confirmation review is that a second person check over the application to ensure it is correct. Also, the SFA should try to directly verify the selected applications through E-Lookup before sending the household the verification request.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	If a visiting student who is not part of the district eats a meal, they need to be charged the full adult price. Also, field trip meals do not follow OVS rules so all components must be provided in their minimum quantities, i.e. Grades K-8 must have a full 3/4 cup vegetables.
700 - Resource Management		The dishwasher table skirt was an allowable direct cost for nutrition funds, but the duct and labor would be considered equipment repair which is an indirect cost. The Schools general fund would need to pay for this and be refunded via the indirect cost process. Future equipment repair paid directly through the nutrition account will need to be refunded by the school. POS software updates are an allowed direct cost (sole source). Best practice when purchasing new desktops (hardware) for each sites POS may be getting price quotes (small purchase) through various vendors including Gov Connection.
800 - Civil Rights	810 Review program materials.	The shortened non-discrimination statement needs to be listed on the posted menu. "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?	Both the Final Rule and the Wellness assessment template were e-mailed to the Superintendent and Business Manager. Discussed the need for stakeholders to be involved in the wellness process and ways to make the wellness assessment 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?	Recommend that one person in the district keep the Professional Standards training tracker for all employees involved in the Child Nutrition Program. This helps with accountability so that one person is ensuring that everyone has met their training requirements each year. At this time, one manager, one newly hired food service staff person, the SFA FSD, Determining Official and all SFA cashiers still need training in order to complete their required training hours. FSDs need 12 hours annually, Managers need 10 hours annually, kitchen staff working over 20 hours weekly need 6 hours annually, kitchen staff working under 20 hours weekly need 4 hours annually, staff hired after January 1 of the current school year need 1/2 their normal positions requirements and non-nutrition staff who are involved in the nutrition program, i.e. determining official, cashiers all need 4 hours annually. Some of the training for each staff member needs to be Civil Rights.

Site - Level Technical Assistance Okoboji High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	If a student chose the breakfast entrees that provide 4 grains daily (2 Mt/MA, 2 G), they would potentially exceed their calorie/sodium allowances. Recommend limiting large meat/grain entrée choices to only a few days a week.
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	Food production records (FPR) at the Middle School need to match what is actually being served. For example, if the FPR shows that 4 oz. is the

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		<p>serving size for the fruit or vegetable, then a 4 oz. scoop should be used to serve the fruit or vegetable. FPR and actual practice should match so that records are accurate and complete.</p>
900 - SFA On Site Monitoring	904 Was corrective action in the general areas of review that are readily observable required?	<p>When doing the SFA on-site monitoring form, if corrective action is needed, the SFA needs to follow-up on this within 45 days as noted on the form and document that follow-up.</p>
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	<p>There was one item in the vending machine that was found to not be compliant with Smart Snacks. This item will be removed. Recommend the person in charge of the machine have not only a key to the machine, but also a copy of the Nutrition Facts/Ingredient label and the Calculator print out to ensure that what was entered into the calculator is correct information.</p>

Org - Level Commendations

Description
Benefit documents, as well as all paperwork, were 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. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential.
Food Service Director, Business Manager, and Authorized Representative work well together to manage the school nutrition program. Food service staff observed to be friendly, knowledgeable and helpful to student customers.
FSMC: The SFA and FSMC have a current Fixed-Price contract in place. As required, the SFA retains signature authority over Programs, retains control of the nonprofit school food service account, and files the monthly claim. The sale of all meals and competitive foods accrue to the food service account. Twice a year monitoring of FSMC operations is being completed. USDA Foods usage from last year was reconciled. The SFA has someone named as the Program Director and that director has had required food safety training.
In SY17-18, the SFA used 101% of their allowed USDA Foods entitlement. They utilize the DOD program for fresh fruits and vegetables through their USDA Foods money. The SFA had adequate funds in their account as of January 31, 2018 so that they did not need to increase their paid student lunch prices. Non-program food revenues sufficiently cover non-program food costs. Reports are filed on time and the SFA keeps their records for at least 3 years plus the current year as required. The SFA had a written procurement plan on file for SY2018-19.
The And Justice for All civil rights poster was posted in the cafeterias observed. The district has taken reasonable steps to ensure access to services are offered to Limited English Proficient households. Annual civil rights training was provided to 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 summary form was completed. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements.
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 applications selected for verification were confirmed as a part of the verification process. The SFA had at least one person attend training.
The district has a current wellness policy on file that is going through a revision at this time. There are guidelines for student wellness, nutrition promotion, nutrition education, and physical activity. The policy is posted on the schools website for public review.
The district has promoted both breakfast at least twice a year and summer as required. Summer promotion is located on the school website so that families know where they can access free meals during the summer months.
The FSMC and FSD do an excellent job of menu planning and offering choices. The SFA has a fresh fruit and vegetable bar offered daily which allows students the opportunity to eat a balanced diet with fresh produce. All meal components were available at the beginning of meal service on the days of observation and throughout each meal service. Menus met daily and weekly meal pattern requirements for each age/grade group within the district and within each building. Documentation indicated that foods purchased and food production ensured meals contained the minimum components and quantities. CN labels and Product Formulation Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. Standardized recipes are used for food production. Water was available as required. There is regular staff training. Many foods low in fat and sodium were observed in storage. Students had sufficient time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable

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meal. A monthly menu is also posted. All students were observed to have a reimbursable meal during the day of the review, with an occasional friendly prompt by staff to take a serving of fruit. Offer vs Serve is done correctly.

The SFA has a district-wide written Food Safety plan that includes the required elements. The latest Health Inspection Report was posted in a publicly visible location at the High school site. Temperature logs are maintained for coolers-including milk coolers, freezer, both hot and cold food served, and dishwasher. The SFA also keeps records showing thermometer calibration, delivery temperatures and sanitizer bucket concentration. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures.

Site - Level Commendations Okoboji High School (0109)

Description
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 end of the line as approved on the SFA application. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
The FSD has documentation that the a la carte foods she sells through the cafeteria meet Smart Snacks criteria. Students can purchase extra entrees sold as a part of the reimbursable meal that day that do not require documentation.