

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
North Fayette Valley CSD (47740000)
Date of Review: February 14th – 28th, 2019

Program Year: 2019
Month of Review: January
Lead Reviewer: Donna Matlock
Org Representative(s): Duane Willhite

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Eight (8) household applications or Direct Certification (DC) errors were made. 4 students were incorrectly identified on DC list, 2 applications were missing the 4 digit social security number, 1 student received reduced benefits but no application on file, 1 household was receiving 'reduced' benefits and should be 'paid'.	Q 126 ca: Submit copies of letters notifying households of an increase or decrease in benefits. Indicate the date that missing information, such as SSNs, income frequency, dates of application, etc., were obtained.	
100 - Certification and Benefit Issuance	V-0100	Four students identified on the direct certification (DC) lists received incorrect benefits; two households were receiving 'free' and should be 'reduced' and two received 'reduced' and should be 'free'.	Q 133 ca: For your response, indicate how you will ensure that direct certification matches are correct. <i>Recommend highlighting either 'Other Free or Other Reduced' column on DC lists to avoid accidentally transferring incorrect eligibility to POS.</i>	
100 - Certification and Benefit Issuance	V-0100	Household applications are not getting processed in a timely manner. USDA requires 10 days'	Q 138 ca: For your response, please indicate how you will ensure that benefits will be implemented in	

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		timeframe for processing application when received.	accordance with required timelines.	
1000 - Local School Wellness Policy	V-1000	The most recent assessment of the local wellness policy was not submitted. SFA provided a copy of wellness meeting minutes in place of assessment. Discussed with and shared Team Nutrition LWP (Local Wellness Policy) assessment template, and DE Wellness Policy website.	The SFA must update and assess the policy and goals to demonstrate compliance with FNS requirements. Submit a timeline and plan on when each school in the district will be assessed on the implementation of the LWP (Local Wellness Policy).	
RMCR - Revenue From Non-Program Foods	V-RMCR	SFA did not calculate non-program food costs vs. revenue for compliance. SFA's current non-program food costs are 35% while non-program food revenue only recoups 13% based on financial report.	Complete and attach the USDA Non-Program Revenue calculator tool. Tool is located in 'Download Forms' of IowaCNP, form number NSLP-150.	

Site - Level Findings: West Union Elementary School (0427)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Breakfast	V-0300	The POS (Point of Service/Sale) allows identification of students eligible for free and reduced priced meals by color coded dots on computer screen.	Moving forward, indicate how the meal counting system will be altered so that overt identification of students receiving free and reduced price meals cannot be determined. SFA had IT immediately change the system to remove the color coded dots right after SA observed during breakfast.	

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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	103 At the beginning of the school year, how is benefit status handled for children who have not submitted an application for the current school year?	Allowable period is 30 operating days for carry over then benefits must be changed to paid if no application has been submitted.
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	Determining Official is using 'annual' conversion for all applications when only one income is reported. Discussed with SFA the correct conversion factors need to be used when households are reporting one income.
700 - Resource Management		SA recommends SFA include 'Buy American & Debarment Certificate' with all procurement solicitations to ensure USDA compliance for procuring services.
700 - Resource Management	710 If the SFA provided adult meals for teachers and/or parents, did it obtain full payment from the adults receiving the meals and/or recover the cost of those meals by some other means (general fund transfer, etc.)?	SFA indicated adult meals are based on PLE tool but the State Agency sets the minimum amount to charge for adult meals prior to SFA's Application Packet is approved by SA. PLE tool is to bring SFA's awareness to the requirements of increasing ' paid student ' prices annually to achieve total of amount of federal free reimbursement rate received annually.
700 - Resource Management	712 Were indirect costs* charged to the SFA's nonprofit school food service account?	SFA charged nutrition fund equipment repairs and vehicle expenses. SA shared documents developed by SA to determine what is direct and indirect costs and if allowable to charge nutrition fund.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	SA shared the racial/ethnic template with SFA to complete prior to onsite visit as this was not completed, SFA is unsure who's responsible for completing.

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1000 - Local School Wellness Policy	1005 <i>Provide a copy of the most recent assessment on the implementation of the local school wellness policy.</i>	SA provided a folder of resources which included a LWP assessment template and is available on the Dept. of Ed. website.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	SA discussed with SFA that all districts are required to promote the SFSP (Summer Food Service Program) even though they are not participating in SFSP. SA shared the DE website where resources, posters, and links can be used to promote the program.

Site - Level Technical Assistance West Union Elementary School (0427)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	325 a. For the review period, complete S-1, 17.	Lunch meal count for 'paid' edit check report had 1,465 meals and claim had 1,466. FSD accidentally hit the wrong number when entering data into system.
400 - Meal Components and Quantities - Breakfast	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	SA recommended to manager to identify type of fruit and leftovers on FPR's.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	FPR's (food production records) for week of review was missing grains on Jan. 9th. It was an oversight when completing FPR for this meal, manager stated bread and butter was served with the meal as stated on menu.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	Health inspection report was inside kitchen. Manager moved it to public location outside of kitchen.

Org - Level Commendations

Description

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- Benefit documents, as well as all paperwork, were very well organized. • The current application form and guidelines were used, direct certification is downloaded twice a month as required, 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. • The SFA has a back-up system for benefit issuance documents and system.
- Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of January were accurate and complete. • Point of Service (POS) counts and filed claims appear accurate. • Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. • Cashiers are trained, and daily edit checks are performed. • All students selected a reimbursable meal.
- 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. • The SFA had at least one person attend training. • The verification report was completed accurately and on time.
- The district has a current wellness policy on file. • The SFA’s wellness policy was reviewed and revised on January 9, 2017. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. • The wellness policy are made available to the public via district website.
- The Resource Management section of the Off-Site Assessment tool was completed on time. • Financial records that were reviewed, indicated appropriate and allowable expenditures. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. • There were no unresolved findings from the previous Administrative Review or from a state audit. • The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. • The Paid Lunch Equity (PLE) tool was completed and prices were increased as required. • No indirect costs are charged to the food service program. • Money is not transferred out of the account to support other programs. • Reports are filed on time, and all records are maintained for at least three years plus the current year.
- The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events, and specifications were well-written and comprehensive. • The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. • IFBs and RFPs are advertised. • The district has a signed agreement with a Group Purchasing Organization for prime vendor to supply food and non-food supplies. • A review of milk, bread, and prime vendor invoices validated the district was receiving the products as bid and prices were charged as bid. • The school utilized 94.9 percent of their Planned Assistance Level (PAL) – USDA Foods.

Site - Level Commendations West Union Elementary School (0427)

Description
<p>• All meal components were available at the beginning of meal service on the days of observation and throughout meal service. • All meals observed met at least the minimum daily requirements. • Menus met weekly and daily 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 required components and quantities. CN labels and Manufacturer’s Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and</p>

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vegetables encourages student consumption. The SFA provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal. • Menus included many homemade entrees, and standardized recipes are used for food production. • Free potable water is available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast. • At least two types of milk are offered. • Many low fat and low sodium food items were observed in storage. • Students had sufficient amount of time to eat after receiving meals. • Recess is scheduled before lunch service. • Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch. A monthly menu is also posted. • Food service staff was polite and respectful to students, other staff, and each other. • Nutrient analysis was not required.

• The “And Justice for All” civil rights poster was posted in the cafeteria. • Annual civil rights training was provided to food service staff and documented. • A copy of the district’s public release was on file, documenting that it was submitted to local media. • 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 Food Service Director completed the USDA menu worksheets for the week of January 7th-11th, 2019 for breakfast and lunch at West Union Elementary. The worksheets showed the serving portions and component contributions meeting the meal pattern. • The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that West Union Elementary school is at low risk for (non)compliance with Dietary Specifications regulatory requirements. • Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, controlling the portion sizes of condiments, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats.

• The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. • The latest Health Inspection Report was posted in a publicly visible location. • Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Good food safety procedures were observed.