

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Gilbert Community School District (24660000)
Date of Review: 4/5/2019 – 4/8/2019; Exit Meeting 4/12/2019

Program Year: 2019
Month of Review: March
Lead Reviewer: Jean Easley
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	Errors were made with verification: 1) the Confirming Official and Hearing Official must be different individuals. The Hearing Official is not to be involved in the eligibility process and is generally a position of higher authority, therefore should not be listed on household letter (except as the Hearing Official). 2) Double-check names in DC/E Look Up prior to verification. 3) Remember to use gross income when calculating proof of income. Households often make this mistake of using net income. Recommend maintaining a copy of ICAVES in verification file as is done with applications.	For your response, state who will be the Determining Official, Confirming Official and Hearing Official. State who will attend the annual verification webinar training.	
700 - Resource Management	V-0700	The SFA does not have a Procurement Plan and Code of Conduct on file.	The SFA will submit their completed Procurement Plan and Code of Conduct to the State Agency. The Code of Conduct must include disciplinary actions listed.	
1000 - Local School Wellness Policy	V-1000	A review of local wellness policy goals was not available.	At least every 3 years, the goals of the local wellness policy must be assessed and the assessment provided to the school community. Sample wellness policies, a progress report template, & other resources can be found on IDOE School Wellness website . For your response, describe 1) when the assessment of goals will be completed (a date), 2) who will be involved in the process (names or titles), 3) confirm the assessment will be posted on the webpage along with the	

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			wellness policy and/or how it will be provided to the community.	
1400 - Food Safety	V-1400	Per Food Code 2013, each site must have a "person in charge" who is a Certified Food Protection Manager (ServSafe Certification). New Nutrition Director has 8 hours of Food Safety training, however, does not yet have ServSafe certification, nor does any staff at the high school central kitchen.	Director has already registered for ServSafe training and exam. For your response, list the date and staff members who are enrolled for training and testing. State your understanding that there must be one "Person in Charge" at each location who maintains certification.	

Site - Level Findings: Gilbert Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Breakfast	V-0300	The meal counting process at breakfast was observed to be unacceptable. 1) Several students were allowed to get their meals before the point of service (POS) was available. 2) the POS was at the beginning of the line and no solid process in place for verifying a reimbursable meal at the end of the line. The kitchen staff were busy and not consistently at the end of the line; potential errors for cashier because several students did not select a reimbursable meal and cashier had to be well-organized to charge a la carte correctly. 3) SFA approved agreement for the POS at the end of the line did not match the process observed.	For your response, describe the revised process for breakfast.	
300 - Meal Counting and Claiming - Lunch	V-0300	A monthly Edit Check is not completed. EDIT CHECK REPORT: USDA regulations require school agencies to complete an edit check prior to combining daily lunch counts for the monthly reimbursement claim. The purpose of an edit check is to identify errors in lunch counts and/or problems with meal counting and claiming procedures. The written prototype from IowaCNP was provided and reviewed. Check with your School Lunch Program vendor about an Edit Check feature.	For your response, describe you plan to include the process of completing a monthly Edit Check. There is an Edit Record found in IowaCNP/Download Forms.	

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400 - Meal Components and Quantities - Lunch	V-0400	Food Production Records are incomplete; total quantity must be included to be able to confirm enough food is planned and prepared. Meal Pattern crediting is not available on standardized recipes served the focus week of review.	Submit one day (breakfast and lunch) of revised FPRs showing required information. Submit meal pattern crediting for the following recipes served during the focus week: Ham & Cheese Sandwich; Turkey & Cheese Sandwich, Walking Taco, Pasta Salad (clarify serving size to be used at the elementary.)	
1300 - Water	V-1300	Free potable water is not available to students.	Describe your plan for offering free water for breakfast and lunch and the date it will begin.	
1400 - Food Safety	V-1400	No freezer thermometers are available, therefore, temperatures are not checked or documented for two small freezers at the elementary school.	Describe what has been done to correct this food safety violation. Submit a current temperature log showing temperature of freezers.	
2000 - Supplemental Special Milk Program (SMP)	V-2000	Special Milk counts were not taken at the point of service. Technical Assistance given to preschool teachers explaining USDAs requirement regarding counts for reimbursement.	For your response, describe how the SFA will ensure special milk counts are counted at the point of service.	

Org - Level Technical Assistance

Area	Question	Comments
600 - Dietary Specifications and Nutrition Analysis		MEAL PATTERN DOCUMENTATION: Continue collecting CN labels and Product Formulation Statements for all products served in cycle menu to correctly verify how all products credit in meal pattern. A Product Formulation Statement is an alternative for crediting information when you cannot get a CN label. This is not the specification sheet from your distributor. Shared how to use the Exhibit A Grain Chart for crediting bread and grain items which may not have documentation.

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700 - Resource Management		PROCUREMENT: Authorized Representative and Business Manager attended regional procurement training offered by state agency. Recommend new Director attend a regional training to be offered this fall.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	CIVIL RIGHTS: 1) USDA Federal and State Non-Discrimination Statement provided to newer director; both statements are required on all FNS documents, website, menu; the abbreviated statement can be used on the menu: "This institution is an equal opportunity provider." 2) Provide training annually at the beginning of the school year for all involved with Nutrition program, including cashiers at point-of-service. 3) Maintain dated documentation that a public release is submitted annually to local newspaper. 4) Application translations can be found at http://www.fns.usda.gov/school-meals/translated-applications . 5) Include a Non Discrimination link on district nutrition page. This directs how to make a civil rights complaint specific to school meals; https://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer

Site - Level Technical Assistance Gilbert Elementary School (0409)

Area	Question	Comments
Meal Component and Quantities - Lunch	1 If option 1 has been selected for the targeted menu review, provide one week of menu documentation from the review period.	Standardized Recipes must include meal pattern crediting information.
400 - Meal Components and Quantities - Breakfast	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	A variety of pre-portioned cups of fruit are offered for breakfast; on the day of review grapes and oranges were slightly less than the required 1/2 cup fruit. Technical Assistance given to site manager and director to be certain ensure each fruit offered meets the full 1/2 cup requirement. Use 1/2 cup as a guideline and review Food Buying Guide for commonly served items such as oranges, bananas, clementines. FSD could develop a "cheat sheet" for commonly served fruits and veggies from the Food Buying Guide for staff.

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400 - Meal Components and Quantities - Lunch		Food Production Records: Use the FPR checklist to ensure all required information is include such as "total quantity prepared" so the amount of food used can be quantified. Effort has been made to pre-populate serving sizes and meal pattern crediting, however, new FSD is challenged to ensure these are accurate. A food bar production record is part of the Iowa template which may be helpful.
1400 - Food Safety		HACCP PLAN: FSD acknowledges a goal to update the district and site HACCP plan. Thermometers are to be calibrated; Begin documentation of thermometer calibration as stated in your local HACCP plan.

Org - Level Commendations

Description
BENEFIT ISSUANCE: eligibility documents are well organized. Applications are maintained along with ICAVES showing income calculation. Direct Certification downloads is completed twice monthly as required. Determining Official participates in training provided by state agency. Ethnic/Racial form completed and maintained. Free and reduced information is maintained confidential.
CIVIL RIGHTS: CR posters are posted in cafeteria, annual CR training is provided to nutrition staff. A public release is supplied to local media. Students with special dietary needs are documented and accommodated. No discrimination is observed.
No fiscal action required as result of this Administrative Review.
NUTRITION: Nutritional information of menu items are available on the school website (along with a photo of the menu item served) for families who wish to monitor carbohydrates or other nutrients.
OUTREACH: promotion of the school breakfast program was maintained from National Breakfast Week in March. Outreach and communication is provided for the Summer Food Service Program communicating closest free meals offered for 18 and younger.
PROFESSIONAL STANDARDS: newer director has organized training and is developing a training plan to ensure all employees will meet annual training requirements.
RESOURCE MANAGEMENT: Nutrition Fund is operating in the black. Revenues were greater than expenses for SY18. Indirect Costs were charged to Nutrition Account - documentation clearly shows calculation was made using correct indirect cost rate for Gilbert CSD and the correct cost base was used. USDA Foods "Paid Assistance Level" or PAL was utilized at 94.8% for SY18. A Meal Charge Policy is in place.
WELLNESS: The district has a local wellness policy is in place and it posted on the Food Service web page so the public has access to the policy as required.

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Site - Level Commendations Gilbert Elementary School (0409)

Description
FOOD SAFETY: staff demonstrated safe food handling practices. Site Manager has ServSafe Certification. Staff work hard to keep a very small kitchen clean and orderly.
MENU, NUTRITION, ENVIRONMENT: Fresh fruits and vegetables are offered and encouraged daily. K - 2 students may select their own fruits and vegetables at lunch. Several choices of 1/4 c servings are offered on a carte - cucumber, carrots, tomatoes, broccoli, grapes and applesauce. Site Manager is positioned at the end-of-the-line at lunch ensuring all students select a reimbursable meal. Students were observed to have adequate time to eat.
REIMBURSABLE MEALS: Nutrition staff and point-of-service cashier are friendly and encouraging to young student customers. Both kitchen and Point-of-Service operator demonstrate an understanding of meal pattern requirements. On the day of observation, all breakfasts and lunches observed met reimbursable meal guidelines.
SPECIAL MILK: elementary school offers a reimbursable milk program to preschool students who do not have access to the meal program.