

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Clarinda Community School District (11970000)
SNP - Review ID: 5070

Program Year: 2019
Month of Review: February
Lead Reviewer: Brenda Windmuller
Org Representative(s): Traci DeBolt

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	While the SFA may complete an application on the behalf of a student or household, they must still follow the guidelines of qualification for free and reduced benefits.	The SFA will watch the "Application Approval" webinar posted on the SA's web site and submit the date to be completed.	
700 - Resource Management	V-0700	The SFA is using the small purchase method for milk. The local threshold for formal purchases is \$25,000 (Board Policy #705.1). Spending on milk exceeded \$36,000 in 2016/2017 and \$31,000 in 2017/2018. As of February 2019 spending on the milk contract was \$18,886.38 with 3 months of purchases remaining.	The SFA will provide evidence that the district's formal procurement threshold is being raised by the school board to a level higher than the milk contract value OR submit 1. a draft of the RFP or IFB for a milk contract 2. The name of the newspaper that the solicitation will be posted in and 3. the date to be posted.	

Site - Level Findings: Clarinda High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA's breakfast option of yogurt and granola did not supply 1 oz eq of grain as required for 9-12 grade.	The SFA will describe how they will ensure that each breakfast offering contains the required 1 oz minimum of grain daily and how the yogurt option will be modified to be compliant.	

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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance		One application was not completed and simply marked "approved by administration." Missing information was acquired during the on-site review.
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	The SFA should date all applications as they are received. One application was not signed by the determining official.
200 - Verification	209 Based on the review of verified applications:	The SFA should select applications from error-prone applications. Neither of the applications selected were error-prone.
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan.</p> <p>The SFA should start now on the procurement plan for 2019/2020.</p> <p>Milk contracts are currently being awarded using the small purchase method, the value of the contract exceeds the \$25,000 threshold for formal procurement. The SA provided guidance on options to resolve this issue and provided information on the formal procurement method.</p> <p>The SFA sent the SA the requirement for small purchases to include all terms and conditions.</p> <p>The SFA should keep records of all communication and solicitations sent out as well as all bids coming in.</p>

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		<p>The SFA should complete an evaluation matrix to decide the lowest bid. (provided) Items must be on your solicitation or in your market basket or you may not order them.</p> <p>Some items purchased as a micro purchase do not meet dietary guidelines. (white bread purchased January 8, 2019)</p> <p>Reinhart is being used as a micro purchase. There is no competitive bid process in place for these items. The dollar amount spent at Reinhart exceeds the district's \$5000 threshold as a micro purchase. Funds are not spread equitably. Purchases from Reinhart must stop immediately for the rest of the 2018/2019 school year. If the SFA intends to continue with this type of vendor, they must follow the small or formal purchase format.</p> <p>Custodial personnel was authorized to purchase a microwave for the middle school. Persons making purchases for the Lunch Program should have procurement training to ensure federal regulation is being followed.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>Must have signed debarment certifications kept on file.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Agreements valued at \$10,000 or more should have an exit clause.</p> <p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p>
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		<p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none"><input type="checkbox"/> All price adjustments throughout the year<input type="checkbox"/> All invoices<input type="checkbox"/> All contracts and agreements<input type="checkbox"/> All bids solicited<input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)<input type="checkbox"/> Documentation of why you selected a specific vendor (Selection Rubrics)<input type="checkbox"/> Copies of bid solicitation<input type="checkbox"/> Debarment statements<input type="checkbox"/> CD provided by the AEA (if applicable) <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.<input type="checkbox"/> Purchases should be distributed around community, not just one store.
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		<p>Small Purchases- Purchases that are under \$250,000 (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"> <input type="checkbox"/> Include all terms and conditions <input type="checkbox"/> Include terms: Buy American and Equal Opportunity <input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more <input type="checkbox"/> Attain Signed Debarment Statements <input type="checkbox"/> Awarded on lowest price (unless written documentation to justify) <input type="checkbox"/> Maintain documentation <p>Formal Purchase- Purchases equal to and exceeding \$250,000 (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"> <input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised. <input type="checkbox"/> Include all requirements of a small purchase <input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. <input type="checkbox"/> Everything must be in writing.
700 - Resource Management		<p>The SFA spent only 87% of the USDS Foods (Commodities) money allocated to them in 2017/1018. The Expectation is that the SFA utilizes 90% or more of those funds every year. The SA shared methods to better track the spending and provided the contact information for the SA's USDA Foods Consultant.</p>
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?	<p>The SA gave an overview of the expectations of the Wellness Committee to include frequency of meeting,</p>

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		setting goals and assessing the goals. The SFA should include faculty, staff, community members and students on the Wellness Committee and should be meeting 1-2 times a year. The SA provided Wellness Policy guidelines to the SFA.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	The SFA is required to promote breakfast two times each year. This is to serve as a reminder that breakfast is available to all students, and encourage additional participation. Promotions may also focus on the many benefits of eating breakfast every day.

Site - Level Technical Assistance Clarinda High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast		The SFA should monitor the juice consumption as it relates to the total calorie intake each day. Students are currently allowed to take two fruit juices at lunch and breakfast. High School students are limited to 850 calories at lunch and 600 calories at breakfast. Each juice contains 50 calories. Extra juice which is paid for as an a la carte item is not subject to the same calorie restrictions.
400 - Meal Components and Quantities - Breakfast	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?	The yogurt and granola selection at breakfast contained 9 oz of yogurt and .6 oz granola. High school students must be offered 1 oz equivalent of grain before counting meat/meat alternate as grain at breakfast. The SFA was short grains for this offering (2 oz of granola is required to equal 1 oz eq.) The SFA should refer to the bread/grain chart to determine how many ounces of an item it takes to equal 1 ounce equivalent. The SA shared the bread/grain chart with the SFA.
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	The SFA should post the breakfast menu like they do for lunch. A poster and some templates were provided by the SA.
1100 - Smart Snacks in School		SMART SNACKS: Competitive foods and beverages sold to students during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) must meet Smart Snack guidelines and nutrition standards.

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		<p>These items must be: whole grain-rich; first ingredient must be fruit, vegetable, dairy product or a protein; or be a combination food that contains at least ¼ cup of fruit and/or vegetable. Items must meet the calorie, sodium, fat and sugar standards. Items must also adhere to the size restrictions for each age group. A brochure was provided. The LEA person responsible for ordering product for the vending machines must ensure that all product is compliant. The LEA and SFA should not rely on lists provided by the vendors selling the product, rather all items stocked in the vending machines should be run through the Smart Snacks calculator to confirm compliance. Best practice is to keep a binder or folder with these calculations.</p>
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Org - Level Commendations

Description
<p>ACCESS AND REIMBURSEMENT (100): Benefit documents, as well as all paperwork, were well organized. The current application form was used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS, and denied applications were correctly handled.</p>
<p>CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. Ethnic/racial information is collected and the form is completed. No discrimination was observed. Students with special dietary needs are accommodated. The “And Justice for All” poster is visible to program participants.</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.</p>
<p>MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the 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. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period.</p>
<p>On-site Monitoring (900): The on-site monitoring forms were completed for both of the SFA's sites prior to February 1st.</p>
<p>PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds. 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. The FSD has attended a Regional Procurement Training.</p>
<p>PROFESSIONAL STANDARDS (1200): The SFA followed regulations for the district’s size category when hiring a new director. Tracking was provided that documents that the director received the required 12 hours of annual training, managers received the required 10 hours of training (or close to completing), full time employees have 6 hours of annual training and all other staff have received at least 4 hours of annual training. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.</p>
<p>REPORTING AND RECORD KEEPING (1500): Reports are filed on time, and all records are maintained for at least three years plus the current year.</p>

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<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. The Paid Lunch Equity (PLE) too was not required as the SFA had a positive balance in January 2018. Errors during the Administrative Review fell below the \$600 disregard, no Fiscal Action is expected at this time.</p>
<p>SUMMER PROMOTION (1600): The SFA does an excellent job of promoting the SFSP with radio announcements, flyers, posers, newsletters, email pushes, signs and facebook postings.</p>
<p>VERIFICATION (200): The correct number of applications were verified. All income sources were verified, 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.</p>

Site - Level Commendations Clarinda High School (0109)

Description
<p>COMPETITIVE FOODS & SMART SNACKS (1100): There is a vending machine at the high school; all items in the machine are compliant with Smart Snacks standards.</p>
<p>HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes all required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers, milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled.</p>
<p>MEAL PATTERN: All students observed on the on-site visit had a reimbursable lunch, the menu was complete with all food groups represented and served in their proper quantity. Offer vs. Serve was implemented properly and staff was monitoring food items on trays. Water was available to all students during meal times. Menus for the month of review contained all required components.</p>
<p>OFFER VS SERVE: Offer vs. Serve is being implemented properly. All students observed selected 1/2 cup of fruit and/or vegetable. Cafeteria staff have been trained on offer vs. serve. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable.</p>
<p>The SFA has a white board posted with the lunch menu. They use colored stickers that are placed next to each menu item to indicate the meal component that the lunch item supports.</p>