

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central City Comm School District (10890000)
Dates of Review: April 3 – 5, 2019

Program Year: 2019
Month of Review: February
Lead Reviewer: Deb Linderblood
Org Representative(s): Denise Starry

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	The SFA attempted to verify a household that was on reduced price meals due to the 30 day carry-over. No confirmation review was completed. The SFA did not attempt to follow-up with the household when they did not respond. TA provided that students whose status is carried over from the prior school year are not to be included in the sample pool. Explained that upon selecting a household for verification, the SFA needs to have someone other than the Determining Official confirm that the application was correctly approved. Also explained that the SFA is required to make one follow-up attempt if the household does not respond.	State your intentions to participate in the verification training webinar next fall.	
700 - Resource Management	V-0700	Fiscal action is pending based on PS2 errors.		
700 - Resource Management	V-0700	The nutrition fund currently has a negative balance. TA provided on some ways that the SFA can possibly cut costs.	State your plans for how you will decrease costs and increase revenue to bring the nutrition account into a positive balance.	
700 - Resource Management	V-0700	The SFA's Meal Charge Policy has not been distributed to all households or to staff.	State how and by when you will distribute your Meal Charge Policy to all households and also to staff.	
800 - Civil Rights	V-0800	The SFA's menu does not have the correct short version of the USDA nondiscrimination statement. It currently has "Central City is an equal opportunity institution" and should be "This institution is an equal opportunity provider."	Revise your monthly menus to have the correct short version of the USDA nondiscrimination statement. Attach one monthly menu showing that the change has been made.	
800 - Civil Rights	V-0800	Two food service staff have not had Civil Rights training in school year 2018-2019.	Have these two staff members complete Civil Rights training. Have them sign an attendance form that has the title of the class, date, time and their signatures signifying that they completed the training. Attach the attendance form.	
1000 - Local School Wellness	V-1000	The Wellness Committee does not include students. No assessment of the Wellness Policy	State how and by when: 1.) students will be invited to participate on the Wellness Committee 2.) an	

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Policy		has been completed and thus has not been made available to the public. TA provided that the following individuals should be permitted to be involved on the Wellness Committee: parents, teachers of physical education, school administrators, students, school health professionals, general public, school food service and school board members. Also provided the State Agency template to use when completing the triennial assessment. In addition, the handout "Non-food Classroom Reward and Celebration Ideas" was provided.	assessment of the wellness policy will be completed 3.) the assessment will be made available to the public.	
1200 - Professional Standards	V-1200	Only one nutrition staff individual has completed their required professional training for school year 2018-2019. The Director has completed 7.25 hours of the required 12, Manager 4.25 of the required 10, one full-time staff 4.25 of required 6, one full-time 0.00 of the required 6 and one part-time 0.00 of the required 4 hours.	Put together and attach a plan for how each nutrition staff will be trained in order to complete their required training for school year 2018-2019.	
1400 - Food Safety	V-1400	The SFA does not have a written food safety plan.	Develop and attach a Table of Contents showing the Standard Operating Procedures that you will have in your Food Safety Plan. Develop and attach 3 Standard Operating Procedures that will be a part of your plan.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	Per the IowaCNP Financial Report, the SFA's revenue ratio was less than its food cost ratio.	State the non-program foods that you will increase the price of in order to bring in additional non-program revenue. State the foods current price and the price it will be raised to and by when.	

Site - Level Findings: Central City High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA does not have breakfast signage. TA provided on where to find the State Agency template for breakfast signage and how to fill in the signage.	Develop and attach breakfast signage for one week's worth of breakfast meals.	
400 - Meal Components and Quantities - Lunch	V-0400	The menu certification worksheets for the week of February 25, 2019 showed that for K-8 and 9-12th grade the SFA was short on total vegetables, short dark green vegetables, had no legumes and were short on grains for the week. The 9-12th grade were also short on red-orange vegetables. Being short on red-orange vegetables, legumes and grains were a repeat violation. TA provided that K-8 must have 3/4 cup of vegetable per day and 9-12 must have 1 cup per day. All age groups must have 1/2 cup of legumes per week and 1/2 cup of dark green vegetables. 9-12th graders must have 1 1/4 cup of red orange vegetable. For grains, the K-8	Using a week of menus that are different than the week used to do the menu certification worksheets, complete and attach a lunch menu template for the 9-12th graders showing that all meal components and vegetable sub-groups were met. Attach the corresponding "CN" labels, Product Formulation Statements and recipes as well as nutrition fact labels for bread products. Also attach the production records for the corresponding week. Also state your intentions to send one or more of the nutrition staff to the Healthy Meals short course this next summer.	

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		must have 8-10 oz. eq. per week and 9-12th graders must have 10-12 oz. eq. per week. Provided the Food Service Director with the meal pattern requirements and a blank menu template. Reviewed how to complete the menu template. TA also provided on how to use the bread/grain chart. Provided a copy of the most up to date chart.		
1100 - Smart Snacks in School	V-1100	The vending machine that is in the cafeteria contains 8 oz. Envy which has 110 calories and is not Smart Snack compliant. Juice is also sold that is greater than an 8 oz. portion. Since all grade levels have access to this machine TA provided that for elementary the juice can only be an 8 oz. portion.	State your intentions to remove the Envy and juice that is greater than 8 oz. from the vending machine.	
1100 - Smart Snacks in School	V-1100	At Valentine's Day there is a fund raiser sponsored by the National Honor Society in which students can purchase chocolate and eat it during the school day. TA provided that all foods sold from midnight until 30 minutes after the end of the school day must be Smart Snack compliant. TA was provided at the last review that this practice is against Smart Snack regulations.	State your intentions to only sell foods that are Smart Snack compliant from midnight until 30 minutes after the end of the school day. State that chocolate will no longer be sold at Valentine's Day to students during the school day.	
1400 - Food Safety	V-1400	Refrigerator, freezer and milk cooler temperatures are not being taken every day.	Begin to take refrigerator, freezer and milk cooler temperatures daily. Attach documentation showing that these temperatures were taken daily for one week.	
1400 - Food Safety	V-1400	Boxes in the freezer at sitting on the floor. These need to be a minimum of 6 inches off of the floor.	State your plan for how you will make sure all food is stored at a minimum 6 inches off of the floor.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	106 Within the SFA, who has access to the applications within the system?	There is currently an individual trained to be a back-up for approving applications but no one is trained to do direct certification. TA provided that the SFA needs to have a back-up person trained to download the direct certification lists in the event that the Food Service Director was not able to do this task. The Food Service Director stated that she would train one of the Food Service staff to do this function.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	TA provided that when the SFA selects an application to verify they should attempt to find the students on Elookup. If they are found they are directly

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		verified and a letter of selection does not need to be sent to the household.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Provided the Food Service Director with a sample Standard Operating Procedure for sack lunches as well as a sample Food Production Record.
700 - Resource Management		<ul style="list-style-type: none"> · The procurement event page on the written procurement plan should be revised to reflect the upcoming school year's procurement events, correct procurement methods and contract award type. It is recommended that the procurement event page of the written procurement plan be reviewed annually (about February). It is best practice to keep a separate procurement event page for each school year. This practice will help ensure that the correct procurement method is identified based on the estimated value of a particular purchase. On the plan the SFA should identify if they will award based on line item or bottom line for any purchasing event using small or formal purchasing method. · TA provided that for equipment repair and preventive maintenance the SFA needs to use a unrestricted indirect cost rate to charge the nutrition account for these services. Explained to the SFA where to locate their indirect cost rate on the Department of Education webpage. These expenses will not be listed on the Procurement Plan. · TA also provided that the SFA needs to have debarment statements from vendors when using small or formal procurement methods. · The written code of conduct did not identify the specific board policies that make a reference to ethics, gift and disciplinary action. A number of board approved policies that reference disciplinary action, gifts and ethics were identified. Write in the policy numbers and titles on the school food service code of conduct that would apply to officers and employees who violate procurement procedures. · Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a Buy) and formal methods of procurement. Please refer to the state-prototype templates posted on IA_CNP. Reviewed how to complete the small purchase template and provided the template. · When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." · When procuring milk and bread, along with specifications (descriptions) for all items to be procured, the estimated annual usage for each item should be provided. To ensure the district

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		<p>selects a responsive vendor with the overall lowest price (bottom line), the cost of each item on price quotation request should be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template that calculates extended cost for milk was shown to the Food Service Director on IowaCNP under download forms.</p> <ul style="list-style-type: none">· For milk, other things to consider when requesting price from vendors are: is pricing requested for paper cartons or plastic bottles, coolers to be provided at no charge, Hazard Analysis Critical Control Plan (HACCP) plan to ensure clean crates and milk cartons are delivered, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should inform vendors whether a firm, fixed price or a fixed price with economic adjustment (escalator clause) is requested.· For bread, provide vendors with a package count/package weight/weight per serving for each bread product. Review current school year bread product purchases to include any regularly purchased items when requesting price quotes.· The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and the description of the product solicited by GPO. Prices on the invoice should match bid pricing or be lower unless SFA was given advance written notification per solicitation of any price increase. Food items procured by the SFA not on the GPO solicitation must be procured using appropriate procurement methods.· Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-domestic agricultural commodity is accepted.· The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification and be at equal or lesser price.* The SFA needs to keep an Exception Log listing items they have accepted that are non-domestic. The exception log needs to list the date that the non-domestic item was accepted, item name/description, and the reason it was accepted. Two reasons are valid for accepting non-domestic foods, i.e. 1). food is not available in the US or not available in adequate quantities in the US OR 2). the domestic product is significantly higher priced than the non-domestic product.
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		* Provided the Food Service Director with the State Agency's rebate tracking and credit tracking form for the SFA to use.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The link for the USDA complaint process/form which should be used if parents wish to file a complaint about any child nutrition program is: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer.
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?	The SFA is interested in starting a Summer Food Service Program. TA provided that the SFA should contact Stephanie Dross at the Bureau of Nutrition to determine if they are eligible to have a program. Also provided TA that there are promotional materials available on IowaCNP under download forms.

Org - Level Commendations

Description
Certification and Benefit Issuance: Benefit documents were very well organized. The current application for free and reduced price meals/milk and income guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the Point Of Service (POS) system, and denied applications were correctly determined. All applications were correctly determined, signed and dated by the household member and the SFA, and all applications were determined within ten days. 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. Waivers are provided to applicants. Eligibility is kept confidential.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria. Services are offered for Limited English Proficient households. The SFA submitted the annual Public Release to the local media. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed.
Food Safety: The latest Health Inspection Report was posted in a publicly visible location. Food temperatures are documented on a Service Temperature Log. Dishwasher temperatures are taken and documented. Good food safety procedures were observed. The kitchen and storage areas were clean. Chemicals are stored away from food items. Tables are sanitized following each group of students who eat. The following individuals at the site reviewed are ServeSafe Certified: Denise Starry and Sarah Holub.
Local Meal Charge Policy; The SFA developed and approved a meal charge policy which was revised in September of 2018. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.
Procurement: The Food Service Director attended the Regional Procurement Training in Cedar Rapids. The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, have listed procurement events and procurement methods for each event. The SFA is part of the AEA purchasing group. The signed agreement with AEA Purchasing states that the school district agrees to procure food (excluding bread and milk) and non-food supplies through the Group's awarded Prime Vendor as well as the vendor awarded the small ware contract. In school year 2017-2018 the SFA utilized 108.3% of their allotted PAL dollars. The SFA participates in Direct Distribution, DOD and Diverted Foods. This school year, the SFA is on track to use their allotted direct distribution dollars and is also on track to utilize their Department of Defense Fresh Fruit and Vegetable allotment and Diverted Foods allotment.
Professional Standards: The Food Service Director has completed 7.25 hours of professional training of the required 12 hours. An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours.
Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.
Resource Management: All expenditures that were reviewed appeared allowable. 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. The Non-Program Revenue (NPR) tool was completed. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs.
School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach was sent out via a flyer to inform families of the availability of the program. Breakfast menus are posted on the district's website each month and breakfast is promoted during testing weeks. The SFA has good breakfast participation. Summer Food Service Program (SFSP) outreach was published in the local newspaper and flyers were posted and sent home with students.

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Wellness Policy: The public is made aware of the SFA's wellness policy via the district's web site. The following individuals are involved in reviewing and updating the LWP: Food Service Director, School Nurse, Curriculum Director, Physical Education/Wellness Teacher, at least one Classroom Teacher and a School Board Member. Potential stake holders are made aware of their ability to participate in the Wellness Committee via letter or e-mail. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.

Site - Level Commendations Central City High School (0109)

Description
Meal Components and Quantities: 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. CN labels and Manufacturer's Statements, as well as nutrition facts labels used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month for breakfast and lunch—including many fresh fruits and vegetables. Standardized recipes are used for food production. At least two types of milk are offered. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal at lunch.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Harris School Solutions is used as the school's POS system. The POS was organized and orderly. 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. The cashier/Food Service Director appeared aware of what constitutes a reimbursable meal. Edit checks are performed.
Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of February 25-March 1st, 2019 for breakfast and lunch. The worksheets showed that all meal components were offered. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the school is at low risk for noncompliance 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, 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. A nutrient analysis was not required.
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 at lunch.
Smart Snacks: Students are able to purchase foods via a la carte sales and a vending machine in the cafeteria. All foods sold meet the Smart Snack standards for nutrition content. Exempt leftover National School Lunch Program entrees are only sold the same day, or the day after, they are initially offered.
Water: Free potable water is available to all students for lunch and for breakfast. via water fountains in the cafeteria.