

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Eastern Allamakee Comm School District (19720000)
April 16-17, 2019

Program Year: 2019
Month of Review: March
Lead Reviewer: Sandra Fiegen
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The benefit issuance information within the point of service is not updated as changes are available.	The information within the SFA's point of service software must be updated as new benefit information is available, including the basis for the determination. In your corrective action response, please indicate your plans to learn within the next 30 days, how to update the determination information, and your plans to update this information as each determination is changed in the future.	
100 - Certification and Benefit Issuance	V-0100	One hundred thirty-one eligibility determinations were reviewed, and of these, there were 3 errors. One student incorrectly received reduced price benefits when they should have received free, and two students were approved based on an incomplete application.	In your corrective action response, please indicate how you will ensure that all approvals are correctly determined. Also, 1) scan and attach a copy of the notification letter sent to the child who should have received free and incorrectly received reduced, and 2) in your comments indicate the date that you obtained the SSN that was missing from the other application.	
200 - Verification	V-0200	Verification not completed correctly. Should have done only one, did two. Report indicates both responded, no change, one free and one reduced. Chose one directly certified application to verify when there were 5 error prone according to report. Looking at the applications onsite, there were no error prone. Also while onsite, no documentation of verification maintained.	In your corrective action response, please indicate when you will complete verification training prior to the end of the school year, and again in the fall prior to completing next year's verification activity. Also indicate where you will maintain all documentation of verification activity. Attach a copy of the certificate of completion of both parts of the verification training. The latest recorded training is located here: https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition . Complete both parts 1 and 2 of Preparing to do Verification Fall 2018. When the newest edition is available this fall, you will complete that.	
300 - Meal Counting and Claiming	V-0300	Response given to the definition of a reimbursable meal under Offer V Serve indicates that more training must be completed on the requirements. All students do not have to take a grain, a protein and a fruit/vegetable in order to have a reimbursable meal.	In your corrective action response, please indicate what offer versus serve training will be completed with all persons who are responsible for identifying a reimbursable meal, and when this training will be completed within the next 30 days. Many resources for training are included in the Professional Development	

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			website at https://educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition and also at the Learning Tools webpage at https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition . Look at all links from these pages as well.	
300 - Meal Counting and Claiming	V-0300	Attendance factor in the point of service software is set at 93%. The local attendance factor must be used. Also, daily edit checks for the number of free, reduced price and full pay student meals is not being completed.	Information regarding the requirement to complete daily edit checks was sent to the food service director and both lead cooks. In your corrective action response, please indicate how you will complete daily edit checks on the number of free, reduced price and full paid student meals for breakfast and for lunch and how the edit checks will be documented.	
800 - Civil Rights	V-0800	USDA nondiscrimination statement is not used. Public release has not been sent to a media service. Not all persons who interact with children regarding their meal service are noted as having participated in training.	Civil Rights requirements are not met. The USDA nondiscrimination statement is found on the 'And Justice For All' poster and also in the media release, as well as at the Bureau Nutrition Programs main page, https://educateiowa.gov/pk-12/nutrition-programs . As corrective action, 1) post the correct nondiscrimination statement on the district website in the page that includes the school meals program information or on the main webpage. Note the date that this change is made in the corrective action response here. 2) Send the correct media release found in the download forms to the local newspaper or radio station. 3) using the civil rights training information posted here https://educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/civil-rights-training , re-do civil rights training with all persons, and in your response indicate the date and the persons who re-completed the training. All persons who interact with students or families in receiving meals must receive civil rights training. It will also be included in your professional development tracking tool that is attached in a separate finding.	
900 - SFA On Site Monitoring	V-0900	Monitoring not completed for all sites.	Only one site received monitoring. According to the application materials on IowaCNP, there are 3 sites in the district. Each must be monitored. As corrective action, complete monitoring prior to the corrective action deadline and attach in this response area. Also, please indicate how you will ensure that onsite monitoring at all sites is completed annually prior to deadline.	
1000 - Local School Wellness Policy	V-1000	Local wellness policy assessment not completed or shared with the public. The written policy does not provide sufficient detail about assessment and sharing assessment with the community.	Attached to this required corrective action is a USDA handout that can be found at https://educateiowa.gov/pk-12/nutrition-programs/school-wellness along with several other resources on reviewing and revision of the district Local Wellness Policy. The Policy and triennial assessment must be shared with the school community, and one suggested method is to post both	

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			<p>items together on a district webpage.</p> <p>In your corrective action response, prior to the end of the corrective action deadline, complete a triennial assessment of all goals in the district's Local Wellness Policy, and attach. Also indicate how you will share both the district's Local Wellness Policy and the complete assessment with all school community members. If this will be shared via a school website, indicate the web address where this will be found.</p>	
1200 - Professional Standards	V-1200	<p>Foodservice training completed for all district staff has not been entered into a tracking mechanism. Training has not been completed for all persons with foodservice duties.</p>	<p>All district personnel (administrative and foodservice) must complete annual professional development training, either for a certain number of minimum hours or training that relates to the tasks that they complete. Attached to this corrective action is a description of persons and tasks that can help you determine who must be included in your district for training. More resources are included at https://educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition.</p> <p>For your corrective action response, attach the professional development tracker you have completed with all training from July 1, 2018 to current, and include planned training for all persons who have not yet completed the required minimum training. The future planned training must be completed prior to June 30, 2019. Place a 'P' next to the training planned yet, and identify the month that training will occur. Monitor your training tracker to ensure that the planned training is completed.</p> <p>Also, in the response area, indicate how you will ensure that future year trainings will be completed as required.</p>	
1400 - Food Safety	V-1400	<p>No district-wide food safety plan available and not available at either site.</p>	<p>A food safety plan based on HACCP principles has been a requirement since 2006. The HACCP based plan must include several components, and the original guidance for building your district's plan is attached to this corrective action, and has also been emailed separately to each manager and to the foodservice director.</p> <p>In your corrective action response, please attach the index/table of contents for your HACCP plan, a list of SOP's that will be included, the description of your district's foodservice operations, and indicate the monitoring operations that will happen on a regular basis. There is a sample HACCP plan included in the guidance that includes these items.</p> <p>Also, indicate where you will maintain your district and site plans for future use.</p>	

Site - Level Findings: New Albin Elementary School (0418)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
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300 - Meal Counting and Claiming - Breakfast	V-0300	Students were not providing a medium of exchange at the point of service. Cashier had memorized all students and entered information on their behalf.	Each student at each reimbursable meal service must provide a medium of exchange for their meal. This can be stating their complete name, providing a ticket to the cashier, entering an account number into a terminal or stating their account number, or other methods of student interaction. Cashiers cannot memorize student identifications. In your corrective action response, please indicate what medium of exchange you will ensure that each student is using, and how the students will be informed of the need to do so. Also provide information as to how cashiers will be trained to correctly count student meals at the point of service (how they will be trained to request that medium of exchange from each student at the point of service).	
400 - Meal Components and Quantities - Breakfast	V-0400	Menus for breakfast and lunch that are posted on district website or distributed in other ways, do not include all components or items offered as part of a reimbursable meal.	Any menu distributed either electronically or by other means must include all components of a reimbursable meal, including any food bar items, alternate main dish items, milk, meat sauce for a spaghetti entrée, grain items such as buns, rolls, etc, and the full breakfast menu. In your corrective action response, please attach the menu for May for each site for breakfast and for lunch. Also indicate how you will ensure that each menu posted in the future include all food items/components offered as part of a reimbursable meal. Your explanation must include how any person responsible for planning or for typing up the menu has been trained on what a full menu includes.	
400 - Meal Components and Quantities - Lunch	V-0400	Dried beans/peas have not been planned each week, so vegetable subgroups have not been met. Provided TA, and this is the second TA provided, CA required but no FA required.	In your corrective action response, please review the vegetable subgroup requirements (handout given to lead cooks at each site), and revise and attach the full 6 week cycle (the tool used for meal planning, which might be slightly different from the actual monthly menu) for each site to provide the minimum 1/2 cup of legume/dried beans and peas vegetable subgroup each week. In the revised menu that you will attach, also indicate the serving size by the food item that will be counted as providing the serving. If the food item is chili, for example, a full 1/2 cup of dried beans and peas per student serving might not be attainable, so indicating the serving size at each food item will help consultant to see that the 1/2 cup is planned per week. At the MS/HS site, any food items available on a food/salad bar must also be included on the 6 week cycle, and vegetable subgroups might be met through providing foods in that area also. The 6 week cycle for this site must also include any alternate main entrée items offered also.	
1300 - Water	V-1300	Water not available at breakfast time.	Free water must be available at both breakfast and	

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			lunch meal service times. Please indicate how you will be sure that it is available at breakfast meal service time.	
1700 - Afterschool Snack	V-1700	The afterschool snack program has not been operational as a reimbursable program this school year. While onsite, discussed information and documentation that would be required to be met if the school district decides to claim reimbursement in the future. District will need to decide whether to indicate in future annual applications whether they intend to participate as a reimbursable program or whether to charge each child a la carte for the items that they purchase/eat after school.	No corrective action required. If district wishes to claim reimbursement, they will need to provide information as to how they will comply with regulations.	

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management	709 With the exception of milk, did the SFA sell Smart Snacks*, second entrees, and/or catering?	Discussed the financial report on IowaCNP and the resources located in the Download Forms. Shared the resources about direct versus indirect costs and allowable costs. Reviewed the expense categories that were paid through the foodservice account this past year, and discussed how to capture all costs or income in daily operation activity. Shared the Nonprogram Food Revenue tool handout.
1200 - Professional Standards	1201 List the employee count for each of the following:	Several administrative staff members complete foodservice duties including cashiering and are not included in the count of foodservice employees.

Site - Level Technical Assistance New Albin Elementary School (0418)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	406 If the school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	Encouraged the elementary school to plan both breakfast and lunch meals for a K-8 compliance, so that separate K-5 and 6-8 meal patterns do not need to be tracked. Provided a K-8 meal planning tool that can be used. Currently 6th grade receives the same meal components and serving sizes as K-5, but it is just being tracked separately instead of with a K-8 tool.
Dietary Specifications Assessment Tool - Lunch	20 Meal pattern for appropriate age/grade groups are used for menu planning, including the meal patterns and serving sizes.	Legume requirement not met consistently. Reviewed information and gave handout on vegetable subgroups.

Org - Level Commendations

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Description
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 vegetables encourages student consumption.
All meals observed met at least the minimum daily requirements.
Almost all applications were correctly determined, signed and dated by the household member and the SFA, were complete with SSN's and case numbers, and all applications were determined within ten days.
Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period, were complete and showed careful planning.
Income was only converted to annual when there was more than one frequency of income. Rollover eligibility determinations 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.
Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of March appeared to be accurate and complete.
Menus included many homemade entrees, and standardized recipes are used for food production.
Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted, as well as the following day's lunch menu.
Students had a sufficient amount of time to eat after receiving meals. Recess is scheduled before lunch service.
The And Justice for All civil rights poster was posted in the cafeteria.
The food service staff were positive, happy and eager to visit with the students, and displayed pride in the important work that they are completing each day. Several students thanked the foodservice staff as they received their meal or as they left the cafeteria.
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.
The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.
There were no unresolved financial findings from the previous Administrative Review or from a state audit.

Site - Level Commendations New Albin Elementary School (0418)

Description
please see commendations in organization level.