

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Mary School-Humboldt
April 10 - 11, 2019

Program Year: 2019
Month of Review: February
Lead Reviewer: Christine Crow
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Income applications received must be complete with all names of household members, parent and staff signatures and dates, received dates, social security number, and household incomes. Upon review of the applications, there were 8 students with applications that did not contain staff signatures or dates and one that did not have a social security number or the box checked to indicate that the applicant did not have a social security number. The SFA also provided benefits to 7 students because they received an email from the local public school regarding the DC status of one of their students that shares a household with a St. Mary's student. When accepting information from another district, the SFA must request the appropriate documentation to ensure the student is eligible to receive benefits. All of these students were found on elookup and should have been provided the correct, free benefit status. Three students that are in the same household were provided benefits on 9/10/2018 when the family did not provide an application until 10/29/2018. Fiscal action may be taken. The number of application errors is over 8% and therefore the SFA must conduct an independent review of applications	Describe who will conduct an independent review of applications and provide written confirmation that both the independent reviewer and the determining official will watch the certification and benefit issuance webinar for school year 2019-2020 prior to processing applications.	

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		going forward. TA provided to the determining official on applications, elookup, and appropriate documentation that is needed from the local district to provide benefits.		
200 - Verification	V-0200	The verifying official was not aware of the required verification procedures or the verification training. The verifying official selected an application and called the family but no proof of income information was provided by the family. The student selected for verification was found on elookup and therefore should not have been a part of the verification selection pool. When the SFA selects an application for verification, they must send the letter of notification of verification selection and collect proof of all income coming into the household to verify that the current eligibility status is accurate. Families must be sent a letter of notification of verification results as well once the process is complete. If families do not provide proof of income they must be changed to paid status. TA provided to the verifying official on verification procedures and the verification webinar.	Provide written confirmation that the SFA will watch the verification webinar in September 2019 prior to initiating the verification process.	
800 - Civil Rights	V-0800	The SFA has 3 students with special dietary needs including 1 gluten free student and 2 students with milk allergies. The SFA communicates with the students regarding their dietary needs and preferences. The gluten free student receives gluten free foods on the days they choose to eat and the 2 students with milk allergies receive water. In order for the SFA to count and claim meals for reimbursement all menu components must be on the tray. Since the students with special dietary needs are receiving meals that do not include all components, in order for them to be counted for reimbursement they must have documentation, such as the diet modification form, signed by a prescribing official stating what foods must	Provide a copy of the diet modification forms or other documentation signed by a prescribing official that gives details on what foods must be avoided and what foods to provide instead for the 3 students with dietary needs.	

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		be avoided and what foods to provide instead. TA provided.		
800 - Civil Rights	V-0800	All program materials, including the menu, student/parent handbook, and/or website, must contain the current USDA and Iowa non-discrimination statements. The student handbook and menu do not include the nondiscrimination statements. If a document, such as the menu, doesn't have enough room for the full statement, the abbreviated statement can be used. The current statements can be found at the following site: https://www.educateiowa.gov/pk-12/nutrition-programs#USDA_Nondiscrimination_Statement	Submit a copy of the menu and the page in the student handbook that has the nondiscrimination statements on it.	
1000 - Local School Wellness Policy	V-1000	Although the SFA's Local Wellness Policy has many of the required elements it does not have a policy on food and beverage marketing or on the nutrition standards for all foods and beverages sold during the school day, as required. Another local wellness policy requirement is to conduct an assessment that describes the progress on the implementation of the goals written in the wellness policy. The assessment must be conducted at least once every 3 years and must be made available to the public. A progress report template is available on the IDOE wellness policy website (https://www.educateiowa.gov/pk-12/nutrition-programs/school-wellness). TA and a handout provided to the SFA on wellness policy requirements. The April 2019 News to Know webinar will provide information on wellness policy requirements. SA encourages the SFA to participate.	Describe when the SFA will update the wellness policy so that it has all of the required elements. Describe when the SFA will assess their progress on meeting the goals written within the policy.	
1200 - Professional Standards	V-1200	The determining official has not received any training, including civil rights training. The determining official works less than 20 hours a week in school nutrition	Submit documentation that shows the determination official has taken civil rights training.	

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		<p>programs and therefore must have at least 4 hours of training in topics related to her school nutrition program responsibilities, including civil rights training. There are previously recorded webinars on the IDOE website on processing income applications, completing verification, completing the verification report, civil rights, and monthly News to Know webinars. TA provided.</p>		
1400 - Food Safety	V-1400	<p>The SFA has an incomplete HACCP Plan. A HACCP (Hazard Analysis and Critical Control Points) Plan is a preventive food safety program designed to control food safety hazards as food flows through a food service operation from purchasing to serving. School Food Authorities (SFA) are required to have a HACCP Plan at every site. HACCP food safety plans use a framework of policies and procedures to guide practices of food service staff. The Iowa State University Extension and Outreach has sample Standard Operating Procedures that might be helpful (https://www.extension.iastate.edu/foodsafety/haccp-school-foodservice). The Institute of Child Nutrition also has resources on developing a HACCP Plan (https://theicn.org/?page_id=108611&q=HACCP). Iowa State University is offering a Food Safety HACCP Plan training on June 13, 2019 and HACCP Plan boot camps in the fall. SA strongly encourages the Food Service Director to attend.</p>	Describe when the SFA will develop a HACCP Plan and train staff on using the plan.	
RMCR - Indirect Costs	V-RMCR	<p>Expenses for services or items that are shared among programs are considered indirect costs and the school food service account may not be charged directly for these services. Examples of indirect costs include utilities, water, custodian and administrative services, pest control, phone and internet services. The general fund must pay for these services but can recover the</p>	Provide documentation of the indirect costs charged thus far for this 2018-2019 school year, the amount of indirect costs that should have been charged by applying the indirect cost rate to the correct direct cost base (supplies (not including food),	

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		costs by charging the nonpublic school (that does not have an agreement with the USDE) 10% or less of the direct cost base of food service supplies (not including food), food service labor and benefits, and food service travel costs. The SFA charged the indirect cost rate of 10% or less to the direct cost base of food service labor and benefits, travel, and supplies including food. SFAs may not include food costs when calculating the indirect costs. TA and handout provided.	food service salary and benefits, and travel), and proof of payment that the school reimbursed the school nutrition fund for any overpayment.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	All foods that are provided to other programs and therefore are not reimbursed by USDA federal funds, must be paid for with non-federal funds such as family payments, general funds, or church funds. The school nutrition program provides preschool students a daily snack but is currently not being paid for those snacks. The business manager reports that parents paid a snack fee with their registration fee but that the snack payments were not put into the school nutrition fund. All snacks provided must be paid for with non-federal funds at a price that covers the cost of providing the snacks. TA provided to the business manager.	The school must pay the school nutrition fund for the snacks provided to the preschool students for the entire 2018-2019 school year. Describe the amount that the school nutrition fund will charge per student for snacks. Provide proof that the school nutrition fund was reimbursed for all snacks provided to all preschool students since the beginning of the 2018-2019 school year.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	Upon review of a 2017-2018 invoice and payment of a catering event, the school nutrition fund was not being fully reimbursed for all food provided possibly due to lack of communication between the food service director and business manager on the amount that was owed. Nonprogram foods must be sold to individuals and groups at a price that covers the cost of providing that food and the school nutrition fund must be reimbursed for those costs within a timely manner. TA provided to the business manager who was able to show that the procedure has been corrected as she provided an invoice for catering event expenses and the proof of payment for an event that took place in November 2018. TA reinforces the	Since the SFA has modified their process to ensure all catering revenues are being collected and put into the school nutrition fund, no further action is needed.	

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		importance of internal controls and communication between the food service director and business manager on costs and revenues received.		
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA charges \$3.65 for all adult visitor meals as required by USDA but they only charge \$1.90 for any teacher or other staff meals. Meals sold to all adults, including teachers, administrators, or school staff other than food service staff, must be sold at the required USDA adult lunch price. The USDA required adult lunch price for the 2018-2019 school year is \$3.63 and the USDA required adult lunch price for the 2019-2020 school year is \$3.7125. The current USDA required adult lunch price must be charged immediately for all adult meals. TA provided to the business manager.	Provide written confirmation that all adults, including school staff, will be charged at least \$3.63 for their lunch beginning on April 22, 2019.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA did not include all nonprogram foods in her calculation. Nonprogram foods provided throughout the school include snacks provided to all preK, preschool, and kindergarten students, food purchased for the Women of the Spirit events, adult meals, 2nd milks, and 2nd entrees sold. TA provided on what nonprogram foods are, how to calculate the cost and revenue of all nonprogram foods, and why it is important that the nonprogram food revenue adequately covers the nonprogram food costs.	Describe how the SFA will ensure that the nonprogram food revenue adequately covers the nonprogram food costs going forward.	

Site - Level Findings: St Mary School (8101)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The SFA provides serve only to students and has the point of service cashier at the beginning of the line. The nutrition staff provide all the components on the tray except for the milk. When conducting serve only, the SFA must provide all of the components on the tray in their minimum daily serving size requirements in order to claim that meal for reimbursement. Once the students take their tray they leave the point of	No further action needed.	

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		<p>service line, get a milk, and go to their table. Therefore, no one that is trained on a reimbursable meal ensures students take a milk and get all of the required components. TA provided to the FSD. While SA was onsite, the FSD modified the point of service so the milk is now at the beginning of the line to allow trained food service staff to ensure all components are on student trays prior to them leaving the point of service.</p>		
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	129 Is household notification of eligibility consistent with the responses provided on the Off-Site Assessment Tool?	The SFA currently notifies families of their eligibility status by sending the letter of notification of eligibility that is generated from their point of service system. If the SFA is going to use a letter other than the State Agency's template letter, they must complete and send the request for approval form found in Download Forms and their letter of notification of eligibility to Deb Linderblood for approval before processing applications. TA provided to the determining official who agrees to begin using the State Agency letter.
300 - Meal Counting and Claiming	314 Is the SFA following their approved SFA-SA Agreement/application (including POS)?	The application does not reflect what the SFA is actually doing during meal service as it states that the K-6th grade students will receive offer versus serve and they actually receive serve only. The application also states that the point of service will be at the end of the line when it is at the beginning. SFAs must receive approval from State Agency before putting their point of service at the beginning of the line. The application also states that they will be participating in the Special Milk Program when they have not submitted a claim for SMP this school year. The application was modified while SA was onsite. TA provided to the FSD on the SMP and how to submit the SMP claim. The FSD has snack milk counts for the preK and preschool students and will revise claims to receive reimbursement for these snacks milks.
700 - Resource Management		<p>PROCUREMENT:</p> <ul style="list-style-type: none"> · The SFA must comply with the Buy American provision for all products purchased

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		<p>with federal child nutrition dollars. If the SFA receives a product that was not made in the USA, that product must be documented on a Buy American exemption log to describe the product and date it was received and the reason why a US product was not able to be purchased. A Buy American exemption log template is available in Download Forms. To help comply, all small and formal procurement events must include the Buy American provision in their bid letter and contract.</p> <ul style="list-style-type: none">· The SFA must conduct contract management for all small and formal procurement events. Contract management is a two-step process and requires SFAs to check to ensure products ordered were delivered and that the invoices match the products received and that the SFA is charged the agreed upon price. This requires that the SFA save all weekly and monthly price lists provided by their milk and prime vendors. TA provided.· SFAs must ensure that all vendors they procure goods from have not been suspended or debarred by USDA. Vendors can sign a debarment certification statement to confirm that they have not been suspended. This statement is a part of the procurement plan template in Download Forms. SA suggests the SFA send this out with their small or formal bid letters.· SFAs must have a code of conduct that includes the disciplinary actions that would be taken if the other conduct requirements were violated. The SFA has a code of conduct but it does not include disciplinary actions.· The SFA's procurement plan reports that they will be conducting a micropurchase for milk and will be conducting line item purchasing. In order to conduct a micropurchase the SFA must spread their purchases equitably among potential vendors which would not be appropriate if the SFA would like consistent products and product delivery. TA provided on line item and bottom line price evaluation as well as on micropurchase, informal/small, and formal purchases.· The SFAs procurement plan is an annual plan that must be completed before sending out bids to potential vendors. The plan must include all purchases that the SFA intends on making in the next school year, the amount they intend on spending, the type of procurement method that will be used, the contract award type, the duration of the contract, how the vendor will be evaluated and who will be responsible for contract management. SA encourages the SFA to attend additional procurement
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		<p>training events as needed.</p> <ul style="list-style-type: none"> · There was no milk bid that was sent out to potential bidders for the 18-19 school year. When conducting a small purchase, a bid letter must be sent to potential vendors to allow for open and competitive competition and to get the best price for products. Small purchase letters must contain delivery and product specifications, an estimate of the amount the SFA is planning on ordering/purchasing, required terms and conditions including a Buy American Provision and Equal Employment Opportunity provision, and a debarment certification statement. The Small Purchase (3 Bids and a Buy) template found in Download Forms can be used as a guide. · Although the micropurchases made were within the appropriate threshold the SFA did not spread their purchases equitably among potential vendors available within the community. When conducting micropurchases the SFA must spread their purchases among potential vendors within the community and keep a micropurchase log to track amounts spent to ensure purchases made were reasonable and that purchases were spread equitably throughout the community.
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	All SFAs must inform the public that they participate in the National School Lunch Program by sending a public release to the local media outlet prior to school starting. The public release is updated annually and can be found in Download Forms. TA provided.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	In the event that there is a civil rights complaint made against the school nutrition program the USDA has procedures that must be followed. TA and a handout were provided on procedures that must be taken if a civil rights complaint is made.
1200 - Professional Standards	1213 Verify the SFA's response to Q1203 on the Off-site Assessment Tool.	The food service director's ServSafe certification recently expired on 03/06/2019. At least one person working in the kitchen must be ServSafe certified and the other food service employee is ServSafe certified. SA encourages the food service director to retake the ServSafe class this summer.

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1400 - Food Safety	1401 If conducted as part of the Administrative Review, are SFA contracted and self-operated warehouses, storing all foods (commercial and USDA) properly?	During the onsite review, boxes of food were placed on the floor in the dry storage area. All food must be at least 6" off the floor. TA provided to the FSD.
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Site - Level Technical Assistance St Mary School (8101)

Area	Question	Comments
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	The And Justice For All poster and the health inspection reports must be on display in a public location. When SA arrived onsite, both the poster and report was hung up in the kitchen. TA provided to the FSD who moved both to a public location while SA was onsite.
2000 - Supplemental Special Milk Program (SMP)	2000 a. If the SFA is operating a pricing program, does the purchase price of milk on the most recent claim for reimbursement match the purchase price reflected on invoices?	Although the SFA is approved to participate in the Special Milk Program (SMP) the FSD has not submitted a Special Milk Program claim this school year. The preK and preschool teachers are taking a point of service count for the students who take a SMP milk and document that on a roster. SA encourages the SFA to work with the determining official/school secretary who can enter milk counts into JMC and print a SMP edit check report monthly to show how many milks were provided. Per the 2018-2019 application in the IowaCNP, the SFA's SMP is pricing without a free option. Therefore, all milks provided to the preschool and preK students must be claimed as paid. If the SFA would like to begin claiming SMP snack milks as free or reduced, they must begin offering an income application to all preschool and preK students and offer the free and reduced snack milks at a lower price than the paid preschool and preK students. Since kindergarten students eat school lunch, they are not eligible to participate in the SMP and therefore must pay full price for any milks received outside of the reimbursable lunch. Claims can be revised if the SFA has documentation of the SMP milks provided to the preschool and preK students. TA provided to the FSD.

Org - Level Commendations

Description
CIVIL RIGHTS: - The SFA has an interpreter to communicate with families with Limited English Proficiency. - Civil Rights training was provided to nutrition staff. - No discrimination was observed while onsite.

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FOOD SAFETY: • The temperatures for all hot foods are monitored and recorded on the food production records. • The temperatures for all cooling equipment and dishwasher are monitored and recorded daily. • The SFA has one person that is ServSafe certified. • Good food safety procedures were observed by the nutrition staff as gloves, clean uniforms, and hairnets were worn.

LOCAL WELLNESS POLICY AND COMPETITIVE FOODS: - The SFA has a wellness policy and that is available to the public and has been updated within the past 3 years. - The SFA sells 2nd entrees and 2nd milks. No other competitive foods are sold during the school day.

MEAL COUNTING AND CLAIMING: • All students had a reimbursable meal during the onsite review. • The point of service line is organized and orderly. • The claim matches the edit check report. • The onsite review count is reasonable when compared to the count during the review period.

MEAL PATTERN REQUIREMENTS AND NUTRITION QUALITY: • Food production records are available for all meals served to students during the review period and are complete to show planned and actual servings, menu items served including condiments and milk, serving size, total quantity prepared, and leftovers available. • At least 2 different types of milk are provided. • Free water is available as there is a water fountain in the cafeteria. • Signage is on display to show how the menu items constitute a reimbursable meal. • The menu served while SA was onsite met the daily meal pattern requirements. • The menu served during the review period met the daily and weekly meal pattern requirements for grain, meat/meat alternate, fruit, milk, total vegetables, and all vegetable subgroups. • A variety of entrée items are served throughout the review period. • Whole grain rich foods are served during the review period and day of review. • CN labels, nutrition facts labels and recipes are available in a well-organized binder. • Serving sizes of condiments are portioned to help adhere to the calorie and sodium restrictions. • The SFA offers seasonings to students to allow them to season their own foods without increasing sodium.

PROCUREMENT: • The SFA has a procurement plan that includes all purchases to be made in the 2019 school year including small, micro, and formal purchases. • The SFA procured their products and services according to the USDA federal purchase thresholds as the school does not have local purchasing thresholds. • The food service director attended a regional procurement training event.

PROFESSIONAL STANDARDS: • The school nutrition staff and food service director have received the required number of training hours and/or have a plan to meet the required number of training hours for this school year, including civil rights training. • The SFA has one staff person onsite that is ServSafe certified. • The SFA uses a professional standards tracking tool for all school nutrition staff.

RESOURCE MANAGEMENT: • The correct paid student lunch price is charged based on PLE tool requirements. • The SFA spent over 100% of their USDA Paid Assistance Level for the 2018-2019 school year. • The SFA has less than 3 months of operating costs in the school nutrition account. - The SFA has a negative balance policy that is provided to families at the beginning of the school year.

SUMMER FOOD SERVICE PROGRAM OUTREACH: - The SFA informs their families on the Summer Food Service Program through advertisements on the radio and local newspaper.