

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Woodward-Granger Community School District
March 11 – 14, 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	Within the statistical sample of applications that were reviewed, the SA found 1 reduced price student whose income application was inaccurately determined to be free and 4 paid student applications that were inaccurately determined to be reduced price. There are 2 students who live in a residential facility that did not have complete information to claim them as free. Two income applications accepted were also from SY 2016-2017 and all applications accepted must be for the current school year. Although the determining official signed all other applications, one application was missing a staff signature. The SFA provides the carryover of eligibility from the previous year but one application did not increase the benefits from reduced price to free when the family turned in a free eligible income application at the beginning of the school year. The SFA	While SA was onsite, the determining official submitted a copy of the letter of notification of eligibility sent to all families whose benefits were determined inaccurately to inform them of their correct eligibility status. Provide a copy of the income application for the 2 residential students who did not have proof of income. Provide written confirmation that the determining official will watch the 2019-2020 certification and benefit issuance webinar once it is available in July.	

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		<p>must change the benefits as soon as an income application is processed and not wait for the 30 day carryover of eligibility to expire. TA provided to the determining official on using and accepting current and complete applications, applications that would be acceptable for residential students, and processing income applications.</p>		
200 - Verification	V-0200	<p>When decreasing a student's benefits due to verification, the family must be given 10 days to appeal the decision. The benefits were accurately reduced because of the income information submitted, but they were not reduced within the correct timeframe. All applications selected for verification must be confirmed by someone other than the original determining official to ensure that the original determination of eligibility was done accurately. The application selected for verification was not confirmed. TA provided.</p>	<p>Provide written confirmation that the verifying official will watch the verification webinar in the 2019-2020 school year once it is available.</p>	
800 - Civil Rights	V-0800	<p>The most current USDA and Iowa nondiscrimination statements must be on all program documents including the website and parent handbook. The current non-discrimination statements are not available on the SFAs materials including the website or the student handbook. The current statements can be found at the IDOE Nutrition Program website: https://www.educateiowa.gov/pk-12/nutrition-programs.</p>	<p>Include the correct nondiscrimination statements on the website where child nutrition program information is provided and provide the link to the updated website.</p>	

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900 - SFA On Site Monitoring	V-0900	SFAs with more than one site are required to conduct onsite monitoring for 100% of sites that offer lunch and 50% of sites that offer breakfast by February 1. The SFA has conducted lunch onsite monitoring for all sites except for the Grandwood site and has not yet conducted breakfast onsite monitoring for at least 2 of the 4 sites that serve breakfast. TA provided to the program director.	Submit the completed onsite monitoring form to show that 2 of the SFA's sites have had a breakfast onsite monitoring review as well as the lunch review for the Grandwood site.	
1200 - Professional Standards	V-1200	While the food service director and program director met the required training hours for SY2019, the managers, full and part time food service staff have not met their training requirements for this year and only half of them met training minimums for SY2018. The Authorized Representative has not had Civil Rights training. The food service director and program director are required to have 12 hours of professional standards training, while managers need 10 hours, staff that work more than 20 hours per week in school nutrition programs must have 6 hours and staff that work less than 20 hours per week in school nutrition programs, including the authorized representative, must have 4 hours of training annually. All employees that have responsibilities within the school nutrition program must have civil rights training annually. TA provided on training requirements and training resources.	Describe how the training requirements will be met for all food service managers, full time and part time food service staff by June 30, 2019. Include a timeline of when the training will take place and topics that they will receive training on. Submit documentation that the authorized representative received civil rights training.	

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1600 - School Breakfast and SFSP Outreach	V-1600	All SFAs must inform families of the Summer Food Service Program (SFSP) before the end of the school year. Even if the SFA does not participate in the SFSP, another organization in the community might offer the SFSP or students might travel throughout the summer to another community that offers the SFSP. USDA has promotional materials that can be used and are located at the following site: https://www.fns.usda.gov/sfsp/raise-awareness	Describe how the SFA will inform their families about the SFSP by the end of the SFSP.	
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Site - Level Findings: Woodward-Granger Early Learning Center (0427)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	Although all meals served on the day of review were reimbursable, the count was not taken at the point of service and there was no medium of exchange provided by the students once they received their tray. Currently, the teacher asks students in the morning who is purchasing a lunch and who is purchasing milk for their sack lunch. Once information is provided by the student, their lunch ticket goes into the respective envelope which is later provided to the food service staff who charges the student accounts after service. If a student goes home sick or changes their mind on if they would like to eat,	Describe how the counting and claiming procedure will be modified to ensure that they count is taken at the point of service during lunch.	

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		<p>the food service staff must write notes or charge the student in the middle of service thus compromising food safety or risk forgetting to charge the student appropriately. Regulations state that meal counts must be taken at the point of service and define the point of service as the point in the food service operation when a determination can accurately be made that a reimbursable meal is served to an eligible student whose account is then charged appropriately. Acceptable point-of-service counting and claiming procedures are required to determine the number of reimbursable meals served and counts taken in the classroom are not allowed. TA provided to the FSD.</p>		
<p>400 - Meal Components and Quantities - Lunch</p>	<p>V-0400</p>	<p>During the week of review, the lunch menu served to the K-1st grade students was short on their red/orange vegetable requirements. They are required to have 3/4 cup red/orange vegetables made available to them and only 1/2 cup was provided. TA provided to the food service director on ways to add an additional 1/4 cup of red/orange vegetables to this week's cycle menu. All other vegetable subgroup requirements were met. During the review period, the food service director reported that they provided a 3rd entree option to</p>	<p>Provide the food production records for the same week in the cycle menu to show how the menu is modified to meet the red/orange vegetable subgroup requirements as well as how daily and weekly requirements are being met for the students who select the cheese sandwich sack lunch option.</p>	

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		<p>students which was a cheese sandwich sack lunch that contained a cheese sandwich, 1/2 cup carrots, 1/2 cup fruit, and milk. Although this meets the daily requirements for meat, grain, fruit, and milk, it does not meet the daily vegetable requirement or the weekly vegetable subgroup or meat/meat alternate requirements. Since this menu option is available daily, it must meet all the daily and weekly requirements and must also be on the food production records. TA provided to the food service director.</p>		
<p>2000 - Supplemental Special Milk Program (SMP)</p>	<p>V-2000</p>	<p>After discussing the Special Milk Program (SMP) processes with the FSD and preschool director, SA discovered that some of the full day and morning half day preschool students (who later attend the district's day care) are being counted and claimed for reimbursement for both lunch and/or breakfast and their snack milk. According to the SMP regulations, students who participate in the National School Lunch Program and/or School Breakfast Program are not eligible to participate in the SMP. Therefore, the students who were counted and claimed for the SMP during the review period and month of review are not allowed to be reimbursed and fiscal action may be taken. In addition, the average price of the</p>	<p>Provide the number of free, reduced price, and paid preschool students who were counted and claimed for the SMP and were also counted and claimed for a breakfast and/or lunch in February 2019 and March 1-15, 2019. Provide the average milk cost for the review period (February 2019) and the process that will be implemented going forward to obtain the average milk cost from the FSMC. Describe how the SFA will ensure that students who eat breakfast and/or lunch are not being claimed for SMP reimbursement and instead are being charged the full price for a milk.</p>	

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		<p>milk must be entered into the claim every month. This average price will determine the reimbursement for the free and paid students entered into the SMP. Currently the SFA's average milk cost has been the same for every month during this school year. For SY 2018-2019, the USDA will reimburse the SMP milk provided to paid students up to \$0.205 or the average milk cost if it is less than that. They will reimburse the milk provided to free students at the average milk cost rate entered into the monthly claim.</p> <p>TA provided to the food service director, preschool program director and child nutrition program director.</p>		
<p>Infant and Pre-K Meal Pattern Checklist - Lunch</p>	<p>V-IMPCL</p>	<p>Currently the SFA offers a combination of the NSLP and CACFP meal pattern. The preschool students eat in the same cafeteria as the K-1st grade students but they leave the cafeteria before the K-1st grade students have their lunch. Therefore, the preschool students are not co-mingled with the K-1st grade students and the SFA must offer the CACFP meal pattern. TA offered on the CACFP lunch meal pattern including serving size requirements for all components, the grain based dessert and juice requirements, and the sugar restriction for cereal and yogurt. The preschool meal served must be documented on food production records to show the menu items and servings received. They are currently</p>	<p>Provide a week of food production record to show that the preschool students receive the CACFP meal pattern.</p>	

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		included on the records with the K-1st grade menu items and portions. TA and handouts provided to the food service director.		
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Org - Level Technical Assistance

Area	Question	Comments
300 - Meal Counting and Claiming	316 All Schools for the Review Period	The claim must be generated from the edit check report. Currently, the claim is generated from the transaction report which was slightly different than the edit check report. There were 4 more paid lunches and 1 more free lunch claimed than what was on the edit check reports. TA provided and the claiming official agrees to begin using the edit check report.
700 - Resource Management		(1) For School Food Authorities (SFA) that use Food Service Management Company (FSMC) services, the SFA must approve in writing all prices for food sold, including a la carte. The SFA should implement a system to show that final approval of prices are made by the SFA and not the FSMC. (2) There was one small error on an invoice where the FSMC charged a penny more for the Meal Equivalent Rate than the contracted amount. The Program Director will address that with the FSMC. (3) The FSMC labels food sold to other groups in the district as "catering." The food is actually a pass-through where the FSMC purchases the food, and the group pays for the food, so it isn't technically catering. It is recommended that an amendment be added to the contract that states how this is being done.
700 - Resource Management		SFAs must have a negative balance policy which is provided to all families annually. SA suggests providing the policy with the registration packet to ensure all families who enroll at the beginning and throughout the middle of the

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		year are provided with this policy. All SFAs must also remind families twice a year that they can complete an income application to receive benefits. 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 a civil rights complaint is made against the school nutrition program, USDA has specific procedures that must be followed. TA provided to the program director on the required procedures. A handout describing the required process and a form to complete was provided in the event that a civil rights complaint is received regarding the child nutrition program.
1000 - Local School Wellness Policy	1000 Provide a copy or appropriate web address of the current Local School Wellness Policy.	Although the wellness policy contains all required elements, it lists the policy on food and beverage marketing as optional. A policy on food and beverage marketing on the SFA's campus is required and not optional to be included in the wellness policy. TA provided.
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?	All SFAs are required to assess the progress being made on the implementation of their wellness policy goals. The SFA's wellness committee is very active and has many wellness projects in place. An assessment or progress form must be completed and made available to the public to show how they are meeting the goals. A progress form and TA was provided to the food service director, who is an active wellness committee member.
1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	Although the authorized representative/determining official reported that she watched the Direct Certification/Income Application webinar as well as the verification webinars there was no documentation on file to show that these took place. All training received must be documented with attendance logs, certificates, or agendas. If a webinar is viewed and it does not have a certificate, the

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		slides can be printed, dated, and signed or the attendees can create their own documentation by listing the title of the webinar, objectives, date and time it was viewed and the signature of the person watching it. TA provided.
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?	While on-site, there were boxes of food found on the floor in the walk-in freezer. All food must be kept at least 6" off the floor. TA provided to the food service director who immediately moved the food up off of the floor onto a shelf and provided she proceeded to provide TA to the kitchen manager.
1400 - Food Safety	1403 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	If SFAs purchase or receive and accept products that violate the Buy American provision, they must document these products in a Buy American exception log that lists the product and date received and why it was not able to be purchased in the United States. Acceptable rationale for purchasing agricultural items that were produced outside of the United States include that the item is not produced in sufficient quantity in the USA or if the USA produced item is significantly more expensive. There is a Buy American exception log in Download Forms. TA provided.
RMCR - Revenue From Nonprogram Foods	9 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	TA provided on the importance of having nonprogram food revenue that adequately covers the cost of the nonprogram food costs. SA also provides information to the new business manager on the IowaCNP Financial Report for 2017-2018, what a nonprogram food is, the nonprogram foods sold throughout the district and how to calculate nonprogram food costs. The business manager is encouraged to work with the food service director to determine the nonprogram food costs and revenue for the current school year. A handout and TA was provided.
RMCR - Indirect Costs	4 Did the SFA apply the indirect cost rate to the correct direct cost base?	According to guidance recently received from the IDOE finance department the unrestricted indirect cost rate must be applied to the direct cost base of food service salary and benefits, food service supply costs, and food service travel costs. The current indirect cost rate and

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		formula was shared with the business manager as well as a list of what expenses can be charged directly versus indirectly with school nutrition funds. Handouts and TA provided to the new business manager.
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Org - Level Commendations

Description
<p>CERTIFICATION & BENEFIT ISSUANCE: • Letters of notification of eligibility were approved by the State Agency and sent to families on the Direct Certification list. • The 30 day carryover of eligibility was provided for all students who received benefits in the previous school year. • Benefits are extended to all students within a household. • Applications are processed and provided within 10 days of the SFA receiving them. • Direct Certification lists are downloaded twice a month and on file. • The benefit status is correctly transferred to the point of service system. • The racial ethnic form was completed to show that no discrimination was made in providing benefits to students. • Income applications contained the appropriate dates, family names and income amounts, adult signatures and dates.</p>
<p>CIVIL RIGHTS: - The nondiscrimination statement is on the menu. - All food service staff received civil rights training. - The SFA does not identify students who have a negative balance at the point of service. - Diet modification forms are signed and on file for all students who have special dietary needs. The food service director works with the families to ensure students get their diet needs met. - The “And Justice For All” poster is on display in a public location. - No discrimination was observed while SA was onsite. - The public release was sent to a local media outlet at the beginning of the school year.</p>
<p>FOOD SAFETY:- The HACCP food safety plan is available at all sites and contains all required elements. - Temperature logs are available for all cooling equipment including both milk coolers, the cooler, and the walk-in freezer. - Food temperatures are monitored and recorded on the food production records. - The food safety inspection report is posted in a public location and the food service director requested 2 inspections from the health inspector. - Staff wore gloves, washed hands, wore hair restraints, and clean uniforms while SA was onsite.</p>
<p>FSMC: The SFA started a new Fixed-Price contract this school year after previously having Cost-Reimbursable contracts. As required, the SFA retains signature authority over Programs, retains control of the nonprofit school food service account, and files the monthly claim. Twice a year, the SFA conducts on-site visits to monitor operations for compliance with regulations. The sale of all meals and competitive foods accrue to the food service account. The Advisory Committee meets at least twice a year and the notes from the meetings indicate an active involvement in menu planning by students. USDA Foods usage from last year was reconciled, and the SFA monitors usage to ensure the maximum amount is utilized. The SFA has someone named as the Program Director, and she has had required food safety training and the required 12 hours of training for SY2019. The SFA does a superior job of reconciling monthly statements from the FSMC and has caught several errors this year.</p>
<p>MEAL COUNTING AND CLAIMING: - All students during the on-site review had a reimbursable lunch and breakfast meal. - The point of service line was organized and orderly to ensure all students received a reimbursable meal. - The number of students counted and claimed on the day of review is reasonable with the number of students counted and claimed during the review period. - Offer versus serve is conducted accurately.</p>
<p>NUTRITION QUALITY AND MEAL PATTERN REQUIREMENTS: - The food production records contain the main entrée and menu items served including milk and condiments, and the total amount prepared, portion sizes, planned and actual servings and leftover amounts. - CN labels, ingredient lists, nutrition facts labels and</p>

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standardized recipes are on file for all items served to students during the review period and on-site review. - The breakfast and lunch menus served during the onsite review met the daily meal pattern requirements. - The breakfast menus served during the review period met the daily and weekly meal pattern requirements for all meal pattern components. - The lunch menus served during the review period met the daily and weekly meal pattern requirements for the grain, fruit, total vegetable, and meat/meat alternate. - All grain items served during the review period and onsite review were whole grain rich. - Free, potable water is available for all students. - Two different types of milk are available to all students. - Signage is posted to provide information on how the menu makes a reimbursable meal. - A variety of different vegetables, fruits, and entrée options are offered to students. - The preschool students receive the CACFP meal pattern. The SFA restricts flavored milk at all meals and with their snacks, meets the sugar limit in any cereal and yogurt provided, limits juice to once a day, and provides whole grain rich foods to preschool with every meal. - Portions of condiments are controlled and many low sodium canned vegetables and fruits canned in their own juices are served to help meet the sodium and calorie restrictions.

NUTRITION QUALITY AND MEAL PATTERN REQUIREMENTS: - The food production records contain the main entrée and menu items served including milk and condiments, and the total amount prepared, portion sizes, planned and actual servings and leftover amounts. - CN labels, ingredient lists, nutrition facts labels and standardized recipes are on file for all items served to students during the review period and on-site review. - The breakfast and lunch menus served during the onsite review met the daily requirements. - The breakfast menus served during the review period met the daily and weekly meal pattern requirements for all meal pattern components. - The lunch menus served during the review period met the daily and weekly meal pattern requirements for the grain, fruit, total vegetable, and meat/meat alternate. - All grain items served during the review period and onsite review were whole grain rich. - Free, potable water is available for all students. - Two different types of milk are available to all students. - Signage is posted to provide information on how the menu makes a reimbursable meal. - A variety of different vegetables, fruits, and entrée options are offered to students. - The preschool students receive the CACFP meal pattern. The SFA restricts flavored milk at all meals and with their snacks, meets the sugar limit in any cereal and yogurt provided, limits juice to once a day, and provides whole grain rich foods to preschool with every meal. - Portions of condiments are controlled, many low sodium canned vegetables and fruits canned in their own juices are served to help meet the sodium and calorie restrictions.

ONSITE MONITORING: - The onsite monitoring form was completed for the lunch service at 3 sites.

PROCUREMENT: • The SFA has a procurement plan that contains all required elements and a signature page to document all involved participants. • The food service director attended a procurement training. • The SFA complied with their local purchase thresholds as they procured their Food Service Management Company (FSMC) by using a formal procurement method. • The SFA works with the SA for assistance in procuring their FSMC. • The SFA conducts contract management to ensure all products delivered were ordered and that the FSMC is charging them appropriately for the services provided.

RESOURCE MANAGEMENT: The SFA increased their paid student lunch price appropriately according to PLE tool requirements. - The correct adult lunch price is charged based on USDA requirements. - The account balance does not exceed the SFA's 3 month operating balance. - The food service account recently paid back their loan to the general fund and are currently without debt. - All revenue received from nonprogram foods, including catered food items sold to other student, staff, and/or outside groups was deposited back into the child nutrition account. - All a la carte items, prepared and ready to eat food items sold to student, staff, and outside organizations were sold at a price to account for the cost of the product as well as staff labor time. - All program documents are kept for 3 years plus the current year.

SCHOOL BREAKFAST PROGRAM OUTREACH: The SFA promotes their breakfast program through the monthly newsletters and on their website.

SPECIAL MILK PROGRAM: - The milk provided during snack time is limited to white milk. - The count for the SMP is taken at the point of service. - The edit check for the SMP matches the claim.

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VERIFICATION: - The verification process and report were completed on time. - The correct number of applications (1) were selected for verification and they were selected from error prone applications first. - The SFA sent the letter of notification of selection and results to inform the family that they were selected for verification and of their reduction of benefits. - The income information provided by the family was accurately processed and kept on file.

WELLNESS POLICY AND COMPETITIVE FOODS: - The wellness policy is made available to the public as it is on the district's website. - The SFA has an active wellness committee that has a variety of stakeholders as evidenced by meeting agendas and sign-in sheets. Stakeholders are made aware of the wellness committee meetings through emails, the district website, and social media posts. - The wellness policy contains all required elements and has been updated within the past 3 year. - The site selected for review does not sell any competitive foods. However, other sites throughout the district do, and the food service director has a binder to show that all a la carte foods meet the Smart Snack requirements.