

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Knoxville Comm School District (33750000)
April 15-17, 2019

Program Year: 2019
Month of Review: April
Lead Reviewer: Shea Cook
Org Representative(s): Jason Swanson, Craig Mobley

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Three household applications were incorrectly determined. One application was determined reduced and should have been denied. Two applications were determined at free and should have been denied. Additionally, five students were receiving free or reduced priced benefits when no application was on file to confirm the determination.	For your response please upload copies of the letters notifying families of the reduction in benefits.	
100 - Certification and Benefit Issuance	V-0100	One household application was denied and should have been awarded reduced meal status.	For your response please upload a copy of the letter notifying the household of the increase in benefits. In addition, please provide documentation that verifies that the family has been refunded all meal charges they have paid for the year.	
800 - Civil Rights	V-0800	The USDA non-discrimination statement is not on the nutrition portion of the district website.	For your response, please provide a link to the location where the full USDA statement has been posted on your website.	
1000 - Local School Wellness Policy	V-1000	Under the final rule of the Healthy, Hunger-Free Kids school districts are required to conduct a triennial assessment of local wellness policy implementation. There is no documentation to demonstrate that an assessment has been completed. In addition, results of the triennial assessments must be made available to the public.	For your response please submit a timeline for completing an assessment of the local wellness policy and how you will make the information available to the public once it is complete. It is the expectation that a wellness assessment and corresponding documentation will be on file and available to the public by the start of the 119/20 school year.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	Nonprogram foods are defined as any food sold during the school day that is not part of a reimbursable meal to a student. Provision 206 of	For your response please complete and submit the nonprogram revenue tool. If the tool indicates that	

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		the Healthy Hunger Free Kids Act requires that nonprogram foods raise revenue sufficient to cover the costs of the food. The financial report on IowaCNP indicates the district is not currently raising enough revenue from the sale of its nonprogram foods.	additional nonprogram revenue is needed please describe your plan to increase nonprogram revenue.	
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Site - Level Findings: West Elementary (0436)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1900 - Fresh Fruit and Vegetable Program (FFVP)	V-1900	November Fresh Fruit and Vegetable Program (FFVP) claim was validated. The case price for yellow tomatoes at the time of order was higher than the price on the invoice. The difference was \$12.00 per case. A total of five cases were ordered and delivered. The SFA claimed the order price on the claims for reimbursement. The FFVP claims should claim the invoice price.	The November FFVP claim was adjusted to reflect the invoice price for yellow tomatoes. The downward adjustment to the November FFVP claims was completed by the state agency. No action is required on the part of the School Food Authority. Technical assistance was provided to the food service director to use the invoice price to when completing claims for reimbursement.	

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		<p>PROCUREMENT:</p> <ul style="list-style-type: none"> • The SFA's written procurement plan, code of conduct, and the NSLP Off-Site Procurement questions were completed by the previous FSD. These documents were reviewed and technical assistance provided to the new FSD on the following - correctly determining SFA micro- and small purchase thresholds, procurement events, estimated value of a procurement event, procurement methods, contract award types, evaluation types, and contract monitoring. The requirement for Buy American for agriculture commodities and limited exception to Buy American was discussed. Showed FSD the procurement resources currently available on IowaCNP. • The SFA Food Service Director (FSD) started employment in October 2018 after the state agency completed Regional Procurement Training. The FSD and the business manager are strongly encouraged to attend regional procurement training in fall 2019. This training will cover in more details information on the written procurement plan and code of conduct as it relates to procurement. • Technical assistance provided to include all anticipated procurement events on the Written Procurement Plan with yearly totals. The written procurement plan should be reviewed annually prior to conducting procurement decisions. It is recommended to review procurement plan annually in February/March. • Food service equipment repair and preventive maintenance will be an indirect cost to the school nutrition fund. School business alerts addressed this and guidance will be ongoing.

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		<p>MICRO PURCHASE:</p> <ul style="list-style-type: none">• When using the micro-purchase method, purchases must be equitably distributed among vendors to "spread the wealth." Add justification to the written procurement plan if purchases are not equitably distributed among vendors. Use of micro-purchase log template is encouraged. <p>SMALL PURCHASE:</p> <ul style="list-style-type: none">• SFA should include estimated annual usage in request for fluid milk pricing in order to get competitive pricing. SA shared electronic resource developed for evaluating bottom line dairy pricing based on estimated annual usage.• Required federal terms and conditions must be included when procurement is conducted using small purchase and formal methods of procurement. Please refer to the state-prototype templates posted on IowaCNP.• SFA was advised that vendors should be given a minimum of 4 weeks to respond to a request for pricing. SA encouraged SFA to exercise best practice of at least 6 weeks response time.• Guidance was given on writing more specific product specifications in price request documents. Additionally, price request documents should only include allowable products.• Dairy solicitation should include the Buy American requirement.• It is best practice to include the school calendar when requesting pricing from vendors to ensure deliveries are not made during holidays, snow days, etc.• It is suggested to request prices for dairy products such as cottage cheese 2% and yogurt from the milk vendor. These items are currently procured through the prime vendor. A dairy vendor may be able to provide competitive prices for these two items.• When escalator price is provided by vendor, be sure to get a monthly price list from the vendor. <p>FORMAL PURCHASE:</p> <ul style="list-style-type: none">• The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and the specifications of the product solicited. Price on the invoice should match bid pricing. Items not in the bid specifications must be procured using the 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 obtain 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 of an equal or lesser price.• The SFA also purchased powder free vinyl gloves - large size. The price for this product increased significantly from 0.036/pair of gloves to 0.045/pair since the initial bid. A similar product was found on the market basket with the price of 0.036/pair. The only difference was the package size. The product SFA ordered is 10/100 and the other is 4/200.
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900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	FSD is new and was unaware of on-site monitoring requirement, so the monitoring was not completed before February 1. As soon as FSD knew of the requirement it was completed at each building and documentation is on file.
1100 - Smart Snacks	1101 What is the SFA's process for determining compliance with non-packaged or recipe food items (combination foods that do not have a label)?	Documentation on file for Smart Snack verification is a list provided by the prime vendor. SA explained that vendor documentation is not sufficient to document compliance with Smart Snack regulation. SA provided TA on completing calculator print outs for all food and beverage items sold to students during the school day, including vending machine items.
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	SFAs must have a tracking system in place to track yearly training hours. Tracking system should include employee's name, position (director, manager, full time staff, part time staff, etc.), title of training, training topic, date of training, and number of creditable training hours. FSD is currently tracking hours on paper and all required information is included. SA suggests utilizing electronic tracking. Professional standards tracking resources can be found at the following location: https://www.educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition
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?	Hearing and confirming officials must complete civil rights training at minimum.
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?	SFA should keep a log to document any non-domestic agricultural products that are received. Log should include what was received, date, country of origin, and reason for acceptance of product.
RMCR - Revenue From Nonprogram Foods	2 For each of the categories selected, what process(es) did the SFA use to ensure that all funds received from the sale of nonprogram foods were deposited into the SFA's nonprofit school food service account?	SA suggested improved checks and balances in cash sales for a la carte.

Site - Level Technical Assistance West Elementary (0436)

Area	Question	Comments
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	SA recommends additional training on OVS for all kitchen staff.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1904 Is the FFVP offered during the school day, but outside the meal service times of the NSLP and/or SBP?	USDA encourages complementary nutrition education. Nutrition education does not have to be provided at every FFVP snack service, however, it is encouraged to incorporate nutrition education a couple of times a week or

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		during the month. The nutrition education should preferably be during the service of fresh fruits and vegetables. Nutrition education can be provided in partnership with the local vendor, health departments, or the extension service. A link to Pick-A- Better-Snack nutrition education resources was emailed to the food service director.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1910 Did the FFVP meal service follow HAACP principles and applicable sanitation and health standards, including the handling of any left overs?	A Standard Operating Procedure (SOP) was developed and available for the Fresh Fruit and Vegetable Program (FFVP). The SOP did not address how leftover snacks would be handled. The food service director will review the SOP and update it to reflect all steps to ensure FFVP snacks are preparation, distribution, and service ensure optimal food safe practices. The FFVP SOP template developed by the state agency was emailed to the food service director.

Org - Level Commendations

Description
<p>CERTIFICATION AND BENEFIT ISSUANCE: The 30 days of eligibility status is provided to all families who were eligible for benefits in the previous school year. • The approved letter of notification of eligibility is sent to all families who apply for benefits including those families who were denied benefits. • Applications are processed and benefits are administered within 10 operating days of the application being received. • Direct certification lists are downloaded in a timely manner and kept on file. All students in the household are extended benefits.</p>
<p>CIVIL RIGHTS: • The correct public release was sent to a local media outlet and published. • The SFA provides forms in other languages as needed for Limited English Proficient households including income applications, verification information and the negative balance policy. • The SFA works closely with the school nurses, students and families to ensure that all students have their special dietary needs met. Diet modification forms are completed and on file for students with special dietary needs. • All staff with responsibilities in the school nutrition program received civil rights training. Documentation is on file. • The “And Justice For All” poster is on display in all cafeterias. • The SFA follows the USDA’s complaint procedure as needed.</p>
<p>COMPETITIVE FOODS: All competitive foods sold during the on-site review meet the Smart Snack requirements.</p>
<p>FOOD SAFETY: The temperatures for hot foods are monitored and recorded on the food production records. • Temperatures are monitored and recorded for the refrigerators, freezers and milk coolers. The temperatures for the dishwasher are also monitored and recorded. • The food safety inspection report is on display in a public location. • The food service director emailed the health inspector requesting a 2nd inspection. • The SFA’s HACCP plan is available at each site. • The food service director, head cooks at each site and many food service staff are ServSafe certified. • Good food safety practices were observed while SA was on-site. • Foods are stored properly.</p>
<p>MEAL COUNTING AND CLAIMING: The point of service line for breakfast and lunch is organized and orderly which allows staff to ensure all students receive a reimbursable meal. • All students at the selected sites had a reimbursable meal at the breakfast, lunch and snack meals observed. • The edit check reports matched the claim. • The day of review meal counts were reasonable with the review period counts.</p>
<p>MEAL PATTERN AND NUTRITION QUALITY: The menu offers a variety of vegetables, fruits and entrees. • The cafeteria has many posters encouraging healthy foods and activity. • Signage is made available informing students of how the menu constitutes a reimbursable meal. • The breakfast menu provided during the review period met the daily and weekly meal pattern requirements for all grade groups. • The lunch menu met the daily and weekly meal pattern requirements for fruit, grain, meat/meat alternate, and milk, dark green, red/orange, other and starchy vegetable subgroups. • Food production records, CN labels, and standardized recipes were on file for all meals served during the review period. • The SFA purchases many low or reduced fat, low sodium products. • The SFA offers 3 different and approved types of milk to students. • The food service director completed the menu certification worksheets. • Foods found in storage met the Buy American provision.</p>
<p>ON-SITE MONITORING: • On-site monitoring forms have been completed for all sites in the district for lunch. • On-site monitoring forms have been completed for 50% of the breakfast sites.</p>
<p>PROCUREMENT: The School Food Authority (SFA) is a member of the AEA Group Purchasing Organization (AEA-GPO) - Southwest service zone. There is a signed agreement for SY 2018 -2019 on file for the purchase of food and non-food supplies through the AEA-GPO contracted prime vendor. The SFA purchases small wares and chemicals through the AEA-GPO contracted vendors for these items for the SW service zone. The FSD and the district’s business manager have a good working partnership which is necessary to ensure optimal management of school nutrition funds and ensure procurement using nutrition funds is necessary, reasonable, and allocable. The SFA used the small purchase method for fluid milk. The solicitation include written description for the products to be procured. Solicitation was sent to three potential vendors. Two vendors responses. The third vendor stated they did not distribute in the school district’s county. The fluid milk solicitation did not include terms and conditions to restrict competition. The solicitation requested vendor provide escalator prices for a variety of fluid milk. The solicitation stated vendor’s to provide fluid milk prices using Federal Milk Market Order Central region #32. To ensure compliance with contract monitoring, three vendor invoices were reviewed from the food primary vendor. Prices and products matched the market basket and the monthly or weekly price lists. There were no product substitutions in the three invoices reviewed. The correct USDA Food Value was applied to USDA Foods - Diverted Food Items. In SY 2017 - 2018 the SFA did an excellent job with the allocated USDA</p>

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Foods Planned Assistance Level (PAL). The SFA was provided more USDA Foods once all allocated PAL was utilized. The PAL use was 111.1 percent. The SFA is on track in utilizing PAL for the current School Year (SY).
PROFESSIONAL STANDARDS: Training hours are tracked for all staff with school nutrition responsibilities. • Civil rights training was provided to all staff with school nutrition program responsibilities. • Documentation is on file for all training received. • Full and part time school nutrition employees have received the required number of training hours for the school year. • The SFA hired a new FSD that met the hiring standards.
RESOURCE MANAGEMENT: The SFA charges the correct paid student lunch price according to the required PLE tool and the correct adult lunch price. • The SFA has a negative balance policy to address negative student lunch accounts. • Expenses made during the review period were allowable. • Revenues received went directly into the school food service line item account and there are numerous checks and balances to ensure the process is followed. • Records are kept for 3 years plus the current year.
SCHOOL BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM OUTREACH: Families are informed of the school breakfast program and the Summer Food Service Program through the district's website, social media and school announcements. The SFA also reminds families of school breakfast through the promotion and celebration of National School Breakfast Week.
SCHOOL WELLNESS POLICY: The wellness policy contains all of the required elements and has been updated in the past 3 years as required. • The wellness policy is available to members of the public as it is posted on the district's website. • The SFA has a school wellness action plan that details the goals that are currently being implemented or will be implemented.
VERIFICATION: The verification report and process were completed on time. • The correct information was collected from parents and eligibility status was determined correctly. • Families were notified of verification selection and the verification results with a letter that contained the correct information including information on their ability to appeal if they disagree with the results. • The applications selected for verification were confirmed and signed to show that the original eligibility status was determined correctly.
FISCAL ACTION: Fiscal action for this review is less than the allowed USDA disregard for both NSLP and SBP so no claim adjustments are needed.

Site - Level Commendations West Elementary (0436)

Description
Civil Rights: The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.
Food Safety: A copy of the written food safety plan was available on site. • The latest Health Inspection Report was posted in a publicly visible location. • Temperature logs are maintained for all coolers-including milk coolers, freezers, refrigerators and for the dishwasher. • Food temperatures are recorded on the daily food production record. • Good food safety procedures were observed. • Opened food products were labeled and dated. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Staff are ServSafe certified.
FRESH FRUIT AND VEGETABLE PROGRAM (FFVP): The school is on track to spend no more than 10% of its total grant on administrative costs. Cost documentation was available to validate November 2018 claims for reimbursement. Cost documentation was well organized. Time logs were available to validate both the operating and administrative costs claimed. FFVP outreach is conducted through family newsletters twice a year. Only allowable fresh produce was purchased with grant funds. Standard operating procedures for the FFVP is available. Students from special needs class assist with FFVP snack delivery to classrooms. The students love this activity. The teacher assistant and students washed hands and wore gloves during snack delivery. The FFVP snacks are offered to all enrolled students. The FFVP snacks are offered during the school day and outside of the meal service times for school breakfast and school lunch. FFVP snack service was observed in one classroom. All students washed hands prior to eating snacks. Napkins are provided. On the day of observation, the snack was single-serve sliced cucumbers. The School Food Authority (SFA) contracts with a local vendor to prepare and deliver pre-packaged FFVP snacks. The local vendor continues to meet and exceed the SFA's terms and conditions.
Meal Components and Quantities: All meal components were available at the beginning of meal service on the day of observation and throughout meal service. • All meals observed met at least the minimum daily requirements. • The menus met weekly and daily meal pattern requirements for the grade groups. • CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • At least two types of milk are offered. • 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: The Point of Service is at the beginning of the line and students punch their unique number into a key pad. • Meal counts during the on-site review were reasonable when compared to the review month counts. • Meal count totals for the month of December were accurate and complete. • Point of Service counts and filed claims appear accurate. • Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. • Cashiers are trained and appeared aware of what constitutes a reimbursable meal. • Edit checks are performed.
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 breakfast and lunch.
Water: Free potable water is available to all students for lunch. Water is provided in a container along with cups.