

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Morning Sun Comm School District (45090000)
SNP - Review ID: 5053

Program Year: April 9-10, 2019
Month of Review: March
Lead Reviewer: Cheryl Benson
Org Representative(s): Morning Sun CSD

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	Beginning July 1, 2017, SFAs were required to have an Unpaid Meal Charge Policy, and the policy must be provided in writing to all households at the beginning of each school year and also communicated to appropriate staff. Morning Sun does not have the required policy.	For your response, submit a copy of the policy that the School Board will consider and indicate a timeline for final vote and implementation of the policy. Also indicate how the policy will be communicated in writing to households next fall.	
800 - Civil Rights	V-0800	Both the USDA and Iowa non-discrimination statements must be included on all materials--written, website, etc.--where Child Nutrition Program information is present. The Iowa statement is on the website where menus are posted, but not the USDA statement, and neither statement is posted with benefit application materials. The USDA statement was also missing on the letter sent out with the second notification of applications.	For your response, add the statements to the website and submit a link to them. The correct statements are available in download forms, NSLP 140 and 141. (The statements can be entered in full at each location or a link to the statements can be entered at each location.)	

Site - Level Findings: Morning Sun Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	107 a. When and how are households notified of students' certified eligibility?	When households are denied benefits, they must be notified in writing. The written letter must provide information on how to appeal the decision and how to contact the Hearing Official. The Hearing Official must be someone other than the Determining and Confirming Officials and he or

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		she must be in a higher position. It is recommended that the SFA use Verification Results Letter in download forms, #ELIG136.
100 - Certification and Benefit Issuance	111 What is the SFA's procedure for extending free school meal eligibility to all children who are members of a household in which one person in that household is receiving SNAP, TANF, or FDIPIR benefits?	Technical assistance was provided on extending benefits to others in the household. Be sure that other siblings who do not appear on direct certification lists are indicated in some way as being part of that household, and that students who have a different name than is on the direct certification lists be indicated. Every student receiving benefits must have documentation showing how he or she was determined as eligible.
100 - Certification and Benefit Issuance	121 a. Is there a back-up system for updating benefit issuance document(s)?	All records for Child Nutrition Programs must be maintained for three years plus the current year. The SFA will check to be sure that documents, including everything on Power School, is backed up and saved.
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	When determining income applications, do not convert the income to annual unless there is more than one frequency of income. Using the annual conversion on all applications may lead to determining errors.
200 - Verification	203 Describe the SFA's verification process (including SFA's verification for cause process, deadlines, due dates, selection procedures, etc.).	When completing the IowaCNP application, #27, be sure to indicate the correct method of verification. The SFA's application indicated Standard Method but Alternate Method was used.
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	<p>PROCUREMENT GUIDANCE:</p> <p>Buy American--SFAs must keep a Buy American Exception Log. There is a template available in download forms, #NSLPPROC016. There are two general reasons that are acceptable for not buying American commodities: First-an American commodity is not available, such as pineapple and mandarin oranges. Second-the price of the American commodity is significantly higher. This frequently happens during the winter for a lot of produce.</p> <p>MICRO PURCHASE--This SFAs micro-purchase threshold is \$5,000. Any purchase under that amount can be micro. There are three main requirements. First, the purchase is under the threshold, second, the price is reasonable, and third, purchases of the item or types of items are spread around to various vendors. This type of purchase is generally best for emergency runs to the store. It is recommended that the Micro Purchase Log be used. The SFA must also maintain detailed receipts of the purchase so that reasonableness of prices can be determined.</p> <p>SMALL PURCHASE--This SFAs small-purchase threshold is \$25,000. Any purchase under that amount can be small purchase. (Note-from zero dollars to \$5,000 either Micro or Small Purchase may be used.) For small purchase, documentation of what is being procured, prices offered, vendors contacted, responses, terms, conditions, etc. must be maintained. For that reason, it is recommended that the 3 Bids and a Buy template be used. Small purchase is determined on the lowest price only.</p> <p>FORMAL PROCUREMENT--For this SFA, any procurement event of \$25,000 or more must be formal. (Note: Formal Procurement is the only method that can be used for any dollar amount.) Formal uses an IFB or an RFP. Everything must be in writing. Specifications must be well-written. The solicitation</p>

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		<p>must be advertised. All appropriate terms and conditions must be included. The SFA must give vendors time to respond; preferably at least six weeks. IFBs must be publicly opened at a designated time and location. RFPs can only be accepted up to a designated time and location. For RFPs, rebates and discounts must be tracked. All criteria that will be used to evaluate responses to formal proposals and bids must be included in the solicitation and price must be worth the most points. REBATES, DISCOUNTS, CREDITS--to ensure that the SFA is receiving all due rebates, discounts, and credits, it is recommended that the form in IowaCNP (NSLPPROC014) be used and then filed annually with other financial documents. BOTTOM LINE--for a true bottom line bid on items such as bread or milk, it is recommended that the projected usage of each bid item be multiplied out by the proposed price and then added together to get a true comparison of the cost. There is a spreadsheet for this purpose in download forms (NSLPPROC015). TERMS AND CONDITIONS--there are many required terms for procurement. All food solicitations must include the Buy American provision. All solicitations must determine that a vendor has not been debarred from doing business with the federal government. There are other terms that must be included depending on the dollar value of the solicitation. These terms are in the templates in download forms for 3 Bids and a Buy, and for the formal IFB and RFP templates. For conditions, the SFA should consider what it expects/wants and what it doesn't want and incorporate those into the solicitation. For example, milk crate sanitation, locking milk coolers, maintaining temperatures, delivery times and days, etc., are all examples of conditions. CONTRACT MAINTENANCE--prices on invoices should be spot checked against bid prices to ensure compliance. The SFA should ensure that contract terms and conditions are met, and document when they are not and the action taken.</p>
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	<p>Besides the three main methods of procurement--micro, small purchase, and formal, there is a fourth method--sole source. Sole source is used when there are no other sources for the product, such as an update to the SFA's POS system. Sole source can also be used for severe emergencies. Before using sole source, the SFA must obtain permission from the state agency. For the past few years, the SFA has used sole source to procure bread. There has been no state agency permission requested nor would it be granted. The SFA is also not sending a request for prices to the vendor but simply purchasing continually without a contract or agreement of any kind. This is not an allowable use of Child Nutrition funds. The SFA must bid its bread for next school year, include all required terms and conditions such as Buy American and debarment forms. The SFA</p>

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		can send other bread companies the solicitation as well as grocery stores and their main vendor.
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	Technical assistance was provided on Unpaid Meal Balance policies. Memos, Q and A, and a prototype policy were shared as well as information on how to notify households in writing of the policy at the beginning of each school year.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Technical assistance was provided for special diets. Special diets that can be accommodated and still meet the meal pattern must be accommodated as soon as possible without waiting for any medical form or confirmation. Special diets that cannot be accommodated while still meeting the meal pattern must be documented with the Diet Modification Form, NSLP452 in download forms, before meals can be claimed for reimbursement.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	Technical assistance was provided on correctly completing the Ethnic/Racial form. All rows must add up to the number in the first column of totals, and the totals for ethnicity must equal totals for race.
1000 - Local School Wellness Policy	1006 How does the public know about the results of the most recent assessment on the implementation of the Local School Wellness Policy?	Technical assistance on some outdated language in Local Wellness Policy, LWP, including mention of SMI review which no longer exists and updating for Smart Snacks. The assessment of goals have not been shared with the public; the Authorized Representative has agreed share it with the public via the district's website as soon as possible.
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.)	Technical assistance was provided on tracking all staff training hours on one form. The Iowa tracking tool was provided. A new tracking tool should be used each year and filed with other paperwork from the year, and a new tracking tool started for the next year. In Iowa, SFAs can put two years of training together and average the hours for the two years on one tool. In that case, the SFA must clearly indicate which two years are united.
1600 - School Breakfast and SFSP Outreach	1600 Did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	Technical assistance on promoting the School Breakfast Program, SBP. Breakfast outreach must include locations and times of meal service. This outreach must be conducted at the beginning of the school year and should be provided at the same time as registration materials. The SFA should also conduct continuing outreach for breakfast throughout the school year which can be done via announcements, newsletters, website, posters, etc.
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	Technical assistance was provided on completing the financial report on IowaCNP. Form NSLP070 in download forms has information on how the financial report is calculated using the Certified Annual Report, IowaCNP data, and formulas. The financial codes are also indicated on one tab. SFAs should remember that anything paid out of the CN account will affect non-program revenue on this report. For example, purchasing food for other groups or staff or school functions will show up as non-program food costs. Unless there is a price mark-up on the items, your non-program revenue will show up as insufficient.

Site - Level Technical Assistance Morning Sun Elementary School (0409)

Area	Question	Comments
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400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	Signage is required at both breakfast and lunch. For breakfast, signage should indicate that students must take at least three items one of which must be a 1/2 cup of fruit/juice/vegetable. The sign must also indicate the food items offered that day and how many items each food credits as. For example, on the day of observation, pizza is 2 items, each slice of toast is 1 item, cereal is 1 item, juice is 1 item, fruit is 1 item, and milk is 1 item. Jelly, peanut butter, and margarine are additional extras. A postable menu form was provided during the review.
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	It is recommended that the SFA be careful with calories at breakfast. Calories for grades K-6 must be between 400 and 500. Milk and juice/fruit will be about 200 calories leaving 200-300 for the entrée, additional fruit, and condiments. On the day of observation, if a student took pizza and a slice of toast with peanut butter, that would be getting to the maximum allowable and maybe over. If the student were allowed two slices of toast and/or cereal, he or she would certainly be over limits. While the calories are averaged out over all students for the entire week, it is still something to be aware of when menu planning.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	<p>Technical assistance was provided on Standardized Recipes, Food Production Records (FPRs), Labels, and Menus.</p> <p>(1) When the food product for a standardized recipe is changed (for example using beef crumbles instead of raw ground beef) the amount needed for each type of meat must be indicated on the recipe. The same goes for using non-creditable cheese sauce as opposed to creditable cheese sauce. The crediting on the recipe must be changed.</p> <p>(2) FPRs need to indicate the amount made in measurable amounts such as pounds, #10 cans, etc. Leftovers must be indicated for all items, especially condiments.</p> <p>(3) Be sure to have original, photos, or photocopies of all labels--ingredient, CN, and nutrition labels. Labels must come from the packaging or the manufacturer. Labels from the vendor are not considered sufficient documentation.</p> <p>(4) Watch menus when items are changed, such as the size of a tortilla or changing a recipe and using non-creditable cheese. These changes could cause you to offer meals that do not meet weekly minimums.</p>
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 should be moved to a lower section of the wall so that it is readable to participants and other household members. The poster provides information on how to file a civil right's complaint and does not fulfill its purpose if it cannot be read.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	USDA regulations require that SFAs request two inspections each year for each site. The request must be documented. The SFA agreed to send out a request as soon as possible.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The latest health inspection report must be posted where the public can read the report. The health inspection report was posted in the kitchen, and was not visible to participants. The report was moved to a visible location during the on-site review.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Technical assistance was provided on checking and logging thermometer calibration. This is an important part of food safety since incorrect reading of temperatures could lead to food borne illness. (Test strips for dishwasher were also out and on backorder.)

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Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE: The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and a correct and current benefit issuance list was available. Approximately 50 applications were reviewed and all reviewed applications were correctly determined, signed and dated by both a household member and the SFA, applications were complete with SSN's and case numbers, and all applications were determined within ten days. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Waivers are provided to applicants that indicate specific fees and were signed and dated by the household.</p>
<p>CIVIL RIGHTS: The And Justice for All civil rights poster was posted in the cafeteria as required. Annual civil rights training was provided food service staff and documented. A copy of the district's public release was on file, documenting that it was submitted to local media. Ethnic/racial information is collected and the form has been completed and filed. No discrimination was observed.</p>
<p>GENERAL: The results from this review show significant improvement from the last review in December 2015. At that time, there were 13 corrective action items where there are only 2 for this review. The errors made last time were not repeated. Corrective action that was implemented has remained in place which reflects well on staff in the Child Nutrition Programs. Since CN programs continue to get more complex and require more time, this is an even greater accomplishment.</p>
<p>HACCP/FOOD SAFETY: The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. 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.</p>
<p>MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of March were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. There was a POS for all students, and the POS was organized and orderly. Students are not overtly identified as free, reduced, or paid during the meal counting process or during meal observation. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. All students observed selected a reimbursable meal.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: All meal components were available at the beginning of service and throughout meal service on the days of observation. Menus met weekly and daily meal pattern requirements A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch. Water was available as required, and at least two types of milk were offered. Offer vs. Serve, OVS, was correctly implemented. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheets for breakfast and lunch for a specified week during the review period. Nutrient analysis was not required.</p>
<p>PROCUREMENT: The off-site procurement tool was completed, and board purchasing policy and vendor paid lists were submitted. The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events, and specifications were well-written and comprehensive. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. The district is a member of a Group Purchasing Organization.</p>
<p>PROFESSIONAL STANDARDS: Tracking was provided that documents that the director received the required 12 hours of annual training, other full-time staff have received at least 6 hours of training, and there is a plan to complete four hours of training for part-time staff.</p>
<p>RESOURCE MANAGEMENT & RECORD KEEPING: Financial records that were reviewed, indicated appropriate and allowable expenditures. The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. The District had a positive balance in January 2018 and elected to not increase paid lunch prices. The district does not charge indirect costs to the food service program. Money is not transferred out of the account to support other programs. The SFA very effectively utilizes its USDA entitlement for commodities. Reports are filed on time, and all records are maintained for at least three years plus the current year.</p>
<p>SBP & SFSP OUTREACH: Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer. The information was shared via websites, newspaper, flyers, etc.</p>
<p>VERIFICATION: The correct number of applications were verified. The application selected for verification was confirmed prior to verification to ensure the original determination was correct.</p>
<p>WELLNESS POLICY: The district has a current wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The wellness policy is available to the public. Potential stakeholders are made aware of their ability to participate on the wellness committee.</p>