

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Bend-Mallard Community School District
April 2 – 4, 2019

Program Year: 2019
Month of Review: February
Lead Reviewer: Christine Crow

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	There was 8.42% benefit issuance errors, thus creating a need for an independent review of applications. Benefit issuance errors included providing benefits with an ineligible case number and inaccurately determining the benefit issuance status based on income. TA provided to the determining official who promptly sent letters to the families notifying them of their benefit status change.	Describe who will conduct the independent review of applications and provide written confirmation that the determining official and the 2nd person reviewing applications will watch the 2019-2020 certification and benefit issuance webinar before processing income applications.	
1000 - Local School Wellness Policy	V-1000	The wellness policy states that assessments of the policy will be done every 5 years and that the food and beverage marketing element of the policy is optional. Food and beverage marketing is a required element to the wellness policy and the policy must be assessed at least once every 3 years. In addition to the policy the wellness committee must also assess the implementation of the goals written within the policy. Both the policy and the assessment of policy goals, must be made available to the public. TA provided to the	Describe when the assessment of the implementation of wellness policy goals will take place. Describe how the SFA will make the policy and the assessment of policy goals available to the public.	

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		superintendent, authorized representative and food service director. Wellness policy resources can be found on the IDOE website: https://www.educateiowa.gov/pk-12/nutrition-programs/school-wellness		
1200 - Professional Standards	V-1200	The food service staff at the Mallard site have not received any training, including civil rights training. School nutrition staff that work more than 20 hours per week in school nutrition programs must have 6 hours of training in their school nutrition job responsibilities. Staff working less than 20 hours must have 4 hours of training. All staff that work in school nutrition programs must have civil rights training annually. Although staff at the West Bend HS site received all required training, the staff at Mallard did not receive any training. TA provided to the authorized representative and food service director.	Send documentation (certificate or attendance log) to show that the 2 Mallard food service staff received civil rights training.	

Site - Level Findings: West Bend-Mallard High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA provides various entree options at breakfast. Students may take 1 oz. grain equivalent cereal option but are not allowed to take any other entree option with their cereal as part of their reimbursable meal. Although the cereal option meets the daily grain requirement, it does not meet the weekly grain requirement for the 5th-12th grade students. The yogurt (1/2 cup) and granola (0.5 ounce) entrée option provides 1.5 ounces grain equivalent, which meets the daily	Describe how the SFA will change the breakfast menu to ensure students who take the cereal entrée option and the yogurt/granola entrée option meet the weekly grain requirement.	

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		grain requirement but does not meet the weekly grain requirement. TA provided to the food service director.		
400 - Meal Components and Quantities - Lunch	V-0400	There were 3, 5-12th grade students who did not have a reimbursable meal during the observed lunch. These meals did not have the 3 components in their daily required serving size or did not have 1/2 cup fruit/vegetable on their tray. Fiscal action may be taken. TA provided to the cashier and the food service director. The preschool students receive serve only meal service which requires all menu components, in the required serving size, to be provided to the student in order to be considered a reimbursable meal. On the day of observation, 3 of the preschool students brought water and therefore did not take a milk. TA was immediately offered to staff who promptly gave those students a milk. If students have a dietary need which prevents them from drinking milk, there must be documentation signed by a prescribing official, that describes what can and cannot be provided to this student. No documentation was available for these 3 students and staff are not aware of any dietary needs. TA provided.	Submit documentation to show that offer versus serve training, preschool serve only training, and training on what constitutes a reimbursable lunch meal was provided for all school nutrition staff, including cashiers, at both sites.	
400 - Meal Components and Quantities - Lunch	V-0400	Food production records for the serving line and salad bar indicate that only 1/4 cup beans/legumes were made available to students. The bean/legume vegetable subgroup requirement is that 1/2 cup be made available to all students every week. Beans/legumes can be provided in smaller servings multiple times throughout the	Provide one week of lunch food production records and any dessert recipes or labels to show that students received less than 2 oz. grain based desserts and that they received 1/2 cup beans/legumes.	

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		<p>week, be made available on the salad bar or served just once a week in at least 1/2 cup serving. TA provided to the FSD.</p> <p>All K-12th grade students must have less than 2 oz. grain based desserts per week. According to the food production records and recipes, the 9-12th grade students received 3.25 oz. grain based desserts during the review period. TA provided to the food service director on the limit and what is considered a grain based dessert.</p>		
600 - Dietary Specifications and Nutrient Analysis	V-0600	<p>The following items are offered as self-service items on the salad bar during the review period and/or on the day of review, thus contributing to excess calories, fat and/or sodium, particularly for 5-8th grade students: cheese, ham, eggs, pudding, and chicken. If items other than fruit and vegetables are on the fruit and vegetable bar, there must be portion control to ensure calories and sodium restrictions are met. TA provided.</p>	Describe your plan to better control servings of items other than fruits and vegetables that are placed onto the salad bar.	
1100 - Smart Snacks in School	V-1100	<p>Per the food service director, leftover entrée items are being provided, free of charge, the next day to students in addition to the regular entrée item. Leftover entrée items can be sold the next day as an a la carte item or, if it meets the daily meal pattern requirement, can be sold as the entrée item for the reimbursable meal for that day. Any item that is given as a part of the reimbursable meal must be included in the total calorie and sodium amounts. TA provided to the FSD.</p>	Describe what the SFA will begin doing with leftover entrée items. If the SFA plans on selling them as an a la carte item during the following day's lunch service, list what the selling price will be.	
1300 - Water	V-1300	Free, potable water must be made available to students during breakfast and	Describe how the SFA will make free water available to all students during	

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		lunch. There was not a water fountain or a water cooler in the cafeteria. TA provided to the FSD.	their breakfast and lunch meals.	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	110 Does the SFA use the direct certification notification letter provided by the State agency?	Direct certification letters and Household notification letters for benefits generated from the school's POS must be pre-approved by the State Agency prior to their use each year. Send the letters you want to use along with Download Form ELIG010 to Deb.Linderblood@iowa.gov in June of each year.
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	When determining applications, use the appropriate income frequency tab based on income the household provides. For example, if all household income is monthly, use the monthly tab on ICAVES. Do not turn the incomes into annual unless only annual, multiple or self-employed income is provided.
700 - Resource Management		PROCUREMENT: TA provided on the SFA's local purchasing threshold, purchasing methods and requirements for sole source, micro, small, and formal purchases. TA also given on the annual procurement plan and information that must be included in the plan. The requirements for contract management were reviewed and SA instructs the SFA to begin saving all weekly and monthly price lists in order to conduct contract management effectively. A procurement plan template and an instructional handout were provided and are available in Download Forms along with many other procurement resources. TA was provided on what must be included in a small purchase bid document including product and delivery specifications, an estimate of the amount to be purchased, required terms and conditions, and a debarment certification statement. SA

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		encourages the authorized representative and the food service director to attend a regional procurement training in the fall in addition to watching procurement webinars.
700 - Resource Management	712 Were indirect costs* charged to the SFA's nonprofit school food service account?	Per the 2017-2018 vendor paid list, the school nutrition fund paid for equipment repair, which is now considered an indirect cost. SA reviewed other expenses that are considered indirect costs and must be paid for by the general fund. Examples include office supplies, phone service, internet, online payment fees, utilities, water, garbage, pest control and preventative maintenance. If the general fund would like to recover these costs back from the school nutrition fund, they can apply the unrestricted indirect cost rate (or less) to the direct cost base of food service employee salary and benefits, food service travel costs and supply costs (not including food). Handouts and TA provided to the food service director and business manager.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The USDA has a complaint procedure that must be followed in the event that a civil rights complaint is made regarding the school nutrition program. SA provided a handout and TA on the required procedures.
800 - Civil Rights	810 Review program materials.	All program materials, including the website and parent/student handbook, must have the current USDA Federal and Iowa nondiscrimination statements. The current statement can be found on the IDOE Nutrition Programs website: https://www.educateiowa.gov/pk-12/nutrition-programs
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	For schools with more than one site, onsite monitoring must be done annually prior to February 1st. Lunch must be monitored at all sites and breakfast must be monitored at 50% of sites. The authorized representative monitored the West Bend High School breakfast and lunch but not the Mallard site, which is closing at the end of May. TA

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		provided.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	Although the SFA had a tracking tool, it did not list all employees that had responsibilities within the school nutrition program and there was no documentation to show that training took place. The tracking tool must include all staff with school nutrition responsibilities and documentation must be on file for all training events. Documentation may include attendance logs, agendas, webinar slides, and/or certificates to describe the date and time that training took place, objectives, and staff in attendance. TA provided to the FSD and authorized representative.
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?	All agricultural food products purchased with federal school nutrition funds, must meet the Buy American provision. Food products were found in storage that violated the Buy American provision. All agricultural food products that are not made in the USA must be documented on a Buy American exemption log that lists the product and why the provision was violated. Templates are found in Download Forms. TA provided.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	Even if an SFA does not participate in the Summer Food Service Program, they still must inform their families of the SFSP at the end of the school year. Students may visit any other SFSP throughout the country and therefore, must be informed of its' availability. Promotion materials can be found on the USDA website: https://www.fns.usda.gov/sfsp/raise-awareness . TA provided on including materials with end of the year newsletter.
RMCR - Revenue From Nonprogram Foods	8 Did the SFA:	Per the 2017-2018 financial report in IowaCNP, the nonprogram food revenue does not adequately cover the costs. Since the food service director and business manager

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		<p>have both been hired during the current school year, they could not offer explanation on the miscalculation, as the report indicated nonprogram food costs were \$0. TA provided on what a nonprogram food is (a la carte, 2nd entrees, 2nd milks, and adult meals), and how to calculate the nonprogram food costs. The FSD and business manager agree that they will work together to determine the cost of a reimbursable meal and will determine the accurate nonprogram food costs.</p>
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Site - Level Technical Assistance West Bend-Mallard High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The pancakes served during the review period and the 100 calorie Oreos available as an a la carte item, are not whole grain rich. Currently, 100% of grains served must be whole grain rich. In school year 2019-2020, 50% of grains must be whole grain rich. TA provided and the FSD agrees to stop selling the Oreos and found whole grain rich pancakes that she agrees to purchase.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	All SFAs are required to have 2 food safety health inspections every school year. If they do not receive 2 inspections, they must request a 2nd inspection by sending their health inspection a letter or email. TA provided.
Infant and Pre-K Meal Pattern Checklist - Lunch	3 During the meal service, did you observe that all required meal components for Pre-K are available throughout the entire meal service?	Preschool students, when following the CACFP meal pattern, are required to have 1.5 oz. meat/meat alternate provided to them. During the review period, they only had 1.0-1.25 oz. meat/meat alt provided to them. TA provided and the FSD was already aware of this mistake and has corrected this error. No further action provided.

Org - Level Commendations

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Description
CERTIFICATION AND BENEFIT ISSUANCE: Benefit documents were well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. Applications were complete with SSN's and parent signatures, and all applications were determined within ten days. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential.
CIVIL RIGHTS: - The SFA provides applications and other program materials in Spanish if needed for families with Limited English Proficiency. - The racial ethnic form was completed to show that students were not discriminated against when providing benefits. - The public release was sent to a local media outlet. - The "And Justice For All" poster is on display in a public location. - The food service staff, authorized representative, and cashiers at the West Bend High School received civil rights training. - The correct nondiscrimination statement is on the menus. - Signed, diet modification forms are on file for the student that has special dietary needs.
COMPETITIVE FOODS: - The food service director has nutrition calculator printouts that show competitive foods meet Smart Snack requirements.
FOOD SAFETY: - The food safety inspection report was on display in a public location. - The HACCP plan is available onsite and has all required elements. - Temperature logs are available for all cooling equipment and hot foods. - Food is stored properly. - The food service staff exhibited good food safety practices. - The director and one other employee at the high school site are ServSafe certified.
MEAL COUNTING & CLAIMING: - The point of service line is organized and orderly to allow staff to ensure all students have a reimbursable meal or get charged appropriately. - The edit check report for the month of review matches the claim. - The meal count on the day of review is reasonable when compared to the month of review meal counts. - Offer versus serve is administered properly. - All students at breakfast had a reimbursable meal during the onsite SA review.
MEAL PATTERN REQUIREMENTS AND NUTRITION QUALITY: • Food production records are complete with menu items including milk and condiments, actual and planned servings, serving sizes per grade group, including preschool students, leftover amounts, and salad bar items. • The breakfast and lunch menus served on the day of onsite review met the daily menu requirements for all components. • CN labels, nutrition facts labels, and recipes are on file for all meals served during the onsite review and during the review period. • The SFA offers the preschool students the CACFP meal pattern for breakfast and lunch. The menu served during the review period met the grain, fruit, vegetable, and milk requirements. The cereal served meets the sugar requirements, unflavored milk is provided, whole grains are offered more than once per day, juice is limited to no more than once per day, and grain based desserts aren't provided as part of the reimbursable meal. • Two different types of milk are made available to the K-12th grade students. • Signage is clearly posted to inform students on how the menu constitutes a reimbursable meal. • Signage is posted to promote healthy eating habits. • The SFA offers at least 2 different types of fruit and a variety of fresh vegetables daily to students. The nutrition staff also make a lot of homemade items throughout the week and have recipes available for all homemade items. • Various breakfast entrée items are made available. • During the review period, the daily and weekly meal pattern requirements were met for the grain, meat/meat alternate, fruit, total vegetables, red/orange, dark green, starchy, and other vegetable subgroups at lunch for all grade groups. • During the review period, the daily and weekly meal pattern requirements were met for milk and fruit at breakfast.
NEGATIVE BALANCE POLICY: - The SFA has a negative balance policy that is provided in the Back to School newsletter. - Families are reminded twice a school year that they can apply for free and reduced price benefits at any time throughout the school year. - Students are not identified as having a negative balance.
ONSITE MONITORING: The SFA conducted onsite monitoring for one of the sites by February 1st.
PROCUREMENT: The SFA has a procurement plan that includes all purchases and a code of conduct that includes a gift policy and a conflict of interest policy.
PROFESSIONAL STANDARDS: - The recently hired food service director met hiring standards. - The food service director is ServSafe certified. - A tracking tool is utilized

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to track training received. - The food service director and the food service staff at the high school received all required training hours.

RESOURCE MANAGEMENT: The correct paid student lunch price is charged based on the PLE tool requirements. - There are multiple internal controls in place to ensure all school nutrition revenue is put back into the school nutrition account and that all purchases are allowable. - The school nutrition account is tracked separately from all other accounts. - The correct adult lunch price is being charged. - The school nutrition program account has less than 3 months of operating costs. - All school program materials are kept for 3 years plus the current year.

SCHOOL BREAKFAST PROGRAM OUTREACH: The SFA informs families of the school breakfast program through monthly menus and information in the school newsletter.

VERIFICATION: The correct number of applications were verified and were correctly selected at random. The verification process was completed on time. The application selected for verification were confirmed prior to verification.

WELLNESS POLICY: -The wellness policy has been updated within the past 3 years and contains the required elements. The SFA also has a wellness committee that consists of a variety of stakeholders (SIAC Committee).