

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Winterset Community School District (70560000)
Dates of Review: April 4/23/2019 – 4/25/2019**

Program Year: 2019
Month of Review: March
Lead Reviewer: Jean Easley
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One student should have been given free status as "directly certified" on July download but received reduced meals per application. Eligibility to be changed to free and account will be repaid for meals eaten since beginning of the year. One student deemed as "Homeless" did not have documentation on file.	For your response, 1) confirm date eligibility of student was changed to free and account was refunded. 2) state your understanding that documentation must be maintained on all students including foster, homeless.	
200 - Verification	V-0200	1) There was no confirmation review. The state agency does not offer waiver at this time for web-based application system per page 104 in the Eligibility Manual. 2) The SFA did not report the number of applications verified accurately on the Verification Collection Report. Technical Assistance was given that any applications "verified for cause" do not count towards the required verification sample. Refer to additional technical assistance for Verification.	For your response, state who will attend the Verification Webinar and Verification Collection Webinar for SY20. State your understanding a Confirming Official will review, sign and date application's income selected for verification. (Print out application and maintain in verification file.)	

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1000 - Local School Wellness Policy	V-1000	The local wellness policy and most recent assessment of the local wellness policy must be made available to the public. It could not be found on the website easily; nor was it listed in Student/Parent Handbook under "Health, Well-Being & Safety". Best practice would be that an assessment is done for each site because goals and activities at various age levels are different.	For your response, describe how and when the Wellness Policy and most recent Assessment will be made available to the public; including how stakeholders will be made of their ability to participate.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The Child Nutrition (CN) account must be maintained as a non-profit account which means the balance must be less than three months' operating expenses unless the SFA has state agency permission to exceed three months. At the end of SY18, the SFA had greater than 4 month's operating expenses.	For your response, submit a plan to spend down the excess balance in the CN account.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	According to the financial report populated in IowaCNP, the percentage of revenue received for non-program food sales (12 %) does not equal or exceed the percentage of money spent on non-program food (15%).	For your response, complete a non-program revenue tool proving compliance. If result is not in compliance describe two strategies you will implement to improve non-program revenue percentage.	

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Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1400 - Food Safety	V-1400	1) Per Food Code 2013, each site must have a "person in charge" who is a Certified Food Protection Manager (ServSafe). Director has 8 hours of Food Safety training, however, currently there is not a full time staff at middle school with certification. 2) The following reports are not maintained: daily temperature for milk cooler, thermometer calibration records, and dishwasher temperature/chemical strip report per HACCP plan guidance.	Director has already registered Middle School staff for ServSafe training and exam. For your response, 1) list the date and staff members who are enrolled. 2) describe corrective action taken for the above reports.	

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	VERIFICATION: 1) always run names through E Look Up prior to sending household letters out for verification. If you find the names students are Directly Certified; verification is complete. 2) any applications which are "verified for cause" are separate from the official verification collection sample and must be counted and documented separately on the Collection Report. 3) the name listed on Verification Collection Report should match the name of the Determining Official who is conducting Verification. 4) A reminder when changing benefit status due to verification, include in your letter to the household a specific date as a deadline to be able to request a hearing. (The Hearing Date is 10 calendar days from date of letter and benefits must be changed within 2 operating weeks after this date.)

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700 - Resource Management		<p>PROCUREMENT: The SY 2018 -2019 written procurement plan identified only one entry which is correct, however the entry was incorrectly listed as Prime Vendor. - FSMC contract services. Technical assistance was provided to the program director. The entry will be corrected.</p> <p>Although invited, no students participated in the SFA advisory board to review and provide feedback on FSMC menu planning and meal service. It is recommended to continue inviting the student council and perhaps communicate through the district newsletter the importance of student participation.</p> <p>Meeting minutes for the SFA advisory board included some information on menu planning, however, it appears that this meeting is used to discuss the school district's goals and implementation of wellness policy as well. It is recommended that if same members serve on both committees and meetings are on held on same day and time slot, a separate agenda be developed for SFA advisory board and wellness committee. Meeting minutes should also be recorded separately for each of these agendas. There should be sign-in sheets available and committee members should have a column to write in their titles. This will clearly identify the SFA advisory board and wellness committee members structure met requirements.</p> <p>Technical assistance provided to follow the breakfast meal conversion factor and counting the adult lunches as one meal equivalent for each lunch served per section III.J.(6)(f) in the FSMC contract.</p>
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		<p>BUY AMERICAN EXCEPTION LOG: SFA is to keep a log reporting any nondomestic agriculture products purchased with CN dollars. The Exemption Log should state date, product accepted and reason why they accepted it, i.e. domestic product was not available or significantly higher priced than the non-domestic product.</p> <p>Technical assistance provided to the SFA program director to complete a spot check of food items in storage (agricultural commodities) to ensure FSMC is to the maximum extent practicable, purchasing domestic agricultural commodities. Review Buy American Exception log to ensure that purchases of non-domestic agricultural commodities meet the limited exceptions to Buy American. This review can be completed at the time of conducting on-site monitoring of FSMC.</p>
700 - Resource Management	712 Were indirect costs* charged to the SFA's nonprofit school food service account?	<p>EQUIPMENT REPAIR, MAINTENANCE: Reviewed nutrition-related repairs, on-line fees, fuel for nutrition vehicle are now to be covered by the general fund and may be recovered by the "indirect cost" method. The Indirect Cost Flow Chart from 10.26.18 was shared for guidance in determining what can be charged directly to Nutrition and what can be recovered though indirect costs. Additionally, expenses such as repairs, tires, service and gas are part of the vehicle operation and maintenance function. These should be a General Fund expense. Questions should be directed to School Finance Iowa Department of Education.</p>
800 - Civil Rights	810 Review program materials.	<p>USDA NON DISCRIMINATION STATEMENT: Complaints regarding school nutrition discrimination are to be directed to USDA. The process and the form is found here: http://www.fns.usda.gov/civil-rights. Recommend including a link for USDA Non Discrimination Statement on the district Nutrition Webpage which includes this process.</p>

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Site - Level Technical Assistance Winterset Middle School (0209)

Area	Question	Comments
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	A few boxes of food were observed on the freezer floor instead of on pallets as required. Maintain Milk Cooler temperature logs (corrected on site). Maintain Dishwasher (temperature logs) as indicated in HACCP plan and thermometer calibration logs as indicated in HACCP plan.

Org - Level Commendations

Description
BENEFIT ISSUANCE: Eligibility is kept confidential. Households may apply online for free and reduced meal benefits offering convenience.
CIVIL RIGHTS: annual civil rights training was provided to food service staff and documented. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The correct state and federal non-discrimination statements are provided on all Nutrition Program materials.
MEAL COUNTING and CLAIMING: Meal count totals for the month of March were accurate and complete. Point of Service (POS), 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.
MENU and MEAL PATTERN: March and April menu met weekly and daily meal pattern requirements for K - 8 served at the Middle School. CN labels, Product Formulation Statements and Standardized Recipes used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch—including many fresh fruits and vegetables. Free water is available as required. At least two types of milk are offered. Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch.
No fiscal action is required as result of this review.
PROCUREMENT: A written procurement plan for SY 2018 -2019 was completed. The correct micro- and small purchase thresholds for School Food Authority were identified in the procurement plan. The written Code of Conduct identified local policies related to conflicts of interest, accepting gifts of monetary value, and disciplinary actions for employee violations of one's job duties. This is the School Food Authority's (SFA) first (base) year with a Food Service Management Company (FSMC). The contract with the FSMC is a fixed-price contract. SY 2017 - 2018 was the fourth and final renewal year for FSMC contract. The previous contract was a cost-reimbursable contract. The SFA retains signature authority of the school meals program. The SFA program director has completed the required food safety training. The SFA program director completed the two monitoring reviews of the FSMC operations. Both monitoring reviews were completed for the current SY before the deadline set by the state agency. The advisory group consisting of SFA business manager/program director, FSMC food service director, school principal, parents, and teachers met twice as required in the current school year. Meeting minutes were available for both meetings. Email notification is sent to program director if there is any substitution to the 21-day menu.

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<p>Typically, there is no substitution necessary during the SY as the FSMC food service director makes sure orders are placed well in advance. Substitutions are likely in the last month of the SY. The SFA program director/business manager tracks receipt of USDA Foods value on the FSMC monthly invoice. The SFA participated in the USDA- Diverted Foods Program. The monthly balances are tracked and recorded by checking Iowa Department of Education (IDOE) USDA Foods portal, FFAVORS, K-12 Foodservice, and ProcessorLink. At the end of the School Year (SY), the business manager will make sure the SFA is credited with all USDA Foods received. In SY 2017 - 2018, the SFA did an excellent job maximizing utilization of their allocated Planned Assistance Level (PAL) with 101.7 percent of PAL was utilized. The SFA is on track with maximizing utilization of USDA Foods in the current year. Three invoices were reviewed to ensure that SFA is paying the FSMC as contracted. The SFA reviews all invoices, resolves any discrepancies, and then pay the FSMC.</p>
<p>PROFESSIONAL STANDARDS: Nutrition staff are appropriately trained and a training tracker is maintained by Director. Determining Official, Program Manager are trained and maintain documentation.</p>
<p>RESOURCE MANAGEMENT: All expenditures that were reviewed appeared allowable. Indirect costs are not charged to the Nutrition Program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for USDA Foods. There is a local Meal Charge Policy in place and is communicated with all households in writing.</p>
<p>SMART SNACKS: SFA maintains documentation was available to show that all a la carte sold to students during the meals met Smart Snack and Healthy Kids Act standards. At the Middle School, only bottled water is offered as a la carte in addition to reimbursable meals.</p>
<p>VERIFICATION: the process of verifying income was completed as required and the Verification Collection Report was completed on time. The Determining Official attended training.</p>
<p>WELLNESS: A local Wellness Policy and Assessment is in place. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.</p>

Site - Level Commendations Winterset Middle School (0209)

Description
<p>DOCUMENTATION: Food Production Records (FPRs) were on file for all meals claimed for reimbursement for the review period. CN Labels, Product Formulation Statements and Standardized Recipes are maintained and indicate how menu items credit towards the meal pattern. Observed that staff save CN labels and nutrition labels from product boxes.</p>
<p>NUTRITION STAFF and ENVIRONMENT: are observed to be friendly, helpful and encouraging to student customers. Cashier demonstrates understanding identifying a reimbursable meal at the point of service. Students are observed to have adequate time to eat.</p>
<p>NUTRITION: students are offered a variety of entrée selections daily and may choose from a variety of fruits and fresh vegetables from a self service bar. Students were observed to eat what they selected - cucumber, cauliflower and tomatoes on the day of observation. All meals observed met reimbursable meal requirements. All meal components were available at the beginning of meal service on the days of observation and throughout meal service.</p>

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