

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Sidney Comm School District (60030000)
SNP - Review ID: 5092

Program Year: 2019
Month of Review: March
Lead Reviewer: Brenda Windmuller
Org Representative(s): Theresa Bryant

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One application was mistakenly entered as free and should be paid.	The SFA will explain how they will process applications, review DC lists and transfer information into the POS to ensure they are complete and categorized correctly.	
1000 - Local School Wellness Policy	V-1000	The SFA does not have an active Wellness Committee and the Wellness Assessment is not available to the public.	The SFA will 1. Submit a list of stakeholders invited to participate in the Wellness Committee. 2. Submit a date of the next wellness committee meeting. 3. Submit a plan of how the Assessment will be available to the public.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA must calculate non-program revenue and non-program expense each year to ensure they are charging adequate prices.	The SFA will complete and submit the non-program revenue tool or calculate the cost of entrees for one week, identify the average price and submit calculations.	

Site - Level Findings: Sidney Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments

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<p>100 - Certification and Benefit Issuance</p>	<p>126 a. Certification and Benefit Issuance Review Method:</p>	<p>The SFA should date all applications with received on date to ensure that applications are processed within 10 days of taking possession of the application.</p> <p>One application was missing the social security number. Applications are incomplete without this information. The social security number was provided by the household during the Administrative Review.</p> <p>The SFA should maintain updated records of students receiving free and reduced benefits. Two households were receiving free benefits based on flood displacement, no documentation on file.</p> <p>One household was receiving free benefits and should be paid due to a data entry error.</p>
<p>700 - Resource Management</p>		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan.</p> <p>Procurement Plan and Code of Conduct must be completed annually. The board policy addressing the disciplinary action was located during the on-site review.</p> <p>Milk was listed as a formal (IFB) in actuality the small procurement method was followed. The procurement plan lists projected spending on milk as \$30,000. Actual spending was \$21,000. The local formal procurement threshold is \$25,000. The procurement plan is meant to identify the value of the contract which will guide the SFA to the required procurement method. The SA explained the steps in the formal procurement method and the SFA decided to discuss raising the local threshold so that the small purchase method may be used for milk.</p> <p>The procurement plan should list all three purchasing categories with the AEA (Food/ groceries, ware wash, and small wares.)</p>

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		<p>Meyer laboratories has not been procured competitively.</p> <p>The SFA must have signed debarment certifications kept on file for all small and formal purchases.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Agreements valued at \$10,000 or more should have a termination for cause clause.</p> <p>The Small and formal purchase templates were provided by the SA with all terms and conditions listed.</p> <p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p> <p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none">· All price adjustments throughout the year· All invoices· All contracts and agreements· All bids solicited· Documentation that a vendor did not reply to bid (if applicable)· Documentation of why you selected a specific vendor (Selection Rubrics)
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		<ul style="list-style-type: none">· Copies of bid solicitation· Debarment statements· CD provided by the AEA (if applicable) <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none">• Track micro purchases, what purchased when and dollar amount.• Purchases should be distributed around community, not just one store. <p>Small Purchases- Purchases that are under \$250,000 (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none">• Include all terms and conditions• Include terms: Buy American and Equal Opportunity• Include Termination for Cause and Convenience if \$10,000 or more• Attain Signed Debarment Statements• Awarded on lowest price (unless written documentation to justify)• Maintain documentation <p>Formal Purchase- Purchases equal to and exceeding \$250,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <ul style="list-style-type: none">• Notice of accepting all types of formal purchase must be advertised.• Include all requirements of a small purchase
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		<ul style="list-style-type: none"> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. <p>Everything must be in writing.</p>
700 - Resource Management		<p>MEAL CHARGE POLICY: The SFA has a written meal charge policy but does not appear to be following it. The policy states "When the balance reaches \$0 a student may charge no more than 5 to this account. When an account reaches this limit, a student shall not be allowed to charge further meals or a la carte items until the negative account balance is paid."</p> <p>The policy does not identify if it is \$5 or 5 meals. Practice is to continue to feed students hot meals regardless of account balances.</p> <p>This is a local policy and may be adjusted at any time by the school board. It is the discretion of the LEA to decide what the policy is, but should be following the policy as written.</p>
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?	<p>WELLNESS POLICY: Provided Technical Assistance, the district is required to invite stakeholders to participate in the wellness committee and/or have documentation of the invitation. Stakeholders should include: parents, teachers of physical education, school administrators, students, school health professionals, general public, school food service and school board members. Attendance records and meeting minutes should be kept.</p> <p>It is required to review the policy once every three years, the posted policy was last reviewed on August 20, 2018. The policy should be made available to the public.</p> <p>The district is required to complete an assessment of the wellness policy every three years and make the results public. Best practices is to complete the assessment once a year.</p>

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		Provided the Local Wellness Policy folder from Team Nutrition that includes the handout on the Summary of the LWP Final Rule, the "Does Your Wellness Policy Measure Up?" handout and the school Building Progress Report form.
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?	<p>ANNUAL TRAINING: All Food Service staff and SFA employees working with the School Lunch Program are required to take Civil Rights annually. Training hours should meet the following guidelines:</p> <p><u>Director- 12 hours annually</u></p> <p><u>Manager- 10 hours annually</u></p> <p><u>Full-Time Staff- 6 hours annually</u></p> <p><u>Part-time Staff- 4 hours annually</u></p> <p>(Part-time staff includes POS operators.)</p>
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The blood born pathogen and body fluid clean up standard operating procedures were missing from the HACCP manual. These SOPs were added during the on-site review.
1500 - Reporting and Recordkeeping	1501 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	All program documentation should be kept for a period of 3 years plus the current year. The SFA is missing production records for one year.
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?	The SFA is required to promote breakfast two times each school year. Currently the SFA does not do anything beyond publicizing menus and a blurb posted on the web site which does not change. The SA shared some ideas of how to promote breakfast to include special events, National School Breakfast Week, and information at parent-teacher conferences.
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	The SFA must evaluate pricing every year to ensure that prices of non-program foods are higher than the cost of the item. Prices have not been evaluated by the SFA for several years.

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		The SA sent the SFA the Nonprogram revenue tool and a menu price calculation form that can be used to determine these prices and compliance.
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Org - Level Commendations

Description
APPLICATIONS/BENEFIT ISSUANCE (100): Benefit documents, as well as all paperwork, were extremely 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. The correct and current benefit issuance list was available. All applications were correctly determined. Access to benefit information is correctly limited. Free meals are extended to all members in the household.
CIVIL RIGHTS (800): The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided to food service staff and documented. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. Ethnic/racial information is collected and the form is completed. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. The non-discrimination statement appears on all printed materials.
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 appeared accurate and complete. There was a point of service (POS) at the point where meals are served for all students observed at lunch. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds. 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 FSD attended regional procurement training.
PROFESSIONAL STANDARDS (1200): The FSD does an excellent job of tracking professional development hours and the majority of the staff have completed the required training hours for 2019/2020.
RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed and, indicated appropriate and allowable expenditures. Reports are filed on time. The FSD does an excellent job of tracking USDA Foods (Commodities) fund allocation. The SFA spent 104.7% of the funds allocated last year. Errors fell below the \$600 disregard, no fiscal action will be required.
SMART SNACKS (1100): The SFA does not allow elementary school students the option to purchase a la care items other than milk. There are no vending machines present.
Summer: The SFA promotes the Summer Food Service Program by distributing a flyer each year. The SFA has submitted an application to participate in the SFSP for the first time in the summer of 2019.
VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified using the gross income. The verification process was completed on time. The applications selected for verification were confirmed prior to verification. The SFA had at least one person attend training. Verified applications were signed by the confirming official.

Site - Level Commendations Sidney Elementary School (0409)

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Description
<p>DOCUMENTATION: Documentation for the month of review indicated that foods purchased contained the required components and quantities. Production records on file confirmed this. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file and well organized. Standardized recipes are used for food production. Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted.</p>
<p>HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes most required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers, milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Food Service workers wore proper hair restraints and practiced good gloving procedures.</p>
<p>MEAL PATTERN: The FSD does an excellent job of planning menus. All menu components and vegetable subgroups are represented in their proper quantity daily and weekly. All students observed during the on-site visit had a reimbursable meal, the menu was complete with all food groups represented and served in their proper quantity. Offer vs. Serve was implemented properly and staff was monitoring food items on trays. Condiments are limited by the use of pre-portioned packets or teachers applying items like salad dressing to the student's plates.</p>
<p>The FSD is extremely knowledgeable about the NSLP and very organized. She is committed to improving herself through professional development and improving tracking and documentation with the use of new software systems. The FSD is willing to help and support her colleagues in this and other districts through mentoring to help strengthen other district's understanding of the NSLP.</p>
<p>WATER: Water is available to students during meal service. There is a sink and cups in the lunch room. A teacher is present to monitor the lunch room daily. That person fills several cups of water for the students. Several students were observed drinking water at lunch.</p>