

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
East Union Comm School District (19700000)
April 29-May 1, 2019

Program Year: 2019
Month of Review: March
Lead Reviewer: Shea Cook
Org Representative(s): K'Lea Johnson

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Four students were receiving free or reduced price benefits when there was no documentation on file to confirm their eligibility. One student was identified as directly certified and did not appear on the list. Two household applications impacting three students were identified as receiving reduced price benefits and there were no applications on file to confirm that eligibility.	For your response please upload copies of the letters notifying the families of reduction in benefits.	
100 - Certification and Benefit Issuance	V-0100	One household application was denied incorrectly when the family should have been given reduced price benefits.	For your response, please submit a copy of the letter notifying the family of increase in benefits. Additionally, submit proof that the family was reimbursed for any meal charges incurred during the 18/19 SY.	
1000 - Local School Wellness Policy	V-1000	The final rule governing local wellness policy requires that the following individuals should be invited to serve on the local wellness committee and participate in the wellness policy process: parents, physical education teachers, school administrators, students, school health professionals, general public, school food service, school board members. There is no evidence that participants have been invited to participate in or that a local committee has met to evaluate the local wellness policy.	For your response, please state your timeline for convening a local wellness committee. Additionally please identify who will be responsible for making sure that all of the required stakeholders are invited to participate in the wellness committee and what documentation you will keep on file to demonstrate that they have been invited and meetings have taken place.	
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 describe your timeline for completing the wellness assessment, how it will be made available to the public (website, etc.), and who will be responsible for completion. It is the expectation that the assessment will be available to the public by the start of the 19/20 school year.	

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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 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.	For your response please complete and submit the nonprogram revenue tool. If the tool indicates that additional nonprogram revenue is needed please describe your plan to increase nonprogram revenue.	
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Site - Level Findings: East Union Junior-Senior High School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

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 reviewed. The procurement plan table in the School Food Authority (SFA) Procurement Plan and Procedures manual was developed in SY 2016 - 2017. This table was not completed for SY 2017 -2018 or SY 2018 -2019. Technical assistance provided to review and update the procurement table annually. It is recommended to complete this table in February for the upcoming School Year (SY). This is the time when procurement decisions for upcoming SY are made. The plan must be completed prior to writing procurement solicitation or conducting any procurement activities. · The written Code of Conduct identifies local district policies for gifts to employees and conflict of interest if a district employee is also employed outside of the district, however, it does not address code of conduct requirement for individuals responsible for the selection, award, and administration of procurement contracts as required in the federal regulations 2 CFR 200.318(c) and 2 CFR 200.303. It is recommended that the SFA use the state agency code of conduct language for individuals responsible for procurement. The template is available in download forms on IA_CNP form NSLPPROC002. · The requirement for Buy American for agriculture commodities and limited exception to Buy American was discussed. Include the Buy American Provision language in procurement of agricultural commodities, example fluid milk. · When non-domestic agricultural commodities are purchased, the SFA must first consider an alternate domestic product when the domestic

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		<p>product ordered is not available. The Exception to Buy American log must be maintained to document why a non-domestic agriculture product was purchased. A template Exceptions to Buy American log template is available in download forms on IA_CNP.</p> <ul style="list-style-type: none"> • 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. <p>SMALL PURCHASE:</p> <ul style="list-style-type: none"> • 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 IA_CNP. For milk solicitation, at a minimum include the Buy American language and the termination of cause and convenience. The Suspension and Debarment Certification is best practice for any procurement estimated below \$25,000. • Provide vendors for small purchases 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. • 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. • When escalator price is provided by vendor, be sure to get a monthly price list from the vendor. In the milk solicitation the SFA should list the federal milk market order #32 as the market index vendor should use when escalator price is requested.
700 - Resource Management		<p>The district does not appear to have a board approved negative balance policy. While a draft of a board level policy was shared, it did not appear to be approved by the board. While there are some policy provisions posted on the nutrition website, those provisions are not board policy. Board policy is best practice for addressing negative lunch accounts. When approving a negative balance policy, the policy should reflect what is actually being done in practice. Both the draft policy and the guidelines posted on the nutrition website indicate that students with a negative balance will be served an alternate meal. However, that is not what is currently being done. Students are being served a full reimbursable meal. Additionally, all policies should be checked for compliance with HF2467. Policy listed on the nutrition website does not comply with the contact provisions. All communications concerning negative account balances should be directed to parents of students and not emailed to students. Any written communications (i.e. paper notices) should also be addressed to the parents or guardians of the student.</p>
700 - Resource Management	712 Were indirect costs* charged to the SFA's nonprofit school food service account?	<p>Although not flagged for a comprehensive review, unallowable direct costs were identified during the procurement review. SA took the opportunity to discuss unallowable direct costs, specifically equipment repair and electronic fees associated with online meal payments. LEA has already</p>

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		taken steps to address these issues going forward and will be covering any unallowable direct charges through indirect costs in the future.
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?	SA recommends an update to the local wellness policy. Some language in the existing policy is outdated. Appendix E references the SMI review, which is no longer applicable. Existing policy also indicates that the SFA will provide parents with a list of healthy snacks. SA could not find any such resources on the website. The policy should reflect what the LEA is actually doing and triennial assessments of the policy should evaluate the implementation of such goals. Existing policy does include language that addresses the final rule for marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards, with examples. One example in existing policy includes, "logos and brand names advertised on vending machines." However there is a cooler with a non-allowable soft drink advertisement in the cafeteria. That logo does not comply with the food and beverage marketing requirement in the local wellness policy.
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?	Any individual not employed within the nutrition department, but who has duties within the department are required to complete yearly civil rights training at a minimum. This includes any individuals who serve as hearing, confirming, or determining officials. Documentation of the training should be kept on file.
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?	Non-domestic produce (tomatoes from Canada) were observed in storage. SA provided guidance on keeping a log to document any non-domestic produce received. Log should include date, description of item, and reason for its acceptance.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	SA encouraged additional outreach for SFSP. Free outreach materials can be found at the following website: http://bestpractices.nokidhungry.org/programs/summer-meals/promote-summer-meals#summer-meals-outreach-resource-toolkit
RMCR - Revenue From Nonprogram Foods	10 If the SFA found that its revenue ratio was less than its food cost ratio, did the SFA take additional steps to sufficiently increase its nonprogram food prices, add sufficient funds to its nonprofit food service account, and/or take other actions to adequately resolve the problem?	Currently the district is charging \$2.60 for vended Pre-K meals. That charge is not enough to cover the cost of the meal and that is likely significantly contributing to the discrepancy in non-program revenue. Vended meals should be charged at the adult meal rate at minimum. Vended meals are not subsidized by the NSLP and no funds from the NSLP, including the value of USDA foods used to prepare the meals, should be used to cover the cost of the meals. As a part of increasing non-program revenue the SFA should increase the price charged for vended meals.

Site - Level Technical Assistance East Union Junior-Senior High School (0172)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	SA recommends additional signage on the salad bar to help students identify how much fresh produce constitutes the 1/2 cup requirement. SFA may want to consider picture signage. At minimum they should indicate the amounts of common salad items needed to meet the 1/2 c minimum requirement (ex. 1 c. lettuce, number of carrot sticks, etc.).

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400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	SA discussed menuing alternate entrees. All alternate entrees should be menued so that they meet the meal pattern. Currently SFA offers uncrustable sandwiches as a daily alternate entrée choice, however if a student chose that alternate meal on a daily basis they would exceed that amount of allowable calories and fat for the week. SA should not offer high calorie/fat options as a daily entrée.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	SA suggests refresher training for OVS with specific focus on the difference between lunch and breakfast. Breakfast OVS is based on the number of required items while lunch is based on the number of required components.
1700 - Afterschool Snack	1707 a. Has the program been monitored within the first 4 weeks of operation each year?	Although monitoring is evident from the observation of the operation, there is no documentation on file to verify monitoring took place in the first four weeks of operation. SFA indicated that monitoring is done more than the twice yearly requirement, but that they don't keep formal documentation. SA reminded SFA that monitoring must be formally documented and that documentation should be kept on file with Afterschool Snack records.

Org - Level Commendations

Description
AFTERSCHOOL CARE SNACK PROGRAM: The food items served during the observed snack met the requirement as 2 components were offered. • The food production records reviewed show that the snack requirements were met during the review period. • The SFA conducted on-site monitoring of all sites that provide the afterschool care snack program. • The “And Justice For All” poster is on display where snacks are served. • The snack count was taken at the point of service and is reasonable when compared to the review period count. Rosters are on file for snacks claimed during the review period and the snacks counted match the claim.
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. • Income applications are complete with parent signatures, income information, names of all family members and social security numbers. • The correct income guidelines were used and the conversion rates were used properly.
CIVIL RIGHTS: The correct public release was sent to a local media outlet and published. • 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. An approved milk alternate is made available for students with a dairy intolerance. • All staff in the school nutrition program received civil rights training. Documentation is on file. • The racial ethnic form was completed and shows that students were not discriminated against when applying for free or reduce price meals. • The SFA follows the USDA’s complaint procedure as needed.
COMPETITIVE FOODS: Nutrition calculator printouts are on file for all a la carte foods and beverages and vending machine items sold. • All competitive foods sold during the on-site review meet the Smart Snack requirements.
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.
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 requested a 2nd inspection. • The SFA’s HACCP plan is available on site. • The food service director, and many food service staff are ServSafe certified. • Good food safety practices were observed while SA was on-site. • Foods are stored properly.
MEAL PATTERN AND NUTRITION QUALITY: The menu offers a daily salad bar and hot vegetable options to provide many options to students. • 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. • Condiments are proportioned and limited to control calories and sodium. • 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.

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PROCUREMENT: The School Food Authority (SFA) developed procurement plan and procedures and written code of conduct following state agency procurement training in SY 2016-2017. The procurement plan correctly identified the SFA micro- and small-purchase thresholds. The food service director attended regional procurement training in Creston in fall 2018. The 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 SFA will continue their membership with AEA Purchasing for SY 2019-2020. Use of micro-purchase method is minimal and limited to purchase of special diets such as non-dairy beverages. Gluten-free products are purchased from the prime vendor. Continue to maintain the micro-purchase log to ensure purchases are equitably spread among qualified vendors. Maintain itemized documentation to show purchase price for item is reasonable. The SFA used the small purchase method for fluid milk. The milk solicitation included written description for the products to be procured and included the annual estimated amount for each type of fluid milk. Milk solicitation was sent to two potential vendors. Both vendors responded. Extended cost was calculated to arrive at bottom line cost. The correct fluid milk vendor was awarded the contract. Documentation for the purchase of apple corer and orange sectioner was reviewed. A vendor was contacted to provide price quotation and online search at three sites was completed. All online search documentation is captured in photos and saved on Google Drive. To ensure compliance of contract monitoring with food prime vendor, three vendor invoices were reviewed. 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. One item crackers was not found on the prime vendor market basket. The food service director completed a price comparison before ordering the product through the prime vendor. In SY 2017 - 2018 the SFA did an excellent job with the allocated USDA Foods Planned Assistance Level (PAL). The SFA was provided more USDA Foods once all allocated PAL was utilized. The PAL use was 105.2 percent. Except for garbanzo beans, the SFA is on track utilizing PAL for the current School Year (SY). Per food service director, the students do not like the state procured hummus. Overall, the food service director is doing very well with procuring goods and services competitively and maintains awarded and non-awarded vendor documentation.

PROFESSIONAL STANDARDS: Training hours are tracked for all staff with school nutrition responsibilities. • Civil rights training was provided to all nutrition staff. • Documentation is on file for all training received. • Most school nutrition employees have received the required number of training hours for the school year and those that had not are scheduled to complete required hours of training before the end of the year.

RESOURCE MANAGEMENT: The SFA charges the correct paid student lunch price according to the required PLE tool and the correct adult lunch price. • 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 and school announcements. The SFA also reminds families of school breakfast through the promotion and celebration of National School Breakfast Week.

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.

Site - Level Commendations East Union Junior-Senior High School (0172)

Description
Civil Rights: • The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.
Food Safety: Food temperatures are recorded on the daily food production record. • Digital thermometers are used. • 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. Many staff are ServSafe certified.
Meal Counting and Claiming: The Point of Service is at the end 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 March 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. • 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 available in a drinking fountain in the lunchroom and students are provided cups.