Program Year:	2019
Month of Review:	April
Lead Reviewer:	Christine Crow
Org Representative(s):	

Site - Level Findings: Orchard Place (8625)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	FPR are missing information on daily alternate entrée options that are available to students. One day during the review period of April, the food production record did not contain all of the grain items served for lunch thus making it appear that the grain requirements were not met for that day. The menu that is available for unit staff documented the correct menu items and portion sizes and verified that the meal pattern requirements were met for that day. All foods that are available as a part of the reimbursable meal must be documented on the food production record. If there are substitutions made to the menu, those must be documented on the food production record as well. Documenting the actual numbers of alternate and main entrees served on food production records can help prevent food waste as well as menu planning and ordering. SA suggests keeping the FPR in the kitchen so staff can make adjustments on the food production records and ensure documentation is accurate and complete. TA provided to the FSD. It is the expectation that SFAs collect, organize, and maintain: CN labels, Product Formulation Statement and Standardized Recipes for all creditable menu items	Send one food production menu that includes all menu items including the alternate entrée items. Submit documentation that the food service director watched the Team Nutrition webcast on food production records that can be found here: <u>https://educateiowa.gov/pk- 12/nutrition-programs/team- nutrition/school-nutrition-staff- training-webcasts</u> . Provide a timeline of when the food labels, CN labels, or PFS will be gathered for the rest of the menu items served on the cycle menu.	

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		served for Breakfast, Lunch and After School Snack Program which SFA receives federal reimbursement. Standardized recipes must be on file for staff to know how to properly make the food to ensure it is made safely and meets the meal pattern requirements. CN labels or PFS are required to ensure the correct serving size is provided to students to meet meal pattern requirements. Standardized recipes were available for menu items served. TA provided.		
1700 - Afterschool Snack	V-1700	days during the review period and on the day of observation, did not meet the snack meal pattern	Provide After School Care Snack Program food production records for one week to show that the menu is meeting snack requirements.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
800 - Civil Rights	V-0800	The SFA strives to accommodate all of their student's special dietary needs but they do not have documentation on file that is signed by a prescribing	Submit a copy of the prescribing official's order for the student receiving almond milk. Describe the SFA's process that will be implemented to ensure documentation from a prescribing official is on file for	
		pattern requirements are not considered reimbursable. For example, there is documentation stating that a student cannot have milk, but the signed documentation does not provide further details about what can be provided instead. Unless otherwise specified, if the student cannot have cow's milk, the SFA would offer their milk alternative that is nutritionally equivalent to cow's milk, such as lactose free milk. If the student	students with special dietary needs.	
		cow's milk, such as lactose free milk. If the student requires a milk that is not nutritionally equivalent to cow's milk, or has another dietary need that requires		

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		them to go outside of the meal pattern, an documentation from a prescribing official is required. This particular student is receiving almond milk which is not nutritionally equivalent to cow's milk and would require documentation from a prescribing official. TA provided to the FSD.		
900 - SFA On Site Monitoring	V-0900	Although the SFA completed lunch onsite monitoring for all sites they did not monitor breakfast at any of the sites. SFAs are required to conduct onsite monitoring for 50% of the sites that serve breakfast. TA provided to the authorized representative.	Submit a copy of the onsite monitoring forms to show that 2 of the SFA's 4 residential units/sites were observed at breakfast.	
1400 - Food Safety	V-1400	The SFA has a HACCP Food Safety Plan but it is incomplete. The plan has some standard operating procedures (SOP), but does not include procedures for all areas where food safety hazards could occur and impact the safety of foods served. Examples of SOPs that would be applicable for this SFA would include how to properly use and clean equipment, control and cleanup of blood and bodily fluids, calibrating thermometers, monitoring and recording temperatures for food and cooling equipment, and transporting foods. Additional information and SOP templates can be found on the ISU Extension and Outreach website https://www.extension.iastate.edu/foodsafety/Standard- Operating-Procedures#personnel The IDOE Bureau of Nutrition and Health Services is partnering with ISU Extension and Outreach to provide a HACCP Food Safety Plan Summer Training. A copy of the HACCP Food Safety Plan must be on file at each residential unit. TA provided.	Describe when the SFA will complete their HACCP Plan so that it provides all required elements. Provide written confirmation that the HACCP Plan will be in the main kitchen as well as each residential unit where meals are served.	

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		PROCUREMENT:
		 The SFA does not spend their funds equitably throughout the community because they go to the store that is closest to them. TA provided on including a description of the distance required for staff to travel when conducting a micropurchase in their procurement policy and procedure manual. The SFA must begin keeping a Buy American Exemption Log to document all purchases made and/or items accepted upon delivery that don't meet the Buy American provision.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	USDA requires SFAs to follow specific complaint procedures in the event that a civil rights complaint is made against the school nutrition program. SA provides the SFA a handout and TA on the USDA civil rights complaint procedures.
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?	The SFA's Wellness Policy has many of the required elements but it does not include goals for food and beverage marketing. Upon the SA onsite visit and per the authorized representative, the SFA does not have any food or beverage marketing on campus, but language still must be included in the wellness policy. Sample policies can be found on the IDOE School Wellness website (<u>https://www.educateiowa.gov/pk-12/nutrition- programs/school-wellness</u>). TA provided.
1400 - Food Safety	1401 If conducted as part of the Administrative Review, are SFA contracted and self-operated warehouses, storing all foods (commercial and USDA) properly?	The freezer in the Jacobsen unit was above 0 degrees Fahrenheit when SA checked it and upon review of the temperature log. TA provided to the FSD who agrees to have maintenance repair it.

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1600 - School Breakfast and SFSP	1602 For each question on the Off-Site Assessment Tool (Questions	The SFA provides local information on the Summer Food
Outreach	1600-1601), do the responses provided demonstrate compliance	Service Program (SFSP) availability on their social media
	with FNS requirements?	sites. SA suggests that they also provide SFSP promotional
		materials in their discharge packet to all students and
		provided the USDA SFSP link that contains materials.

Site - Level Technical Assistance Orchard Place (8625)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	Although the breakfast menu served on the day of review met all the daily requirements, SA suggests offering 1 cup of cereal (flake or rounds) and 3 pancakes so that each item meets the daily requirement of 1 ounce of grain on its own. Other grain breakfast options discussed.
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 must be posted in the eating areas so that students can see what constitutes a reimbursable meal. Currently, the menus are posted for the unit staff who communicate the menu items to students the week prior and the day of. TA provided to the food service director on various ways to post the menu, including involving the students.
400 - Meal Components and Quantities - Lunch		Beginning SY 2019-2020, 50% of the grains served must be whole grain rich. This differs from the current regulation that states that 100% of grains served must be whole grain rich. Because of the new, whole grain rich flexibility, whole grain exemptions will not apply for the 2019-2020 school year.

AFTER SCHOOL CARE SNACK PROGRAM: -Food production records are available for all snacks served. - The snacks served contain 2 components every day. - Snacks are stored and served safely and the "And Justice For All" poster is on display in a public location where snacks are served. Snack onsite monitoring has been conducted twice in this 2018-2019 school year.

CIVIL RIGHTS: • The SFA offers interpreters for students with Limited English Proficiency. • Staff with school nutrition program responsibilities have received civil rights training within the past year. • The "And Justice For All" poster is on display in a public location where meals and snacks are served. • The nurses, dietitian, food service staff, and staff on the residential units strive to meet the special dietary needs of students.

FOOD SAFETY: - The contract dietitian conducts a food safety check in each residential unit to ensure staff are following all food safety procedures such as hand washing, proper food storage, monitoring temperatures of cooling equipment and hot foods, etc. - Each residential unit had temperature logs for their refrigerators, freezers, and dishwashers. They also monitored and recorded all food temperatures for the hot foods received. - Food was stored at least 6" off the ground in the main kitchen and in residential units. - The freezers and coolers in the main kitchen were kept at the correct temperatures and temperatures were monitored and recorded daily. - The authorized representative requested a 2nd visit from the health inspector since they are only receiving one visit each year. - The health inspection report is located in a public location.

LOCAL WELLNESS POLICY: • The Local Wellness Policy and assessment are both made available to the public as they are on the organization's website. • The Local Wellness Policy is assessed annually. • A variety of stakeholders participate in reviewing and updating the local wellness policy and goals including community dietitians, staff, teachers, food service staff, the recreational therapist and the organizations administration. • The SFA has an assessment that describes how the SFA is meeting the goals written into the wellness policy. • The SFA does not sell any competitive foods to students.

MENU PATTERN AND NUTRITION QUALITY: • The FSD serves a variety of entrée items and vegetable items throughout the month. Homemade entrée items are also offered. • Cycle menus are used. • Two different types of milk are offered at each meal to students. • Free, potable water is available to students at all meals. • Portions of condiments are controlled and lower sodium canned vegetables are offered to students to help control the sodium amount in meals. • The breakfast menu served on the day of review met all meal pattern requirements for the fruit, grain, and milk components. The lunch menu served on the day of review met all meal pattern alternate, milk and grain. All grains served at lunch were whole grain rich. • The breakfast menus served during the week of review met the daily and weekly meal pattern components for the fruit, grain, and milk. • The lunch menus served during the week of review met the daily and weekly meal pattern components for the fruit, grain, and milk. • The lunch menus served during the week of review met the daily and weekly meal pattern components for the fruit, grain, and milk. • The lunch menus served during the week of review met the daily and weekly meal pattern components for the fruit, grain, and milk. • The lunch menus served during the week of review met the daily and weekly meal pattern components for the fruit, grain, and milk. • The lunch menus served during the week of review met the daily and weekly meal pattern components for the fruit, grain, and milk. • The lunch menus served during the week of review met the daily and weekly meal pattern components are available subgroups, the total vegetables, fruit, meat/meat alternate, milk and grains. • The breakfast meal service is family style and all menu components are available on the table in adequate quantities for students to take. • The lunch meal service is serve only and is implemented accurately.

PROCUREMENT: - The SFA's authorized representative attended the regional procurement training and completed the offsite procurement review tool. - The local procurement plan contains all of the planned purchases for SY 2018-2019 and the required, corresponding information such as value of each event, the procurement method used, the type of contract awarded to the vendor, the type of evaluation method used, and individuals responsible for contract management. - The SFA conducts contract management monthly. - The procurement policy includes a code of conduct that contains all the required elements. - The SFA saves all monthly and weekly price lists and conducts contract management.

PROFESSIONAL STANDARDS: - The SFA uses a tracking tool to track all of their training events for individual staff members. - All staff with responsibilities in the school nutrition program have either met their required training hours or have a plan to do so before the end of the school year. - Documentation is on file to show that all training events took place. - The food service director has food safety certification. - All staff with responsibilities in cluding campus staff that eat meals with students, have received civil rights training.

RESOURCE MANAGEMENT: • The SFA has a separate account for school nutrition revenues and expenditures. • The school nutrition program account has less than 3 months of operating costs. • Internal controls are in place to ensure that school nutrition funds are spent on allowable expenses. • The school nutrition program documents are kept for at least 3 years plus the current year. • The financial report in IowaCNP was completed and shows that nonprogram food revenue adequately covers the nonprogram food costs. - The vendor paid list and invoices from the review month indicate all allowable expenses.

SPECIAL PROVISION OPTION - PROVISION 3: • The 2012-2013 base year applications and meal counting rosters are on file for all breakfast, lunch, and after school care program snacks served to students. • The current claim is calculated accurately based on base year claiming percentages for all meals and snacks served. The SFA completes their own calculation for the after school care snack and based on their base year claiming percentage for snack and current enrollment the claim information is accurate and reasonable. • Documents are kept for 3 years plus the current year.