

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Diagonal Comm School District (17820000)**  
**SNP - Review ID: 5221**

**Program Year:** 2019  
**Month of Review:** March  
**Lead Reviewer:** Brenda Windmuller  
**Org Representative(s):** Danielle Newton

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	The confirming official must review the original application selected for verification to ensure that it was processed correctly and sign the application.	The SFA will have the confirming official complete verification training and submit the date the training will be completed.	
300- Meal Counting & Claiming	V-0300	All meals claimed for reimbursement must be counted at the Point of Service. Preschool students are served breakfast in the lunch room but counts are recorded in the classroom.	The SFA will describe their plan on who will be recording the names of pre-school students eating breakfast, where this will take place (at the beginning of the serving line or the end of the serving line) and how those numbers will be transferred into the claim.	
1000 - Local School Wellness Policy	V-1000	The SFA must customize the wellness policy to meet the needs of the district. An assessment must be completed once every 3 years. A wellness committee must be utilized to set and assess goals. The policy and the assessment must be made available to the public.	The SFA will 1. Submit a draft of a revised wellness policy. 2. Submit a draft of a wellness assessment. 3. Submit a list of individuals and their relationship to the school who have been invited to serve on the wellness committee. 4. The date you plan to have a wellness committee meeting. 5. A plan of how you intend to make the wellness policy and assessment available to the public.	
1200 - Professional Standards	V-1200	The FSD has not completed 8 hours of food safety training.	The FSD will submit a plan of when and how 5 additional hours of food safety training will be completed by July 1,	

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			2019. List the classes to be taken and the date the class is scheduled for.	
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**Site - Level Findings: Diagonal Junior-Senior High School (0172)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Standardized recipes must be used for all menu items combining 2 or more ingredients. The SFA did not have a standardized recipe for the "haystack" served on the day of review.	The SFA will submit all standardized recipes to be used the week of May 6-10. The SFA will also locate or create a standardized recipe for the "haystack" and submit it.	
400 - Meal Components and Quantities - Breakfast	V-0400	Students under Offer vs Serve must have at least 1/2 cup of fruit or 100% fruit juice at breakfast. Eight students were missing this component on the day of review.	SFA's cook staff will complete meal pattern training and Offer vs. Serve training and submit the date the training was completed.	
400 - Meal Components and Quantities - Lunch	V-0400	The production records for March 28, 2019 indicate only 1/2 cup of vegetables (beans) were available for all age groups. Grades K-8 were short 1/4 cup of vegetables and grades 9-12 were short 1/2 cup vegetables on that day.	The SFA will submit 1. The lunch menu for May 2019. 2. The lunch production records for May 6-10, 2019. 3. The completed certification worksheets for the week of May 6-10, 2019.	
400 - Meal Components and Quantities - Lunch	V-0400	The production records for lunch on the day of review (April 23, 2019) had recorded planned serving of 1/2 cup fruit (strawberries). Staff started service by giving students a 1/4 cup serving. The SA asked staff to switch to a 1/2 cup. The cook staff changed spoodles but was not giving the students the full 1/2 cup spoodle full of	The cook staff will complete training on the meal pattern and production records prior to July 1, 2019. Submit the date the training will be completed.	

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		fruit until SA intervened. 5 students did not receive ½ cup of fruit this day.		
1700 - Afterschool Snack	V-1700	The SFA was not able to provide menus, production records, and the self-monitoring form for the Afterschool Snack Program.	The SFA will submit 1. The menu for the Afterschool Snack Program for the month of May 2019. 2. Afterschool Snack production records for May 6-10, 2019. 3. The SFA will also complete and submit the Afterschool Snack Program self-monitoring form.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	134 Does the SFA perform Direct Certification matches according to the required timeframes?	The SA shared how the SFA can keep better tabs on E-lookup as one student was on the E-lookup as of July, but not caught until October 2019. All applications for free and reduced benefits must be processed within 10 days of receiving them. The SFA should write the date received on each application to ensure compliance.
200 - Verification	209 Based on the review of verified applications:	Technical Assistance was provided on the verification process starting with selecting the applications for verification from error prone applications. The High School Principal is the designated Confirming Official. The Confirming Official must enter the application into ICaves to see if the application was processed correctly in the first place. The Confirming Official must sign and date the applications that they verify. The SFA should use the gross income when processing applications. A link to the Verification training webinar was provided.
300 - Meal Counting and Claiming	314 Is the SFA following their approved SFA-SA Agreement/application (including POS)?	The NSLP Application states that grades 6-12 are Offer vs Serve for lunch and breakfast. In practice, grades 9-12 only are Offer vs Serve at lunch. The application should be changed to reflect each grade level's service style.
700 - Resource Management		Resource Management: Final calculations of errors indicate a total less than \$600. No Fiscal Action will be taken at this time. Continued issues with the meal pattern

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		<p>are likely to result in Fiscal Action during the next Administrative Review if not resolved.</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.</p> <p>Must have signed debarment certifications kept on file.</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>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>All invoices including receipts from the local grocery store should be itemized. ("produce" or "grocery" is not enough detail.</p> <p>Maintenance and repairs may not be paid for from the school lunch account.</p> <p>The SA provided templates for small and formal purchasing method.</p> <p>SFA should keep on file:</p>

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		<ul style="list-style-type: none"><li><input type="checkbox"/> All price adjustments throughout the year</li><li><input type="checkbox"/> All invoices</li><li><input type="checkbox"/> All contracts and agreements</li><li><input type="checkbox"/> All bids solicited</li><li><input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)</li><li><input type="checkbox"/> Documentation of why you selected a specific vendor (Selection Rubrics)</li><li><input type="checkbox"/> Copies of bid solicitation</li><li><input type="checkbox"/> Debarment statements</li><li><input type="checkbox"/> CD provided by the AEA (if applicable)</li></ul> <p>Three types of purchases, (Federal Thresholds):</p> <p><b>Micro-purchase-</b> under or equal to <b>\$10,000</b>(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><li><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.</li><li><input type="checkbox"/> Purchases should be distributed around community, not just one store.</li></ul> <p><b>Small Purchases-</b> Purchases that are <b>under \$250,000</b> (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"><li><input type="checkbox"/> Include all terms and conditions</li><li><input type="checkbox"/> Include terms: Buy American and Equal Opportunity</li></ul>
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		<ul style="list-style-type: none"> <li><input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more</li> <li><input type="checkbox"/> Attain Signed Debarment Statements</li> <li><input type="checkbox"/> Awarded on lowest price (unless written documentation to justify)</li> <li><input type="checkbox"/> Maintain documentation</li> </ul> <p><b>Formal Purchase-</b> Purchases equal to and <b>exceeding \$250,000</b> (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"> <li><input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised.</li> <li><input type="checkbox"/> Include all requirements of a small purchase</li> <li><input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</li> <li><input type="checkbox"/> Everything must be in writing.</li> </ul>
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 in 2018, but is lacking goals specific to the district. The policy should be made available to the public.</p>

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		<p>The district is required to complete an assessment of the wellness policy every three years and make the results public. Once a year is best practice.</p> <p>SA 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.</p>
1200 - Professional Standards	1213 Verify the SFA's response to Q1203 on the Off-site Assessment Tool.	The Food Service Director is required to complete 8 hours of food safety training every 5 years and should have 8 hours completed within 30 days of being hired. The Food Service Director has completed 3 hours to date. Upcoming training opportunities were shared with the FSD.
1400 - Food Safety		Food Safety: The SFA is required to request a second health inspection each year. The request should be kept on file.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The SFA should add the bloodborne pathogen and body fluid clean up standard operating procedures to the HACCP manual.

**Site - Level Technical Assistance Diagonal Junior-Senior High School (0172)**

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast		Preschool: All meals being claimed for reimbursement should be counted at the Point of Service. Pre- school students received their meal and ate in the lunch room, but counts were taken in the classroom. The SFA must change this practice.
400 - Meal Components and Quantities - Breakfast		Breakfast: Students at breakfast must give you their name in exchange for their meal (like they do at lunch.) Students

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		must be monitored to ensure that they take a reimbursable meal and that a la carte items are recorded accurately.
400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	Five high school students and 3 middle school students were missing fruit from their breakfast tray on 4-24-2019. These meals were not reimbursable as a result.
400 - Meal Components and Quantities - Lunch		PRODUCTION RECORDS: Production records evaluated from the review period do not include consistent units of measure. Quantities planned for each age level should be compared to the meal pattern to ensure compliance. Items included on the production record should be specific. (example: rather than "veggies" list the specific vegetable served.
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	The kitchen staff were not working off of the correct meal pattern requirements. Fruit: The SFA did not plan 1/2 cup of fruit to students grades K-5. The production records indicated that all grades (K-12) were being served 1/2 cup of strawberries on the day of review, but a 1/4 cup spoodle was going to be used. This was corrected by the SA at the beginning of meal service. Under serve only, K-8 students must be given 1/2 cup fruit daily and under OvS, high school students must be offered 1 cup. Once service started, the cook serving the strawberries initially was not emptying all of the contents of the 1/2 cup spoodle onto the student's tray, shorting the serving. Vegetables: Production records for March 28, 2019 indicate all age groups (K-12) were served only 1/2 cup of beans with no other vegetables offered. Grades K-8 are required to be served 3/4 cup vegetables daily and grades 9-12 must be offered 1 cup of vegetables daily.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	The SA answered questions on OvS and provided copies of the meal pattern and printed material on Ovs. The SFA was reminded that they must offer all 5 components in their full portion size to all high school students, and the students may choose what they take as long as they have 3 of the 5 components including at least 1/2 c. fruit and/or vegetable. At breakfast, the SFA must offer 4 food items from 3



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		components (fruit, grains, milk). Students must take at least 3 items including 1/2 c. fruit.
500 - Offer versus Serve	502 Is there signage explaining what constitutes a reimbursable meal to students including the requirement to select at least 1/2 cup fruit or vegetable?	The SFA should have a sign posted which states the daily lunch and breakfast. This allows students to see what is being served and make decisions prior to reaching the serving line.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	The SFA's cook staff is recording temperatures of the coolers and freezers daily. Two days indicated temperatures in the temperature danger zone (41-135) and no corrective action was documented. The purpose of checking the temperatures is to identify any issues with equipment maintaining proper temperatures. When problems are found, corrective action must be taken and documented.
1500 - Reporting and Recordkeeping	1502 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	Food Production records and CN labels must be kept for 3 years plus the current year in addition to all of the financial documentation for the program. The SFA only had the current year on file. All temperature records must be kept for a minimum of 6 months.
1700 - Afterschool Snack		<p><b>AFTERSCHOOL SNACK PROGRAM:</b> All documentation for the Afterschool Snack Program must be maintained for a period of 3 years plus the current year to include: participant counts, menus, production records, on site monitoring, and claim information.</p> <p>On site monitoring must be completed within the first 4 weeks of operating the program each year. The program must include educational or enrichment activities. The SFA must follow the prescribed meal pattern. Production records must be maintained daily. The "And Justice for All" poster must be present in the location that the snacks are served. And counting must be done at the point of service after staff have verified that the student has a reimbursable snack.</p> <p>The SA provided the FSD with a copy of the Afterschool Snack Program handbook.</p>

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Dietary Specifications Assessment Tool - Lunch	19 Standardized recipes are followed: all ingredients are weighed or measured with standardized weight or measuring utensils.	Standardized recipes must be used for all items combining 2 or more ingredients. Recipes should include ingredients, ingredient quantity, cooking procedures, serving sizes, and recipe yield. A standardized recipe was not available for the "haystack" served on the day of review.
Dietary Specifications Assessment Tool - Lunch	6 Reduced-fat, low fat, fat-free mayonnaise, sour cream, and/or salad dressings are offered instead of full-fat varieties.	The SFA should purchase low fat and low sodium products whenever possible to stay within the dietary guidelines. The SFA has beef broth in the store room with 730 mg of sodium per cup and ranch dressing with 130 calories per 2 tablespoons.
Infant and Pre-K Meal Pattern Checklist - Breakfast	11 Was the appropriate milk type served?	<p>The SFA may not allow pre-school students to have flavored milk unless students are co-mingled with other age groups.</p> <p>These preschool students came in after the K-8 students left the lunch room, and before the high school students came for breakfast.</p>

**Org - Level Commendations**

Description
BREAKFAST & SUMMER PROMOTION (1600): The SFA does good job of promoting the Summer Food Service Program. Outreach for the SFSP program state-wide is shared via websites, and flyers which are posted at business around town.
COMPETITIVE FOODS (1100): Competitive foods and beverages sold to students during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) meet Smart Snack guidelines as outlined by the Smart Snacks Guidelines.
PROCUREMENT: The SFA has a comprehensive written Procurement Plan. 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 SFA has attended Regional Procurement training.

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PROFESSIONAL STANDARDS (1200): The SFA followed regulations for the district's size category when hiring a new director. Tracking was provided that documents that the director received the required 12 hours of annual training, managers received 6 of the required 10 hours of training, and all other staff have received at least 6 hours of annual training. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.
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. The Paid Lunch Equity (PLE) too was completed and prices were increased as indicated by the PLE tool. Reports are filed on time, and all records are maintained for at least three years plus the current year. No Fiscal Action is required at this time.
ACCESS AND REIMBURSEMENT (100): Benefit documents, as well as all paperwork, were well organized. The current application form was used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS, and denied applications were correctly determined.
CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The "And Justice for All" poster is visible to program participants.
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. Food Service Staff ensured each student received the required meal components, another staff member recorded the names of students eating the meal. The recorded meal participation is reviewed by the Food Service Director and compared to the daily census before being submitted as a claim.

**Site - Level Commendations Diagonal Junior-Senior High School (0172)**

Description
FOOD SAFETY (1400): The SFA maintains a clean and well organized kitchen, following safety standards: food handling, recording temperatures, proper labeling and food storage. The latest health inspection report was posted in a publicly visible location. Food Service Staff took temperatures of food product and recorded the temperatures daily.
The Food Service Director does an excellent job of documenting records and communication.
The Food Service Director has done a great job of monitoring USDA Foods (commodities) money and effectively spending the annual allowance. In 2017/2018 the SFA spent 107%.
The Food Service Director has incorporated Farm to School events into annual activities, sourcing food from local farmers.
The SFA takes creative approaches to ensure students are being fed. High School students eat breakfast after the first period of the day. This allows students time for transportation to and from classes in other buildings and provides them with the nourishment they need to get through the morning. Students were testing during the review week. Students were given healthy snacks mid-morning after testing. The FSD also does an excellent job of interacting with the students in a positive way, encouraging them to try their food without pressure.
WATER (1300): Water was available to all students in the dining area during breakfast and lunch.