

**Iowa Department of Education  
Bureau of Nutrition and Health Services  
State Review Summary Report  
Community Christian School (23138301)  
Desk Review Completed May 2020**

**Program Year:** 2020  
**Month of Review:** February  
**Lead Reviewer:** Deb Linderblood  
**Org Representative(s):** Dr. Angie Moffit

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One student's benefits were started on 9/3/19 but the application was not approved until 11/20/20, three had benefits start on 10/2/19 but were not approved until 2/26/20, and one had benefits start on 9/13/19 but were not approved until 11/20/19. TA provided that the Determining Official must sign and date the application before benefits are made available to the household. Per the SFA the individual who was the determining official at the beginning of the year was replaced with a new Determining Official. The new Determining Official went through and confirmed applications and put the date she confirmed them. This Determining Official has resigned. Also, one student is receiving reduced price benefits and should be denied as application was determined with 3 household members but there are only two household members on the application and there is no social security number.	State which position will be assigned the duty of Determining Official and that this individual will watch the Application Approval and Direct Certification webinar that is presented by the State Agency in July. For the student who is reduced but should be denied with only two household members, obtain the name of the third household member and also obtain a social security number. Attach a copy of the corrected application. If there are actually only two household members, send the household a notification letter changing their status to denied and giving them 10 calendar days to appeal. Attach a copy of the notification letter.	
100 - Certification and Benefit Issuance	V-0100	The SFA uses a version of the State Agency prototype notification letter but has made revisions to the letter. TA provided that if the SFA revises the letter in any way that it must be approved by the State Agency prior to use. TA also provided on what changes need to be made to the current letter.	Attach a copy of your corrected Notification Letter. State your intention to begin to use the State Agency prototype letter as written or state your intentions to have your letter approved by the State Agency whenever it is re-revised and when you have your next Administrative Review.	
100 - Certification and Benefit Issuance	V-0100	One student was granted free meal benefits as the SFA thought that the student was to receive free meal benefits due to extended eligibility from a sibling. The State Agency could not find the sibling on Elookup and the SFA could not produce documentation showing that the student should be free.	Send the household a notification letter letting them know that they will no longer be receiving free meal benefits. Attach a copy of the notification letter.	
200 - Verification	V-0200	The SFA verbally stated that the application	State the two individuals who will be trained to be able	

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		<p>selected for verification was confirmed, but there was no documentation on the application that this was completed. The SFA did not determine their sample pool until after October and there was at least one application that was not received until November 20, 2019 that was included in the sample pool and was the application selected for verification. The SFA also did not complete the Verification Process until after November 15th and was also late with completing their Verification Collection Report. Lastly, the SFA created their own Verification Results Letter and did not include the Iowa non-discrimination statement. TA provided that the SFA should have more than one person trained on how to complete verification so that if one of them is not able to do this process, the other person can be their back-up. That way the verification sample pool can be determined on October 1st, the process completed by November 15th and the Verification Report completed by the due date which is listed on the yearly LEA calendar. Discussed that when a confirmation review is done, the confirming official needs to sign the bottom of the application that is being verified. Also discussed that if the SFA is not going to use the State Agency prototype Verification Results letter theirs must have the Iowa nondiscrimination statement and if benefits are decreasing they also must put in the language regarding households being able to appeal the decision.</p>	<p>to complete verification and that they will both participate in the State Agency's Verification and Verification Reporting webinars. Sate your intentions to complete the verification process by November 15th and the Verification Report by the due date on each year's LEA calendar. Attach a copy of the verification letter(s) you will use to inform households of the results of verification (if benefits remain the same, if benefits are increased and if benefits are decreased).</p>	
800 - Civil Rights	V-0800	<p>The SFA's menus does not have the USDA short version of the nondiscrimination statement on it currently. TA provided that the short version is "This institution is an equal opportunity provider."</p>	<p>Attach a copy of your breakfast and lunch menu showing that the USDA nondiscrimination statement has been added.</p>	

**Site - Level Findings: Community Christian School (8301)**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
400 - Meal Components and Quantities - Breakfast	V-0400	<p>For the week used for the breakfast menu certification worksheets, the SFA was short on grain one day (Friday) as the muffin served was not large enough. The recipe for the banana muffin has 3 quart, 1 cup of whole wheat flour for 100 servings. Per the grain calculator this provides .98 oz. eq. of grain. TA provided that the SFA needs to adjust the recipe so that it makes 96 muffins which then will provide 1.02 oz. eq.</p>	<p>Find two additional recipes for grain based products. Using the grain calculator to determine how many ounce equivalents each recipe provides per serving. Attach the recipe and identify the contributions on each recipe.</p>	
400 - Meal	V-0400	<p>The week of lunch menus used to complete the</p>	<p>State how you will revise the week of lunch menus</p>	

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<p>Components and Quantities - Lunch</p>		<p>menu certification worksheets showed that the SFA was short .5 oz. eq. of grain (only had 7.5 oz. eq. of the required 8 oz. eq.) and were also short 2 oz. eq. of meat (only had 7 oz. eq. of the required 9 oz. eq.) TA provided that when the SFA offers an alternate selection (sandwich each day) that over the course of the week if a student took the alternate selection each day that the meal pattern for the week must be met. Pointed out that 2 days of the week the sandwich only credited 1 oz. eq. of meat (PBJ and Grilled Cheese). Also, the cheese sauce in the Cheesy Macaroni was not found to be creditable. If the SFA can switch to a creditable cheese sauce this will add meat oz. eq. to the menu. The SFA is developing their own recipes. Encouraged the FSD to look for some recipes that are already standardized such as the Kansas Healthier Recipes, Iowa Gold Star Recipes and USDA recipes. TA also provided that the alternate entrée selection that is offered each day needs to be included on the Food Production Record.</p>	<p>used to complete the menu certification worksheets to meet the meal pattern and attach a copy of the revised menu. If this will result in revising a recipe(s), attach a copy of the recipe(s). If it involves obtaining a creditable cheese sauce, attach the "CN" label. Also, attach a completed Grades K-8 Menu Template form showing that all components were offered in the correct quantities.</p>	
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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance		TA provided that the State Agency has a tool ICIVES that is available on their website. In ICIVES the SFA can enter a household's income and household size and the tool will determine their eligibility status. ICIVES will also flag error prone applications.
100 - Certification and Benefit Issuance	105 How long does the application's approval take from the date the SFA receives the application from the household?	TA provided that the SFA should document on each free and reduced price application the date that it is received by the school. The Determining Official also needs to sign and date each application with the date the application is approved. This provides the documentation that the application was determined within 10 calendar days. Also discussed that the SFA needs to put where applications are to be returned as the Department of Agriculture ends up receiving a lot of applications.
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	TA provided that if a household has foster and non-foster children, they should use one application and list all of the children. This can help the household receive greater benefits for their non-foster children.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	TA provided that if the SFA is going to allow students to have second meals, they need to charge the adult meal price for these meals. Giving them free full meals counts towards the calories, sodium and fat in the menu. Also, second meals should be considered to be non-program revenue and non-program food cost. So you will need to track sales and costs by coming up with an average cost of a meal. Entrees sold the day of and the following day are exempt from Smart Snacks standards; however sides that are sold must be Smart Snack compliant. So

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		sides such as French fries and corn should be run through the Smart Snack's calculator. Students can be allowed to have additional fruits and vegetables and not be charged for these.
700 - Resource Management		Procurement: The written procurement plan should be completed yearly (around February) to reflect the upcoming school year's procurement events, correct procurement methods and contract award type. It is best practice to keep a separate procurement event page for each school year. This practice will help ensure that the correct procurement method is identified based on the estimated value of a particular purchase. On the plan the SFA should identify if they will award based on line item or bottom line for any purchasing event using small or formal purchasing method.
700 - Resource Management	709 With the exception of milk, did the SFA sell Smart Snacks*, second entrees, and/or catering?	On IowaCNP under Applications you will find the Financial Report Tool. As you were not part of the NSLP or SBP last year you did not have to complete the 2018-2019 tool. Following the end of the year (after June 30, 2020) you will want to begin to work on the 2019-2020 tool. A spreadsheet that will help with this tool was provided. Completing this tool will provide you with the Non-program revenue tool that must be completed yearly to determine if you are bringing in enough non-program revenue. It also gives you your 3 month operating balance to be sure you are not accumulating excessive money in the nutrition account. The deadline for completing the tool is on the LEA calendar which can be found in download forms each spring.
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	TA provided that even though the CACFP Public release is sent to the local news media, the SFA still needs to submit the NSLP public release. A new version of the public release is posted on IowaCNP under download forms each spring.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The link for the USDA complaint process/form which should be used if parents wish to file a complaint about any child nutrition program is: <a href="http://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer">www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer</a> .
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	For their Civil Rights Form the SFA submitted the Pre-award Civil Rights Compliance Form. TA provided that there is a different form that is to be completed each year in the fall and updated routinely. Emailed SFA a copy of the form.
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	Parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public must be permitted to contribute to the development, implementation, periodic review, and update of the wellness policy. It is not required that all of these people be on your wellness committee but that none of them be prohibited from participating. The public/stakeholders must be made aware of their ability to participate in the development, review, update, and

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		implementation of the wellness policy.
1000 - Local School Wellness Policy	1005 <i>Provide a copy of the most recent assessment on the implementation of the local school wellness policy.</i>	TA provided that along with the building assessment of their Wellness Policy, SFAs are also now required to complete a Triennial Assessment. The due date of 6/30/20 was extended to 6/30/21 due to COVID-19. Schools will need to complete a survey to opt-in that they want to take advantage of the extended due date. Emailed the Triennial Assessment template.
1200 - Professional Standards	1215 Validate the SFA's response to Question 1205 on the Off-site Assessment Tool, if applicable.	TA was provided that CACFP training needs to be separate training from the required training for NSLP/SBP. The FSD and Manager have met the training requirements even without counting the CACFP training.
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	TA provided that the Iowa Professional Standards Tracking tool has columns that will provide necessary documentation of type of training, training category and document examples. Emailed the Food Service Director the tool.
RMCR - Indirect Costs	1 Did the SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency?	<p>TA provided that since the following expenses are most likely shared services they cannot be directly charged to the school nutrition fund:</p> <ol style="list-style-type: none"> <li>1. Bank service charge (Paypal fees)</li> <li>2. Office expenses (supplies)</li> <li>3. Gas, electric, and water unless there is a separate meter that supplies only the USDA School Nutrition Programs. If the meter applies to areas that are used for other programs and functions, then cost can only be recovered through Indirect Cost.</li> <li>4. Kitchen appliance repairs may be a direct charge if there is an itemized invoice available.</li> </ol> <p>If the SFA wants to recoup some of this money, they can charge the nutrition fund an indirect cost rate. Indirect Cost rate is a percentage (%) that is applied to certain expenses to generate the Indirect Cost (money). Nonpublic schools can use up to 10%. The Indirect cost rate percentage can be applied to food service labor, food service supplies (not food) and job related travel for food service staff. The Nonpublic and RCCI Indirect Cost guidance was provided.</p>

**Site - Level Technical Assistance Community Christian School (8301)**

Area	Question	Comments
500 - Offer versus Serve		TA provided that on the Food Production Records the planned number of servings should vary as the SFA utilizes OVS so not every student will take every food item.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	TA provided that nutrition staff need to have offer vs. serve training on a yearly basis. This should be tracked on the training tracker.

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Dietary Specifications Assessment Tool - Lunch	1 Are specifications considered when purchasing menu items and condiments to limit the following?	TA provided that when procuring food items the SFA will want to be sure foods have zero trans fats. One item in particular to check is your margarine.
Dietary Specifications Assessment Tool - Lunch	24 Students are offered salt:	TA provided that students should not be offered salt at a condiment station or if they ask for it. Recommended that the SFA put out items such as pepper, hot sauce, Mrs. Dash without salt, etc.

**Org - Level Commendations**

Description
Certification and Benefit Issuance: The current application for free and reduced price meals/milk and income guidelines were used, Elookup is used to directly certify students, and denied applications were correctly determined. All applications were signed and dated by the household member. Income was only converted to annual when there was more than one frequency of income. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Free meals are extended to all members in the household.
Civil Rights: Annual civil rights training was provided food service staff and documented. All forms, information, educational flyers, etc. are available in Spanish upon request. Other translation services are available upon request.
Fiscal Action: Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for February seem to be needed.
Food Safety: The SFA has a district-wide written Food Safety plan that includes all required elements. Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Food temperatures are documented on a food temperature log. Dishwasher temperatures are taken and documented and thermometers are calibrated. The following individuals at the site reviewed are ServeSafe Certified: Andrea Halbach and Kayla Marvin.
Local Meal Charge Policy: The SFA developed and approved a meal charge policy. The policy was distributed to all households with beginning of school materials and is also in the student handbook which all new households receive. Staff were informed of the policy via the staff handbook. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.
Meal Components and Quantities: The Food Service Director does a god job of menu planning. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month—including many fresh fruits and vegetables. Standardized recipes are used for food production. At least two types of milk are offered.
Meal Counting and Claiming: In April meal counts were taken using a roster. In March the SFA started to use JMC as for their point of sale system. Students are not overtly identified as free, reduced, or paid during the meal claiming process. Food Production Records were on file for all meals claimed for reimbursement for the review period. Edit checks are performed.
Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of February 24-28, 2020 for breakfast and lunch. The worksheets showed that all meal components were offered. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the school is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: offering a vegetable bar, only using low-fat or fat-free milk for student consumption and in menu recipes, using frozen or fresh vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats. A nutrient analysis was not required.
Procurement: The Food Service Director attended a regional procurement training in Dakota City. The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, value of procurement events and procurement methods. The plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA also has a written Code of Ethics/Conduct.
Professional Standards: The newly hired Food Service Director meets the hiring standards for a school with an enrollment of 2499 or less. The current Food Service Director has completed 19 hours of professional training of the required 12 hours. The nutrition manager has completed 10 hours of the required 10 hours. An organized annual Training Spreadsheet is maintained showing which staff have been trained and meet required annual hours.
Reporting and Record Keeping: All records are maintained for at least three years plus the current year.
Resource Management: There were no unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate financial account for the nonprofit school food service and net cash resources do not exceed three operating months. No indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for USDA Foods. In school year 2019-2020 the SFA utilized all of their allotted PAL dollars.
School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach was done by sending home information with the monthly menus and weekly memos throughout the

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year. Summer Food Service Program (SFSP) outreach was done by sending emails, information in a school-wide newsletter, mass text messages, letters being sent home putting flyers on the SFA's website.

Smart Snacks: Students are only able to purchase milk via a la carte sales. Exempt leftover National School Lunch Program entrees are only sold the same day, or the day after, they are initially offered.

Verification: The correct number of applications were verified. All income sources were verified with at least one month's income. The verification report was completed accurately.

Water: Free potable water is available to all students for lunch and for breakfast via a water cooler and cups.

Wellness Policy: The SFA's wellness policy was approved on September 1, 2019. The public is made aware of the SFA's wellness policy via the school's website. Potential stake holders are made aware of their ability to participate in the Wellness Committee via the school's newsletter and flyers being sent home. The SFA completed an assessment of their wellness policy on April 13, 2020. The assessment is available on the school's website and was emailed to households. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.