

**Iowa Department of Education  
Bureau of Nutrition and Health Services  
State Review Summary Report**

**Woodward Youth Corporation - Woodward Academy (71109611)**

**Date of Review: 5/8/2020 – 6/10/2020**

**Program Year:** 2020  
**Month of Review:** May  
**Lead Reviewer:** Jean Easley  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	A confirmation review was not completed as required. Technical Assistance reminded SFA that a Confirming Official must sign and date application after "confirming" documentation is complete on application. The Confirming Official is an ideal "back up" for the Determining Official.	For your response, describe the process of confirming the application selected for verification and select who will be your "Confirming Official".	
700 - Resource Management	V-0700	<p>Per 2 CFR 200.323(d) Cost plus percentage of cost must not be used. The Prime Vendor contract is a cost plus percentage of cost contract. This is the fifth and final renewal year for the Prime Vendor.</p> <p>Per USDA memo SP 04-2018 <i>Market Basket Analysis when Procuring Goods and Modifying Contracted-for Product Lists</i> issued on January 17, 2018, market basket analysis evaluation and scoring for contract award is allowed when using an established, "representative sample" of goods. USDA recommends that the "representative sample" have an aggregate value of 75% or more of the estimated value of the contract to be awarded.</p> <p>The current solicitation does not show all the items a facility can purchase rather it shows when a new solicitation is issued.</p>	State what type of contract award (fixed price or cost reimbursable) will be issued and how the contract will be evaluated to meet USDA requirements.	

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1000 - Local School Wellness Policy	V-1000	Wellness Policy is appropriately posted for the public on the website. Although an assessment of the wellness policy goals was completed, the assessment must also be made available to the public. Additional Technical Assistance: a reminder the local Wellness Policy must be reviewed and updated in October 2020. A requirement as well as best practice is to invite stakeholders (administration, board members, food service, PE, health professionals, students, parents) to participate in the wellness committee.	For your response describe how you will make the assessment available to the public.	
1500 - Reporting and Recordkeeping	V-1500	Financial Report for SY19 has not been completed in IowaCNP. SFAs at non-public schools must complete this report in IowaCNP annually no later than September 15.	Submit a revenue and expense statement for the Nutrition Program for SY2018-2019 showing if SFA is in compliance with the net cash resources limitation to a level at or below 3 months average expenses. State your understanding and intention to submit the Financial Report annually no later than September 15.	

Site - Level Findings: Woodward Academy (9611)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1700 - Afterschool Snack	V-1700	AFTERSCHOOL SNACK: Snack Menu Cycle: Monday offers insufficient serving size of fruit on Monday - 1/2 cup applesauce does not meet the required 3/4 cup fruit serving size. Technical Assistance provided: reference the Afterschool Snack Program resource booklet provided by state agency. This resource booklet can be used for annual training of direct care staff.	For your response, submit a revised cycle menu for the Afterschool Snack Program.	

Org - Level Technical Assistance

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Area	Question	Comments
200 - Verification	202 Who serves as the confirming official? (Name and/or position title or software used is acceptable)	<p>VERIFICATION: the Confirming Official listed on IowaCNP application did not match the signature of the individual who signed as confirming official on 5/6/2020. Not only is the Confirming review required - prior to beginning the verification process - it is also an excellent way to ensure the Determining Official has a back- up system as this individual is trained in eligibility.</p> <p>Additionally, prior to verification always run names through E Look Up - if found on DC list, this process is called "Direct Certification" and the process is considered complete.</p>
600 - Dietary Specifications and Nutrition Analysis		<p>MEAL PATTERN WAIVER: your application includes Grades 7 - 8. Technical Assistance provided that if younger students are being served as residential students or day students, an approved waiver from the state agency must be in place to be in compliance for approval to serve the Grade 9 – 12 meal pattern to all.</p>
600 - Dietary Specifications and Nutrition Analysis	601 How will the SA proceed with the targeted menu review?	<p>RECIPE CREDITING: Cookies do not credit for 1 Grain. Molasses Cookie = .75 and Snickerdoodle .50. Coffeecake = 1.5 Grain (instead of 1 Grain)</p>
700 - Resource Management		<p>PROCUREMENT TECHNICAL ASSISTANCE: Records must be retained by the DAS-CPB and the operating facility for a period of three (3) years after submission of the final claim for reimbursement for the fiscal year (July 1, 20XX- June 30, 20XX). If an audit is not resolved, records shall be retained beyond the 3-year period as long as required for the resolution of issues identified by the audit. (7 CFR 210.23(c)).</p> <p>For facilities operating school nutrition programs, the following federal terms and conditions must be included in solicitation documents and contracts:</p> <p><b>Buy American Provisions (7 CFR 210.21(d)):</b> As per NSLP regulations, all entities participating in the school meal programs require compliance with Buy American provisions, to the maximum extent practicable. The Buy</p>

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		<p>American statement must be included in all solicitation and contracts for school meal programs. Further, there should be language for vendors to provide a domestic alternative prior to the facilities accepting a non-domestic product. It is the responsibility of the facility operating the school meals program to document an exception to Buy American. We are aware of the challenge to meet this requirement by state-operated facilities.</p> <p><b>Appendix II to 2 CFR 200</b></p> <p>Termination for Cause and for Convenience (<b>contracts in excess of \$10,000</b>): The solicitation includes a number of reasons for termination of contract for cause. A termination for convenience is required for contracts where federal funds are used such as in school nutrition programs.</p> <p>Equal Employment Opportunity (<b>contracts in excess of \$10,000</b>)</p> <p>Contract Work Hours and Safety Standards (<b>contracts in excess of \$100,000</b>)</p> <p>Byrd Anti-Lobbying Amendment (<b>contracts in excess of \$100,000</b>)</p> <p>Clean Air Act and the Federal Water Pollution Control Act (<b>contracts in excess of \$150,000</b>)</p> <p>Energy Policy and Conservation Act</p>
700 - Resource Management		The SFA has an obligation to monitor Prime Vendor, Milk and Bread contracts in terms of ensuring correct pricing, receiving rebates, discounts, credits.
700 - Resource Management	701 At the end of the SFA's RM review period, did the food service have net cash resources that exceeded three months' average expenditures?	SY18-19: 88% of USDA's Paid Assistance Level (PAL) was used. SFA participates in Direct Distribution only. SY19-20: 88% has been utilized as of 5/4/20. Recommend maximizing your USDA resources to 100%.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	ON SITE MONITORING: self-monitoring is required for schools with more than one site or school, therefore, SA

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		guidance is to complete this process annually. It is to SFA benefit to ensure each residential site is properly counting meals, understands meal pattern, offer versus serve and offers water as required. Residents interact with staff and the more staff is trained and ensure these processes are in place, the better. Additionally - SFA should ensure each site maintain written instructions with details of the meal count system and the responsibilities of each staff involved.
1200 - Professional Standards	1206 a. Have the school nutrition staff met the annual training requirements for the current school year including part-time, full-time and any staff hired after January 1?	PROFESSIONAL STANDARDS training is tracked on a training tracker as required. Include the targeted number of hours each staff is required to have on tracking sheet. For example, FSD 12 hours, Managers 10 hours, FT (>20 hours) 6 hours and PT (<20 hours) 4 hours. Work on a nutrition training plan for staff: all must have civil rights at a minimum. Anyone who assists with meal counting and tracking should have meal pattern training in addition to counting and claiming. Offer versus Serve for dorm staff and the Afterschool Snack Program for evening shift staff.
1200 - Professional Standards	1209 Did the employees that work outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program receive training applicable to their duties related to the program?	DIRECT CARE STAFF TRAINING: Recommend annual training on civil rights, counting and claiming, completing food production records, meal pattern requirements for breakfast, lunch and afterschool snack program. Use State Agency developed webcasts.

**Site - Level Technical Assistance Woodward Academy (9611)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast		FOOD PRODUCTION RECORDS: Additional items include romaine/iceberg lettuce, FF Ranch dressing, Low Fat Yogurt, Jelly, Peanut Butter and Whole Wheat Bread - as described on a free standing salad bar located after the main serving line and milk cooler. FPR should include these items because they count towards nutrition. When after the POS, they do not contribute to meal pattern, however, they do count towards overall nutrition. Documentation of Leftovers is also required to ensure enough food is provided.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	NUTRITION DOCUMENTATION: Distributor documentation is not acceptable by USDA. It is the expectation that you will

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		continue to collect, organize, and maintain: CN labels, Product Formulation Statement and Standardized Recipes for all creditable menu items served for Breakfast, Lunch and After School Snack Program which SFA receives federal reimbursement.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve?	Residential Staff working with meals should be given training annually on Meal Pattern, Offer versus Serve, Meal Counting Procedures, Civil Rights.
800 - Civil Rights	811 Is the USDA “And Justice for All” poster displayed in a prominent location and visible to recipients of benefits?	CIVIL RIGHTS COMPLIANCE: Reminder that the “... <i>And Justice for All</i> ” nondiscrimination poster must be displayed prominently where participating children can see it which also includes all dorm areas. The poster can be obtained by contacting our office.
1300 - Water	1300 Is free potable water available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)?	WATER: a reminder that water is to be made available at meals. SFA was uncertain how water is made available on the residential student floors where breakfast is eaten (and lunch is eaten during time of review due to COVID-19). TA given to include with training on the availability of free, potable water at each dorm. This could be a pitcher of water, or any other means of simply ensuring water is available at meals. During the last review it was noted that at breakfast residents can go to the sink and get water and at lunch “a jug of water” is available for residents to get water. Review this process during the On-Site Reviews.
1500 - Reporting and Recordkeeping		DIET MODIFICATION FORM: the state agency form has been updated. Please use the updated form moving forward.

Org - Level Commendations

Description
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**CIVIL RIGHTS:** Annual civil rights training was provided to all staff involved in the National School Lunch and Breakfast Program 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 summary form is completed.

**NUTRITION and MEAL PATTERN:** 4 week menu cycle meets meal pattern requirements for Grade 9 – 12. Menu planned with nutrition in mind as well as many student favorites – all vegetable subgroups are met and additional fruit is offered daily above regulations. Many items are homemade – cookies, muffins, even the BBQ sauce. Standardized Recipes are in place with proper meal pattern crediting. Understanding of meal pattern is evident.

**PROCUREMENT:** Food Service Director attended the Regional Procurement Training. There is a procurement plan and code of conduct in place. The State of Iowa Department of Administrative Services is the purchasing agent for Iowa Department of Human Services in which Woodward Resource Center is one facility.

**PROFESSIONAL STANDARDS** training is tracked on an annual training tracker as required. Refer to Technical Assistance given to include the targeted number of hours each staff is required to have on tracking sheet and recommendations for targeted training topics specific to the Nutrition program.

Thank you to both the Food Service Director and Authorized Representative for sending documentation off-site to be able to complete the AR during COVID-19 as a Desk Review as this greatly expedited the Administrative Review (AR). Both are responsive to emails and quick to submit needed documentation and clarification.

The Iowa Department of Administrative Services, Center for Purchasing Bureau (DAS-CPB) completes the procurement of Prime Vendor, Dairy, and Bread Products for state-operated facilities that participate in the school meal programs. DAS-CPB purchasing agent responsible for developing, issuing, evaluating, and awarding new contracts or renewing contracts is very responsive to the Bureaus requests for all documentation and promptly responds to any questions. The purchasing agent has met with the bureau chief and procurement consultant at least twice to discuss changes required to RFP/RFB to meet school meal procurement regulations. The solicitation issued allow for full and open competition. Public notification of solicitations is posted on the Iowa Department of Administrative Services (DAS) Bid Opportunities website. The solicitation allows for vendor(s) to provide a brand name or “equal” item(s) (2 CFR 200.319) The solicitation is posted on the Targeted Small Business website for forty-eight (48) hours prior to opening it up for all vendors. This process meets the following federal requirements 2 CFR 200.321 Contracting with small and minority businesses, women’s business enterprises, and labor surplus area firms. The following federal terms and conditions per Appendix II to 2 CFR 200 are included in solicitations and contracts: Administrative, contractual, and legal requirements. Suspension and Debarment certification statement and non-collusion certification are included in solicitation and contract. Vendor protest procedures are included in solicitation and contracts. State facilities terms and conditions are included in the solicitations and contracts.

**WELLNESS POLICY and ASSESSMENT:** A wellness policy is in place and an assessment of goals have been documented. It is noted that there has been excellent progress since previous review. Refer to Finding and technical assistance provided in continuing to move Woodward Youth Corporation forward with the important area of wellness for both day and residential students.

No fiscal action is required as result of this Administrative Review.