

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Louisa-Muscatine CSD (38410000)
February 2020

Program Year: 2020
Month of Review: February
Lead Reviewer: Shea Cook
Org Representative(s): Linsey Reimers

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	<p>Three applications were denied incorrectly. The justification given for denying two of the applications was that, "The application was incomplete because student should be listed only once." The application was not incomplete. In both cases students was listed on the application twice, once under the section for student names and once under the section for adult household members. However, in both cases, the total number of household members indicated on the application was correct and should have been used to determine benefits for the families. It is the responsibility of the determining official to review the applications and use their judgement to correct simple mistakes. They cannot simply mark the application as incomplete for a simple error.</p> <p>The justification for denial of the third application was that there was no income amount listed, there was no case number provided, and the last four digits of the SSN were not provided. Page 25 of the Eligibility Manual states, "When no income is provided for any of the adult household members, the application is still considered complete." Additionally, families are not required to list a case number unless that is the information with which they were applying for benefits. Some applicants do not have</p>	<p>For your response, please do the following:</p> <ol style="list-style-type: none"> 1. Identify the individual who will be participating in the certification and benefits training webinar in July or watching the recording before the start of SY21. 2. Submit documentation notifying the families that were incorrectly denied benefits and that their benefits have been changed in the system and will be carried over for 30 operating days in SY21. 3. Submit documentation that correctly identifies the students' status from the POS system. 4. Issue a full refund to families for the amount they have paid into their perspective lunch accounts since the date that the original application was submitted and submit documentation showing the refund. Additionally, if families have a negative account balance as a result of incorrect denial of benefits the balance should be changed to zero. 	

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		a SSN and the determining official should contact households with missing SSN information to obtain the last four digits of that number or clarify that the individual has no SSN and mark the box on the application.		
100 - Certification and Benefit Issuance	V-0100	One application impacting two students was correctly determined as reduced by income but the household was incorrectly listed as free in the point of service system.	For your response send the household notification of a reduction in benefits from free to reduced and upload a copy of the notification letter and change the benefits in the point of service system so that incorrect benefits are not carried over for 30 days in the next school year.	
200 - Verification	V-0200	Although the verification report filed this year was not late, it was inaccurate. Only one application was verified and reported by the verification report due date. After learning of the error, the SFA did verify an additional application, but that was well past the due date for reporting.	For your response please identify the individual who will be attending the Verification Training Webinar on 9/15/20 and the Verification Sample Selection Training Webinar on 10/1/20. It is the expectation that training certificates will be on file for both of these completed trainings and documentation will be checked at a follow up technical assistance visit in the fall.	
800 - Civil Rights	V-0800	Each year, SFAs must submit a copy of the Public Release to the local newspaper notifying families of the income eligibility guidelines to apply for free and reduced price benefits. Additionally, documentation that the release was submitted to the media must be kept on file. There is no evidence that a release was submitted to local media. This is a repeat finding from the previous administrative review.	For your response please identify the individual who will be responsible for sending the public release to local media for SY21. It is the expectation the documentation verifying the release was sent to local media will be kept on file. Documentation will be checked during technical assistance visit in the fall of SY20.	
800 - Civil Rights	V-0800	Food service staff have not completed USDA Civil Rights training. All staff who interact with program participants or applicants must be provided Civil Rights training on an annual basis. USDA training is specific and addresses collection and use of eligibility data, public notification, USDA complaint procedures, compliance reviews, requirements for reasonable accommodations of persons with disabilities, requirements for language assistance, conflict resolution and customer service. This was a finding on the last administrative review.	For your response, please provide your plan for providing USDA civil rights training for all nutrition staff and for non-nutrition staff that have responsibilities in the nutrition program (hearing official, determining official, etc.). Additionally please describe how you will document that training and who will be responsible for providing the training and maintaining documentation that training has been completed.	

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1000 - Local School Wellness Policy	V-1000	Under the final rule of the Healthy, Hunger-Free Kids Act 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 submit a timeline for completing an assessment of the local wellness policy and how you will make the information available to the public once it is complete. It is the expectation that a wellness assessment and corresponding documentation will be on file and available to the public during SY21.	
1000 - Local School Wellness Policy	V-1000	The local wellness policy posted on the district website indicated that it was last updated on 1/19/15. Regulation requires that wellness policy be updated or modified as appropriate. The current policy contains outdated language and needs to be updated. Additionally, language about marketing and all foods and beverages available during the school day should make clear that any items marketed or available must meet Smart Snack nutrition standards.	For your response please provide a timeline for review and revision of the local school wellness policy. It is the expectation that the policy will be revised and implemented during SY21 and the updated policy will be posted on the district website.	
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.	

Site - Level Findings: Louisa-Muscatine Elementary (0421)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Production records evaluated from the review period indicate that fruit juice was the only fruit offered on 3 of the 5 serving days. No more than half of the fruit requirement can be met with fruit juice.	For your response please submit a two week sample breakfast menu showing how this error has been corrected to meet the requirement for future breakfast service.	
400 - Meal Components and Quantities	V-0400	Food Production Records indicate that an insufficient quantity of legumes were offered for the week of the	For your response complete the meal pattern training module offered through The Institute of Child Nutrition's website at the following address: https://theicn.docebosaas.com/learn/course/external/view/elearning/69/MealPatterns .	

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- Lunch		review. Green beans served on 2/26 were incorrectly identified as legumes instead of the other vegetable subgroup. That error resulted in only an 1/8 c. of legumes being offered for the week. Additionally, on 2/27 grains were insufficient. The bread served as grains is only 26 gm, which is a 3/4 oz equivalent. A one once equivalent of grains (28 gm) is the required daily serving.	When complete upload a copy of the certificate of completion and submit a one month template menu that demonstrates compliance with the meal pattern.	
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Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	213 If applicable, did the SFA's notice of adverse action contain all required information, including notification of appeal rights?	SFA was unable to provide letter of adverse action sent to the family. All documentation for verification including notification and follow up letters, letters of adverse action, and income verification documents must be kept of file for review. There has been frequent turnover in this area. CA for other findings for verification requires SFA to identify who will be attending verification training. That training should address this issue as well.
700 - Resource Management		<p>Technical assistance for procurement was given in the following areas:</p> <ul style="list-style-type: none"> • All expected expenses should be included on the yearly procurement plan. About half of the expenses charged to the nutrition fund were not included on the required yearly procurement plan. Some of the food suppliers and yearly maintenance fees for software were not included. <p>Micro Purchase:</p> <ul style="list-style-type: none"> • One micro purchase was identified as an unallowable direct charge to school nutrition. The vendor paid list for SY18-19 indicates that fire hood inspections were paid out of nutrition funds. Per school finance, these inspections are part of general operational costs and should be paid out of the general fund. Costs can be recovered from the nutrition fund through indirect costs. <p>Small Purchase:</p> <ul style="list-style-type: none"> • When utilizing the small purchase method SFA is sending letters requesting bids. This language is incorrect and suggest a formal contract. SFA should change the language on small purchase pricing requests to "Request for Pricing" to accurately reflect the type of purchase method being used. • Vendors should be given a minimum of 4 weeks to respond to a request for pricing. Pricing request for milk bid did not include a sent date, so SA

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		<p>was unable to verify that vendor was given the minimum response time.</p> <ul style="list-style-type: none"> ● It is the responsibility of the SFA to write product specifications in price request documents, including but not limited to size, nutritional information, delivery expectations, packaging, etc. Documents on file for milk pricing requests reflect that the SFA did not include adequate product specifications. It is the responsibility of the SFA to communicate to the vendor exactly what products they wish to procure. ● A number of required statements were absent from the price request documents including Buy American, debarment statement, termination for cause and convenience, equal opportunity, small business, etc. SFA was advised to use Small Purchase Three Bids and a Buy document to help identify which statements are required, as determined by the value of the procurement event. ● SFA should include estimated annual usage in request for pricing in order to get best pricing. No estimated usage was included with the price requests for the milk bid. ● Documentation of price request for equipment purchase was not available and SA was unable to determine if the appropriate vendor was chosen. The quotes for two vendors were supplied, but the specifications for the equipment quoted were different so pricing was not comparable. The initial request for pricing with product specifications sent to all vendors should be kept on file. ● The initial milk contract language from the school documents is for two years plus two one year extensions. Best practices is that initial contracts be for one year, giving the SFA opportunity to make sure the vendor can fulfill the requirements and there are no issues with contract execution. ● Documentation kept on file for chemical request for pricing is incomplete, as no pricing is listed for the contacted vendors. Other information is listed and written notes, but SA is unable to tell if the vendor with the lowest price was chosen. Best practice would be a written small purchase request for pricing. A number of the issues noted on the documentation that is available could be included in a written request for pricing for the vendors to respond including frequency or service, product specifications, etc. If vendor was unable to meet the requirements in the contract the SFA could document the deficiencies and void the contract if they were not corrected. <p>Formal Purchase:</p> <ul style="list-style-type: none"> ● SFA does exercise contract management by price checking invoices. SFA was encouraged to continue price checks and to include a variety of food and non-food items from the bid in those checks.
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	District wide equity training does not address the specific civil rights for USDA nutrition programs or include information on the USDA complaint process for school meals.

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800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	USDA racial ethnic form was not completed correctly. On site technical assistance will be offered during follow up TA visit in fall of SY20.
1000 - Local School Wellness Policy	1004 How are potential stakeholders made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy?	At minimum, schools must permit the participation of the general public and school community (parents, students, physical education teachers, administration, nutrition staff, school nurses, school board members, etc.) in wellness committees and the policy updating process. That participation should be documented with meeting invitations, district announcements, sign in sheets, etc. and documentation should be kept on file.
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 removing all of the specific information concerning portion size/calories/ etc. and replacing it with general language outlining that items offered will follow the NSLP school meals nutrition standards and Smart Snack nutrition standards. Specific language in the current policy is incorrect and using specific information will require that the policy be updated any time that the meal pattern is changed or targets for sodium are updated or suspended.
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.)	SFA currently uses their own spreadsheet to track professional standards hours. That tool lacks some of the necessary information needed to validate required training hours including employee position, title/topic of training area. SA recommends using one of the tracking tools available on the Department website.
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?	There is no record that the Hearing or Determining Officials have completed civil rights training. At minimum each individual should complete USDA specific civil rights training and the Determining Official should complete training on certification and benefits. FSD should document that training on the professional standards tracking tool.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	SA recommends additional SFSP outreach. Free outreach materials can be found at http://bestpractices.nokidhungry.org/programs/summer-meals/promote-summer-meals#summer-meals-outreach-resource-toolkit .
RMCR - Nonprofit School Food Srvc Acct	9 If the SFA encumbered bad debt from unpaid student meal accounts during the RM review period, how did it ensure that only allowable non-Federal revenues were used to restore operating losses? (Unpaid Meal Charges: Guidance and Q&A SP 23-2017)	SA clarified that the nutrition fund cannot be used to resolve negative lunch account balances. Funds to cover negative account balances must come from other sources.

Site - Level Technical Assistance Louisa-Muscatine Elementary (0421)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Although Food Production Records (FPRs) have improved since the last administrative review, they are still missing some of the elements required for a completed FPR including adult and a la carte planned and actual servings. Additionally, omitted/incomplete information on items being served (i.e. listing "fruit" instead of the actual fruit being served) make it difficult for the SA to assess compliance without follow up questions. FPRs should be complete and demonstrate meal pattern compliance without follow up. FPRs should also reflect the actual serving sizes and amounts of food being served to students. FPRs for the week being reviewed indicate amounts that do not match the product specifications. The serving amount of the pizza is listed on FPRs is 3 oz. CN labels for product that is served indicate that one slice of pizza is 5 oz. FPRs should indicate that serving size is 1 slice.

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		SA recommends FSD review the components of a complete FPR with staff so that records are complete and demonstrate what is actually served. A training webcast on FPRs is located on the Department website here: https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts .
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	FPRs indicate that a 1/2 c serving of romaine lettuce was offered on 2/25. Menu certification worksheets for the corresponding day indicate that a one cup serving was offered. This is a discrepancy. A 1/2 c serving of romaine lettuce would only credit as a 1/4 cup serving of dark green vegetables. While other dark green vegetables were served during the week and the meal pattern requirements were met for the subgroup, FSD should correct the serving size/crediting information on the FPRs so that they accurately reflect the serving size/component contribution.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	FSD should request two health inspections per year and documentation of that request should be kept on file.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	FSD indicated that temperature logs are kept for 8-10 years. Temperature logs are only required to be kept for 6 months.

Org - Level Commendations

Description
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. 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.
FOOD SAFETY: Temperatures are monitored and recorded for the refrigerators, freezers and milk coolers. The temperatures for the dishwasher are also monitored and recorded.
MEAL PATTERN AND NUTRITION QUALITY: The breakfast menu provided during the review period met the daily and weekly meal pattern requirements for all grade groups. • Food production records, CN labels, and standardized recipes were on file for all meals served during the review period. • The SFA purchases many low or reduced fat, low sodium products. • The food service director completed the menu certification worksheets.
PROFESSIONAL STANDARDS: Training hours are tracked for all staff with school nutrition responsibilities. • Documentation is on file for all training received.
RESOURCE MANAGEMENT: The SFA charges the correct paid student lunch price according to the required PLE tool and the correct adult lunch price. • The SFA has a negative balance policy to address negative student lunch accounts. • 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 outreach.
VERIFICATION: Families were notified of verification selection appropriately. • The applications selected for verification were confirmed and signed to show that the original eligibility status was determined correctly. • Applications selected for verification were correctly pulled from the pool of error prone applications.

Site - Level Commendations Louisa-Muscatine Elementary (0421)

Description

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Meal Counting and Claiming: Meal count totals for the month of February were accurate and complete. • Point of Service counts and filed claims appear accurate.