

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Youth Homes Of Mid-America (32318000)
May 12 – July 14, 2020

Program Year: 2020
Month of Review: March
Lead Reviewer: Christine Crow
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming	V-0300	<p>The point of service meal counts were provided for lunch, breakfast and snack during the review period. The lunch meal counts match the claim during the review period. However the breakfast and snack counts do not match the claim for the review period of March. The snack count reports that 210 snacks were served during March 2020 but only 144 snacks were claimed. The point of service breakfast counts indicate that 581 breakfast meals were served when 517 breakfast meals were claimed. The March 2020 claim can be revised so that the SFA can be reimbursed for those meals. The meal counting sheets are completed by staff in each of the cottages as meals are served. In order to decrease risk of error, meal counts should be consolidated in a spreadsheet that will calculate meal and snack totals for each cottage instead of calculating by hand. TA provided to the authorized representative who agrees to review the process with the claim preparer.</p>	<p>1. Submit the breakfast and snack meal counting sheets that were used to submit the claim for June 2020 to show meals served match the claim. 2. Describe the process that will be implemented to ensure that the meal counts match the claim.</p>	
700 - Resource Management	V-0700	<p>The SFA was not able to complete the offsite procurement review tool charts as their 2018-2019 purchases were made without sending any bids. The SFA does not have a purchasing policy and therefore is using the federal purchasing thresholds. The SFA in 2018-2019 purchased items from 6 different vendors. The amount spent for 4 of the vendors was under the federal micro-</p>	<p>Send a copy of the bid that the SFA sent out for the 2020-2021 school year for their prime vendor, bread vendor and milk vendor. Send a list of where the bids were sent. Provide written confirmation that the SFA will select the most responsive and responsible bidder that is able to meet your specifications at the lowest price.</p>	

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		<p>purchase threshold. The other 2 procurement events were over the micro-purchase threshold but under the federal small purchase threshold. When making a micro-purchase, the procurement events must be spread equitably among potential vendors. Although 3 of the micro-purchases were spread among different vendors (Hy-Vee and Walmart and the Food Bank of Iowa) the amount spent at each store was not equitable. The procurement events for the SFA's prime vendor, milk vendor and bread vendor would be more appropriate as a small/informal or formal procurement event instead of micro-purchase. The SFA attended a procurement training in 2019 and has already made steps to send out bids for these procurement events. When selecting a vendor, the SFA must select the most responsive and responsible bidder that is able to meet the specifications listed in the bid at the lowest price. TA provided to the SFA.</p>		
1200 - Professional Standards	V-1200	<p>The SFA provides annual training for all staff who serve and count and claim meals in the cottages. Annual training includes civil rights, meal pattern, offer versus serve, and meal counting training. Since the authorized representative provided the training for the 2019-2020 school year, 11 additional people were hired. The new employees were provided an orientation training that included training on all required items except civil rights. All individuals with responsibilities in school nutrition programs must have training in civil rights every year. A training webcast can be found at https://educateiowa.gov/pk-12/nutrition-programs/civil-rights-training-child-nutrition-programs. TA provided to the authorized representative on training requirements.</p>	Provide civil rights training to all new staff and submit documentation (attendance log) to show that training was provided.	
1400 - Food Safety	V-1400	<p>A HACCP plan is required to prevent hazards as food flows through a food service operation and although the SFA's plan has some of the applicable standard operating procedures (SOP), many are missing. For example, the SOP for the contact and cleanup of blood and bodily fluids, equipment cleaning and sanitizing, machine ware washing high temperature, manual ware washing, pest control, preparing cold food, cooking food, holding and transporting food, cooling food, reheating food, and food</p>	Provide an individualized SOP for 5 of the areas listed above. Provide a date of when the remainder of the plan will be completed.	

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		donations (if applicable) must be included in the HACCP plan. TA provided on HACCP Plan requirements.		
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Site - Level Findings: Ross Campus (8601)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	<p>Although the weekly meat/meat alternate requirements were met, there were 2 days in which the daily requirements were not met. The chicken tetrazzini standardized recipe called for raw chicken to be used. Instead, the SFA used CN labeled chicken which did not credit the same as the raw chicken. The CN labeled chicken states that 2.75 ounces of chicken is needed to provide 2 ounces meat/meat alternate. The amount of CN labeled chicken and cheese used per the recipe provides 1.5 ounces meat/meat alternate when 2 ounces is required per day for a high school student. If the SFA uses the same CN labeled chicken, they would need to use 10 pounds, in addition to the 1.75 pounds of shredded cheese, in order to provide 2 ounces meat/meat alternate for 70 servings. Alternatively, the SFA could keep the recipe the same and offer an additional meat/meat alternate menu item.</p> <p>The ham and cheese sandwich recipe states that 6 slices of ham and 1 slice of cheese is used in the ham sandwich. Using the CN labels for the ham and cheese, this recipe only provides 1.63 ounces of meat/meat alternate when 2 ounces is required. This recipe must also be adjusted in order to meet the 2 ounce meat/meat alternate requirement when using this CN labeled ham and cheese. TA provided to the food service director on applying CN labeled products to recipes. This is a repeat finding and fiscal action may be taken.</p>	Modify the ham and cheese recipe and the chicken tetrazzini recipe so that they provide 2 ounces meat/meat alternate. Submit the updated recipes and CN labels if the SFA decides to use different chicken and/or ham.	
1400 - Food Safety	V-1400	Each of the 11 cottages on campus have a refrigerator that holds foods used for the School Breakfast Program and After School Care Snack Program. Although there is a thermometer in each refrigerator, unit staff often do not record refrigerator temperatures to show that food is	Describe the revised plan that will be implemented to ensure cottage refrigerator temperatures are monitored and recorded daily. Submit the cottage refrigerator/freezer logs for July.	

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		being stored safely. In order to ensure and prove that food is stored safely, refrigerator and freezer (if used) temperatures must be monitored and recorded daily. The authorized representative reports that staff have been trained but often forget. They will work together to create a better process that will decrease human error and increase frequency in which refrigerator temperatures are recorded.		
1700 - Afterschool Snack	V-1700	The after school snack food production records are complete with the food items provided for each day, their serving sizes, the number of planned snacks and servings prepared. The after school care snack program requires SFAs to offer 2 components in their minimum required serving size. Labels were provided for all food items served and although most days met the required meal pattern requirements, one of the components served on 3/5/2020 did not meet requirements as the grain item served only credits as 0.75 ounces grain equivalents when 1 ounce grain equivalent is required. TA provided to the food service director on the meal pattern requirements for after school care snack program.	Provide a label of what the SFA will provide in addition to or instead of the cookie that was served on 3/5/2020.	

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		<p>PROCUREMENT:</p> <ul style="list-style-type: none"> - SFAs are required to spend their federal nutrition dollars on agricultural items that are grown and processed in the United States. If the nutrition department purchases or receives an agricultural product that does not meet the Buy American provision, they must document that item in a Buy American log and describe why it doesn't meet the Buy American provision. A Buy American template is available in Download Forms (NSLPPROC016). TA provided. - The procurement plan includes the prime vendor,

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		<p>dairy, and bread purchases but does not include the micropurchases made. The procurement plan must include all micropurchases such as purchases made for special diet items, holiday meals for students, or purchases made at the local store when the SFA runs out of an item.</p> <p>- The SFA purchases holiday and special event meals for students using school nutrition funds as a micropurchase event. If using school nutrition funds, these purchases must be made following procurement guidelines. The SFA must spread purchases equitably throughout the community, the procurement event must be under the micropurchase threshold, and the procurement events must be included on the procurement plan and must be included on the micropurchase log.</p> <p>- The food service director reports that prices lists are provided by the milk vendor but she does not save them. Procurement regulations require SFAs to manage the contracts by ensuring that the vendors charge the agreed upon price in the bid. If the vendor is providing monthly price lists, those price lists must be compared to the invoices for that time frame to ensure that they are charging the correct price for items purchased. All price lists must be saved for 3 years plus the current year. TA provided to the food service director.</p> <p>- The SFA's code of conduct does not include all required elements including a policy stating that the employees may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. SFAs may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value.</p>
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	<p>Although the SFA lists the Iowa nondiscrimination statement in their handbook, the USDA nondiscrimination statement must also be listed in all program materials. The full, current USDA and Iowa nondiscrimination statements can be found on the Iowa Department of Education's website: https://educateiowa.gov/pk-12/nutrition-programs TA provided.</p>

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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 USDA has a complaint process that SFAs must follow. The USDA process and form were provided to the food service director and authorized representative.
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 authorized representative reports challenges with getting interest in wellness committee participation. Currently, the authorized representative and food service director are the only staff participating in the wellness committee. SA encourages the authorized representative to continue to invite staff and students regularly but also consider inviting members of the administration, board, and/or other community partners. Community partners may include contract teachers or nurses, or community partners that help with fundraising efforts or other operational goals. Some activities that the SFA is already implementing may work toward meeting the SFA's wellness goals and therefore be included in the wellness progress report. The wellness progress report must be completed once every 3 years and must be made available to the public. It has been 3 years since the wellness progress report has been completed so the SFA must schedule a time to update the report within this school year and determine how to make it available to the public. TA provided.

Site - Level Technical Assistance Ross Campus (8601)

Area	Question	Comments
900 - SFA On Site Monitoring	901 a. Was the on-site review of the <i>lunch</i> counting and claiming procedure completed prior to February 1?	Onsite monitoring must be conducted at every lunch site and 50% of breakfast sites by February 1 every year. SA encourages the SFA to include a reminder on her calendar in January every year. TA provided.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	The SFA has not received a health inspection during this school year and only received one inspection last year. TA provided to the food service director on requesting a health inspection for this school year.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	Based on the report from the food service director, the health inspection report is not displayed for the public to

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		view. The most recent health inspection report must be displayed in an area for the public to easily review. TA provided to the food service director who moved the report to the cafeteria near the posted menu.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	The food service director reports using a high temperature dishwasher and although she monitors the dishwasher temperatures she does not record them. TA provided on monitoring and recording the dishwasher temperatures.

Org - Level Commendations

Description
AFTER SCHOOL CARE SNACK PROGRAM: • The SFA conducted onsite monitoring for the snack service and did a follow up when errors were observed. • Snack food production records are available for all snacks claimed. Records are complete with menu items, serving sizes, dates, total number of servings prepared and the number of planned snacks. • A point of service count is available at each site where snacks are served. • The after school care snack program contains an educational and/or enrichment program.
CERTIFICATION AND BENEFIT ISSUANCE: • The RCCI has a meal eligibility roster for the review month that is complete with student names, date of birth, the date they were admitted, income, date of eligibility determination, category of eligibility, initials of determining official ethnicity, race, and date of discharge.
CIVIL RIGHTS: • Civil rights training was provided to all staff with responsibilities in the school nutrition program. • Based on reports from the food service director, the “And Justice For All” poster is on display in all areas where meals are served. • The SFA works with students to make sure they have their special dietary needs met. Currently the school nutrition director accommodates students with peanut and lactose allergies. The food service director provides a milk alternative that is nutritionally equivalent to cow’s milk and offers other protein sources when a peanut butter or peanut option is on the regular menu. • The menu that is on display for the public to view contains the nondiscrimination statement. • Although the SFA doesn’t currently have Limited English Proficiency (LEP) students, they have used translators to translate program materials for LEP students and families in the past. • The SFA completed the ethnic racial form to show that they do not discriminate when providing meal benefits to students.
FOOD SAFETY: - The food service director monitors and records the temperatures for all refrigerators and freezers in the kitchen. - The food service director monitors and records the temperatures of all hot foods. - The SFA’s HACCP plan is available in the kitchen. - The food service director is ServSafe certified.
MEAL COUNTING AND CLAIMING: - Point of service meal counting sheets are available for every breakfast, snack and lunch meal throughout the review period. - The number of meals claimed did not exceed the number of students enrolled per eligibility category. - Offer versus serve is the service option made available for all breakfast and lunch meals. Staff are trained in OVS at least once a year.
MEAL PATTERN REQUIREMENTS AND NUTRITION: • Free, potable water is available to students at all meals as there is a water pitcher and glasses on all tables in the cafeteria. Water is available in the cottages for breakfast and after school care snack program. • The breakfast menu served during the review period met all the daily and weekly meal pattern requirements for grains, milk, and fruit. • A variety of fresh fruit is available at every breakfast and snack for students to take. • Grains served are whole grain rich. • The SFA limits grain based desserts to less than 2 ounce equivalents per week. • Food production records, CN labels, product formulation statements and standardized recipes are on file for all meals served during the review period. • The lunch menu served during the review period met the daily and weekly meal pattern requirements for grains, fruit, milk, total vegetables, and all vegetable subgroups. • Two different types of milk are made available to students. •

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Breakfast and lunch meal signage is posted in the cafeteria and in the cottages so students know how the menu items being served constitute a reimbursable meal.

ONSITE MONITORING: The onsite monitoring form was completed for lunch in the cafeteria and for breakfast in one of the cottages.

PROCUREMENT: • The SFA maintains a micropurchase log. • The procurement plan has been created for the 2019-2020 and the 2020-2021 school year and contains prime vendor, bread, and milk purchases. The procurement plan also includes the total estimated amount anticipated to spend, the procurement method to be used, contract award type, evaluation method to be used and contract management information. • The food service director and business manager attended a procurement training. • The SFA has a code of conduct that includes a conflict of interest policy, a disciplinary policy, and a policy that ensures no one single person has control over any aspect of finances.

PROFESSIONAL STANDARDS: • The SFA has a training tracker to ensure that all staff receive the correct number of training hours and the correct training topics. • The food service director received over the required 12 hours of training and the authorized representative received over her required 4 hours of training including the civil rights training. • The SFA has non-nutrition staff that have responsibilities within the school nutrition program. The staff received civil rights training and the correct number of training hours that are related to their program responsibilities. • The food service director is ServSafe certified. • An orientation training is provided to all new staff on offer versus serve, the meal counting and the meal pattern.

RESOURCE MANAGEMENT: • The school nutrition account does not exceed 3 months of operating costs. • The school nutrition account is tracked separately from all other accounts and money has not been transferred out of the account to fund other accounts. • The SFA does not sell non-program foods and is not charged for indirect costs. • The SFA completed the 2018-2019 financial report. • Per the 2018-2019 vendor paid list, the SFA's expenses are allowable.

SCHOOL WELLNESS POLICY AND COMPETITIVE FOODS:• The SFA's local wellness policy contains all the required elements and the policy was updated within the past 3 years. • Stakeholders are invited to participate in the wellness committee as information is posted in the student and parent handbook. Staff are also invited to participate through verbal or written invitations. • A wellness policy assessment was conducted in 2017 to assess the implementation of the goals written in the wellness policy. No competitive foods are sold.

Summer Food Service Program and School Breakfast Program Outreach:• The SFA informs families and students about the Summer Food Service Program by putting program information in their student handbook that is provided to all families and students upon enrollment. • The SFA informs all students about the breakfast program daily as a verbal reminder and through posted menus.