

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Holy Family Schools-DSM (17378001)
February 3 – 6, 2020

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

Site - Level Findings: Holy Family School (8108)

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|---|--|----------------------------|
| 400 - Meal Components and Quantities - Lunch | V-0400 | <p>The food production records, recipes, and CN labels provided during the week of review show that the SFA was short on the amount of red/orange vegetables offered. SFAs must provide ¾ cup red/orange vegetables every week. During the week of review only 5/8 cup red/orange vegetables were offered to Pre K - 8th grade students. TA provided to the food service director on meal pattern requirements and a handout was issued on vegetables in each subgroup.</p> <p>If preschool students are co-mingled, the SFA can offer either the NSLP meal pattern or CACFP meal pattern. The preschool students are co-mingled and the SFA is offering a combination of meal patterns as the preschool students only received the required portion of vegetables for the CACFP meal pattern but also received flavored milk and grain based desserts which do not comply with the CACFP meal pattern (but are allowable for the NSLP meal pattern). TA provided to the FSD on the different meal patterns and the FSD agreed to offer the preschool students the NSLP meal pattern.</p> | Submit one week of food production records to show that all vegetable subgroup requirements are being met and to show that the preschool students are receiving the NSLP meal pattern. | |
| 800 - Civil Rights | V-0800 | During the observed lunch meal, there was a 3 year old | Provide a copy of the letter that was sent to the parents informing | |

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| | | <p>child who did not have a number in the point of service system and therefore, did not pay at the point of service for his meal. Since the child is not officially enrolled as part of the preschool program but is treated more like a day care child, the SFA did not believe the child could be counted and claimed for reimbursement. The 3 year old student pays the paid student lunch price of \$2.80 for lunch meals received and the SFA does not count or claim this student's meals for USDA reimbursement. All children within the building, including the 3 year old, must be offered an income application and be counted and claimed for USDA reimbursement for reimbursable breakfast and lunch meals provided. TA provided. This student is the only 3 year old student in the school building. This student is in the same household as a student on the DC elookup list as free. SA verified this onsite. Therefore, the 3 year old must receive free meals as well. The parent can be reimbursed and the claim can be revised.</p> | <p>the family that the 3 year old child will begin receiving free meals and that they will be reimbursed for meals purchased during the school year. Revise the school year 2019-2020 claims and submit copies of the claims report from IowaCNP.</p> | |
| 1100 - Smart Snacks in School | V-1100 | <p>USDA requires all food and beverages sold throughout the day to students, including those sold as a fundraiser, will meet Smart Snack requirements. SA discovered that the school had a bake sale and an ice cream sundae fundraiser during the school day. These fundraisers do not comply with Smart Snack requirements or the school's local wellness policy on foods sold to students. If the SFA would like to conduct fundraisers during the school day, SA encourages them to consider selling non-food items or if food is will be sold, the student group is encouraged to work with the food service director to ensure the foods and beverages meet Smart Snack regulations. TA provided on Smart Snack requirements for all foods sold to students during the school day.</p> | <p>Provide written confirmation that any future fundraisers will comply with Smart Snack requirements.</p> | |
| 1700 - Afterschool | V-1700 | <p>The After School Care Snack Program serves snacks and conducts a point of service count in the gym and in</p> | <p>Complete and submit a copy of the site monitoring form for the</p> | |

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| Snack | | the preschool classroom. A site monitoring form must be completed at all sites, twice a year. The site monitoring form was completed for the gym site but was not yet completed at the preschool site. TA provided. | preschool snack site. | |
| 1700 - Afterschool Snack | V-1700 | The After School Care Snack Program requires that SFAs offer 2 components that consist of either 1 oz. grain, 8 oz. milk, 1 ounce meat/meat alternate, or 3/4 cup fruit or vegetables. According to the menu documentation during the review period there was one day in which only one component was served (12/2/2020) and 5 days in which they were short in the fruit/vegetable component served. SFAs are required to serve 3/4 cup fruit and/or vegetable and they only served 1/2 cup of 100% fruit juice. SFAs are also required to keep food production records, which are not available for the snacks served. Instead, the menu was documented on the meal count sheet. The handbook was provided along with TA on the required portion of fruit/vegetables, ideas on how to meet the 3/4 cup requirements, and the snack food production record. | Submit one week of After School Care Snack Program food production records to show that the component and meal pattern requirements were met for all days of service. | |
| 1900 - Fresh Fruit and Vegetable Program (FFVP) | V-1900 | <p>The cost documentation provided did not support the school's December FFVP claim for reimbursement.</p> <p>1. Two cases of oranges delivered and invoiced on December 4th, in the amount of \$25.31 per case, were claimed for the December 3rd FFVP snack service. The December 3rd service of oranges in actuality, used oranges previously purchased and claimed in November.</p> <p>2. No documentation was maintained to support the SFAs claim for administrative labor hours. TA was provided during both the SY 2014-15 & SY 2016-17 Administrative Review regarding appropriate documentation of administrative labor hours. This is a repeat finding.</p> | <p>1. Revise the December FFVP claim to remove the claim expense for the 2 cases of oranges.</p> <p>2. Describe the process that will be implemented going forward to ensure that the expenses included in the FFVP claim for reimbursement align with the produce and supply items purchased and utilized during the FFVP snack service.</p> <p>3. A time sheet must be maintained to clearly document administrative labor hours with the FFVP grant. In the event</p> | |

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| | | | <p>that administrative time spent is consistent from month to month, a time study may be completed for one month and documented hours from the time study may then be utilized for the reporting of subsequent month's labor expense, in lieu of completing a monthly time sheet. Describe the process that will be implemented going forward to document administrative labor hours.</p> <p>4. Submit a copy of the time sheet or time study used to document February administrative labor hours.</p> | |
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Org - Level Findings

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
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| 1000 - Local School Wellness Policy | V-1000 | <p>SFAs are required to assess the progress of the implementation of goals written within the wellness policy. The wellness committee should complete a progress report of goals at least once every 3 years and document any steps that are going to be taken to ensure the goal will be met or will be maintained. The progress/assessment report must be made available to the public. TA provided on wellness policy requirements. The wellness policy contains all required elements but lists food marketing goals as optional. SFAs are required to have food marketing goals documented in their wellness policy to ensure all marketing materials on campus for food and beverages meet Smart Snack guidelines. SFAs must also assess and update the policy at least once every 3 years and the policy did not specify the frequency of policy assessments. TA</p> | Describe when the wellness committee will assess the progress of how the wellness policy goals are being implemented and how it will be made available to the public. | |

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| | | provided on wellness policy requirements. | | |
| 1200 - Professional Standards | V-1200 | The individual responsible for the Afterschool Care Snack Program did not receive civil rights training. All individuals with responsibilities in the school nutrition program must receive civil rights training annually. A civil rights training webcast was provided. | Submit documentation to show that the After School Care Snack Program coordinator watched the civil rights training. Documentation can consist of an attendance log to show the date, time and signatures of attendees that watched the webcast. | |
| RMCR - Indirect Costs | V-RMCR | The school nutrition account is currently being charged 10% of the school's total cost of the water bill, energy bill, pest control bill, equipment repair and garbage bill. Unless the service company is able to provide a separate invoice to show the services and costs that the food service incurred, the school must pay the entire bill of these expenses. The school can recover the costs of these expenses by applying an indirect cost rate of 10% or less to the direct cost expense of food service salary and benefit costs, supply cost (not including food), and the cost of food service travel. TA provided to the business manager on the proper way to recover indirect costs. A handout on indirect costs for nonpublic schools was provided. | Show the amount of indirect costs that were charged to the school food service account for February 2020 expenses and show how this amount was determined. | |
| RMCR - Revenue From Nonprogram Foods | V-RMCR | The school nutrition fund provides snacks on Tuesdays to a student group. In school year 2018-2019, the school nutrition program provided 374 snacks and charged the group \$748.00 for the snacks. The group paid the money but the amount of money was not paid into the school nutrition fund. Instead, the group's payment was deposited into the school account. This money must get paid back to the school nutrition fund. TA provided to the business manager and food service director. | <ol style="list-style-type: none"> 1. Provide proof that the school nutrition fund was reimbursed the \$748 for the Tuesday snacks sold last year. 2. Describe the process that will be implemented going forward to ensure that the school nutrition fund gets reimbursed for the Tuesday snacks sold and any other non-program foods sold. | |

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Org - Level Technical Assistance

| Area | Question | Comments |
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| 200 - Verification | 213 If applicable, did the SFA's notice of adverse action contain all required information, including notification of appeal rights? | When informing families of the results of the verification, the letter of verification results is sent. If a student's eligibility status is decreasing as a result of verification, the letter must inform families of their ability to appeal and families must have 10 calendar days to appeal the decision. The letter of results sent to the family did not give the required appeal time. The benefits must be reduced within 10 operating days after the appeal period. TA provided to the verifying official. |
| 700 - Resource Management | | The SFA currently does not have a negative balance policy, as is required by all schools that participate in the NSLP. All schools must have a policy that informs families and staff of the steps that will be taken if a student has a negative lunch balance. A hard copy of this policy must be provided to all families once a year. TA, a sample policy, and information on the Iowa Legislation HF 2467 provided. |
| 700 - Resource Management | | PROCUREMENT: - Although the SFA's procurement plan included many requirement elements, it must also include the local purchase thresholds, date of completion, and all purchases including any micropurchases. - The small purchase bid sent to potential vendors did not include the required terms and conditions such as the Buy American provision, equal employment opportunity, termination for cause and convenience. Bids also did not include the amount of each product |

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| | | <p>they intend on purchasing. SA provided TA on all required elements of an informal/small purchase bid document and encourages the director to use the small purchase (3 Bids and a Buy) template found in Download Forms.</p> <p>- If the SFA begins making micropurchases, these purchases must be documented on a micropurchase log. A micropurchase log template is available in Download Forms. TA provided.</p> |
| 800 - Civil Rights | 800 What is the non-discrimination statement that is used for appropriate Program materials? | <p>The correct non-discrimination statement is not listed on the menus. All program materials must contain the full Iowa and USDA non-discrimination statements. The abbreviated statement is allowed for the menu since there is not enough room for the full statement. The abbreviated statement is "This institution is an equal opportunity provider." The full USDA and Iowa nondiscrimination statements can be found on the Iowa Department of Education's Nutrition program website: https://educateiowa.gov/pk-12/nutrition-programs. TA provided.</p> |
| 800 - Civil Rights | 803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs? | <p>The complaint form on file is outdated from 2012. An updated complaint form is available from USDA. TA provided to the food service director on USDA's complaint procedure and form.</p> |
| 800 - Civil Rights | 809 a. Are denied applications disproportionately submitted by minority households? | <p>The ethnic racial was not accurately completed to show that no ethnic or racial identifier was being discriminated against. TA provided to food service director on how to complete the ethnic racial form.</p> |
| 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? | <p>SFAs are required to inform families of the Summer Food Service Program (SFSP) annually so that families are aware of the SFSP opportunities in their area when school is on break. SFSP promotional</p> |

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| | | <p>materials can be included in newsletters or emails to families or on the school's social media site if available. Promotional materials provided along with TA.</p> <p>Although the SFA informs families of the breakfast program at the beginning of the school year, SFA's should promote their program throughout the school year. Information about the program and benefits of eating breakfast can be shared with families throughout the year by sending emails to families or information can be included in wellness committee newsletters. Pictures of breakfast menu items and other breakfast information can be posted on the school's social media site. TA provided to the food service director.</p> |
| <p>RMCR - Revenue From Nonprogram Foods</p> | <p>8 Did the SFA:</p> | <p>According to the IowaCNP Financial Report, the nonprogram food revenue adequately covers the nonprogram food costs. Nonprogram foods are those that the school nutrition account purchases for meals or snacks that are not reimbursed by USDA. This includes Tuesday snacks, extra milks, and adult meals. TA provided on how to calculate the nonprogram food costs and revenues.</p> |

Site - Level Technical Assistance Holy Family School (8108)

| Area | Question | Comments |
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| <p>1400 - Food Safety</p> | <p>1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.</p> | <p>The USDA requires that schools receive 2 food safety inspections per year. The SFA only received one inspection in the previous school year and has yet to receive one this school year. The SFA must email the health inspector to request 2 food safety inspections annually.</p> |

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| 1400 - Food Safety | 1409 Were on-site (or Off-site, if observed) storage violations observed? | During the day of observation, the freezer was packed full from floor to ceiling and the food was sitting on the freezer floor when food must be kept at least 6” off the floor. The SFA would benefit from having additional freezer space. TA provided to the food service director and encourages the director to apply for a USDA NSLP equipment grant. The application and instructions were provided. |
| 1900 - Fresh Fruit and Vegetable Program (FFVP) | 1906 Were any of the following unallowable products offered during the FFVP meal service: frozen, canned, and other types of processed fruits/vegetables; fruit/vegetable juice, nuts, cottage cheese, trail mix, fruit/vegetable pizza, smoothies, fruit strips, fruit drops, fruit leather, jellied fruit, or carbonated fruit? | The goal of the FFVP is to serve a variety of fresh fruits and vegetables in their natural state and without additives. The FFVP does not allow fruit that has added flavorings. Conversations with the students and teachers during the FFVP snack service identified that Tajin seasoning has previously been made available for use with both fruits and vegetables. TA was provided to the FSD that Tajin would be allowed as an added flavoring for service with vegetables only. As Tajin seasoning does include salt, the SFA is encouraged to limit overall use of it with vegetables that are poorly consumed or not consumed without a low fat dip. Tajin may also be used with a vegetable, when culturally appropriate. The SFA may wish to look for a salt free spice alternative as well. |

Org - Level Commendations

| Description |
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| <p>CERTIFICATION AND BENEFIT ISSUANCE AND VERIFICATION • The SFA provides 30 carryover days of benefits to students who received benefits in the previous school year. • The SA template letter of notification of eligibility is sent to families who complete an income application and are denied as well as those who are found on the Direct Certification list. • The income applications are complete with dates, signatures, and social security numbers and are processed within 10 days of being turned in to the school. • The income applications are correctly approved and the correct benefit status is transferred to the point of service system. Denied income applications are accurately determined. • The determining official looks up all students on the elook up and keeps all lists on file. • Benefits are extended to all students within a household. • The correct number of applications were selected for verification (2). • The verification process and report were completed on time. • The SFA selects from error prone applications first. • The correct letter of</p> |

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verification selection was sent to the families selected. • The eligibility status of the original application selected for verification was confirmed and signed by a confirming official. • The proof of income provided by the families selected for verification was processed accurately.

CIVIL RIGHTS: • The correct USDA and Iowa non-discrimination statements are on the SFA's website. • The public release was sent to the local media outlet before the school year started. • Translators are available to help families with Limited English Proficiency. • Civil rights training was provided to all direct nutrition staff on 09/13/2019. • The food service director has complete documentation with a signature from a prescribing official on file for all students with special dietary needs. The director works with families to ensure all students get their dietary needs met.

FOOD SAFETY: • The HACCP Plan contains all required elements and is available onsite for employees to use. The food service staff review the HACCP Plan annually. • The health inspection report is on display in a public location. • Staff monitor and record temperatures for their dishwasher, all cooling equipment, and hot foods. • Food in the walk-in cooler, reach in cooler, milk coolers, and dry storage areas are stored properly. • Food service staff exhibit good food safety practices during the meal service. • The food service director is ServSafe certified.

MEAL COUNTING AND CLAIMING: - There is a backup system in place in case the point of service computer system does not work. - The edit check report for December matches the number of meals submitted on the claim. The edit check report for the day of review is reasonable when compared to the edit check report for the month of review. - All students observed during the day of review had a reimbursable breakfast and lunch meal. - The point of service line at both breakfast and lunch was organized and orderly to ensure that all students receive a reimbursable meal. - Students provide a medium of exchange such as an ID card or number, for their meal.

MEAL PATTERN REQUIREMENTS AND NUTRITION QUALITY: • Food production records, CN labels, product formulation statements, and recipes are on file for the menu items served during the week of review. • At least 50% of grains served during the review period and day of review are whole grain rich. • At least two different types of milk is offered. • The breakfast and lunch meals served during the day of review met the daily meal pattern requirements. • The breakfast menu served during the review period met all the daily and weekly meal pattern requirements for all components. • The lunch menu served during the review period met the daily and weekly meal pattern requirements for the milk, fruit, grains, meat/meat alternate, total vegetables and the dark green, bean/legume, starchy and other vegetable subgroups. • Signage is posted to inform students how the menu meets meal pattern requirements for breakfast and lunch. • Posters and decorations are on display in the serving line that promote healthy eating. • All students that were counted and claimed during the day of observation had a reimbursable meal. • Portions of condiments are controlled. • The lunch menu offers at least 2 different vegetables daily giving students an increased opportunity to enjoy vegetables at the lunch meal. • Canned fruits are canned in their own juice and most canned vegetables are lower sodium. • Less than 2 ounce equivalents of grain based desserts were offered during the review period.

PROCUREMENT: - The SFA maintains a Buy American Exception log that contains agricultural items that do not meet the Buy American provision. - Small Purchase Review: -The small purchase bid for milk was sent to 2 potential vendors and include products needed, delivery specifications, and a due date for the bid. The debarment certification statement was signed by the company awarded the bid. The SFA awarded the bid to the lowest bidder. Price lists for milk were saved. - The SFA sent the bread bid to 3 potential vendors. The bids contained a list of products that they wanted to purchase, nutritional specifications for each product and delivery specifications. The bid also included a time frame in which the school was intending on making these purchases and a due date. Only one vendor responded even though the SFA was not overly restrictive. - Formal Purchase Review: The SFA belongs to a Group Purchasing Organization (GPO) and has the GPO agreement on file, all invoices, and price lists provided from the vendor. -The food service director conducts contract management. - The SFA did not conduct any micropurchases. - The SFA has a procurement plan that includes items that the school nutrition program plans on purchasing, the amount to be spent, the procurement method, the evaluation method and the people responsible for contract management. - The SFA has a code of conduct that contains all required elements including a disciplinary policy.

PROFESSIONAL STANDARDS: • The food service director received the correct number of professional standards training hours (12 hours) as documented by certificates and attendance logs. • All nutrition staff received the required number of training hours for a full time nutrition staff (6 hours)

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as documented with certificates and attendance logs. • The food service director tracks training of all staff members by using her own tracking tool.

RESOURCE MANAGEMENT: • The correct paid student lunch price is charged based on the PLE tool requirements. The correct adult lunch price is being charged for the adult lunches served at school. • According to the IowaCNP 2018-2019 financial report, the non-program food revenue adequately covers the non-program food cost. • According to the IowaCNP 2018-2019 financial report, the SFA nutrition account contains less than 3 months of operating costs. • Program materials are saved for 3 years plus the current year.

SCHOOL WELLNESS POLICY: • The SFA has an active wellness committee that meets throughout the school year and consists of a variety of stakeholders. • Newsletters are sent home throughout the year to promote healthy eating and physical activity to families. • The wellness policy is reviewed and updated at least once every 3 years and is made available to the public as it is on the school's website.

Site - Level Commendations Holy Family School (8108)

| Description |
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| After School Care Snack Program: The snack count is taken at the point of service and documentation is on file to show the number of snacks served every day during the review period. - The snack count sheet matches the claim. - The after school care program contains an educational or enrichment component. - The site monitoring report is completed for the gym site. |
| FRESH FRUIT AND VEGETABLE PROGRAM (FFVP): The school is on track to spend less than 10% of its total grant on administrative costs and labor hours. This allows for the majority of the FFVP grant to be utilized for the provision of fresh fruits and vegetables. A nice variety of fresh fruits and vegetables were served. FFVP menus for December were available. Nutrition education materials are provided by the school food service to teachers as well as for families via Wednesday folders. The FFVP materials are provided in both English and Spanish. The FFVP snack service is provided in a manner with minimal disruption to the classroom and is well received by both students and staff. |