

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Vinton-Shellsburg Community School District (66600000)
July 1, 2020

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

Site - Level Findings: Vinton-Shellsburg High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	<p>The food production records must list the type of fruit being offered. Although the lunch fruit and vegetable bar lists the exact fruits and vegetables offered, the breakfast food production record does not. TA provided on listing the specific fruits and/or vegetables served.</p> <p>The breakfast menu offers many entrée options and students are allowed to take 2 entrees as a part of a reimbursable meal. Although some items only provide 1 ounce grain equivalent and students should be allowed to take an additional entree item (for example the 1 pop-tart and cereal), many offer more than two ounce equivalents. At breakfast, meat/meat alternate can credit towards the grain requirement and the food service director reports that they aren't counting the meat/meat alternate when determining the grain crediting. Although there aren't any grain ounce equivalent maximums, all grain and meat equivalents still contribute to the sodium and calorie amounts for that meal. By allowing students to take 2 of some entree items as a reimbursable breakfast meal, the menus are over the calorie restriction. Specifically, additional entrees offered with the breakfast sandwich, peanut</p>	<p>Describe how the SFA will modify the reimbursable breakfast choices for the 2020-2021 school year to ensure they are within the calorie restrictions. Provide written confirmation that nutrition staff will be trained on specifying what fruit was served on the food production records, what constitutes a reimbursable breakfast, and what to charge students who want to purchase additional entrée items.</p>	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Vinton-Shellsburg Community School District (66600000)
July 1, 2020

		butter and jelly sandwich, and long john are over the calorie restriction. When biscuits and gravy are offered, the food production record and recipe state that students receive 2 biscuits and extra gravy which is over the calorie restriction. A breakfast for high school students must provide between 450-600 calories. TA provided on calorie and sodium restrictions.		
400 - Meal Components and Quantities - Lunch	V-0400	The SFA also has an alternative school site called West Campus, in which they serve a very small number of high school students daily. The nutrition staff at the high school prepare meals and create food production records for the meals served at West Campus. The entrée items they receive are the same as the entrée items served at the traditional high school site. The main vegetable and fruit options are also the same but the students at West Campus do not receive the salad bar items and the fruit and vegetables offered are only in ½ cup servings. The students at West Campus are 9-12th graders and therefore must have 1 cup fruit and 1 cup vegetables made available to them. TA provided to the food service director on requirements for the West Campus site.	Describe how the food service director will ensure that students at West Campus will receive at least 1 cup fruit and 1 cup vegetable daily at lunch. Provide written confirmation that staff will be trained on the lunch meal pattern requirements and the changes to be made when serving the West Campus students.	
400 - Meal Components and Quantities - Lunch	V-0400	1. The wrap that is served as a reimbursable entrée option is made with a whole grain rich tortilla that credits as 1.5 ounce grain equivalents. This does not meet the daily grain requirement for a high school student as they need 2 ounce grain equivalents daily. The day during the review period in which smokies were served, mac and cheese (0.67 oz. grain) and a muffin (1 oz. grain) were also served as the grain. The total grain equivalents	1. Describe how you will modify the wrap entrée option to ensure it provides 2 ounce grain equivalents. Provide the nutrition facts label for the tortilla if a different one will be served. 2. Describe how you will modify the menu for the day smokies are the served to ensure it provides 2 ounce grain	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Vinton-Shellsburg Community School District (66600000)
July 1, 2020

		<p>provided with this menu only credit as 1.5 ounce grain equivalents as well. Therefore, the menu offered during the week of review was short on the daily (2 days) and weekly grain requirements.</p> <p>2. Although the school nutrition staff offers a variety of vegetables daily, there is no documentation that the ½ cup bean or legume requirement was met during the week of review. SFAs are required to offer at least ½ cup beans or legumes weekly. The chili served during this week provided ¼ cup beans but no other beans were listed on the food production records.</p> <p>3. The chef salad recipe states that only one dinner roll is provided with the salad. According to the food service director, the chef salad comes with 2 dinner rolls. The standardized recipe must be modified to ensure students receive at least 2 ounces grain equivalents at lunch.</p> <p>SA provides TA on meal pattern requirements, standardized recipes, and provides a handout on vegetable subgroups. SA also encourages the food service director to work with their food distributor to find a larger tortilla to use for the high school students. The SA might also want to serve a larger portion of macaroni and cheese (6 oz. instead of 4 oz.) with the 1 oz. muffin to ensure students receive 2 oz. grain equivalents with their smokies. In the previous AR, the SFA was also short on grains and beans/legumes. Since this is a repeat finding, fiscal action must be taken.</p>	<p>equivalents.</p> <p>3. Describe how the SFA will ensure that at least ½ cup beans/legumes are served weekly at each site within the district</p> <p>4. Submit the revised chef salad recipe to show exactly what is provided with the chef salad.</p> <p>5. Provide written confirmation that nutrition staff will be trained on the above menu changes before the start of the 2020-2021 school year.</p>	
--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness	V-1000	SFAs are required to conduct an assessment of the implementation of the goals written in the	Describe when the SFA will conduct an assessment of the goals written in the wellness policy and how this will be made	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Vinton-Shellsburg Community School District (66600000)
July 1, 2020

Policy		wellness policy. This assessment must be conducted at least once every 3 years and must be made available to the public. Although the SFA is active in implementing many wellness related activities, there isn't documentation on the wellness committee meetings or assessments. TA provided on wellness policy requirements and an assessment template form is provided. .	available to the public.	
RMCR - Nonprofit School Food Svc Acct	V-RMCR	Upon review of the 2018-2019 vendor paid list, the SA discovered \$12,312.09 of unallowable expenses made with the school nutrition fund. The fund was used to pay for equipment repairs and maintenance and credit card fees, which must be paid for with general funds. If the general fund would like to recover the cost of these, they can do so by charging the school nutrition fund an indirect cost rate. TA and a handout was provided to the school business manager.	Provide written confirmation that equipment repair and maintenance and credit card fees will be paid for with general funds starting in the 2020-2021.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	All non-program food that the nutrition department provides must be sold at a price that at least covers the cost of the food and labor and funds must be deposited into the nutrition fund. During this Administrative Review, the SA discovered that there was no invoice provided for the food served during the staff picnic catered in August 2019. The food service director created an invoice and provided it to the business manager who approved it and sent it to the board for approval. A process must be put in place so that the nutrition department receives payment for all future catering events.	Provide proof that the school nutrition fund was paid the \$828.20 for the food and services provided for the August staff picnic. Describe the SFA's process to ensure that the nutrition department provides an invoice and gets paid in a timely manner for all catering events.	

Iowa Department of Education
 Bureau of Nutrition and Health Services
 State Review Summary Report
 Vinton-Shellsburg Community School District (66600000)
 July 1, 2020

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	214 If a student's eligibility changed due to verification,	The families selected for verification had their benefits reduced and were given the correct information on how to appeal the decision. Families have 10 calendar days to appeal and the SFA has up to 10 operating days after the appeal date to reduce the benefits. The SFA provided 18 calendar days to appeal instead of the required 10 days. TA provided.
700 - Resource Management		<p>PROCUREMENT:</p> <ul style="list-style-type: none"> · The procurement plan lists the correct micro-purchase threshold but does not include the correct small purchase threshold. The local purchasing policy states that purchases using federal child nutrition funds will be made in accordance with procurement procedures required by law. Federal procurement regulations state that the federal small purchase threshold of \$250,000 or less can be used unless the SFA's local small purchase threshold is more restrictive. The SFA's local small purchase threshold is more restrictive at \$25,000 or less so that is the threshold that should be used. If the SFA wants the child nutrition funds to be spent using the federal purchasing thresholds, they must state that in their policy. · The procurement plan also lists office supplies as an item they intend on procuring. Office supplies are not an approved direct costs. They must be purchased using general funds. These costs can be recovered by the general fund using an indirect cost rate. Indirect costs do not need to be included in the procurement plan or need to be procured according to federal regulations. · A Buy American exception log is required to be maintained to document all agricultural commodity items purchased or received that do not adhere with the Buy American provision. A micro-purchase log is also required to document all micro-purchases. · According to the vendor paid list, the SFA also used child nutrition funds at local farms for farm to school events. These purchases must also be included on the procurement plan. · All monthly and/or weekly price lists must be kept from vendors so that contract management can be conducted to ensure the SFA is getting the products they ordered at the price agreed upon in the bid. This includes all weekly and monthly bids from milk vendor (when using an escalator clause) and from your prime vendor. · The SFA described the bread, milk, and pizza purchases as formal procurement events. However, their bid documentation more closely resembles small purchase events for all three bids.

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

Vinton-Shellsburg Community School District (66600000)

July 1, 2020

	<p>Although a formal bid is allowed for all events, a small purchase method would be allowable for all procurement events except for the milk bid which is over the SFA's local small purchase threshold. The milk must be procured using a formal procurement method unless the SFA's local purchasing policy is modified.</p> <ul style="list-style-type: none">· Micropurchase: According to the SFA's purchasing policy, the local micropurchase threshold is \$2500 or less. The nutrition program spent \$3,443 at the local grocery store as a micropurchase, thus spending over their micropurchase threshold. If the SFA wants to continue to spend that much on items they need to conduct a small purchase instead of a micropurchase. Alternatively, they may consider using the food production records to determine the quantity of food needed so that they can purchase items from the prime vendor and not from the local grocery store. In addition, when making a micropurchase, SFAs are required to spread their funds equitably among local vendors. The SFA spent significantly more at one store than the other 2 grocery stores in town. TA provided on micropurchase requirements. <p>Formal & Informal (Small) Procurement Methods</p> <ul style="list-style-type: none">· Bread Bid: Although they provided a due date, the SFA only provided a week for potential vendors to respond. For a small purchase, 4 weeks is preferred. The SFA included a list of all nutrition programs that they participate in but the bid must also include approximate dates in which the bid will be applicable for. The SFA provided a list of product specifications but did not include the total quantity of each product they anticipate purchasing. Terms and conditions are required to be included in all small purchase bids including the Buy American provision, the Equal Employment Opportunity, Targeted Small Business Certification, and if spending more than \$10,000, the Termination for Cause and Convenience is required.· Milk Bid: Based on the local purchase threshold and the amount the SFA spends on milk in a year, the SFA must conduct a formal bid. The bid sent to potential vendors does not include any of the required terms and conditions including the termination for cause and convenience, equal employment opportunity compliance statement, Buy American provision, or the USDA and Iowa non-discrimination statements. Although the SFA included a list of the products they intend on purchasing they did not include the quantity that the SFA anticipates purchasing. If the SFA uses bottom line pricing to evaluate a bid, the quantity must be included in order for the SFA to calculate the extended price. The SFA did provide a due date for the bid information, but only provided potential bidders one week to respond to the bid when 4-6 weeks is recommended. In addition, the contract time period is not specified in the bid and the bid did not include an evaluation matrix or description of how the bid will be awarded (required for a formal procurement method). The bid was also not advertised in a widely circulated newspaper or journal which is required for formal procurement methods. Formal procurement templates are available in Download Forms that SFAs can use as a guide when writing
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Vinton-Shellsburg Community School District (66600000)
July 1, 2020

		<p>bids.</p> <ul style="list-style-type: none"> Pizza Bid: Although SFAs can conduct a small purchase bid over the phone, product, quantity, and delivery specifications and all other terms and conditions must be writing so that the SFA can ensure that the same specifications are communicated to each potential vendor. The SFA conducted their small purchase bid for pizza over the phone but no documentation is available regarding what was communicated by the SFA or received from vendors.
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 SFA must follow USDA's complaint procedures in the event that a civil rights complaint is made against the school nutrition program. All complaints must be sent to USDA and the Iowa Civil Rights Commission. The policy was provided.
800 - Civil Rights	810 Review program materials.	The full USDA and Iowa non-discrimination statements must be on all program materials including the SFA's website. The nutrition page has a nondiscrimination statement but it is not the full, USDA nondiscrimination statement. The abbreviated statement, "This institution is an equal opportunity provider" can be on any form that doesn't allow room for the full statement. Neither the school's website nor menu have the correct nondiscrimination statements. The full USDA and Iowa statements can be found at the Iowa Department of Education Nutrition Programs website: https://educateiowa.gov/pk-12/nutrition-programs
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?	In an attempt to increase breakfast participation the SA suggests promoting breakfast throughout the school year by informing families and students on the importance of breakfast and the breakfast menu options. Information can be passed through mass email communications, the district's social media sites, website, or by posting details around the school building. TA provided to the food service director.

Org - Level Commendations

Description

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Vinton-Shellsburg Community School District (66600000)
July 1, 2020

CERTIFICATION AND BENEFIT ISSUANCE: Students who received benefits in the previous school year are provided 30 carryover days of benefits. • The SFA uses the State agency’s notification of eligibility template letter to notify all families if they are on the direct certification list or if they are denied benefits after completing an income application. • Access to benefit information is limited and kept confidential. • The determining official downloads the direct certification list twice monthly and keeps the list on file. • Benefits are accurately transferred to the point of service system. • Income applications are processed within 10 days or less. • Applications are determined accurately and contain all required information including signatures, dates, and social security numbers. • Denied applications are denied accurately. • The point of service system is backed up and documentation is kept for 3 years plus the current year.

CIVIL RIGHTS: - Civil rights training was provided to all staff with NSLP and SBP responsibilities on 10/28/2019 - The public release was sent to the local Vinton Newspaper on June 25, 2019. - The “And Justice For All” poster is on display in a public location in the cafeteria. - The racial ethnic form was completed and shows that no discrimination was made in providing meal benefits to students. - Diet modification request forms are on file for students that have special diet needs. The food service director works with families to ensure students receive the food items needed to meet all needs.

COMPETITIVE FOODS: The food service director has nutrition calculator printouts to show all a la carte items meet Smart Snack requirements. - The food service director works with student groups who are interested in selling food to ensure they sell Smart Snack approved items. - Leftover entrée items are either sold the next day or thrown away.

FOOD SAFETY: The SFA monitors and records the temperature of all cooling equipment, dry storage areas, dish machine temperatures, and food temperatures. - The site’s last 2 food safety inspection reports did not have any findings. - There are four staff at the review site that are ServSafe certified. The food service director is registered to get her ServSafe certification renewed in July. - The SFA has a HACCP Plan that contains all required and applicable Standard Operating Procedures. According to the food service director, the HACCP Plan is available at each site.

LOCAL WELLNESS POLICY: The Local School Wellness policy contains all required elements and is available to the public. - The wellness policy has been updated within the past 3 years.

MEAL COUNTING AND CLAIMING: The SFA has a backup plan in the event that their point of service system does not work. - The SFA maintains an edit check report to ensure that the number of free, reduced and paid meals claimed do not exceed the number of free, reduced and paid students eligible or the attendance adjusted allowable amount. - The breakfast and lunch edit check reports generated by the SFA’s point of service computer system matches the claim. - The SFA’s meal service matches their application. - A negative balance policy has been created and provided to all families.

MEAL PATTERN AND NUTRITIONAL REQUIREMENTS: The breakfast menu served to the high school site provides a wide variety of entrée options as well as fresh fruit every day. • The food production records are complete with all menu items served including the milk and condiments, the food serving temperatures, the serving sizes, amount prepared, adult or a la carte items sold, leftover servings, and actual number of students. The item’s brand and product code or recipe number are also listed. The nutrition staff have a food production record to show the items available on the fruit and vegetable bar as well. • Many homemade items are offered. A variety of different entrée options and fresh fruits and vegetables are offered daily. • CN labels, product formulation statements and recipes are available for products served. • The breakfast menu served during the week of review meets the daily and weekly meal pattern requirements for fruit, grains, and milk. • The lunch menu served during the review period met the daily and weekly meal pattern requirements for milk, fruit, meat/meat alternate, total vegetables, and the dark green, red/orange, starchy, and other vegetable subgroups. • The lunch and breakfast menus served during the review period exceeded the whole grain rich requirement of at least 50% of grains being whole grain rich. • No grain based desserts are on the menu during the review period. • Free, potable water is available during the breakfast and lunch meals as there is a water fountain in the cafeteria. • Signage is posted for breakfast and lunch to ensure students understand how the menu constitutes a reimbursable meal.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Vinton-Shellsburg Community School District (66600000)
July 1, 2020

ONSITE MONITORING: • The SFA conducted breakfast and lunch onsite monitoring for all sites within the district before February 1, 2020.

PROCUREMENT: The procurement code of conduct includes all required elements including a disciplinary policy. • The procurement plan includes prime vendor, dairy, bread, pizza, and special diet purchases. The plan includes the total amount the SFA intends on purchasing, the procurement method used, contract award type, duration, and evaluation method used. • The SFA also conducts contract management and includes the responsible parties on their procurement plan. Invoices and monthly dairy price lists are available. • The SFA purchased allowable items at a reasonable cost. Invoices and receipts were available for purchases made. **FORMAL & INFORMAL (SMALL) PROCUREMENT METHODS - Milk Bid:** The milk bid contains a list of items the SFA is interested in purchasing. The bid also includes additional items that they require prior to awarding a bid including nutritional information, a HACCP plan and suspension and debarment certification statements. Delivery and other specifications are also described in the bid. The milk bid was sent to 3 potential vendors. - **Bread Bid:** The bread bid was sent to 2 potential vendors and the bid was awarded to the responsive and responsible bidder. Although the SFA described the bid as a formal procurement event in the procurement plan and review documents, it more closely resembles a small purchase. Based on the amount spent on bread and the local purchase threshold, a small purchase is allowable. The SFA provided a due date of when they expected bid responses to be returned and described the child nutrition programs that they will need product for. The bid letter reported that there was one building in Shellsburg and 3 buildings in Vinton that they would need product delivered to. The bid also included a list of all items that they would like to purchase, including size and whole grain percentage. The bid also described other specifications including the need for nutrition and crediting information on all products, a HACCP policy and the disbarment certification statement. Additional delivery specifications were provided. - **Pizza Bid:** The pizza bid was conducted as a small purchase which is allowable based on the SFA's local purchase threshold. The SFA conducted the bid process through a phone conversation with 2 potential vendors.

PROFESSIONAL STANDARDS: A training tracking tool is maintained to ensure that required training is provided to all staff. - The food service director, food service managers and staff received the required number of training hours for the 2019-2020 school year. - Civil rights training was provided to all staff. - The high school/review site has 4 ServSafe certified employees and the food service director is registered to renew her certification in July 2020.

RESOURCE MANAGEMENT: • Per the 2018-2019 financial report, the non-program food revenue adequately covers the cost of non-program foods. The non-program food cost and revenue calculation includes all non-program foods. • Per the 2018-2019 financial report, the account balance does not exceed three months of operating costs. • The correct paid student lunch price is charged based on the PLE tool requirements. • The correct adult lunch price is charged. • The school nutrition fund is tracked separately from all other funds • The SFA used 94% of their USDA commodity foods in the 2019-2020 school year. • The SFA has a negative balance policy that is provided to all families annually at registration.

SCHOOL BREAKFAST AND SUMMER FOOD SERVICE PROGRAM OUTREACH: Families are informed of the breakfast program annually at registration. - Families are informed of the Summer Food Service Program through social media posts, local newspaper posts, flyers posted throughout the community and Friday Folders.

VERIFICATION: The correct number of applications (3) were selected for verification. • Applications were selected from error prone applications first and were confirmed by a confirming official. • The SFA processed the verification documentation received by families correctly and in a timely manner. • Families were notified using the state agency letter of notification of verification selection and verification results. • If families didn't respond after the first letter, the SFA sent a second letter of notification to families. • Families that had their benefits reduced after verification, received information on how to appeal the decision and their ability to reapply at any time. • The verification process and report were completed on time.