

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Holy Family School System-Cedar Rapids (10538000)**  
**February 24-26, 2020**

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

**Site - Level Findings: LaSalle Intermediate (8120)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Breakfast	V-0300	During the observed breakfast, the SFA counted and claimed 32 reimbursable meals when the SA counted only 8 meals as being reimbursable. A reimbursable breakfast meal must consist of 3 items, one of which being a ½ cup fruit or juice. The 24 meals that were not reimbursable but counted as such on the day of observation did not contain ½ cup fruit or juice. The point of service line must be organized in a way to allow the server/cashier the ability to observe all student meals to ensure they contain all components. TA provided to the food service director about the breakfast meal pattern, offer versus serve, and point of service line. The food service director changed the meal service line to allow her to better observe trays. The SA observed breakfast on the 2nd day and confirms that the newly organized line allows the	No action required.	

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		<p>server/cashier to better ensure that students have a reimbursable meal. The food service director agrees to continue to implement this point of service line. No further action required.</p>		
<p>400 - Meal Components and Quantities - Lunch</p>	<p>V-0400</p>	<p>During the week of review, meat sauce was on the menu but the recipe provided was not what the staff is actually making. Therefore, the SA was not able to verify how the meat sauce credits towards the meal pattern. TA provided to the food service director on standardized recipes and crediting ingredients using the food buying guide.</p> <p>During the week of review, the daily grain requirements were met but the weekly grain requirements of 8-9 oz. grain equivalents were not met. TA provided on reading a product formulation statement and on using the grain bread chart. The food production records are complete with the all menu items served, planned and actual servings, and leftover amounts but instead of serving sizes, some of the menu items describe how the serving credits towards the meal pattern. Food production records must contain the actual serving size provided for all items served to ensure staff know how much to serve and the SFA can show the SA how the menu meets the meal</p>	<ol style="list-style-type: none"> <li>1. Submit one week of lunch food production records that contain the serving size used. Submit labels, product formulation statements, and/or CN labels for all grain items served during this week to show that the daily and weekly grain requirements are being met.</li> <li>2. Submit a standardized recipe for the meat sauce to show ingredients and amounts used, critical control points, portion size, and crediting information.</li> </ol>	

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		pattern requirements. TA provided on food production record requirements.		
500 - Offer versus Serve	V-0500	During the observed lunch meal, there were two students who did not have ½ cup fruit or vegetable on their tray and therefore did not have a reimbursable meal. There were other students who had a reimbursable meal, but were made to go back to the serving line to get more fruits or vegetables. During the observed breakfast meal, there were 24 meals that did not contain 1/2 cup fruit or juice. TA provided to the cashier and the food service director on the breakfast and lunch meal patterns and offer versus serve. Lunch and breakfast offer versus serve webcasts provided to the food service director.	Provide training to all staff on what constitutes a reimbursable breakfast and lunch and how to properly implement offer versus serve.	
800 - Civil Rights	V-0800	The SFA provides breakfast and lunch meals to preschool and day care students but does not claim them for reimbursement or provide them with the opportunity to apply for benefits. Any school that participates in a child nutrition program, including NSLP and SBP, must make available, as applicable, free and reduced price lunches and breakfasts to all children in the school. Therefore, if the SFA would	Provide written confirmation that the SFA will make the free and reduced benefits available to preschool and day care students in the 2020-2021 school year. Describe how families will be charged (flat rate or per meal) and the amount that they will be charged.	

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		like to continue to participate in the NSLP and SBP they must provide an income application to all preschool and day care families, extend benefits to all children in a household, including those children in preschool and/or day care, provide the appropriate benefit to preschool or daycare students that are found on the Direct Certification list and claim their meals for USDA reimbursement. TA provided to the business manager and principal.		
1100 - Smart Snacks in School	V-1100	The Jamwich is being sold on the a la carte line and is not currently sold as an entrée item. The SFA did not have a nutrition calculator printout on file to show that the Jamwich is Smart Snack approved. TA provided to the food service director who entered the nutritional information into the nutrition calculator to determine that it is not Smart Snack approved. However, a school can sell an entrée item as an a la carte item if it is served as a part of the reimbursable breakfast or lunch meal that day or the day prior. TA provided.	While SA was onsite, the food service director agreed to sell the Jamwich as a breakfast entree item daily and will continue to offer it as an a la carte item. Corrective action approved and no further action required.	

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
800 - Civil	V-0800	Schools are required to submit a	Provide written confirmation that the	

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Rights		<p>copy of the public release to the local media outlet annually to inform the public of their participation in the National School Lunch Program. The SFAs purchasing group sent the public release on behalf of the schools participating in the group and the school does not have proof that the public release was sent to the local media. If the purchasing group is going to continue to send the public release to the local media outlet, the school must have documentation that shows when the public release was sent, where it was sent, and specified the school by name on the documentation sent to the local media outlet. TA provided to the food service director.</p>	<p>SFA will either send the public release to the local media outlet for school year 2020-2021 or maintain documentation from their purchasing group that shows when and where the public release was sent.</p>	
1000 - Local School Wellness Policy	V-1000	<p>The wellness policy must include certain elements including a goal for food and beverage marketing. SFAs are not allowed to market food or beverages on campus that are not Smart Snack approved. In addition to a wellness policy, schools must also assess the progress of the implementation of the goals written in the wellness policy for each site. The assessment must also be made available to members of the public. TA provided on wellness policy requirements and an assessment template provided.</p>	<p>Describe when the wellness committee will assess the progress of the implementation of goals written in the policy and how the assessment will be made available to the public.</p> <p>Describe when the wellness policy will be updated to include a goal regarding food and beverage marketing.</p>	
1200 - Professional	V-1200	<p>The food service manager at the St. Jude site must have 10 hours of</p>	<p>Describe what training the food service manager will take to get her 10 hours of</p>	

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Standards		professional standards training every year and currently only has 4 hours of training. TA provided to the food service director on training requirements and recorded trainings that could be used to meet her requirements.	professional standards training prior to 06/30/2020.	
RMCR - Indirect Costs	V-RMCR	The school nutrition account is being charged directly for indirect costs including phone, utilities, water, garbage, maintenance, internet, pest control, equipment repair and janitorial services. The indirect costs can only be charged directly to the school food service account if an invoice can be provided that includes the services incurred only by the nutrition department. If this is not feasible, the school must pay for the entire bill but can recover the cost of the expenses by applying an indirect cost rate of 10% or less to the nutrition department's direct cost base of salary and benefits, supplies (not including food), and travel. If the school nutrition fund pays directly for indirect expenses such as pest control, equipment repair, and internet services, those providers must be procured according to regulations. TA provided as well as a handout on indirect costs.	Describe the amount that will be charged to the school nutrition fund for the indirect expenses, what expenses will be included in that amount and how that amount was calculated.	
RMCR - Nonprofit School Food	V-RMCR	The USDA requires that schools have a negative balance policy that	Describe when the school will create a negative balance policy and how they will distribute it to families annually.	

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Srvc Acct		describes the procedures that will be taken when a student has a negative lunch account. A hard copy of the policy must be provided to all families at least once a year. TA provided on the negative balance policy and the Iowa legislation House File 2467.		
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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	129 Is household notification of eligibility consistent with the responses provided on the Off-Site Assessment Tool?	The SFAs letter of notification of eligibility status was not approved by the State Agency which is required when using a letter other than the SA template found in Download Forms. If using a letter other than the template, the determining official must complete the Approval Request Form – Notification Letters found in Download Forms (ELIG010) and send to Deb Linderblood for approval. Letters of notification of eligibility must be sent to all families on the Direct Certification list and to all families who apply and are denied benefits. TA provided.
200 - Verification	208 When a confirmation review was conducted:	The original eligibility status of the application selected for verification must be confirmed by someone other than the original determining official to ensure that the eligibility status is correct before informing the family they were selected for verification. The confirming official must sign the application after they confirmed the eligibility status but before the letter of notification of verification selection is sent to the family. TA

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		provided on above.
700 - Resource Management		<p>PROCUREMENT:</p> <p>Small purchase:</p> <ul style="list-style-type: none"> <li>· In addition to a list of items, the purchase group must include quality and nutritional specifications for all products. For example, the purchasing group must include the fat content they would like for all dairy products including yogurt, cottage cheese, and sour cream. The usage of each individual item must also be included in the bid to inform the vendor how much of each item the group intends on purchasing. This allows the purchasing group to conduct extended pricing.</li> <li>· In addition to the Buy American provision, other terms and conditions are required to be included in the small purchase bid documents. Examples include the equal employment opportunity provision, debarment certification, targeted small business certification, the full USDA and Iowa nondiscrimination statements, and termination for cause and convenience. SA encourages the purchasing group to use the Small Purchase (3 Bids and a Buy) template in Download Forms.</li> <li>· The Buy American Provision written in the bid documents states that certain products are acceptable from outside of the USA including tuna. Canned tuna from the USA is available.</li> </ul> <p>Formal purchase:</p> <ul style="list-style-type: none"> <li>- The SFA must conduct contract management to ensure vendors are charging the agreed upon prices. To do so, the SFA must begin saving all weekly and monthly prices lists provided by the EIPG purchasing group to compare to the prices listed on invoices.</li> </ul>



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		<ul style="list-style-type: none"><li>- SFAs must also keep all purchasing group agreements on file.</li><li>-When sending out a formula procurement bid, best practice is to allow for 8-12 weeks for potential vendors to respond.</li></ul> <p>Micro purchase</p> <ul style="list-style-type: none"><li>- A requirement of micro purchases is that the SFA must spread their purchases equitably among a variety of sources throughout the community. The SFA only used one company for equipment repair, pest control and only one company to purchase cleaning supplies. The SFA must use other vendors to fix equipment and obtain cleaning supplies in the next school year in order to comply with micro purchase requirements. If the SFA would like to use just one vendor, they must send out a competitive quote to at least 3 vendors. TA provided on micro purchase requirements.</li><li>- The procurement plan must include all purchases that the SFA intends on using school nutrition funds for including equipment repair and pest management companies. There were purchases for these items on the vendor paid list but not on the procurement plan. The procurement plan must also include the local purchase threshold. If the SFA does not have a local purchase policy, the federal thresholds can be used. The federal thresholds are \$10,000 or less for a micropurchase, \$250,000 or less for a small purchase, and \$250,000 or more for a formal procurement method. The code of conduct meets all federal requirements.</li><li>- Contract management is a procurement requirement and requires SFAs to check to ensure that the items ordered were delivered and that the price charged was the agreed upon price in the bid. In order to check prices, all monthly price lists must be saved for 3</li></ul>
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		<p>years plus the current year. TA provided on record keeping and procurement requirements.</p> <p>A Buy American exception log is also required for SFAs to document all food items purchased or received that violate the Buy American Provision. A Buy American Exception Log template can be found in Download Forms.</p> <p>A micro purchase log is also required to document all micro purchases made. The log must contain the date, the amount spent, the vendor and the items purchased (an itemized receipt is allowed).</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?	The SFA must follow the USDA complaint procedure and complete the complaint form in the event that a civil rights complaint is made regarding the school nutrition department. A handout on the USDA procedures and form was provided.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	The SFA is encouraged to provide the diet modification form to all families at registration and/or on their website. The diet modification form was provided to the food service director. TA provided to the school nurse and food service director.
800 - Civil Rights	810 Review program materials.	Although the abbreviated nondiscrimination statement is on the menu, the full USDA and Iowa nondiscrimination statements must be on all program materials including the website. The full statements are located on the Iowa Department of Education Nutrition Program's website ( <a href="https://educateiowa.gov/pk-12/nutrition-programs">https://educateiowa.gov/pk-12/nutrition-programs</a> ) and must be included on Holy Family's Food Service

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		website.
1400 - Food Safety	1403 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	SFAs are required to follow the Buy American provision when purchasing agricultural items. If SFAs purchase or receive an agricultural item that violates the Buy American provision the item must be documented in a Buy American exception log. The log must include the item purchased and why the Buy American provision was violated. There is a Buy American exception log in Download Forms (NSLPPROC016). TA provided.
1600 - School Breakfast and SFSP Outreach	1600 Did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	Schools are required to promote their school breakfast program. In addition to posting the menu online, SFAs can send information to families about their breakfast program and the importance of breakfast in a newsletter or email.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	Schools are required to inform all families annually about the Summer Food Service Program (SFSP). Promotional materials can be found on USDA's Raising Awareness site ( <a href="https://www.fns.usda.gov/sfsp/raise-awareness">https://www.fns.usda.gov/sfsp/raise-awareness</a> ) and can be distributed via emails, newsletters, or hard copies.
RMCR - Nonprofit School Food Svc Acct	11 If Yes, was the equipment included on an approved State agency equipment list or did the SFA otherwise secure prior approval from the State agency before purchasing the equipment (per FNS Policy Memo SP 31-2014)?	If the SFA would like to purchase equipment that is over \$5000, the equipment must be on the pre-approved equipment list. If it is not on the list, the SFA must get SA approval. TA provided to the food service director.
RMCR - Nonprofit School Food Svc Acct	3 Did the SFA's net cash resources exceed its 3 month average monthly expenses?	The school nutrition account is nearing a balance that is close to the SFA's 3 month operating costs. SFAs are not allowed to have a balance that is greater than

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		<p>3 months of their operating costs. Therefore, the food service director should begin to consider how to start spending down the account. SA provides TA and examples of ways to spend the funds. Examples include purchasing more fresh fruits and vegetables and/or preparing more homemade items which may increase the SFA's food cost and require more labor hours. New equipment, additional staff or increased staff hours are other ways to help spend down the nutrition account.</p>
<p>RMCR - Revenue From Nonprogram Foods</p>	<p>8 Did the SFA:</p>	<p>According to the 2018-2019 financial report, the nonprogram food revenue adequately covers the cost of the nonprogram foods. Nonprogram foods include all food that the SFA purchases using the school nutrition fund, but does not receive federal or state reimbursement for. Examples include adult meals, a la carte sales, 2nd entrees, preschool milks, preschool breakfast and lunch meals and extra milks. TA provided on calculating the nonprogram food cost and revenue and a handout was issued.</p>

**Site - Level Technical Assistance LaSalle Intermediate (8120)**

Area	Question	Comments
<p>400 - Meal Components and Quantities - Breakfast</p>	<p>404 a. Is there signage explaining what constitutes a reimbursable <b>breakfast</b> to students for all applicable grade groups?</p>	<p>SFAs are required to post signage that describes how the menu meets the meal pattern requirements. A breakfast sign template was provided that informs students and staff how many items the breakfast menu credit for. TA provided to the food service director on the breakfast signage requirement and meal pattern.</p>
<p>400 - Meal Components and Quantities - Breakfast</p>	<p>409 Review production records and other supporting documentation.</p>	<p>The breakfast menu served during the review period meets all the daily and weekly minimum requirements for all menu components. The amount of grain served during the review period however is higher than the maximum recommended amount of grain which puts the menu slightly over on calories. TA provided to the</p>

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		food service director on requirements and ideas to decrease calories. The food service director agrees to decrease toast that is served daily, from 2 slices to 1 slice. No further action required.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	SFAs are required to receive 2 food safety health inspections annually. If two inspections are not received, the SFA must request a 2nd inspection by emailing their health inspector from the Department of Inspections and Appeals. TA provided.

**Org - Level Commendations**

Description
<p><b>Certification and Benefit Issuance:</b> • The SFA offers 30 day carryover of benefits for students who received benefits in the previous school year. • The determining official downloads the SFAs direct certification (DC) list monthly and keeps the list on file. Students on the DC list are provided the correct benefits in a timely manner. • The income applications are processed within 10 days of receiving them. • Income applications are complete with all required information including dates, social security numbers, signatures, income amounts and household member’s names. • Eligibility status is transferred to the point of service accurately. • Income eligibility status is kept confidential. • Benefits are extended to all students within the household. All applications are determined correctly.</p>
<p><b>CIVIL RIGHTS:</b> - Program materials are available in different languages for families as needed. - Staff with responsibilities in the school nutrition program received civil rights training (8/20/2019) - The ethnic racial form was completed to show that discrimination was not made against any ethnic or racial group. - The “And Justice For All” poster is on display in a public location. - The SFA offers to accommodate the dietary needs of any student that has a special dietary need. The food service director provides a nutritionally equivalent milk alternative to students that have lactose intolerance.</p>
<p><b>FOOD SAFETY:</b> • The food safety inspection report is on display in a public location. • Food is being stored safely as open containers are labeled and dated, food is at least 6” off the floor, and the temperatures of the cooling equipment are within normal range. • The temperature for food is monitored and documented on food production records. The temperature of all cooling equipment is monitored and recorded on logs. • The HACCP Plan contains all required and applicable standard operating procedures. • The food service director is ServSafe certified.</p>
<p><b>MEAL COUNTING AND CLAIMING:</b> • The cashiers are trained annually on their job responsibility. • The SFA has a backup plan in case the point of service system does not work. • The edit check for the review period matches the claim. • The edit check for the review period is reasonable when compared to the day of review.</p>
<p><b>NUTRITIONAL QUALITY AND MEAL PATTERN REQUIREMENTS:</b> • At least two different types of milk are available. • Signage is posted on how the menu constitutes a reimbursable meal. Posters promoting healthy eating are also on display. • At least 50% of grains served are whole grain rich. • At least two different fruits and vegetables and entrée options are available daily for students to select. • The breakfast and lunch menu served on the day of observation met the meal pattern requirements. • Food production records, CN labels and recipes are available for the meals served during the review period. • Free, potable water is available to students in the cafeteria where breakfast and lunch is served. • Food production records include all menu</p>

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items, including condiments and milk that are served during that meal. Food production records are also complete with the planned and actual number of servings for students, adults, and extras and the leftover servings. • The point of service line for the observed lunch is organized and orderly to ensure that all students have a reimbursable meal. • The lunch menu served during the review period meets the meal pattern requirements for total daily vegetables, weekly vegetable subgroup requirements, daily and weekly fruit, milk and meat/meat alternate requirements. • The breakfast menu served during the review period meets the daily and weekly meal pattern requirements for grains, fruits, and milk.

**ONSITE MONITORING FORM:-** The SFA completed onsite monitoring for breakfast and lunch at both sites prior to February 1, 2020.

**PROCUREMENT:** Small purchase: • The milk bid was part of a smaller purchasing group that consists of the catholic schools in the Cedar Rapids area. The purchasing group is following the correct purchasing method based on the amount that they are spending and their local purchase thresholds. • The milk bid sent includes dates of service, delivery frequency, the Buy American act, and request for a HACCP Plan, items intending on purchasing and the bid was sent to 3 potential vendors. Since only one vendor was able to provide all items and specifications written in the bid, the purchasing group selected the correct vendor. Formal purchase: - The SFA participates in the GPO for their prime vendor. Agreements were on file. • Micropurchase: • The SFAs micropurchases made for the 2018-2019 school year are under the local micropurchase threshold and the prices were reasonable. Procurement Plan • The procurement plan is completed for the 2019-2020 school year and lists the prime vendor, milk, POS, and cleaning chemical purchases, their estimated amount to be spent for the year, the identified procurement method, and individuals responsible for contract management.

**PROFESSIONAL STANDARDS:** • The food service director is ServSafe certified (3/10/2016-2021). • Certificates and attendance logs are on file for all training received. Training is tracked for all employees on the Iowa Professional Standards Training log. • The food service director has certificates on file to show that she received all required training hours. • All part time food service staff received the required number of training hours. • The food service director was hired since July 2015 and met the hiring standards.

**RESOURCE MANAGEMENT:** • The correct paid student lunch price is charged based on the PLE tool requirements. • The correct adult lunch price is being charged, per USDA requirements. • The SFA has an internal control process in place to ensure more than one person oversees the nutrition fund. • The school nutrition account has less than 3 months of operating costs. • The school nutrition revenues and expenses are tracked separately. • The school nutrition records are kept for three years plus the current year. • According to the 2018-2019 financial report, the nonprogram food revenue adequately covers the nonprogram food cost.

**VERIFICATION:** • The SFA selected the correct number of applications to verify (1) and completed the verification report and process on time. • The application selected for verification is selected from error prone applications first. • The SFA sent the SA letter of notification of verification selection to the family selected for verification.

**WELLNESS POLICY AND COMPETITIVE FOODS:** The wellness policy has been reviewed and updated within the past three years and is available to members of the public as it's on the school's website. - The nutrition calculator printouts for a la carte items sold are organized in a binder to show that items sold meet Smart Snack requirements.