

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

Belmond-Klemme Comm School District (05940000)

Date of Review: October 30 – November 1, 2018

Program Year: 2019
 Month of Review: September
 Lead Reviewer: Donna Matlock
 Org Representative(s): Theresa Greenfield

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	14 household applications were not correctly approved: 8 applications were missing the 4 digit social security number, 6 were miscategorized resulting in reducing or increasing benefits.	Q 126 ca: Submit copies of letters notifying households of an increase or decrease in benefits. Indicate the date that missing information, such as SSNs, income frequency, dates of application, etc., were obtained.	
100 - Certification and Benefit Issuance	V-0100	3 households were identified on the DC (Direct Certification) list as 7/3/18 but eligibility was not increased to "free or reduced" benefits. SFA has been manually updating POS (Point of Service) from DC list; but was not aware Infinite Campus is capable of importing DC list to POS benefit issuance list which will reduce the number of errors found during visit.	Q 133 ca: For your response, indicate how you will ensure that direct certification matches are conducted within required timeframes.	
100 - Certification and Benefit Issuance	V-0100	Eligibility benefits were not correctly transferred from determination of free, reduced, or paid to the Point of Service, POS.	Q 137 ca: For your response, please indicate how benefits will be correctly transferred to the POS in the future. Indicate the date that changes to benefits were made for those receiving benefits at the incorrect level. (Submit	

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			copies of letters? Submit POS benefit list showing changes?)	
1000 - Local School Wellness Policy	V-1000	<p>SFA could not provide documentation to show the review and update process of the Local School Wellness Program.</p> <p>SFA provided a sample wellness policy template that has not been utilized to reflect districts wellness goals on nutrition, physical activity, and education.</p> <p>The local wellness policy committee has not updated the policy to align with the HHFKA.</p> <p>The most recent assessment of the local wellness policy was not submitted.</p>	<p>The SFA must update the policy to demonstrate compliance with FNS requirements.</p> <p>The SFA must invite potential stakeholders to serve on the wellness committee and provide a list of committee members with name and title.</p> <p>The SFA must provide a plan and timeline as to when the Local Wellness Policy will be reviewed, revised, and assessed. Review and/or update and assessing goals of the LWP is required every three years.</p>	
RMCR - Revenue From Non-Program Foods	V-RMCR	<p>SFA did not take steps to adequately increase its non-program food revenues and/or secure non-federal funds if out of compliance with the Revenue from Non-program Foods requirements. Financial report 2017-2018 lists non-program revenue (2%) is not adequately contributing to non-program food costs (4%).</p>	<p>For your response, complete the Non-Program Revenue tool and attach a copy. If the tool indicates that revenue is insufficient, also indicate your plan to either increase revenue or decrease costs of non-program foods.</p> <p>Available in IowaCNP "Download Forms" are tools to assist in determining non-program food costs. NSLP120 - Menu Costing Worksheet and NSLP150 - Non-Program Revenue Tool or access additional guidance and tools at</p>	

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			https://educateiowa.gov/reporting-nonprogram-food-costs-how-and-why-may-2016 . <i>Recommend using "Food Cost Calculator" to accurately reflect program/non-program food costs.</i>	
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Site - Level Findings: Belmond-Klemme Community High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	<p>There were days when the free, reduced price, or paid meal counts exceeded the number of free, reduced price, or paid eligible students. (Sept. 6, 10, 13, 17, 2018)</p> <p>During onsite visit, SA was unable to obtain all edit check reports due to software problems.</p>	<p>Contact software company to repair/fix software problems. Describe how the systemic issue has been resolved on how meal counts will not exceed maximum reduced eligibility status.</p> <p>Revise September claim to reflect actual eligibility data for question G1 - G4 as necessary; L3.b from 461 to 452 reduced meals, and L3.c from 1832 to 1830 for paid meals.</p>	

Org - Level Technical Assistance

Area	Question	Comments
300 - Meal Counting and Claiming	304 At the end of meal service, how does the SFA obtain the daily meal counts by category from each school's point(s) of service?	SA worked with SFA on using the correct reports from POS software for meal counts and claiming. SFA has been using monthly transaction summary report, at times this report is inaccurate. For accurate meal counts SFA needs to populate the daily and monthly "Edit Check Report" before filing monthly claims. This allows SFA to review and fix any errors that populate (number of meals counted exceeding total number of eligibility for free, reduced, and paid).

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800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	SFA needs to track eligibility applications for racial/ethnicity data and keep for documentation. Shared form with SFA and location in "download forms" of IowaCNP.
1000 - Local School Wellness Policy	1004 How are potential stakeholders made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy?	SA discussed with SFA that committee members need to listed and available to the public.
1000 - Local School Wellness Policy	1005 <i>Provide a copy of the most recent assessment on the implementation of the local school wellness policy.</i>	SA provided SFA with an assessment template along with resources.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	SFA has a HACCP plan onsite but SOP's (Standard Operating Procedures) are all sample templates and do not reflect the current operations of the facility and food safety procedures. Discussed individualizing SOP's for equipment, operations, and health and food safety practices.

Site - Level Technical Assistance Belmond-Klemme Community High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	Discussed using additional signage making breakfast and lunch signs indicating food offered and indicate what entails a reimbursable meal to help students identify all the food items offered. Shared signage available on the nutrition website under "Communication Tools" for examples and Pinterest examples for school signage.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	FSD was aware 2 health inspections are required but was not aware that she needed to request an inspection and keep documentation on file.

Org - Level Commendations

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Description
<p>• Benefit documents, as well as all paperwork, were very well organized. • The current application form and guidelines were used, direct certification is downloaded twice a month as required, and denied applications were correctly determined. • The current benefit issuance list was available. • Access to benefit information is correctly limited. • Free meals are extended to all members in the household. • Waivers are provided to applicants and indicate specific fees. • Eligibility is kept confidential. • The SFA has a back-up system for benefit issuance documents and system.</p>
<p>• School Breakfast Program (SBP) outreach was sent out at the beginning of the year to inform families of the availability of the program. • Reminders of the SBP were also sent out throughout the school year. • Outreach included announcements, newsletters, the school website, posters, etc. • Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer. • The information was shared via websites, lunch menus, newsletters, phone calls, flyers, etc.</p>
<p>• The “And Justice for All” civil rights poster was posted in the cafeteria. • The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. • Annual civil rights training was provided to food service staff and documented. • A copy of the district’s public release was on file, documenting that it was submitted to local media. • The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. • Ethnic/racial information is collected and the form is completed. • No discrimination was observed.</p>
<p>• The correct number of applications were verified and were correctly selected from error prone applications. • All income sources were verified with at least one month’s income, and the process was completed on time. • The application(s) selected for verification were confirmed prior to verification. • The SFA had at least one person attend training. • The verification report was completed accurately and on time.</p>
<p>• The Resource Management section of the Off-Site Assessment tool was completed on time. • Financial records that were reviewed, indicated appropriate and allowable expenditures. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. • The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. • No indirect costs are charged to the food service program. • Money is not transferred out of the account to support other programs. • The SFA effectively utilizes its USDA entitlement for commodities. • Reports are filed on time, and all records are maintained for at least three years plus the current year. • The SFA developed and approved a meal charge policy on 9/21/2017. The policy was mailed (emailed) to all households and staff were informed of the policy.</p>

Site - Level Commendations Belmond-Klemme Community High School (0109)

Description
<p>• All meal components were available at the beginning of meal service on the days of observation and throughout meal service. • All meals observed met at least the minimum daily requirements. • Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer’s Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption. The SFA provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal. • Menus included many homemade entrees, and standardized recipes are used for food production. • Free potable water is available to all students for lunch (in</p>

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each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)? • Offer vs. Serve (OVS) was being implemented properly. All students observed selected ½ cup of fruit and/or vegetable. Students have the option to decline any one or two of the five components. • At least two types of milk are offered. • Many low fat and low sodium food items were observed in storage. • Students had sufficient amount of time to eat after receiving meals. • Food service staff was polite and respectful to students, other staff, and each other. • Nutrient analysis was not required.

• Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. • Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. • Cashiers are trained. • All students selected a reimbursable meal without having a prompt to select a ½ cup of fruit or vegetable as one of the three required components.

• Students may purchase a second entrée and/or a second milk at lunch. Second entrees are correctly documented on production records. • Beverages sold meet the standards for the various age groups of students. Students are able to purchase foods via a la carte sales. • The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte. • All foods sold meet the Smart Snack standards for nutrition content. Exempt leftover NSLP entrees are only sold the same day, or the day after, they are initially offered.

• The Food Service Director completed the USDA menu worksheets for the week of Sept. 17th-21st, 2018, for breakfast and lunch at the high school. The worksheets showed the serving portions and component contributions meeting the meal pattern. • The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that high school is at low risk for (non)compliance with Dietary Specifications regulatory requirements. • Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, controlling the portion sizes of condiments, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats.

• The latest Health Inspection Report was posted in a publicly visible location. • Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Good food safety procedures were observed.