

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Bosco Catholic School System (67958008)
Date of Review: April 30th – May 2nd, 2019

Program Year: 2019
Month of Review: March
Lead Reviewer: Donna Matlock
Org Representative(s): Shelby Douglas

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	3 household applications were not correctly approved: one (1) household was determined using a Medicaid number which is not valid for determination, one (1) household benefits were incorrectly transferred from application to the POS (Point of Sale) resulting in increasing benefits from reduced to free, and one (1) household was receiving free and should have been reduced.	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	One (1) household listed on the direct certification (DC) list was identified as "other reduced" but was receiving "free" benefits.	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.	
RMCR - Revenue From Non-	V-RMCR	During lunch, a staff member was eating a free meal, when asked by SA if they perform food service	RMCR 5-ca: Please state how the SFA will ensure the integrity and appropriations of the nutrition fund and will only allow free meals to food	

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Bosco Catholic School System (67958008)
Date of Review: April 30th – May 2nd, 2019**

Program Foods		duties; they stated "no, and won't be expected to either."	<p>service support staff only.</p> <p><i>CFR-210.6 & CFR-220.6 sets forth SFA's (School Food Authorities) must ensure to the extent practicable, that the Federal reimbursements, children's payments, and other non-designated non-profit food service revenues do not subsidize program meals served to adults.</i></p> <p><i>Meals served to adults who are directly involved in the operation and administration of the school nutrition programs may, at the discretion of the SFA, be furnished at no charge. As such, their cost may be fully attributed to and supported by the non-profit food service operation.</i></p>
---------------	--	--	--

Site - Level Findings: Don Bosco High School (8115)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Reminded SFA if a student's account is negative and cash is brought in to purchase a meal, the cash <i>cannot</i> be put towards negative account. Student must be able to purchase a meal regardless of negative account balance.
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	SFA was unaware of the "Public Release" located in IowaCNP within "Download Forms" that is required to

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Bosco Catholic School System (67958008)
Date of Review: April 30th – May 2nd, 2019

		be sent out annually. Information regarding eligibility applications for 'free/reduced' are announced on the district website.
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	Principal & Business Manager are new to the food service program and unaware of USDA requirements to conduct annual civil rights training with staff involved with food service operations. SA shared website and training materials during onsite visit.
800 - Civil Rights	810 Review program materials.	Shared with SFA that all CNP (Child Nutrition Program) materials must have the USDA non-discrimination statement. Menus need to have a minimum of the "This institution is an equal opportunity provider" using the same font size but no smaller than font 10.
1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements?	SA discussed USDA requirements for implementation, review, and assessment of LWP (Local Wellness Policy) every 3 years. SA shared Team Nutrition folder with resources on LWP and assessment template. Shared the DE nutrition website for further resources and regulations. SFA needs to establish a broader group of stakeholders to include students, parents, and community members, PE teacher, administration, or board members. Assessment of wellness goals, stakeholder/committee members list with names and titles, along with policy must be made available to the public.
1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	SA recommends Business Manager attend SA (State Agency) summer training in 'Financial Management' on June 11th, 2019 at ISU, Ames. SA shared class flyer with SFA for additional training opportunities.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Bosco Catholic School System (67958008)
Date of Review: April 30th – May 2nd, 2019

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?	<p>USDA requires all SFA's to promote the SFSP (Summer Food Service Program) regardless of whether the SFA does not participate in the SFSP. Promotion encourages families to seek out participating locations to access healthy foods.</p> <p>SA shared the Dept. of Ed. SFSP website to access resources for promotion of the SFSP.</p>
---	---	---

Site - Level Technical Assistance Don Bosco High School (8115)

Area	Question	Comments
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	Health inspection report was hanging in kitchen. FSD placed it in a public location during onsite visit.
1400 - Food Safety	1411 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?	SFA received cucumbers from Mexico. Shared with SFA that products must meet the 'Buy American' declaration unless lower prices are documented justifying non-domestic purchases. SFA participates in a GPO (Group Purchasing Organization), discussed responsibilities of monitoring food items and produce to ensure "Buy American" requirements are implemented.

Org - Level Commendations

Description
<ul style="list-style-type: none"> • 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, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. • The correct and current benefit issuance list was available. • Access to benefit information is correctly limited. • Free meals are extended to all members in the household. • Eligibility is kept confidential. • The SFA has a back-up system for benefit issuance documents and system.
<ul style="list-style-type: none"> • 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. • There were no unresolved findings from the previous Administrative Review or from a state audit. • The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Bosco Catholic School System (67958008)
Date of Review: April 30th – May 2nd, 2019

months. • The Paid Lunch Equity (PLE) tool was completed and prices were increased as required. • No indirect costs are charged to the food service program. • Money is not transferred out of the account to support other programs. • Reports are filed on time, and all records are maintained for at least three years plus the current year.

• 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.

• The district has a current wellness policy on file. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. • Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.

Site - Level Commendations Don Bosco High School (8115)

Description

• 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. • 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. • Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch. A monthly menu is also posted. • Food service staff was polite and respectful to students, other staff, and each other. • Nutrient analysis was not required.

• Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of March were accurate and complete. • Point of Service (POS) counts and filed claims appear accurate. • 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, and daily edit checks are performed. • 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.

• The “And Justice for All” civil rights poster was posted in the cafeteria. • The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. • No discrimination was observed. • SFA on-site monitoring was completed to ensure that all schools are meeting program requirements.

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

Bosco Catholic School System (67958008)

Date of Review: April 30th – May 2nd, 2019

• The Food Service Director completed the USDA menu worksheets for the week of January 7th-11th, 2019 for lunch at the Bosco 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 the 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 SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. • 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.