

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Clarion-Goldfield-Dows Comm School District (12060000)
Date of Review: April 17th – 19th, 2019

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Q 107b f: The organization is not using the prototype letter for notification of free/reduced status and have not had the JMC letter approved by the State Agency.	Q 107b ca: State your intentions to have your JMC notification letters, direct certification (DC) letters, and denied notification letters approved by the State Agency on a yearly basis.	

Site - Level Findings: Clarion Middle School (0209)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	208 When a confirmation review was conducted:	Discussed with the Determining Official the need to have a confirmation review for all verified applications prior to sending the household notification letter asking for their proof of income. The confirmation official must sign and date the application showing that they have reviewed the application.
700 - Resource Management		SA recommends that SFA include 'Buy American' declaration and 'Debarment Certificate' when soliciting

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		for small purchases/bids. Recommend including an escape clause if contract is not effectively meeting agreement.
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 discussed with SFA that USDA requires the LWP Assessment and committee/stakeholder list be made available to the public. The LWP is available via district website, recommend the assessment and committee list be added to the nutrition website or home page per USDA regulations require they be made available to the public.
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 shared with SFA a folder of resources, including Local Wellness Policy (LWP) templates. Discussed that the LWP is due this year (2019) for review and if necessary updates or revisions added.
RMCR - Nonprofit School Food Srv Acct	9 If the SFA encumbered bad debt from unpaid student meal accounts during the RM review period, how did it ensure that only allowable non-Federal revenues were used to restore operating losses? (Unpaid Meal Charges: Guidance and Q&A SP 23-2017)	SA shared with SFA the IASB negative account balance template to incorporate additional information into district policy. Discussed follow through with families for collecting funds as one site is CEP and second site is not so negative accounts are accruing and determine how negative accounts will be addressed moving forward.
RMCR - Revenue From Non-program Foods	7 If Yes, what process did the SFA use to calculate its compliance with the revenue from non-program food requirements in 7 CFR 210.14(f)?	SA & SFA worked on the USDA Non-Program Revenue calculator and uploaded to review attachments. Recommend SFA determine an average meal cost, a la carte, and vending to determine if price increases are necessary.

Site - Level Technical Assistance Clarion Middle School (0209)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	409 Review production records and other supporting documentation.	SFA offers 'grab-n-go' breakfast bags as a choice if student chooses to eat elsewhere. SA recommends FSD list this option on the menu to make families aware of additional choices and promotion of the SBP.

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400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	SFA provides a fruit and vegetable bar daily for grades 3rd - 8th. SA recommends FSD add this to the menu to reflect all food items offered to correspond with FPR's as required. This may increase participation as it's promoted and families are made aware of the variety of choices their children have.
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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. • All applications were signed and dated by the household member and the SFA, and all applications were determined within ten days. • Income was only converted to annual when there was more than one frequency of income. • Rollover applications were removed if the household did not apply within thirty days of the school year. • 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.
<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> • The district has a current wellness policy on file. • The SFA's wellness policy was reviewed and revised on February 8, 2016. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. • The wellness policy is made available to the public via district website.
<ul style="list-style-type: none"> • 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. • There were no unresolved findings from the previous Administrative Review or from a state audit. • The SFA has a separate financial account for the

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nonprofit school food service, and net cash resources do not exceed three operating months. • The Paid Lunch Equity (PLE) tool was completed and prices were increased as required. • The Non-Program Revenue (NPR) tool was completed, and no increase in prices were required. • 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.

• The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events, and specifications were well-written and comprehensive. • The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. • The district has a signed agreement with a Group Purchasing Organization for prime vendor to supply food and non-food supplies. • A review of milk, bread, and prime vendor invoices validated the district was receiving the products as bid and prices were charged as bid. • The school utilized 93.2% of their Planned Assistance Level (PAL) – USDA Foods.

Site - Level Commendations Clarion Middle School (0209)

Description
<p>• 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 and vending machines. • 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.</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. • SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. • The on-site monitoring forms were completed for 100% of the SFA’s sites for lunch and at least 50% were completed for breakfast prior to February 1st. • The correct state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school’s website.</p>
<p>• The district has good breakfast participation. [reason] • Grab and Go breakfast is provided which increases participation. • Breakfast in the Classroom is practiced which increases participation. • Signage was posted explaining what constitutes a reimbursable meal. A monthly breakfast menu is also posted. • Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one of four items offered at breakfast.</p>
<p>• The Food Service Director (FSD) does a nice job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat. • 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,</p>

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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 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. • Recess is scheduled before lunch service. • 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.

• The Food Service Director completed the USDA menu worksheets for the week of March 11th-15th, 2019 for breakfast and lunch at the Middle 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 Middle 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. • 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.