

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Nashua-Plainfield Comm School District (45990000)
Date of Review: April 9th – 12th, 2019

Program Year: 2019
Month of Review: February
Lead Reviewer: Donna Matlock
Org Representative(s): Valerie Roach

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
800 - Civil Rights	V-0800	Training did not occur within the most recent school year. Topics that must be covered include: Collection and Use of Data, Effective Public Notification Systems, Complaint Procedures, Compliance Review Techniques, Resolution of Noncompliance, Requirements for Reasonable Accommodations of Persons with Disabilities, Requirements for Language Assistance, Conflict Resolution, and Customer Service.	Provide civil rights training to all applicable staff before the end of the school year and submit a sign-in sheet to the SA with date, time-in, time-out, participant signatures and topics covered. Civil rights training must be conducted annually.	
1000 - Local School Wellness Policy	V-1000	Submit a timeline and plan on when each school in the district will be assessed on the implementation of the Local School Wellness Policy.	Submit the district's plan on how it will make the assessment on the implementation of the Local School Wellness Policy available to the public.	

Site - Level Findings: Nashua-Plainfield High School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Nashua-Plainfield Comm School District (45990000)
Date of Review: April 9th – 12th, 2019

Org - Level Technical Assistance

Area	Question	Comments
300 - Meal Counting and Claiming	307 Electronic Systems Only:	SFA was using the "lunch meals served summary" report rather than the required "Edit Check Report" in JMC software. SA showed SFA where to find the edit check report to use moving forward for filing meal claims.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	SFA's FSD went on medical leave. District just hired an interim FSD in March so these responsibilities were not completed by February 1st as required. Discussed requirements with new FSD and SFA moving forward.
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	SA provided training tracking tools for new interim FSD during onsite visit.
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?	FSD has been working in this position for 3 weeks. SA observed produce (cherry tomatoes, cucumbers) in walk-in refrigerator from Mexico. SA discussed with SFA the requirements and agreements with prime vendor that non-domestic products need to be justified for SFA to accept foods that are not domestic or qualify under the 'Buy American' declaration.

Site - Level Technical Assistance Nashua-Plainfield High School (0172)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	POS is at the beginning of the line for students that choose to purchase the 'salad bar entrée' which requires a staff member to monitor the bar to ensure each student walks away with a reimbursable meal. This has been an issue in the past prior to the new interim FSD coming into the district. Discussed having

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Nashua-Plainfield Comm School District (45990000)
Date of Review: April 9th – 12th, 2019

		students go to the salad bar first, then go through the POS or move bar closer to the POS.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	SA went over April menu where there are vegetable subgroups missing in 3 weeks. SA shared the meal pattern; vegetable subgroup poster, and excel worksheets to assist her in ensuring the meal pattern is being met. During the visit FSD was going to add the missing vegetable subgroups to the menu for compliance.
500 - Offer versus Serve	502 Is there signage explaining what constitutes a reimbursable meal to students including the requirement to select at least 1/2 cup fruit or vegetable?	SA recommended adding signs to the salad bar on sneeze guard or on top indicating portion sizes (minimum/maximums) and required components for a reimbursable meal.
600 - Dietary Specifications and Nutrient Analysis	603 Were any areas identified during the Off-site review requiring technical assistance or corrective action prior to the beginning of the On-site portion of the review?	SA provided TA (technical assistance) to new FSD by helping her start working on the breakfast and lunch certification worksheets. FSD was able to upload all worksheets to 'Review Attachment' prior to exiting the AR (Administrative Review).
900 - SFA On Site Monitoring	901 a. Was the on-site review of the <i>lunch</i> counting and claiming procedure completed prior to February 1?	Onsite monitoring forms had to be completed by secretary due to FSD being on medical leave and just hired an interim FSD for the rest of the school year. SA discussed with new FSD the requirements and purpose in completing these reports, and shared where to find reports in IowaCNP "Download Forms".
1100 - Smart Snacks in School	1107. Are exempt SBP and NSLP leftover entrees only sold the same day, or the day after, they are initially offered?	SA discussed how additional entrees/leftovers can be sold the following day after initial day offered. Shared ideas in improving menu planning to increase participation.
1400 - Food Safety	1404 Is a copy of the written food safety plan site specific and available at each school?	SA provided guidance on implementing additional SOP's (Standard Operating Procedures). Shared some

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Nashua-Plainfield Comm School District (45990000)
Date of Review: April 9th – 12th, 2019

		websites for resources, discussed training opportunities being provided by the SA this summer.
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?	<p>FSD is new and been working only 3 weeks during the onsite visit. She was unaware of the 'Buy American' clause. Explained to FSD since they are a part of a GPO (Group Purchasing Organization) AEA, with Martin Brothers as prime vendor, should be notifying SFA of products of out of country origins if no USA products are available.</p> <p>FSD will be participating in some procurement webinars and upcoming training in June 2019.</p>

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 correctly determined, signed and dated by the household member and the SFA, were complete with SSN's and case numbers, 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 February 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. • 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 “And Justice for All” civil rights poster was posted in the cafeteria. • 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. • 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

Nashua-Plainfield Comm School District (45990000)

Date of Review: April 9th – 12th, 2019

• 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. • The SFA's wellness policy was reviewed and revised on June 12, 2017. • 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 are available to the public via district website. • Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.

• 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. • 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. • The SFA effectively utilizes its USDA entitlement for commodities.

Site - Level Commendations Nashua-Plainfield High School (0172)

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. • 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 Entrée that encourages students to select a reimbursable meal. • 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. • 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.

• 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.

• 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.

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

Nashua-Plainfield Comm School District (45990000)

Date of Review: April 9th – 12th, 2019

• 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.

NUTRITIONAL QUALITY OF SCHOOL MEALS: • The Food Service Director completed the USDA menu worksheets for the week of March 11th-15th, 2019 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.