

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Osage Comm School District (49950000)**  
**Date of Review: December 11<sup>th</sup> – 14<sup>th</sup>, 2018**

**Program Year:** 2019  
**Month of Review:** November  
**Lead Reviewer:** Donna Matlock  
**Org Representative(s):** Renae Treptin

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	4 household applications were not correctly approved: 1 applications is missing the 4 digit social security number; 3 were receiving incorrect eligibility 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	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. Refer to benefit issuance errors in "Review Attachments."	
200 - Verification	V-0200	Q208a F: The SFA did not provide documentation demonstrating that a confirmation review had occurred.	Q208a C: State your intentions to provide documentation demonstrating that a confirmation review occurred.	
1000 - Local School Wellness Policy	V-1000	The most recent assessment of the LWP (Local Wellness Policy)	Submit the district's plan on how it will conduct an assessment on the	

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		was not submitted.	implementation of the Local School Wellness Policy goals. <i>Once completed it must be made available to the public.</i>	
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**Site - Level Findings: Lincoln Elementary School (0409)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	The counts by category were not correctly used in the Claim for Reimbursement for both breakfast and lunch. It is unclear whether the correct report from Total Access is used for actual meal counts to claim. The discrepancy lies between the "free and reduced".	Describe in a plan moving forward who will ensure the correct reports are used for filing claims.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	130 Is household notification of denied benefits consistent with FNS requirements?	SA (State Agency) shared the denial prototype letter with SFA. One part of the appeal process including timeframe needs to be added. COS (Corrected Onsite)
100 - Certification and Benefit Issuance	135 Are the Direct Certification lists retained on file by the SFA?	SFA was not aware there are additional lists to download (potential, Elook-up, migrant). Walked through process with Admin. Asst. as this is her 2nd year in position.
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>	SFA provided board minutes which did not show anything on the LWP (Local Wellness Policy) as reviewed.  SA provided SFA with a folder of resources which

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		includes a copy of the LWP checklist and an assessment template.
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?	SA observed in freezer SFA has frozen broccoli originated in Mexico. Recommend SFA and staff monitor products during delivery.
RMCR - Revenue From Non-program Foods	8 Did the SFA:	SA recommends SFA to reference a large period of menu to determine an average meal cost. Also, ensure all non-program food costs and non-program food revenue are fully captured in account inquiry summary/ledger.

**Site - Level Technical Assistance Lincoln Elementary School (0409)**

Area	Question	Comments
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	FSD didn't receive enough posters to replace old poster at elementary. SA provided a copy of the newest poster.
1400 - Food Safety	1404 Is a copy of the written food safety plan site specific and available at each school?	Food service has a HACCP plan in place along with SOP's but the SOP's are samples and need to be personalized to the operations and equipment usage.
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 frozen broccoli from Mexico. Recommend FSD and staff monitor items when receiving shipments.

**Org - Level Commendations**

Description
<ul style="list-style-type: none"> <li>• Benefit documents, as well as all paperwork, were very well organized.</li> <li>• 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.</li> <li>• The correct and current benefit issuance list was available.</li> <li>• All applications were determined within ten days.</li> <li>• Income was only converted</li> </ul>

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<p>to annual when there was more than one frequency of income. • 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>• Students may purchase a second entrée and/or a second milk at lunch. Second entrees are correctly documented on production records. • 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 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 SFA had at least one person attend training. • The verification report was completed accurately and on time.</p>
<p>• The district has a current wellness policy on file. • The SFA’s wellness policy was reviewed and revised on 4/17/2017. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.</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. • 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 months. • The Paid Lunch Equity (PLE) tool was completed as required. • The Non-Program Revenue (NPR) tool was completed. • 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.</p>
<p>• 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. • 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. • IFBs and RFPs are advertised. • The SFA ensures that no vendors have been debarred or suspended by USDA. • The SFA’s policy on purchasing local follows regulations for unprocessed food. • The district has a signed agreement with a Group Purchasing Organization for prime vendor to supply food and non-food supplies. • The invoices from vendors were well-organized. The invoices had a date, vendor name and address, items purchased were clearly identifiable.</p>

**Site - Level Commendations Lincoln Elementary School (0409)**

Description
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• 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. • 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. • 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. • "Fearless Foods on Fridays" - FSD provides nutrition education per grade, which includes a snack of the new food being introduced.

• The “And Justice for All” civil rights poster was posted in the cafeteria. • 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.

• The Food Service Director completed the USDA menu worksheets for the week of November 26th-30th for breakfast and lunch at Lincoln Elementary. 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 Lincoln Elementary 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. • Good food safety procedures were observed. • FSD is very organized and training is done annually on SOP’s.