

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Rudd-Rockford-Marble Rk Comm School District (56970000)
Date of Review: October 23 – Nov. 6, 2018

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Repeat Finding: 17 household applications were not correctly approved: 6 applications were missing 4 digit social security number making application incomplete; 4 students appeared on DC (direct certification) list and current benefits were not updated accordingly, 5 students were receiving wrong eligibility benefits either increasing or decreasing benefits.	<p>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.</p> <p>Determining Official will participate in the "Application Approval & Direct Certification - Part 1 & 2" webinar at this link: https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition.</p> <p>State your intentions to do this, attach a copy of the training certificate or email confirmation of completion.</p>	
100 - Certification and Benefit Issuance	V-0100	Q 130 F: Denied households notification letter must inform family of the reason for the denial of benefits, right to appeal, instructions on how to appeal and instructions on how to re-apply for free and	Q 130 ca: For your response, please submit a copy of notification of denied benefits that you will use. Indicate who will be responsible for notifying households and for maintaining	

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		reduced price benefits at any time during the school year.	documentation of notification.	
100 - Certification and Benefit Issuance	V-0100	Eligibility benefits were not correctly transferred from determination of free, reduced, or paid to the POS (Point of Service).	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 copies of letters? Submit POS benefit list showing changes?)	
100 - Certification and Benefit Issuance	V-0100	The benefit issuance document was not updated within three days for increases in benefits. Not all students were captured when reviewing DC list. SFA has been doing this manually while JMC can automatically import DC list which would result in fewer errors.	For your response, please indicate how you will ensure that changes in benefits will be implemented in accordance with required timelines.	
1000 - Local School Wellness Policy	V-1000	The most recent assessment of the local wellness policy was not submitted. The SFA must conduct a baseline assessment of wellness goals to demonstrate compliance with FNS requirements.	Submit a timeline and plan on when the district will be assessed on the implementation of the Local School Wellness Policy. The assessment must be made available to the public.	

Site - Level Findings: Rockford Middle-Senior High School (0109)

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.	Counts were incorrectly combined and/or recorded. The claim for August and September must be revised.	

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		<p><i>SA worked with FSD during visit to produce "Edit Check Reports" as he was not familiar with JMC functions. The reports indicate different meal counts from filed claim. Spoke with Business Mgr. 11/6/18, she will work with FSD to determine if the "Transaction Summary Report" is used to file claims instead of "Edit Check Reports".</i></p>		
<p>400 - Meal Components and Quantities - Breakfast</p>	<p>V-0400</p>	<p>Repeat Finding: Signage is not available at or near the beginning of the service line to identify the components of a reimbursable meal.</p>	<p>A minimum of 3-5 entrées are offered daily but no signage to indicate which items constitute a reimbursable meal. SA had to inquire which items met the meal pattern even though breakfast sandwiches are served daily.</p> <p>Obtain the correct signage, indicate where it is posted and who is responsible for daily updates of the menus.</p>	
<p>400 - Meal Components and Quantities - Lunch</p>	<p>V-0400</p>	<p>Repeat Finding: Salad bar must be set up prior to POS to consider the meal reimbursable for claiming. There is no one monitoring the salad bar station to ensure students walk away with a reimbursable meal. <i>Additional grains need to be offered to meet the minimum daily ounce equivalents</i></p>	<p>Please describe in a plan how the salad bar will be placed before the POS (point of service) to ensure every student has a reimbursable meal. State how this process will remain corrected/implemented and who will ensure this correction continues moving forward.</p>	

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		<i>(crackers or croutons are not sufficient amounts).</i>	<i>COS (Corrected on Site) the following day prior to meal service, FSD, changed the direction of to entering salad bar and students proceed to POS, resulting in reliable monitoring of salad bar and reimbursable meals.</i>	
400 - Meal Components and Quantities - Lunch	V-0400	All meals observed on the day of review counted for reimbursement did not contain all of the required meal components. Four students chose not to take a reimbursable meal after asking them to get another component. <i>Two students walked away from the vegetable/fruit bar without full vegetable or fruit components. Two students walked away from main entrée line choosing not to take a fruit or vegetable (a la carte was charged to students).</i>	Total of 4 meals may not be claimed for reimbursement. Describe how SFA will inform students/families what consists of a reimbursable meal and if by choice will be charged a la carte if necessary.	
400 - Meal Components and Quantities - Lunch	V-0400	FSD did not provide SA with certification worksheets for 1 week of September menu for AR. SA started and walked through the worksheets with FSD during visit.	Complete both breakfast and lunch certification worksheets and attach for documentation and review by due date.	
1400 - Food Safety	V-1400	SFA did not have 2 food safety inspections in 2018 school year and did not have documentation to show that they requested a 2nd (or first for current school year)	For the CA response, contact your Health Inspector and request an inspection. Submit documentation of the request.	

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		<p>inspection. SFA's last health inspection were on 4/24/18 and 3/21/17.</p> <p>USDA requires CN (Child Nutrition) programs to receive 2 health inspections per school year. If only one is conducted, SFA is responsible for requesting a 2nd one and document date, time, person contacted at health department.</p>		
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	104 If the SFA has an electronic application approval system, answer the below questions.	SA discussed methods used for backup when JMC is not operating during meal service. SFA stated they use sign in sheets and enter data into system when functioning again.
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	SA showed Determining Official how to use the correct conversion factors on ICAVES excel worksheet and web based tool. The "annual" tab was used for all income frequencies.
100 - Certification and Benefit Issuance	138 Did the SFA update the benefit issuance document(s) accurately and in a timely manner, including those students that are new, transferred, or withdrawn?	FSD was unaware of some students not being removed or deactivated in JMC so they wouldn't appear on the benefit issuance list. Discussed training for staff and secretaries involved in the process.
200 - Verification	203 Describe the SFA's verification process (including SFA's verification for cause process, deadlines, due dates, selection procedures, etc.).	Discussed with SFA the timeline of starting the verification process and due date is approaching. Shared with SFA the Calendar-LEA located in IowaCNP that provides all due dates for the school year. SFA stated they will begin the verification process on 10/26/18.

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300 - Meal Counting and Claiming	315 Does the SFA consolidate the Claim for Reimbursement?	JMC meal counts are separated into 2 groups: K-6th and 7th-12th. Unsure if FSD is pulling one report for both groups but meal counts are not accurate based on "edit check" reports printed for September claim.
300 - Meal Counting and Claiming	316 All Schools for the Review Period	Discussed with Bus. Mgr. that the meal counts used for filed claims may be coming from the "transaction summary" report and should be the "edit check" reports that have accurate meal counts for all eligibilities.
700 - Resource Management		<p>Procurement Review: SA provided TA on rebates and credits. SFA has not received any rebates/credits based on contracts. Business Manager will follow-up on whether any have been received and to ensure funds are accurately coded and rebate or credits are not identified correctly.</p> <p>SFA was not aware when procuring the "Debarment Disclaimer" must be included with solicitation to ensure they're working with approved vendors not debarred from working with CN program federal dollars.</p> <p>Discussion included the importance of SFA's responsibility to ensure AEA, who is procuring on their behalf, is following all federal regulations and proper procurement methods.</p> <p>SFA will need to properly solicit using the <i>small or formal purchase method</i> for a la carte food and beverages moving forward. SFA has purchased solely from Coca-Cola Atlantic Distribution company.</p> <p>Rapids Wholesale is part of the AEA contract for small-wares. SFA has been purchasing from Martin Brothers and Pioneer Products for general and small-</p>

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		wares and should be purchasing through Rapids Wholesale unless SFA is able to justify lower prices than Rapids Wholesales.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	Shared with FSD the "Self-Monitoring" forms to complete for both kitchens is located in "Download Forms", form #NSLP260. This form must be completed by Feb. 1st annually.
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	Discussed with SFA to include a list of stakeholders/committee members name and title for public awareness and involvement of policy.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	FSD was unable to provide documentation of staff training hours to SA. SA shared the Iowa Tracking excel worksheet with FSD for future use of tracking training hours. SFA must have a system to track training of staff. Training logs should include: employee's name, position, title of training, KEY Area (refer to learning objectives) training topics in Professional Standards Guide, date training is completed, and creditable training hours.

Site - Level Technical Assistance Rockford Middle-Senior High School (0109)

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	325 a. For the review period, complete S-1, 17.	SA worked with FSD to find correct reports, "Edit Check Report" to use for meal counts.
400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	Many students had to be stopped at POS and return to the line to get a fruit or additional item to have a reimbursable meal. <i>It is very chaotic during breakfast where FSD at POS</i>

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		<i>had to send students back while only 2 staff are serving meals. SA recommends having another staff member to serve meals. This would help ensure staff can monitor students' trays before POS.</i>
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?	FSD credited baked potato chips towards grain component. This food item is an extra and while included in the meal another grain, sub bun, met the grain requirement.
400 - Meal Components and Quantities - Lunch	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	Fruit juice (1 cup) is served and counted toward the fruit component. Discussed with SFA that fruit can only be served in juice form 50% of the average total fruit offered a week. Juice is also offered during breakfast resulting in 100% juice over the course of a week.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Some students were told to go back and get milk or another food item for breakfast. SA reminded staff milk may be declined but FSD said some students tend to forget and come back asking for milk.
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 recommends additional signage to indicate the various food items offered for breakfast and lunch. During breakfast there are a variety of food item combinations where signs would help students identify what is allowable for a reimbursable meal. SA shared with FSD signs available on the Dept. of Educ. website for use in both breakfast and lunch meal service.
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?	Certification worksheets were not completed and provided to SA prior to onsite visit. SA provided showed FSD how to complete worksheets for submission to SA.

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		SA provided menu planning worksheets and resources during visit.
1400 - Food Safety	1404 Is a copy of the written food safety plan site specific and available at each school?	SOP's (Standard Operating Procedures) need to reflect actual procedures and processes on operations of the facility and equipment. Recommend implementing a written policy for community/student organizations usage of facility to ensure the integrity of federal dollars, equipment, and food safety.
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	SA observed a few boxes on the freezer floor.

Org - Level Commendations

Description
• 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.
• 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.
• 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. • 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 district has a current wellness policy on file. • The SFA’s wellness policy was reviewed and revised on March 17, 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 available to the public via district website.
• 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. • 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 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 as required. • When using the micro purchase method, each transaction with the vendor was below the local micro-purchase threshold of \$3,500. The purchase prices were reasonable. • The invoices from vendors were well-organized. The invoices had a date, vendor name and address, items purchased were clearly identifiable. • The district used the small purchase method and obtained price quotations for milk and bread. Three vendors were contacted for milk price quotations. The milk price quotation included specifications for milk items, annual estimation of each type of milk to be purchased, the request for two deliveries (day to be mutually agreed upon between school and awarded contractor). • Bread product price quotations was solicited from two vendors. Each procurement was in compliance with the requirements for the local small purchase threshold of less than \$150,000. • The district has a signed agreement with a Group Purchasing Organization for prime vendor to supply food and non-food supplies. • The school utilized 100 percent of their Planned Assistance Level (PAL) – USDA Foods for previous school year 2018.

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Site - Level Commendations Rockford Middle-Senior High School (0109)

Description
<ul style="list-style-type: none"> • 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. • 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 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. • Teachers and parents volunteer daily to monitor and assist younger students with meal service and condiments.
<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> • The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that Rudd-Rockford Marble Rock 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.
<ul style="list-style-type: none"> • 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.