

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
SOUTH WINNESHIEK SCHOOLS (61000000)
Date of Review: March 5th – 8th, 2019

Program Year: 2019
Month of Review: December
Lead Reviewer: Donna Matlock
Org Representative(s): Kristine Kulish

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Q 126 f: Three (3) household applications were not correctly approved: all three applications were determined missing additional income - 2 applications remain reduced; 1 application resulted in decrease of benefits from reduced to pay.	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.	
700 - Resource Management	V-0700	<p>SFA is not fully utilizing allocated funds supported by USDA Foods. SFA has only allocated 79.76% of funds towards foods for meals with \$4,771.00 remaining for usage. Last school year 2017-2018, SFA utilized 71.53% of PAL funds.</p> <p>To support school nutrition programs the State requires SFA's to utilize USDA funds to its fullest capacity up to 100% usage.</p>	<p>Please contact Sarah White, USDA Foods Consultant at 515-281-4032 or sarah.white@iowa.gov.</p> <p>Describe in a plan how SFA will incorporate ways to utilize USDA dollars moving forward.</p>	

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700 - Resource Management	V-0700	SFA exceeds the three (3) month operating balance with a net cash balance of \$35,678.68.	Describe in a plan how SFA will spend-down funds so as not to appear 'for profit'. <i>Options to spend-down funds may be salary increases; hire of additional staff, equipment purchases, improve food quality (fresh fruits/vegetables), promotional posters, etc.</i>	
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Site - Level Findings: South Winneshiek High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	110 Does the SFA use the direct certification notification letter provided by the State agency?	Letters that are not the State Agency prototype letter must be approved by the State Agency on a yearly basis. An Approval Request Form for notification letters should be sent along with the letters for approval to Deb Linderblood at deb.linderblood@iowa.gov . <i>Approval Request Forms are located in 'Download Forms' of IowaCNP - #ELIG010.</i>
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	Q 128 ta: Income is only converted to annual income when income is reported on the application in more than one frequency. <i>Determining Official used annual tab for single income frequencies which may result in not capturing 'error prone' applications.</i>
700 - Resource Management		Recommend SFA include "Buy American & Debarment Certificate" with solicitations.

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		SA recommends <i>monitoring</i> awarded bid contracts. SFA has over charged for half pint orange juice which bid price was .3600 - March invoices show prices higher than amount contracted at .3847/half pint. Additionally, cauliflower bid price was \$23.20, SFA was charged \$26.20.
700 - Resource Management	712 Were indirect costs* charged to the SFA's nonprofit school food service account?	Discussed indirect costs charged to nutrition fund. Revtrak - online account software fees is a direct cost as this software is specifically used for the lunch program and no other program. Equipment repairs will now be allocated from the general fund moving forward.
800 - Civil Rights	810 Review program materials.	USDA non-discrimination statement on 'menus' needs to be updated to current version "This institution is an equal opportunity provider." Font must be size 10 or larger or same font as content on menu.
1000 - Local School Wellness Policy	1002 When and how does the review and update of the Local School Wellness Policy occur?	Discussed updating LWP (Local Wellness Policy) under section 'Policy Review' that "Assessments will be repeated every 5 years (s/b 3 years)..." USDA requires the policy and baseline assessment be conducted triennially (3 years) to support current goals.
1500 - Reporting and Recordkeeping	1500 Are reports submitted to the State Agency as required?	SA observed SFA begin breakfast service at 7:30 am. Organization application states breakfast start time at 7:45. SFA needs to update meal service times to reflect actual meal service time frame. <i>USDA regulations require meals be served no sooner than start time or after end time.</i>

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Site - Level Technical Assistance South Winneshiek High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	<p>SA reviewed recipes for review period. Some recipes do not provide the component contribution to help FSD determine if meal pattern is being met or whether she needs to supplement food components to meet meal pattern and portion amounts.</p> <p>SA shared USDA recipes and resource links to assist in standardizing recipes moving forward. Recommend FSD include additional foods offered daily on the menu to indicate the variety of foods provided and accurately reflect FPR's (food production records).</p>
1400 - Food Safety		<p>During onsite visit SA observed the store room does not have controlled temperatures during winter and summer months; where canned and soft packaged foods are kept. The area was very cold and difficult to work in as there is no heat or cooling system in place.</p> <p>It is important to ensure foods used in the SBP/NSLP are safe while the integrity of the CNP (Child Nutrition Program) is maintained to protect federal dollars.</p> <p><i>Store room temperatures should be recorded in conjunction with refrigeration temperatures and have a thermometer placed in store room for monitoring.</i></p>

Org - Level Commendations

Description
<p>• 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</p>

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determined. • The correct and current benefit issuance list was available. • All applications were 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. • 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.

• Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of [month] 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 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 2/10/2016. • 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 and the most recent assessment of the policy are available to the public via district website. • The SFA completed an assessment of their wellness policy on November 30, 2018 for both sites. • The following individuals' FSD, Superintendent, Physical Education teacher, school nurse, students, and staff are involved in reviewing and updating the LWP. • Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.

• The Food Service Director and Food Service Coordinator attended the Regional Procurement Training. • There is a written procurement plan and code of conduct. • 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. 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 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 and prices were increased as required. • The Non-Program Revenue (NPR) tool was completed, and no increase in prices were required. • 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

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Site - Level Commendations South Winneshiek High School (0109)

Description
<ul style="list-style-type: none"> • 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.
<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, 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.
<ul style="list-style-type: none"> • 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 state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school’s website.
<ul style="list-style-type: none"> • 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, 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. • 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.
<ul style="list-style-type: none"> • The Food Service Director completed the USDA menu worksheets for the week of December 3rd - 7th, 2018 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

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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. • 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. • FSD is very organized and training is done annually on SOP's.

• The staff training agenda covered many important topics and shows a commitment to ensure food program compliance. • All nutrition staff have obtained the required training for SY 2018 & 2019.