

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Tripoli Comm School District (64710000)
Date of Review: January 15th – 18th, 2019

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Three household applications were not correctly approved: SFA decreased benefits from free to reduced as family appeared on DC (direct certification) list. Application supersedes with higher benefits. Two applications were missing the 4 digit social security number.	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.	
200 - Verification	V-0200	Q200bF: The SFA did not verify the correct number of applications based on their verification sample size. SFA verified 2 too many, should have verified one application.	Q200bC: Describe your plan to verify the correct number of applications based on your verification sample size.	
200 - Verification	V-0200	Q208aF: The SFA did not provide documentation demonstrating that a confirmation review had occurred.	Q208aC: State your intentions to provide documentation demonstrating that a confirmation review occurred.	
1200 - Professional Standards	V-1200	All employees working in any aspect of school nutrition need to be provided training to do their job,	Submit a written plan to assure all positions who provide school nutrition functions will receive training. Attach a	

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		including civil rights. Documentation of training is to be recorded even if a specific number of hours is not required. <i>Both business manager and secretary did not receive civil rights training.</i>	copy of training documentation completed for current school year.	
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Site - Level Findings: Tripoli Middle/Sr High School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Tripoli Elementary School (0418)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	129 Is household notification of eligibility consistent with the responses provided on the Off-Site Assessment Tool?	Q 129 ta: Technical assistance was offered on notification of eligibility. Notification of eligibility must be provided to households either verbally or written. When provided in writing, the federal and state non-discrimination statements must be included. SFA needed to add one sentence to the non-discrimination statement.
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	SFA verified 2 too many applications. Based on data, SFA should have only verified 1 application.
700 - Resource Management		Discussed with FSD regarding USDA foods which had two areas Yangs 5th Taste (100%) & JTM (57%) with remaining funds that need to be spent down. SA recommended FSD contact Sarah White to set up a plan to use up PAL funds.

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700 - Resource Management		When procuring services (small & formal methods) SA recommends including Buy American & Debarment Certificate with all solicitations to be compliant with USDA procurement regulations.
700 - Resource Management	701 At the end of the SFA's RM review period, did the food service have net cash resources that exceeded three months' average expenditures?	At the time of completing offsite questions, SFA was exceeding the 3 month operating balance. Based on 2017-2018 financial report, SFA was not exceeding 3 month operating balance.
700 - Resource Management	703 Excluding the purchase of equipment using equipment grant funds, if the SFA used food service funds to buy equipment* during the school year under review, did it receive prior approval from the State agency either directly or via the State's pre-approved equipment list?	Equipment purchases exceeding \$5,000 require SA (State Agency) approval prior to purchase. Moving forward, SFA needs to seek SA approval prior to large equipment purchases exceeding \$5,000 threshold.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	Non-discrimination statement is outdated. SA provided updated version to SFA which will need to update all program materials and district website.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	SFA was not collecting racial/ethnicity data from household applications as required by USDA regulations. SA provided the report to SFA and shared where template can be found. SFA completed form during onsite visit.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	SA (State Agency) shared with SFA the newest version of the On-site Monitoring forms to use moving forward.
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 has not provided SA with a copy of the most recent baseline assessment of Local Wellness Policy (LWP). Last revised date of LWP is 10/17/2016, this school year the LWP will need to be reviewed, assessed, and revised if necessary. Also discussed with SFA to post a list of committee members - name and titles for public awareness.

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Site - Level Technical Assistance Tripoli Middle/Sr High School (0172)

Area	Question	Comments
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?	SA shared with FSD the new version for Onsite Monitoring located in "Download Forms" of IowaCNP.
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 cherry tomatoes, a product of Mexico, from their prime vendor. Discussed with FSD to check with prime vendor and GPO for documentation.
Dietary Specifications Assessment Tool - Lunch	5 Are non-creditable cheese products offered as part of a reimbursable meal? (Non-creditable cheese includes: cheese sauce without a CN label or product formulation statement, cheese product, imitation cheese and powdered cheese).	SA observed cans of non-creditable cheese sauce in store room. Discussed with FSD, cheese is used as an extra item and nutrient information is included with a reimbursable meal.

Site - Level Technical Assistance Tripoli Elementary School (0418)

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Discussed with food service staff that all three components for breakfast must be offered to students but with OVS students need to have 3 items for a reimbursable meal, not required to have all 3 components.

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, were complete with 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

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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 December 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.

• 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. • 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 district has a current wellness policy on file. • The SFA’s wellness policy was reviewed and revised on October 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 Food Service Director attended the Regional Procurement Training. • There is a written code of conduct. • The local policy for disciplinary actions for violations of the code has been identified on the written 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. Two 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 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. • 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 75 percent of their Planned Assistance Level (PAL) – USDA Foods.

• 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. • 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

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and approved a meal charge policy. The policy was mailed (emailed) to all households and staff were informed of the policy. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.

Site - Level Commendations Tripoli Middle/Sr High School (0172)

Description

- 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.
- The Food Service Director (FSD) does a good 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.
- The Food Service Director completed the USDA menu worksheets for the week of December 10th-14th for breakfast and lunch at the Tripoli Elem./MS/HS. 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 the 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. Inspection report had no findings and positive remarks from health inspector. • 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

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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.

Site - Level Commendations Tripoli Elementary School (0418)

Description

• Grab and Go breakfast is provided 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. • Students have a variety of meal components to select at breakfast. Students have a daily choice of a hot or cold breakfast.