

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Turkey Valley Comm School District (65090000)
Date of Review: January 8th – 10th, 2019

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	1 application is missing the 4 digit social security number.	Obtain 4 digit social security number from household and provide date to SA (State Agency) by due date.	
200 - Verification	V-0200	Q200bF: The SFA did not verify the correct number of applications based on their verification sample size.	Q200bC: Describe your plan to verify the correct number of applications based on your verification sample size.	
1100 - Smart Snacks	V-1100	<p>Repeat Finding: SA observed the vending machine operating during school hours (defined as the period from the midnight before, to 30 minutes after the end of the official school day). Many beverages did not meet the Smart Snacks Standards for all grades.</p> <p>SA shared link and worked with the Principal walking through the website, "Alliance for a Healthier Generation"</p>	<p>Please describe in a plan how you will ensure all beverages/food items sold via vending machines, sold during school hours, will meet Smart Snacks standards.</p> <p>All items need to be checked using the "Product Calculator" at the website "Alliance for a Healthier Generation" website: https://www.healthiergeneration.org/resources/smart-snacks.</p>	

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		product calculator and list of compliant products if food and beverages are to be sold during school hours.		
1600 - School Breakfast and SFSP Outreach	V-1600	Q1601F: The SFA did not inform eligible families about the availability and location of free meals for students via the Summer Food Service Program.	Q1602C: Provide a description of how you will demonstrate compliance with the FNS requirements for Summer Food Service Program Outreach (SFSP). Guidance and resources on how to promote are available at the SFSP website: https://www.educateiowa.gov/pk-12/nutrition-programs-0	

Site - Level Findings: Turkey Valley K-12 (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	SFA verified one too many applications. Discussed with FS Sec. about calculating the total number required based on total applications.
300 - Meal Counting and Claiming	315 Does the SFA consolidate the Claim for Reimbursement?	JMC software is set up as 3 sites based on grades K-5, 6th-8th, and 9th-12th for other state education reporting. The FS Sec. has been manually adding all 3 grade level meals to calculate the final number of meals served for free, reduced, and paid. Meal counts were verified and accurate for claim.
700 - Resource Management		SA discussed with SFA; moving forward, if using small purchase method to include the "Buy American

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		& Debarment Certification" for all bids and solicitations.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials?	SFA is using the old version of USDA's non-discrimination disclaimer. Discussed with SFA in updating and provided correct version of disclaimer to update all food service materials, including the district webpage.
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	SA discussed with SFA that USDA requires a list of committee members be posted with the Local Wellness Policy (LWP) on the district website; as well as the latest baseline assessment for public view.
RMCR - Revenue From Non-program Foods	10 If the SFA found that its revenue ratio was less than its food cost ratio, did the SFA take additional steps to sufficiently increase its non-program food prices, add sufficient funds to its nonprofit food service account, and/or take other actions to adequately resolve the problem?	At the end of each year, the SFA must determine whether the percentage of revenue from non-program food sold is equal to or greater than the percentage of money spent on non-program food. Discussed with SFA; the financial report shows non-program food cost at 25%, and non-program revenue at 21% which is not contributing adequately towards food costs.
RMCR - Indirect Costs	3 Did the SFA apply the correct indirect cost rate for the appropriate year?	SA discussed with SFA a list of expenditures that require payment out of the general fund and not the nutrition fund, moving forward. SA recommends SFA to determine if half of garbage/sanitation actually reflects half of disposal from food service. SFA is currently charging nutrition fund 50% of expense, and 50% charged to general fund.

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800 - Civil Rights	811 Is the USDA “And Justice for All” poster displayed in a prominent location and visible to recipients of benefits?	Preschool has access to lunch and eats in classrooms. SA provided SFA with additional "And Justice for All" posters to hang in public locations of classrooms.

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 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 [month] were accurate and complete. • Point of Service (POS) counts and filed claims appear accurate. • There was a POS for all students, and the POS was organized and orderly. • 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.
<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.
<ul style="list-style-type: none"> • The district has a current wellness policy on file. • The SFA’s wellness policy was reviewed and revised on 4/9/2018. • 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 website. • The SFA completed an assessment of their wellness policy on 9/26/2018. • The SFA's assessment/action plan of wellness goals are thorough and well established. • The following individuals’ PE teacher, Principal, school nurse, students, and school board 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.

Iowa Department of Education
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State Review Summary Report
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• The Food Service Director attended the Regional Procurement Training. • 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 three 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 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 SFA effectively utilizes its USDA entitlement for commodities exceeding 100% for past and current school year. • Reports are filed on time, and all records are maintained for at least three years plus the current year. • The SFA developed and approved a meal charge policy. The policy was mailed (emailed) to all households and staff were informed of the policy.

Site - Level Commendations Turkey Valley K-12 (0172)

Description
• 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.
• Students may purchase a second entrée and/or a second milk at lunch. Second entrees are correctly documented on production records. • Beverages sold during meal services 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.
• The Food Service Director (FSD) does a superior 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 variety of fruits and vegetables 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 and for breakfast in the cafeteria. • Offer vs. Serve (OVS)

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Turkey Valley Comm School District (65090000)
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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 17th-21st for breakfast and lunch at the Turkey Valley CSD. 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 Turkey Valley CSD 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.