

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Waterloo Comm School District (67950000)
Date of Review: November 13th – 16th, 2018

Program Year: 2019
Month of Review: October
Lead Reviewer: Donna Matlock
Org Representative(s): Heather Bathen

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	The SFA last reviewed the Local Wellness Policy on October 1, 2015. This is the version currently posted on the district's web site. The Wellness Policy and a baseline assessment of wellness goals must be reviewed and/or updated once every 3 years.	The SFA will provide a time line on when the Local Wellness Policy will be reviewed and presented to the School Board. SA provided SFA with an assessment template and USDA Final Rule memo during visit.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	Copying and printing expenses are charged directly to nutrition fund. These expenses are to be charged to the nutrition fund using the "Indirect Cost Rate" established by the Department of Education.	Develop and attach a policy and procedures to correctly identify expenses as necessary and reasonable. If needed, develop repayment plan of the unallowable expense and attach.	

Site - Level Findings: LOWELL ELEMENTARY (0553)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1400 - Food Safety	V-1400	There are items that do not meet the Buy American provision and no approved exceptions log with reasonable information: frozen broccoli in freezer is a product of Mexico.	Describe the policy/procedure that will be put into place to ensure foods received will be domestic. The procedures could include monitoring food deliveries for compliance with the delivery for the domestic food item	

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			ordered and prior to accepting non-domestic foods, ensuring that an alternative domestic food component has been delivered.	
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Site - Level Findings: CENTRAL MIDDLE SCHOOL (0213)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: HOOVER MIDDLE SCHOOL (0215)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	212 Did the SFA meet the follow-up requirements if the household failed to respond to the request for verification?	Technical Assistance was given to SFA to shorten the amount of time that households have to return applications and documentation for verification. Two to three weeks is adequate time for households to return the information.
700 - Resource Management		<p>PROCUREMENT</p> <p>1) The Food Service Director (FSD) and Asst. Food Service Director have not attended regional procurement training or procurement training at the summer school program short courses. Encouraged to attend a training in summer/fall 2019.</p> <p>2) The federal micro- and small-purchase thresholds were not updated in the SFA written procurement plan. Effective July 1, 2018, the federal micro-purchase threshold was increased to \$10,000 and the small purchase threshold to \$250,000. The school district purchasing policy 703.4 states, the district's small purchase threshold is \$100,000 or the current statutory</p>

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		<p>limit. The change was made to the SFA written procurement plan to reflect this change.</p> <p>3) The written procurement plan was missing the Code of Conduct policy. SFA adapted the DE written code of conduct policy. Additional district policies to add to the Code of Conduct policy are: district gift, conflict of interest, and disciplinary policies in the written code of conduct - 402.8 Gifts to Employees, 415.0 Employee Suspension, and 415.2 Classified Employee Dismissal.</p> <p>4) Apples were purchased once each from two orchards using micro-purchase method. However, the purchase was not equitably distributed. A variety of apples were purchased from the orchard with the higher dollar amount. Less was purchased at the other orchard due to limited supply. As the district's Farm to School program is expanded, it is recommended that the SFA talk to farmers ahead of the purchasing time on variety and amount needed. This may enable more equitable distribution of purchases among farmers.</p> <p>5) Fruit cups were purchased monthly from a California company. These fruit cups do not meet the Buy American provision. The price of the domestic product, however, was significantly higher. TA was provided to document the price comparison and to maintain a Buy American exception log. Each school year, the SFA should research the market to seek out domestic product.</p> <p>6). When procuring milk and bread, along with specifications for all items to be procured, the estimated annual usage for each item to be procured should be provided. To ensure the SFA selects a responsive vendor with the overall lowest price, the price for each item on the price quotation request or formal bid should be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for each item. The sum of the</p>
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		<p>extended cost for all specified items is the total extended cost (bottom line). A template to calculate extended cost for milk is available on IA_CNP. A similar process should be used for bread products.</p> <p>7). It is best practice to include the school calendar with solicitation documents to ensure deliveries are not made during holidays, snow days, etc.</p> <p>8). Kitchen managers placing order and the SFA administration office should spot check invoices from vendors to ensure products delivered match the order quantity and the specification. Price on the invoice should match bid pricing. Substitution of items should follow the procedures in the solicitation document. Any items not included in the solicitation must be procured using appropriate methods.</p> <p>9) Agricultural products should meet the Buy American provision. A non-domestic agricultural product should only be accepted if the domestic product or alternative significantly higher in price or is not produced in sufficient quantity and of superior quality.</p> <p>10) For cost reimbursable contracts, such as prime vendor contract, all discounts, rebates, and applicable credits should be returned to school nutrition funds. A tracking log template is available in IA_CNP.</p> <p>11) The SFA spent a significant amount in purchasing small wares from a single company. Orders are placed monthly. Small purchase procedures documentation including all specifications, required federal and district-specific terms and conditions and solicitation from three vendors must be maintained. The small purchase (3 Bids and a Buy) template is available in download forms.</p> <p>12) The SFA purchases office supplies from the district's central supplies store. The central supply store items are procured competitively annually. A copy of</p>
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		<p>the solicitation including the specification and price list should be retained by the SFA.</p> <p>13) The SFA is using both formal methods of procurement - Request for Proposals (RFP) and Invitation for Bid (IFB) interchangeably. The solicitation for milk, bread, and fresh produce were issued as RFPs but are actually IFBs. The difference between both the formal methods was explained. More information can be found in the Methods of Procurement webinar posted on School Nutrition - Procurement webpage on IDOE website.</p> <p>14) Copying, toner, ink cartridge should be an indirect cost to the school nutrition program and not charged directly.</p>
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	SFA needs to use current/updated civil rights training materials which can be found in "Download Forms" of IowaCNP or on the DE Nutrition website.
1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements?	Wellness Policy: Provided TA that the SFA is required to review and update the Local Wellness Policy once every 3 years. This policy should be made available to the public. The assessment of the Wellness Policy should also be reviewed at a minimum of once every three years to monitor the progress and success. The assessment should also be made available to the public. SA sent FSD the final rule and a template which may be used for the assessment.
1200 - Professional Standards	1204 a. Did the School Nutrition Program Directors meet the training requirement?	The SFA's employees should continue to work towards completion of the required Professional Development hours for 2018/2019. The FSD's Food Safety certification has expired and should maintain this certification. FSD is scheduled to take the class in January 2019.

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RMCR - Revenue From Non-program Foods	9 Did the SFA correctly calculate its non-program food ratio and its food cost ratio?	Revenue is not adequately contributing to food costs. FSD and business manager will be exploring to see if all revenue is captured and coded properly. On 11/27/18 FSD completed and uploaded the USDA Non-Program Revenue Calculator tool indicating non-program revenue contributes adequately to non-program food costs.
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Site - Level Technical Assistance CENTRAL MIDDLE SCHOOL (0213)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	SFA should review the component contributions generated by Mosaic Menu Planning. Some discrepancies were found. Example: Goulash recipe notes .375c. vegetables, the recipe only has 1 #10 can of tomato sauce. The recipe makes 60 servings at a 2/3 c (#6 scoop) serving. The same recipe contributes 1 oz. eq. grain and should only be .7 oz. eq.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The most recent health inspection report was posted in the kitchen. SFA staff relocated the report to the cafeteria during the on-site review, where it is visible for customers to see.

Site - Level Technical Assistance LOWELL ELEMENTARY (0553)

Area	Question	Comments
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?	SFA should post the daily menu at the Point of Sale (on or near the two carts) at Lowell Elementary to communicate to students what is being served that day as well as inform them what they need to select to make a reimbursable meal. The "And Justice for All" poster should also be posted in these locations.
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	Grab-in-Go breakfast is offered at 2 entrances of school building. Discussed with staff an "And Justice

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		for All" poster and daily breakfast menu need to be visible to students while receiving meals.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	A health inspection was conducted in September but SFA had not received report from DIA until DIA hand delivered reports to FSD during visit on 11/16/18.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1901 Did the cost documentation provided support the school's FFVP claim for reimbursement?	Lowell Elementary's fresh fruit and vegetable invoices are combined on one invoice with another school's invoices and were divided evenly. The other school's participation is actually 60% of the total participation, so it is suggested that the costs be divided 60/40 instead.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1903 Is the FFVP available to all enrolled children at no cost?	Two classrooms were visited to observe the distribution of the fresh vegetable item. In the third grade classroom, the children were just told that if they wanted a serving, to go get it (their independent determination of whether to stop what they were doing to get it). Only about 1/3 of children actually did so. In the other classroom, a kindergarten classroom, there was a class activity of learning about the item, and positive preparation for receiving it. Each child received the item, and were encouraged to try it. The district is encouraged to provide more guidance to all teachers in providing positive encouragement for all children to participate.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1905 Is the FFVP widely publicized within the school?	Pick a Better Snack activities are regularly planned and conducted, but they do not always publicize the Fresh Fruit and Vegetable Program. The district is encouraged to plan and conduct more outreach to students, teachers and families in the buildings that participate.

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1900 - Fresh Fruit and Vegetable Program (FFVP)	1907 a. Did the school choose to offer dip with the day's offering?	Previously, a lot of children overconsumed the vegetable dip provided with the vegetable item for the day, and it was decided to discontinue providing dip. In the third grade classroom observed, the teacher noted that many more children consumed the items when there was some dip.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1910 Did the FFVP meal service follow HAACP principles and applicable sanitation and health standards, including the handling of any left overs?	Each classroom needs to be provided with the FFVP SOP, and some basic food safety guidelines.

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, were complete with SSN's and 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"> • 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"> • 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 Food Service Director completed the USDA menu worksheets for the week of October 15th-19th, 2018, for breakfast and lunch at the Central & Hoover M.S. & Lowell 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 that all three schools are at low risk for (non)compliance with Dietary Specifications regulatory requirements. • Some practices that help improve the nutrition quality of the school meals

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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 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 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.
- 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.

PROCUREMENT: The School Food Authority (SFA) is a member of a Group Purchasing Organization (GPO) - AEA Purchasing (Northeast Service Zone). A signed written agreement is on file with the GPO for SY 2018-2019. The agreement is for the purchase of food only. The SFA issued Request for Proposals (RFP) for the procurement of milk and dairy products, bread, and fresh produce for the Fresh Fruit and Vegetable Program (FFVP) for SY 2017 - 2018. A public notification for milk and dairy products, bread, and fresh produce was issued in the Waterloo Courier. SY 2018-2019 was the renewal year for milk, bread, and fresh produce contract. Except for mutually agreed upon price changes, no other changes were made to the contract. The following federal terms and conditions were included in all formal procurement documents - Buy American Provision, Suspension and Debarment Certification statement, Non-Collusion Certification statement, Byrd Anti-Lobbying Certification statement, and the Small Business Certification. The SFA participates in the Farm to School program. In SY 2017 -2018, local produce was purchased from three orchards. The SFA does an excellent job (99 percent utilization in SY 2017-2018) with using the Planned Assistance Level (PAL) for USDA Foods by participating in the Direct Distribution (Brown Box), Diverted Foods, and DoD Fresh programs.

Professional Development: The SFA has a good system in place for ensuring that all employees receive the necessary training on an annual basis. Training is conducted at the beginning of the school year by the FSD and Asst. FSD and cover important topics such as OVS, blood borne pathogens, civil rights, CEP, menu planning, reimbursement, harassment and food safety. All Subs are required to complete training prior to being allowed to work. Site managers are responsible for monitoring their staff and presenting training opportunities to them. The FSD maintains a comprehensive spread sheet with all district employees, tracing the completion of their training. Many individuals including the FSD and Asst. FSD have completed the required Professional Development hours for 2018/2019 and there is a plan in place to ensure that the others complete their hours.

VERIFICATION: The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one pay period, 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.

Wellness Policy: The SFA has a well-rounded committee to help steer them in the direction of their goal and includes partners that are well equipped to assist in achieving their goals. The SFA is working towards establishing a Blue Zone, incorporating Farm-to- School, working with Food Corps, provide health screenings, and nutrition education is imbedded in science and CTE curriculum.

Site - Level Commendations CENTRAL MIDDLE SCHOOL (0213)

Description

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Central: The Site Manager does a good job of overseeing the operation, communicating with her staff, and monitoring the daily menus. She has a great attitude and is very knowledgeable about the program requirements. The site had good signage explaining the requirements for a reimbursable meal, POS operators were well trained in spotting required components on each tray. Staff were able to serve a large number of students in a relatively short period of time. All students had a reimbursable meal. Students have several choices for lunch daily. Students had access to water and the "And justice for All" poster was displayed in a prominent location on each serving line.

Site - Level Commendations HOOVER MIDDLE SCHOOL (0215)

Description
<ul style="list-style-type: none"> • 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"> • Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of October 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.
<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 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.

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Site - Level Commendations LOWELL ELEMENTARY (0553)

Description
<p>• 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. • Recess is scheduled before lunch service. • 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.</p>
<p>• The district has increased breakfast participation by offering "Grab-n-Go" breakfast. • Grab and Go breakfast is provided which increases participation. • Breakfast in the Classroom is practiced which increases participation. • 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.</p>