

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**West Central Comm School District (69430000)**  
**Date of Review: April 2<sup>nd</sup> – 5<sup>th</sup>, 2019**

**Program Year:** 2019  
**Month of Review:** February  
**Lead Reviewer:** Donna Matlock  
**Org Representative(s):** Lois Tyler

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	1 household application was missing income in determination; benefits remain free.	Describe in a plan how SFA will ensure all income is included in calculations for determining free/reduced benefits.	
800 - Civil Rights	V-0800	Training did not occur within the most recent school year, not all applicable staff attended training, and training did not pertain to Child Nutrition Programs. Topics that must be covered include: Collection and Use of Data, Effective Public Notification Systems, Complaint Procedures, Compliance Review Techniques, Resolution of Noncompliance, Requirements for Reasonable Accommodations of Persons with Disabilities, Requirements for Language Assistance, Conflict Resolution, and Customer Service.	Submit a sign-in sheet to the SA with date, time -in, time-out, participant signatures and topics covered.	

**Site - Level Findings: West Central Charter High School (0109)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
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600 - Dietary Specifications and Nutrient Analysis	V-0600	FSD has not completed the required 'certification worksheets' for the AR (Administrative Review) prior to onsite visit. SA reviewed all FPR's, recipes, component contributions, and labels during visit. SA provided FSD the certification worksheets to complete via email on April 4th, 2019.	<p>FSD will complete both the breakfast and lunch certification worksheets from <b>February</b> (1 full week - 5 days) for grades K-12 and <i>submit</i> to SA by the CA (Correction Action) due date.</p> <p>Please include copies of FPR's, labels indicating component contributions, and standardized recipes to verify certification worksheets.</p> <ul style="list-style-type: none"> <li>~ Complete K-12 breakfast certification worksheet</li> <li>~ Complete K-8 lunch certification worksheet</li> <li>~ Complete 9-12 lunch certification worksheet</li> </ul>	
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**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		<p>SFA is not fully utilizing allocated funds supported by USDA Foods. SFA has only allocated 85.65% of funds towards foods for meals with <b>\$2,714.00</b> remaining for usage. Previous school year 87.1% of allocated funds were used leaving a balance of <b>\$1,587.00</b>. SFA may contact Sarah White, USDA Foods Consultant, at <a href="mailto:sarah.white@iowa.gov">sarah.white@iowa.gov</a> with questions or planning PAL dollars to effectively use moving forward.</p> <p>To support school nutrition programs the State requires SFA's to utilize USDA funds to its fullest capacity up to 100% usage. <i>Utilizing these funds provides SFA's</i></p>

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		<i>with additional funds to improve the quality of foods, salaries, equipment &amp; operations for an improved environment &amp; morale.</i>
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	SFA was unaware of the form to use to collect ethnic/racial data from household applications. SA showed SFA can find the form in "Download Forms" of IowaCNP. SFA corrected onsite during visit.
800 - Civil Rights	810 Review program materials.	USDA requires all child nutrition program materials to state the non-discrimination statement. It is allowable to state the one line disclaimer due to limited space. Must be same font size or no less than font 10. "This institution is an equal opportunity provider."
1000 - Local School Wellness Policy	1004 How is potential stakeholders made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy?	SFA needs to ensure that potential stakeholders/committee members and the public are made aware of the LWP. This can be done through newsletters, email, newspaper, and flyers. The committee member list and assessment must be made available to public along with the LWP (Local Wellness Policy).
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?	SA shared a folder of resources which include LWP (Local Wellness Policy) assessment template and website to access additional resources. Superintendent recently took over the district and is shared with another district. Superintendent stated it is taking time to sort through and review all the district policies and bring them up to date.  LWP was last review on Oct. 17, 2016 and is up for review and revisions if necessary. Discussed with

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		SFA that the LWP and baseline assessment are to be reviewed every three (3) years.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	USDA requires all SFA's to promote the SFSP (Summer Food Service Program) even though you are not participating in the SFSP. Promotional resources are available at this link: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs-0">https://www.educateiowa.gov/pk-12/nutrition-programs-0</a>

**Site - Level Technical Assistance West Central Charter High School (0109)**

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	411 a. Did the school comply with the planned menu for the review period?	SA shared with FSD about promoting the daily fruit/vegetable bar provided daily so families and students are aware of the variety of foods offered. Currently the FSD is offering either a vegetable bar and fruit bar separately every other day. Recommend offering both components as an approximate amount of labor is performed daily for prepping and setting up the bar.  <i>Implementing these recommendations will help increase participation in the lunch program.</i>
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 have not been submitted to SA or completed prior to onsite visit. SA provided worksheets via email to FSD to complete.
1400 - Food Safety	1404 Is a copy of the written food safety plan site specific and available at each school?	SA recommends FSD updating and include additional SOP's (Standard Operation Procedures). Shared additional templates with FSD which can be found at ISU - Extension Outreach and ICN (Institute of Child Nutrition). May also be used toward Professional Standards credits for training.
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	Boxes of applesauce cups were just delivered this morning and staff didn't have time to put on

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		shelves. No other violations noted during visit, store room and refrigeration are very clean and organized.
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 non-creditable cheese sauce on storeroom shelf. FSD didn't receive cheese sauce from USDA foods so used for lunch as an extra food and not as a component. FSD will search for a CN label if available.

**Org - Level Commendations**

Description
<ul style="list-style-type: none"> <li>• 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 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.</li> </ul>
<ul style="list-style-type: none"> <li>• The "And Justice for All" civil rights poster was posted in the cafeteria. • 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. • No discrimination was observed.</li> </ul>
<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<ul style="list-style-type: none"> <li>• 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. • 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 developed and approved a meal charge policy. The policy was</li> </ul>

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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 West Central Charter High School (0109)**

**Description**

- Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of February 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.
- 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 school store. • 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 wonderful 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. • Recess is scheduled before lunch service for elementary grades. • 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 also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that West Central 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.

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• 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.