

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Waukee Community School District
January 28, - February 1, 2019**

Program Year: 2019
Month of Review: December
Lead Reviewer: Christine Crow
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	<p>One application that had 2 students listed, was processed and determined to be reduced when the income and family size documented on the application was free eligible. Per the determining official, the SFA spoke with the parent on the phone who provided additional income details that made the students reduced price. In the point of service system, there weren't any details on the information provided by the parent other than the information provided on the application. The determining official contacted the family to verify the income while SA was onsite. The students were being claimed at the correct eligibility status. TA provided to the determining official on documenting all communication received from families that impact the eligibility status.</p> <p>There was one student who was mismatched with a student on the DC</p>	<p>The determining official sent the letter of notification of eligibility status to notify the family that their eligibility status changed from free to paid and scheduled the eligibility change in their point of service while SA was onsite. No further action required.</p>	

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		list. The student on the DC list had the same name and same State ID as the SFA's student but different birthdates. The student had been receiving free benefits when he should have been paid. TA provided to the determining official on checking birthdates to ensure they match with the student's name on the DC list.		
200 - Verification	V-0200	One of the families selected for verification provided multiple income stubs that had different gross income amounts. The gross income amounts must be averaged when determining the student's eligibility. The SFA took the highest income stub to determine that the students were paid eligible. When the income stubs were averaged, the students were reduced price. TA provided to the verifying official.	The verifying official sent a letter of notification of eligibility status to the family informing them of their eligibility status change and updated the status in the point of service system while SA was onsite. No further action required.	

Site - Level Findings: Waukee Senior High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The macaroni and cheese food production record and standardized recipe states that the serving size (2/3 cup) only provides 1.75 oz. meat/meat alternate when 2 oz. is the daily minimum for high school students. All other entree items served during the review period met the meat/meat alternate daily quantity requirements. TA provided to the school nutrition staff who had immediately modified the serving size of macaroni and	No further action required.	

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		cheese to 3/4 cup which provides 2 oz. meat/meat alternate.		
1100 - Smart Snacks in School	V-1100	The vending machine at the high school has a protein drink that isn't Smart Snack approved as it has too many calories. TA provided on Smart Snack approved beverage requirements.	Describe who will manage the products inside of the vending machine near the weight room to ensure that they meet the Smart Snack standards. Send labels of products that will be put into the vending machines that are Smart Snack approved.	

Site - Level Findings: South Middle School (0218)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The middle school and elementary school menus provide a variety of entrée options every day. Although each entrée option meets the daily grain requirements, if a student selects the entrée item with the lowest grain equivalent each day, the weekly grain requirement is not met during the review period for the elementary or middle school students. Although the weekly grain requirement was not met at the previous AR, it was for a different reason that the SFA has since been corrected. Since technical assistance was not previously provided for meeting the weekly grain requirements when serving multiple entrée options, no fiscal action will be taken. Technical assistance provided to the SFA on meeting the weekly grain requirements when serving multiple	Provide week 2 cycle menu, food production records from South Middle School and Woodland Hills Elementary to show how the weekly grain requirements will be met for elementary and middle school students throughout the district.	

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		entrée options.		
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Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		<p>PROCUREMENT: The district's purchasing policy 803.1 states that the board, upon request from the Superintendent or designee, may authorize the direct purchase of goods and services from vendors on the State Contractor/Bid List without following the procurement policy outlined in district purchasing policy. It is the bureau's understanding that the State Contractor List does not competitively procure vendors, therefore, the School Food Authority (SFA) would have to follow proper procurement procedures. It is suggested that the Food Service Director (FSD) work with the district business manager and Superintendent to revise the policy.</p> <p>The SFA's food service procurement plan should state that a public notification will be issued in a major circulating newspaper in the SFA's service area when a formal procurement method is used.</p> <p>Add policy #803.3 Purchase Order to the Procurement Plan as all procurement is initiated by issuance of an official purchase order signed by authorized staff. In the Code of Conduct section of the school food service procurement plan, the district policy number and title that pertains to disciplinary action for violation of the Code of Conduct should be identified. This would be #409.3 Dismissal of Classified Employees, #403.3 Discharge/Dismissal of Certified Personnel, and #413.5 Employee Conflict of Interest.</p>

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		<p>The SFA written procurement plan event page should be reviewed and updated each year preferably in February when food service begins the process of procuring for the following school year.</p> <p>To monitor compliance with micro-purchase vendor, two vendors were selected. While the bureau understands that it is important to appreciate employees for the work they do, any expense paid from the nutrition fund should be necessary, reasonable and allowable. Flowers at the dessert table for a staff appreciation dinner is not a necessary cost. This cost should be paid for from another funding source.</p> <p>When procuring any food or supplies using the small purchase method, use the usage report provided from the vendor to calculate extended price for each item. The sum of all items will provide the total cost for a particular vendor. To review compliance with the small purchase method, one vendor was selected. The vendor who was awarded the contract was justified even though extended cost was not calculated, as the other two vendors who responded did not have a number of products available in their inventory.</p> <p>In procuring bread products for the school meal program the SFA used a combination of small and formal purchase methods - Request for Proposal (RFP). The estimated value of the procurement was less than the small purchase threshold and the informal (3 Bids and a Buy) method could be used. This procurement was conducted in 2015, when food service staff had not comprehended procedures for each procurement method. Technical assistance was provided on how to follow all the steps outlined in the procurement plan for the procurement method selected, i.e. including an evaluation criteria in RFP and issuing a</p>
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		<p>public notification in a widely circulating newspaper etc.</p> <p>Specifications should provide clear and accurate general descriptions for products. The description for bread products should clearly state if the SFA is requesting a price quotation for a 100% whole grain or 50% whole grain-rich product.</p> <p>The Buy American statement was included in all procurement of food products. The solicitation should outline a procedure for vendors to suggest an alternate domestic product if the domestic product ordered is not available. The SFA should then make a decision to accept the domestic alternative or to purchase a non-domestic product. There are only two exceptions to Buy American. If a non-domestic food product is accepted, an exception log should be maintained. While an exception log at the SFA central office is sufficient, there should be a procedure to ensure communication between the site and the SFA central office when the Buy American requirement is not met.</p> <p>In addition to participating in the DoD Fresh program, a RFP for fresh produce was issued in SY 2016-2017. The contractor capabilities in the evaluation criteria included twenty points for USDA DoD produce availability. We understand that the DoD program has a minimum order requirement of \$150 per drop site and that combining DoD and non-DoD produce allows the SFA to meet this minimum dollar requirement. However, the points assigned to this criteria restricts other produce vendors who are not DoD program vendors from responding to the proposal. We suggest that the points assigned for this be reduced significantly to allow other produce vendors to respond and have a chance to compete.</p> <p>The SFA currently purchases beverages from Atlantic</p>
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		<p>Bottling Co for a la carte and catering meals. This is not a competitively procured contract but an agreement signed between the district administration and the company that includes the purchase of school food service beverages exclusively from the company. We suggested that school food service conduct a price comparison to select vendor.</p> <p>In SY 2017-2018 two trucks were purchased using nutrition funds. These trucks are used solely by the school food service program. Any future purchase of truck for school food service should be paid using PPEL funds. This guidance was provided by School Finance at the Iowa Department of Education. Questions should be directed to School Finance.</p> <p>Meal van tires, repairs, and gas are part of the vehicle operation and maintenance function. These should be a General Fund expense. Questions should be directed to School Finance at the Iowa Department of Education.</p>
<p>RMCR - Revenue From Nonprogram Foods</p>	<p>8 Did the SFA:</p>	<p>Although the 2017-2018 nonprogram food revenue is greater than the nonprogram food costs, the percentage of nonprogram food revenue, as a percentage of total revenue is less than the percentage of nonprogram food costs as a percent of total food costs due to a miscalculation on the Certified Annual Report. For the 2018-2019 school year, SA suggests calculating the total program food costs for all reimbursable breakfast and lunch meals served and subtracting that from total food costs to determine the nonprogram food cost. TA provided to the food service director who agrees to work with the newly hired business manager when calculating the 2018-2019 nonprogram food revenue and costs.</p>

Site - Level Technical Assistance Waukee Senior High School (0109)

Area	Question	Comments
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500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	When the whole fruit offered is fresh mandarin oranges or similar product, be sure that students take at least two mandarin oranges to equal a half cup of fruit. Several students who were counted as having a reimbursable meal, were observed taking only one which does not equal 1/2 cup fruit.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Technical assistance was provided on logging the results of thermometer calibration. The log helps ensure that the thermometers are being checked, and they serve as documentation that thermometers are accurate.

Site - Level Technical Assistance South Middle School (0218)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Currently, 100% of grains must be whole grain rich unless the district has a whole grain rich exemption. The SFA has a whole grain rich exemption for a variety of grain items served. During the review period, hamburger and hotdog buns, honey cornbread, and pita chips that were not whole grain rich were served without having a whole grain rich exemption. As of school year 2020, the regulation is changing and requires only 50% of grain items served to be whole grain rich. TA provided to school nutrition program staff.

Org - Level Commendations

Description
<p>CERTIFICATION AND BENEFIT ISSUANCE: • The SFA received SA approval for their individualized letters of notification of eligibility and for their web based application. • The letter of notification of eligibility status is sent to all Direct Certification families as well as those families who were denied, free or reduced. • Families are provided with the 30 day carryover of eligibility status if they had benefits in the previous school year. The SFA notifies families twice prior to the 30 day deadline. • Families have the ability to apply for benefits with an online application. • Applications are processed within 10 operating days. • Benefits are extended to all students within the household. • Applications are complete with adult signatures, dates, and social security numbers, family names, and income. • Applications are processed accurately and the correct eligibility status is transferred to students correctly. • DC lists are downloaded and on file twice monthly.</p>

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CIVIL RIGHTS: • The SFA makes available a diet modification form to any student with special dietary needs. The form and further instructions are available on the district's website. Special diet modification forms are signed and on file for all students with special dietary needs throughout the district. The dietitian at the central office works with the school's food service staff, school nurse, and families to ensure all students get the foods needed to meet their needs. The SFA has a cycle menu for the common special diets such as a cycle gluten and dairy free menus. • Program materials contain the correct USDA and Iowa nondiscrimination statement. • The bilingual staff translate program materials for families with Limited English Proficiency. • All staff with responsibilities within the school nutrition program received civil rights training on 8/23/18. • The "And Justice For All" poster is on display in a public location at each site reviewed. • The racial ethnic form was completed. • The public release was sent to the local media outlet.

COMPETITIVE FOODS: - All a la carte items sold to students during the meal service meet Smart Snack requirements. - Nutrition calculator print outs are available for all a la carte items and SFA managed vending machine items sold to show they meet Smart Snack requirements.

FOOD SAFETY: - The HACCP Plan is complete and individualized to meet each school's needs. There is a HACCP plan at each site. - The food safety health inspection report was publicly displayed at each reviewed site. - Temperature logs are maintained for all milk coolers, freezers and refrigerators. - Food temperatures are documented on the Food Production Record at each reviewed site. - Dishwasher temperatures are taken and documented at each reviewed site. - Good food safety procedures were observed at each site as food service workers wore proper hair restraints and practiced good gloving procedures. - The kitchen and storage areas were orderly and clean at each reviewed site. All foods are stored off of the floor and opened foods are labeled and dated. - Each site has at least 2 employees that are ServSafe certified.

MEAL COUNTING AND CLAIMING: • The point of service line at the reviewed sites was organized and orderly to allow cashiers to ensure students had a reimbursable meal. • All students observed at the reviewed sites had a reimbursable meal for breakfast and lunch. • The claim matched the edit check reports. • Offer versus serve was administered correctly and staff were familiar with what constituted a reimbursable meal. • The number of free and reduced students claimed during the review month or onsite review did not surpass the number of those enrolled. • The number of students claimed during the on-site review was reasonable when compared to the number of students claimed during the month of review.

MEAL PATTERN & NUTRITION QUALITY: • The students at each of the reviewed sites had a reimbursable breakfast and lunch during the meal observations. • The breakfast and lunch meals served during the onsite review at each reviewed site met the daily meal pattern requirements for all components. • At least 2 different types of milk were made available. • Signage was posted to inform students and staff what constituted a reimbursable meal. • Posters were on display promoting good nutrition and health. • Students have a sufficient amount of time to eat breakfast and lunch meals. • Food production records are complete with menu components, their serving sizes, planned and actual number of servings, total quantity prepared, and leftovers. • CN labels, product formulation statements, and standardized recipes are available for all menu items served during the review period and during the onsite review. • Flavor shakers are available at the high school and portions of condiments are limited at all sites. • Free, potable water is available for students as there is a water fountain in or near the cafeteria at each reviewed site. Cups are readily available for any student who wants to fill up their glass. • A variety of entrée items, fruits and vegetables are available every day for students. • The breakfast menu served at each review site met the daily and weekly meal pattern requirements for fruit, milk and grain. • The lunch menu served during the review period at the high school met the daily and weekly meal pattern requirements for milk, fruit, grains, total vegetables and all of the vegetable subgroups. • The lunch menu served during the review period at the elementary school met the daily and weekly meal pattern requirements for the milk, fruit, total vegetables and all the vegetable subgroups. • The lunch menu served during the review period at the middle school met the daily and weekly meal pattern requirements for the meat/meat alternate, milk, fruit, total vegetables and all the vegetable subgroups.

NEGATIVE BALANCE POLICY: The negative balance policy is provided to families twice a year through the school messenger newsletter. Families are also reminded that they can apply for free and reduced price benefits twice annually through the messenger. No students were identified as having a negative balance during the SA

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onsite review.

ON-SITE MONITORING: The onsite monitoring is done in January by District Office Managers by visiting each site. Site inspections are done throughout the year using the SFAs own district form.

PROCUREMENT: **PROCUREMENT:** The Food Service Director (FSD) and Procurement Coordinator attended the State Agency's Regional Procurement Training in Adel. The food service procurement procedures and the code of conduct including the procurement events for SY 2018-2019 are completed. The micro-purchase threshold and small purchase threshold was correctly identified in the food service procurement procedures. Purchases using the micro-purchase method are limited to items such as for special diets or catering. To review compliance with small purchase method, one vendor was selected. 1) Price comparison among three vendors was completed for the purchase of paper products. The vendor with the lowest price was selected. Selected vendor had signed the suspension and debarment certification statement. To review compliance with the formal procurement method, three vendors were selected: 1) The prime vendor contract for food and distribution services was reviewed. The district formed a buying group - WASS with other metro areas schools for procurement of prime vendor for food and supplies. Specifications allow pricing to be submitted for an equal product. The prime vendor contract included all required Federal terms and conditions. The Prime Vendor Request For Proposal (RFP) included the Buy American provision. The RFP had evaluation criteria with price as the primary factor. The evaluation criteria was objective and identified clearly how contracts would be evaluated. A review of three invoices showed specified products were received, substitutions were clearly identified, and prices were validated. A recent audit showing discrepancies in diverted food price was corrected. The SFA pays invoices once credits are received. Rebates are tracked. FSD maintains sufficient records for all procurement activities. The FSD and Procurement Coordinator monitor all contracts to ensure contract terms and conditions are being met and cost reimbursable contract discounts, credits and rebates are returned to nutrition fund in a timely manner. The school food service does a great job with maximizing Planned Assistance Level (PAL) for USDA Foods. In SY 2017-2018, 90.7% of PAL was used. The SFA is on track with ordering and usage of USDA Foods to maximize allotted dollars for the current school year. Indirect expenses such as equipment maintenance and repair, hood cleaning etc. are charged directly to school nutrition funds. These expenses are coded to indicate an indirect expense. At the end of the school year the nutrition fund is reimbursed fully. The FSD monitors to ensure all expenses that are coded as indirect are reimbursed.

PROFESSIONAL STANDARDS: • The SFA tracks the professional standards training provided to all food service staff. • All food service staff received civil rights training. • Documentation was on file for all training provided to food service staff. • The food service director, managers, full and part time staff that were employed at the beginning of the school year have received their required training hours. • The staff who was hired after the start of the school year have a plan on how they will receive their required number of training hours.

RESOURCE MANAGEMENT: - The correct paid student lunch price is charged based on the PLE tool requirements. - The correct adult lunch price is charged per USDA requirements. - The food service account is tracked separately from all other accounts. - Although the school nutrition account has greater than 3 months of operating costs, the SFA has a plan to purchase new equipment and small wares. - All revenue gets directly deposited into the school nutrition account from vending, catering, and cash sales. - There are many checks and balances in place to ensure that all revenue is accurate and deposited into the school nutrition account. - The SFA keeps all school nutrition documents for 3 years plus the current year.

SCHOOL BREAKFAST PROGRAM & SUMMER FOOD SERVICE PROGRAM OUTREACH: - Families were informed of the School Breakfast Program through handouts and through their website. - Families were informed of the Summer Food Service Program through the Summer Opportunities brochure which was provided to students at the end of the school year and through social media posts.

VERIFICATION: - The correct number of applications were selected for verification and applications were selected from error prone applications first. - The verification process and report were completed on time. - If families selected for verification don't respond to the initial letter of notification of verification selection, a 2nd notice such as an email or phone call were made. - Applications selected for verification were confirmed. - Letters of notification of verification selection and results were

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sent to the families selected for verification.

WELLNESS POLICY: The wellness policy and wellness assessments are available to the public as they are on the SFA's website. - The SFA has an active wellness committee that meets monthly during the school year. Stakeholders can find out information about upcoming or past meetings as all upcoming dates and past meeting minutes are located on the website. - The wellness policy contains the required elements and has been updated within the past 3 years. - The wellness committee conducts an assessment of the wellness policy goals annually and makes it available to the public.

Site - Level Commendations Waukee Senior High School (0109)

Description

Waukee High School's food service staff are courteous and well-trained; everyone knew what their duties were and carried them out efficiently. Cashiers spoke to each student who went through the line, and they correctly implemented Offer vs Serve. There was excellent signage at both breakfast and lunch. Students are offered multiple options at both meals. The site's food safety plan, HACCP, was thorough, recently updated, and well-organized.

Site - Level Commendations South Middle School (0218)

Description

South Middle School staff were very familiar with a reimbursable meal and offer versus serve. Staff did an excellent job of asking students to get additional items if needed to make a reimbursable meal and were friendly with all students. The point of service was organized and orderly. No discrimination was observed. Food service staff made sure students with special diets got the appropriate foods to meet their needs. Food was stored properly as food was at least 6" off the floor, open packages were labeled properly and refrigerators and freezers were kept at appropriate temperatures. Temperature logs were up to date for all cooling equipment. Signage was clearly posted to inform students and staff how to make a reimbursable meal.

Site - Level Commendations Woodland Hills Elementary School (0442)

Description

Woodland Elementary staff properly implemented offer versus serve and made sure all staff had a reimbursable meal with at least 1/2 cup fruit/vegetable. Staff was very knowledgeable about what constitutes a reimbursable meal. The point of service was organized and orderly and students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Food temperatures are documented on the food production record. Dishwasher temperatures are taken and documented. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. All foods are stored off of the floor and opened foods are labeled and dated. Food service workers wore proper hair restraints and practiced good gloving procedures. The cafeteria tables are sanitized after each group of students have finished eating and 3 staff are ServSafe certified.