

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Boone Comm School District (07290000)**  
**Dates of Review: February 21-24, 2017**

**Program Year:** 2017  
**Month of Review:** January  
**Lead Reviewer:** Deb Linderblood  
**Org Representative(s):** Bradley Manard

**Site - Level Findings: Boone Middle School (0209)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA does not currently have signage which tells the students and cashiers how many items each food provides.	Develop and attach one week's worth of breakfast signage.	
500 - Offer versus Serve	V-0500	Two secretaries that operate the POS system have not had offer vs. serve training in school year 2015-2016.	Provide training on offer vs. serve to these two individuals. Attach a sign-in sheet which states the title of the training, the date and time and have them sign to indicate that they have been trained.	
1400 - Food Safety	V-1400	The SFA is taking daily temperatures on their walk-in refrigerator, the walk-in freezer and this past week they started to take daily temperatures on the milk coolers. Temperatures are not being taken on their smaller upright refrigeration units.	Begin to take temperatures on the two upright coolers. Attach documentation showing the temperatures were taken for two weeks.	

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	The Food Service Director has started a Procurement Plan for school year 2016-2017. TA provided on revisions that need to be made to the plan and the handout which describes how to complete a procurement plan was provided.	Make the agreed upon revisions to the Procurement plan. Attach the revised version.	
800 - Civil Rights	V-0800	Two individuals who run the POS at an elementary school and a newly hired substitute have not had civil rights training for school year 2016-2017.	Have these three individuals complete civil rights training. Attach a sign-in sheet which provides the title of the class, date and time of the class and their signatures indicating that they received the training.	
1000 - Local School Wellness Policy	V-1000	The SFA does not have any representation of Food Service, Teacher of Physical Education or the school nurse involved in the Wellness Committee. The policy needs to be expanded to include goals that are not already being met. Also, an assessment of the Wellness policy has not been completed.	State your plans and provide a timelines for: 1.) Adding the Food Service Director, nurse and a teacher of physical education to the wellness committee 2.) Revising of the Wellness Policy to contain goals that are not already being met 3.) How you plan to make the policy available to the public 4.) When reviews and/or revisions will be made to the policy 5.) When each school in the district will be assessed on the	

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			implementation of the Local School Wellness Policy 6.) How the district will make the assessment on the implementation of the Local School Wellness Policy available to the public.	
Resource Mgt Comprehensive Review	V-RMCRF	The SFA did not complete the USDA nonprogram revenue tool and on the Financial Report their nonprogram food cost is the same number as their nonprogram revenue, so was not calculated correctly.	Attach documentation showing how you determined the average cost of a meal. Complete and attach the USDA nonprogram revenue tool. If the tool states that you need to bring in additional revenue, state how you plan to do this.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	111 What is the SFA's procedure for extending free school meal eligibility to all children who are members of a household in which one person in that household is receiving SNAP, TANF, or FDPIR benefits?	TA provided that when a household submits an application with a case number written on it, the SFA should try to find these students on ELookup. If found, these students would then be directly certified.
100 - Certification and Benefit Issuance	124 a. Certification and Benefit Issuance Review Method:	TA provided that the Determining Official should participate in the yearly State Agency webinar on Application Approval and Direct Certification so that she has a refresher before beginning the process of determining student's eligibility and learns about any changes that have occurred since the last training.
100 - Certification and Benefit Issuance	127 Is household notification of eligibility consistent with the responses provided on the Off-Site Assessment Tool? If NO, explain.	TA provided that when a household's benefit status is reduced, the SFA must notify the household and give them 10 calendar days to appeal. They then have 10 operating days after the end of the appeal period to change the benefit level in their POS system.
100 - Certification and Benefit Issuance	130 Does the direct certification list utilized by the SFA:	TA provided that the SFA needs to be sure when downloading the direct certification lists that the columns indicating if a student is on FA, FIP or FC are printed as well so that the SFA has accurate numbers for their verification report.
100 - Certification and Benefit Issuance	131 Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified? If NO, explain. Record errors on the Certification and Benefit Issuance Error Worksheet, SFA-1.	TA provided that SFA needs to have a letter from their homeless liaison before they put a student on free meals. Also explained that if one sibling is identified on the direct certification list as a foster child their free meal benefits does not extend to other siblings in the household.
1000 - Local School Wellness Policy	1000 Provide a copy or appropriate web address of the current Local School Wellness Policy.	TA provided that the goals in the Wellness Policy need to be areas that the Committee wants to see progress. Suggested they focus on setting goals that mean something to the Committee.
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	TA provided that someone from Food Service should serve on the Wellness Committee. Food Service Director plans to ask to participate.
1000 - Local School Wellness Policy	1006 How does the public know about the results of the most recent assessment on the implementation of the Local School Wellness Policy? Provide documentation to support the response (or appropriate web address(es)).	TA provided that the assessment of the Wellness Policy needs to be made available to the public.
1600 - School Breakfast and SFSP Outreach	1600 How did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	TA provided on where to find breakfast promotional materials on the DE web site.

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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?	TA provided that even if the SFA does not have a Summer Food Service Program they still need to inform eligible families about the availability and location of the program.
200 - Verification	206 When a confirmation review was conducted,	TA provided that the Food Service Director, as the Confirming Official, needed to confirm that each application selected for verification is approved correctly and then sign on the application where applicable.
700 - Resource Management		TA provided on how the SFA should go about procuring the coffee for the coffee shop and a new POS system. The SFA should look at their initial solicitation document to see if there is any language about adding another feature such as POS at a later date. Whether the SFA uses a formal method such as RFP will depend on the local purchase threshold. In the case of Infinite Campus POS system, where the SFA wants to make sure that the POS software purchased interfaces seamlessly with Infinite Campus, it might be in their best interest to issue a RFP for the POS system. A RFP must always include an evaluation criteria with score assigned to each. Price should be part of the evaluation criteria and be assigned the highest score (hope this makes sense).
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging discrimination within FNS School Meal Programs? If procedures are written, provide a copy.	TA provided on where to find a complaint procedure for receiving and processing complaints alleging discrimination. Informed the Food Service Director that this procedure should be kept as a reference to use if there was a complaint.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	TA provided that the SFA needs to complete the racial/ethnic form each school year. The Food Service Director had the form but was unsure how to complete. Provided guidance on how to complete the form. The Food Service Director and Secretary completed the form while the SA was on-site.
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	TA provided that since the SFA has a food service web page, there should be a link to the USDA and Iowa nondiscrimination statements.
Resource Mgt Comprehensive Review	3 Did all revenue from nonprogram foods accrue to the SFA's nonprofit school food service account?	The Food Service Director currently does not have a way to monitor if nonprogram costs are being allocated correctly or if all nonprogram revenue is being posted to the nutrition account. TA provided that the Food Service Director should each month be provided with a detailed financial report showing the revenue posted to the nutrition account and the expenses that were paid out of the nutrition account, including program and nonprogram costs.
Resource Mgt Comprehensive Review	7 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	TA provided on how to complete the USDA nonprogram revenue tool. Discussed calculating the average cost of a meal to use in determining program food cost for SY15-16.

**Site - Level Technical Assistance Boone Middle School (0209)**

Area	Question	Comments
1400 - Food Safety	1402 Is a copy of the written food safety plan site specific and available at each school?	TA provided that a copy of the SFA's food safety plan needs to be available at each of the five sites.
300 - Meal Counting and Claiming - Lunch	323 a. Were there any days when the free, reduced price, or paid lunch counts exceeded the number of attendance adjusted eligible students?	TA provided that SFA should complete an edit record for each individual school at the end of each month.

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400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students?	TA provided that the DE has editable breakfast signage on the DE web site that the SFA can tailor to their menus.
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	TA provided that when the SFA offers cereal as an alternate choice that it must be offered with another grain or a meat/meat alternate to meet the weekly requirements. The SFA added yogurt the day the State Agency observed breakfast.
400 - Meal Components and Quantities - Lunch	406 If school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	TA provided that as of 10/1/17 since the SFA provides meals to Drake Head Start, that they will need to begin to follow the new CACFP meal pattern. Provided a copy of the new meal pattern, reimbursable foods list and a CACFP production record.
900 - SFA On Site Monitoring	901 a. Was the on-site review of the lunch counting and claiming procedure completed prior to February 1?	TA provided that the on-site review form has been modified to include breakfast. Discussed that the SFA is required to review 100% of the sites at lunch and 50% each year at breakfast.

**Org - Level Commendations**

Description
Certification and Benefit Issuance: Benefit documents 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. All applications were co signed and dated by the household member and the SFA, were complete with SSN's 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 to the Determining Official and the Food Service Director. Free meals are extended to all members in the household when there is someone directly certified. Waivers are provided to applicants and indicate specific fees. The SFA has a back-up system for benefit issuance documents and system. The Food Service Director serves as a back-up person for the Determining Official.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria, services are offered for Limited English Proficient households, annual civil rights training was provided for food service staff and documented. The SFA submitted the annual Public Release to the local media. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The correct state and federal non-discrimination statements are provided on all material describing the program.
On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and breakfast prior to February 1st.
Procurement: The SFA has a written Procurement Plan and a procurement method is identified for all purchases. The plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA also has a written Code of Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. The SFA is working at getting debarment statements to ensure that no vendors have been debarred or suspended by USDA.
Professional Standards: The Food Service Director has obtained 28.5 hours of Professional Training in school year 2016-2017. All staff who have responsibilities in the food service department have started to obtain their required training except for one newly hired substitute worker. Additional trainings are planned so that all staff will be able to get their required hours of professional training by the end of the school year.
Reporting and Record Keeping: Reports are filed on time, and all records are maintained for at least three years plus the current year
Resource Management: All expenditures that were reviewed appeared allowable. There were no unresolved findings from the previous Administrative Review. 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 and in school year 2015-2016 142% of the school's allotted dollar amount. The SFA has a procedure for handling student accounts that have a negative balance.
School Breakfast and Summer Food Service Program Outreach: School Breakfast Program 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 in September. The SFA will be offering a Summer Food Service Program starting the summer of 2017 so plans to initiate outreach to promote the program.
Smart Snacks: Students are able to purchase milk as an a la carte item only, Vending machines, are turned off from midnight until 30 minutes after the end of the school day. Exempt leftover NSLP entrees are only sold the same day they are initially offered. Beverages sold meet the standards for 5th through 8th grade students.

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Verification: The SFA used the Standard process for verification and applications 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 Food Service Director/Verifying Official listened to the verification and verification reporting webinars. The verification report was completed accurately and on time.

Wellness Policy: The SFA's wellness policy was reviewed and revised on January 16, 2017. The public is made aware of the SFA's wellness policy via the district's web site.

**Site - Level Commendations Boone Middle School (0209)**

Description
Food Safety: The SFA has a newly developed district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site reviewed. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for the milk coolers, walk-in freezer, walk-in refrigerator, food served, and for the dishwasher. The kitchen and storage areas were orderly and clean. The Food Service Director and the baker are ServSafe Certified. Numerous food service workers took the "Serving It Safe" twelve hour course two years ago.
Meal Components and Quantities: The Food Service Director does a god job of menu planning and has developed a four week cycle menu and plans to expand it to a six week cycle. All meal components were available at the beginning of meal service on the day of observation and throughout meal service. All meals observed met at least the minimum daily requirements. The 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 were on file. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch—including many fresh fruits and vegetables in a salad bar. At least two types of milk are offered. Many low fat and low sodium food items were observed in storage. Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of January were accurate and complete. Point of Service (POS), counts and filed claims appear accurate. Total K-12 is used as the school's POS system. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records were on file for all meals claimed for reimbursement for the review period. Cashiers are trained and appeared aware of what constitutes a reimbursable meal.
Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of January 23-27, 2017 for breakfast and lunch at the Middle School. The worksheets showed that all the required meal components were available at lunch. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Middle school is at low risk for noncompliance 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 recipes, controlling the portion sizes of condiments, offering some reduced-fat salad dressings, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week, purchasing low sodium legumes and draining fat from browned meats.
Offer vs. Serve: Offer vs. Serve is being implemented properly. All students except four that were observed selected 1/2 cup of fruit and/or vegetable. Cafeteria staff have been trained on offer vs. serve. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at breakfast and lunch.
Water: Free potable water is available to all students for lunch and breakfast through a water fountain that is in the cafeteria.