

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Harmony Comm School District (28340000)**  
**Dates: January 11-13, 2017**

**Program Year:** 2017  
**Month of Review:** December  
**Lead Reviewer:** Cheryl Benson  
**Org Representative(s):** April Smith

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The following application errors were reviewed: (1) One household included a student on direct certification, but the household was receiving reduced benefits instead of free benefits. (2) Three income applications were missing the required last four digits of an adults social security number. (3) Income was converted to annual income on all applications. Income is only converted to annual if there is more than one frequency of income. (4) Waivers for school fees must state the specific fee(s) and the amount of each fee. The waiver must also inform households that they do not have to complete the waiver in order to receive free or reduced meal benefits.	For your response, (1) The household was changed to free during the on-site review. No further action is needed. (2) Two SSNs were obtained during the on-site review. Indicate the last four digits of the third SSN. (3) Converting income to annual income was discussed during the on-site review. No further corrective action is required. (4) Attach a copy of the waiver that will be used which includes fees and the required statement.	
200 - Verification	V-0200	The following verification errors were reviewed: (1) The SFA did not use an error prone application. This was due to an error in the original I-CAVES that did not show EP applications. (2) One application used for verification was determined to remain reduced but should have been changed to paid. The SFA used net income instead of gross income. Also the submitted income documentation was not one month's documentation, and there was no way to determine frequency of income from the documentation.	For your response: (1) The SFA downloaded a revised I-CAVES. No further action is required. (2) The SFA sent a letter of adverse action to the household during the on-site review. Please indicate the date that the household was changed from reduced to paid.	
	V-0700	SFAs are required to have a written procurement plan in place as of July 1, 2016. The plan must include each procurement event (for example, purchasing from your main vendor is an event), the value of the event, procurement method (micro, informal, formal), contract type (eg-fixed price or cost reimbursable), duration of the contract, name of the vendor or purchasing	For your response, submit a written procurement plan that includes the required information. There is a state agency prototype available at <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/school-procurement/school-nutrition-procurement">https://www.educateiowa.gov/pk-12/nutrition-programs/school-procurement/school-nutrition-procurement</a> .	

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Harmony Comm School District (28340000)**  
**Dates: January 11-13, 2017**

		group, evaluation method (bottom line or line item), and information on contract management.	
700 - Resource Management	V-0700	<p>2 CRF 200. In order for expenditures from the Child Nutrition account to be allowable, the costs must be necessary, reasonable, and allocable to Child Nutrition Programs. If the expenditures are not allocable to a Program then the expenditures must be adequately covered by the sale price of the items. During the on-site review, several uses of Child Nutrition (CN) funds were found to be unallowable expenses. (1) Students in the Head Start program and in the state funded Pre-K program are being provided breakfast and lunch. The meals are not claimed for reimbursement and no money is being deposited into the School Food Authority's Nonprofit School Food Service Account, NSFSFA, for those meals. (2) In the afternoon, between lunch and the end of the school day, all students in the school are being provided a snack. No money is being deposited into the NSFSFA account for the snacks. (3) At the end of the day, the kitchen and cafeteria are left unlocked. The kitchen is easily accessible from the cafeteria. Coolers and freezers in the kitchen and cafeteria are not locked at the end of the day. On the day of review, the dry storage area and outside walk-in freezer were also not locked due to an expected delivery. Not only is this a financial concern, it is a food safety issue. Before food service staff leave the building, the supplies and equipment must be secure.</p>	<p>For your response, (1) indicate whether claims will be revised to include the Pre-K and Head Start meals or whether funds will be deposited into the School Food Authority's Nonprofit School Food Service Account, NSFSFA, to cover the cost of the meals. Claims may be revised back to the beginning of the school year. If claims are revised, submit documentation for each month for the number of free, reduced, and paid meals for the two programs. Also submit documentation that funds have been deposited into the NSFSFA to cover the missing household payments for reduced and paid meals. If claims are not revised, submit documentation for each month for the number of free, reduced, and paid meals for the two programs. Also submit documentation that funds have been deposited into the NSFSFA to cover all missing payments from federal, state, and household sources. (2) Submit documentation of the cost of food for the afternoon snack since the beginning of the school year through the time the practice was stopped. Documentation should include invoices with the products that were used for the snacks indicated in some way. (Highlight, circle, etc.) Deposit that amount into the NSFSFA account and submit documentation of the deposit. Also attach the attestation statement that was previously sent to the district. The statement must be signed and dated by the Superintendent and School Board President. (3) Indicate how supplies and equipment will be secured whenever food service staff are not present.</p>
700 - Resource Management	V-0700	<p>At the end of each year, the SFA must determine whether the percentage of revenue from non-program food sold is equal to or greater than the percentage of money spent on non-program food. Non-program food is anything the SFA is not receiving federal or state reimbursement for, such as adult meals, second milks, and second entrees. The new Financial Report on IowaCNP can be used in place of</p>	<p>For your response, complete the Non-Program Revenue Tool and submit a copy. If the tool indicates that more revenue is needed to cover expenses, indicate your plan to increase revenue.</p>

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Harmony Comm School District (28340000)**  
**Dates: January 11-13, 2017**

		<p>completing the Non-program Revenue tool if that section of the report is correct. The 2015-16 report is not available and the 2014-15 report was incorrect.</p>		
1000 - Local School Wellness Policy	V-1000	<p>The Local Wellness Policy, LWP, must be reviewed at least every three years and goals must be assessed at least every three years. Both the LWP and the assessment of building goals must be made available to the public. All required stakeholders must be invited and encouraged to attend committee meetings. Stakeholders include parents, teachers, students, school nutrition staff, PE teachers, school health professionals, school board, school administration, and general public. The LWP at Harmony has not been reviewed for at least four years, there is no evidence of a review or assessment of goals, there is no indication that the required stakeholders have been invited. The policy includes some outdated language.</p>	<p>For your response, indicate how stakeholders will be invited and encouraged to attend as part of the wellness committee, when the first meeting will be held, and how the LWP and assessment will be made available to the public. Attach a meeting agenda and a copy of the assessment of goals.</p>	
1200 - Professional Standards	V-1200	<p>(1) SFAs are required to track Professional Standard's training hours for all food service staff. Directors must have 12 hours, Managers must have 10 hours, full-time staff (20 hours/week or more on average) Other staff must have 6 hours, and part-time Other staff must have 4 hours. A 'director' is responsible for the management of day-to-day operations for the entire district, and every district must have a designated director regardless of what title he or she has. 'Managers' are responsible for day-to-day operations in one or more buildings in the district and answer to the Director. Everyone else is considered Other staff. Iowa allows the SFA to average training hours over a two year period. The SFA must designate which two years are being averaged, and some training must be completed in each year. To track training, there is an Iowa tracking tool and a USDA tracking tool. The SFA is not required to use either of the tracking tools; they may choose a tracker of their own. Tracking must include name, position, part or full time, training name, length of time, area covered (there are four areas), and documentation.(Certificate, agenda, etc.) The hours of training have not been met, and training is not being tracked at the SFA. (2) The director is required to have eight hours of food safety training every five years. The director</p>	<p>For your response, (1) submit a completed Training Tracker tool that includes the director, other kitchen staff, secretary who determines benefits and files claims, and the cashier at the point of service. If training hours have not been met, also submit a plan to complete required hours by the end of the school year. (2) Submit documentation of food safety training, or indicate a date in the next three months when training has been scheduled.</p>	

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Harmony Comm School District (28340000)**  
**Dates: January 11-13, 2017**

		has not had any food safety training in the past five years.	
1400 - Food Safety	V-1400	A complete food safety plan (HACCP), includes a comprehensive list of Standard Operating Procedures (SOP), temperature logs for food, all coolers, freezers, dishwasher, and thermometers; annual training, critical control points on recipes, and general review of the plan. The SFA has a good start on a complete food safety plan. SOPs are not comprehensive, temperatures for the coolers and freezers are not consistently recorded, training has not been conducted recently, and the plan has not been reviewed.	For your response, submit a list of SOPs that will be added to your current list and indicate when this will be completed. Since training has not been conducted recently, both SFA staff must complete the Food Safety module on Iowa Learning Online Professional Development and submit copies of certificates of completion. The importance of taking and recording all temperatures was discussed on-site. Temperature logs are important to ensure that food is stored at safe temperatures and in the case of an outbreak of a food borne illness, the logs also serve as documentation that food was stored safely. No further response on temperature logs is required.

**Site - Level Findings: Harmony Elementary School (0409)**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
400 - Meal Components and Quantities - Breakfast	V-0400	(1) For both breakfast and lunch, at least two types of milk must be offered. The choices for milk types are no-fat flavored and/or unflavored and low-fat unflavored. The SFA purchases low fat unflavored and no-fat chocolate, but students are not allowed to select the chocolate milk at breakfast. (Note: A repeat of this error during the next review will result in meal reimbursement being reclaimed.) (2) All grains offered for both breakfast and lunch must be at least 50% whole grain. Two cereals are not 50% whole grain-- Cocoa Munchies and Crispy Rice.	For your response, (1) The SFA immediately started allowing chocolate milk at breakfast which then provides two types of milk. No further corrective action response is required. (2) Submit labels for whole grain cereals that will replace the Cocoa and Rice cereals. (It is okay to use up the remaining cereal in store.)	
400 - Meal Components and Quantities - Breakfast	V-0400	Observation indicated that students were not used to being required to take milk with breakfast and lunch. When using Serve Only instead of Offer vs Serve, all components in at least the minimum amounts must be on the students' trays. For lunch, students were allowed to take an orange juice instead of milk, and for breakfast, students were allowed to not select milk. This was corrected as students went through the line, but it was obvious that it was something new for the students. Fluid milk is a required component for both breakfast and lunch. There are allowable substitutions for students with allergies/disabilities, but juice is not a substitution for milk and should not be presented to students as a substitution.	Signage on the milk cooler is needed to inform students that milk is required for both breakfast and lunch. If the orange juice is going to remain in the milk cooler, then signage on the milk cooler is needed to indicate that the juice is a la carte only, indicate the price, and state that milk is still required. For your response, state what the sign(s) say(s) and when they were posted.	

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Harmony Comm School District (28340000)**  
**Dates: January 11-13, 2017**

**Org - Level Technical Assistance**

Area	Question	Comments
		<p>Technical assistance was provided on handling negative lunch accounts. Beginning July 1, 2017, all schools will be required to have a policy covering negative account balances for school meal programs. Information in two memos was shared as well as a Q and A.</p>
		<p>Technical assistance was provided on completing a comprehensive written procurement plan. A prototype procurement plan is available on the Procurement in Child Nutrition Programs area of the DE website, <a href="http://www.educateiowa.gov">www.educateiowa.gov</a>. Further information on completing the form and links to webinars was provided.</p>
		<p>Sufficient staffing is important for many reasons. First, to ensure that high standards can be maintained. Second, to keep qualified, trained food service workers on staff. Third, to allow the director time to complete the bookkeeping and monitoring requirements so that errors are not made that can lead to reimbursement being recaptured. Expecting only two staff members to complete all tasks, especially with many homemade items (notably- making all bread, buns, and rolls) may be unrealistic in the long run. There is a considerable amount of paperwork involved, meal planning, meal preparation, dish washing, equipment cleaning and sanitizing, procurement, food ordering and receiving, training requirements, etc. It is highly recommended that additional staff be employed. Even an hour at breakfast and two hours at lunch of someone assisting with dishes and clean-up coupled with purchasing part of the bread, buns, and/or rolls would go a long way to relieving the work load.</p>
		<p>Technical assistance was provided about Community Eligibility Provision, CEP, which allows qualifying SFAs to provide all students with free meals. The SFA was encouraged to be sure that all students directly certified are correctly entered by that method of determination.</p>
100 - Certification and Benefit Issuance	126 Are the correct conversion factors used when processing applications that indicate more than one income frequency? If NO, explain.	<p>Applications must be determined on the frequency of income that is indicated. If the income is weekly, then it is determined as weekly and noted the administrative section of the application as weekly. However, if the household is receiving income in more than one frequency, for example one income is weekly and another income is monthly, then the application is determined on annual income and noted in administrative section of the application. Converting all income to annual income may lead to benefit errors and may cause applications that are error prone to not show as error prone.</p>

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Harmony Comm School District (28340000)**  
**Dates: January 11-13, 2017**

1000 - Local School Wellness Policy	1002 When and how does the review and update of the Local School Wellness Policy occur? Provide documentation to support the response (or appropriate web address(es)).	<p>The local wellness policy committee has not updated the policy to align with the Healthy Hunger Free Kids Act. Technical assistance was provided during the on-site for updating the wellness policy. A folder with information was left that included information on reviewing the policy and assessing goals.</p> <p>More information is available at <a href="http://www.fns.usda.gov/school-meals/local-school-wellness-policy">http://www.fns.usda.gov/school-meals/local-school-wellness-policy</a></p>
1200 - Professional Standards	1206 a. Did Full-Time school nutrition staff, meet the training requirements?	<p>There are many resources that can be used to fulfill the required training hours. Websites for USDA resources, Institute for Child Nutrition, and Iowa Professional Development modules were provided as well as a flyer with training ideas and suggestions from several sources. The Iowa Training Tracker form was also emailed, or the USDA Tracker can be found at one of the websites that were provided.</p>
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?	<p>SFAs are responsible for promoting breakfast (SBP) at the beginning of the year and then periodically throughout the school year. Promotion is more than simply announcing menus. At a minimum, the locations and times should be provided as well as the menu. Continuing outreach can be done in many ways, including announcements, newsletters, posters, website, and contests.</p> <p>For information on summer, SFSP, locations in Iowa, go to complete information about promoting SFSP, go to <a href="https://www.educateiowa.gov/pk-12/nutrition-programs-0">https://www.educateiowa.gov/pk-12/nutrition-programs-0</a></p> <p>One resource that could also be shared is the National Hunger Hotline <a href="http://www.whyhunger.org/findfood">http://www.whyhunger.org/findfood</a>. 1-866-3-Hungry or 1-877-8-Hambre. There is also information on the federal website with ideas for outreach brochures at <a href="http://www.fns.usda.gov/sfsp/raise-awareness">http://www.fns.usda.gov/sfsp/raise-awareness</a>. This information could be shared via websites, newsletters, phone calls, flyers, etc.</p>
300 - Meal Counting and Claiming	306 What procedures are used as internal controls to ensure the meal counts do not exceed enrollment or attendance adjusted enrollment?	<p>(1) Technical assistance was provided on edit checks. Daily and monthly edit checks should be conducted to ensure correct claims. Edit Check #1: On a daily basis compare the daily student counts for each category (free, reduced price, and paid) to the highest number of students reported as eligible to participate. The daily count in each category must be equal or</p>

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Harmony Comm School District (28340000)**  
**Dates: January 11-13, 2017**

		below the highest number eligible. Edit Check #2: Compare the monthly count in each category to the "attendance adjusted" eligible students. Edit Check #3: Compare each school's average daily participation (ADP) by category (free, reduced price and paid) to the preceding month. There is an edit check form in Download Forms of CNP that describe the procedures for the three edit checks. (2) Technical assistance was also provided on the number of free and the number of reduced students that should be entered on the monthly claim. Those numbers should be based on the total number of students certified at each benefit level and not by the number of students at each benefit level that ate meals that month.
800 - Civil Rights	805 How are students with special dietary needs accommodated?	Technical assistance on special diets was provided. Information on the difference between a disability and an allergy or intolerance was shared. The latest special diet form was emailed to the director. The form does not have to be replaced annually. Instead, the household can be contacted, and if there are no changes then a new form is not needed. Contact with the household should be documented. There is one special diet form on file that has not been signed by a medical professional and that should be completed. When accommodating students special dietary needs, it is not required that the same menu items be provided. For example, if pizza is on the menu, but a student cannot have gluten, the SFA is not required to provide gluten free pizza. The SFA could provide something like a plain chicken breast and gluten free bread or brown rice.
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	All letters used for Child Nutrition programs must have the current USDA and Iowa non-discrimination statements. The letter of adverse action has an outdated USDA statement. This was pointed out to the SFA and the statement was updated. If benefit applications, menus, or other child nutrition program information is posted on the district's website, the statements must be there also.

**Site - Level Technical Assistance Harmony Elementary School (0409)**

Area	Question	Comments
1400 - Food Safety	1403 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	Technical assistance was provided on changes to the health inspection practices in Iowa. In the past, two inspections of prep sites and one inspection of satellite sites was conducted free of charge. DIA changed to one inspection per year of prep sites and one inspection every 18-24 months for satellite sites. SFAs must still request two inspections per year and document the request.
1400 - Food Safety	1407 Were on-site (or Off-site, if observed) storage violations observed? If YES, explain.	Resources for HACCP/Food Safety were shared with the director. The ISU website for Standard Operating Procedures and other resources was provided. Information on correctly and safely implementing a sharing table was emailed to the director. Also while checking storage areas on-site it was noted that food in the walk-in freezer is being stored less than six inches off of the floor of the walk-in. Ideas for lifting the food further off the floor were shared.

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Harmony Comm School District (28340000)**  
**Dates: January 11-13, 2017**

300 - Meal Counting and Claiming - Lunch	317 a. Based on meal observation, does the meal counting system as implemented prevent overt identification of students receiving free and reduced price benefits?	A Point of Service (POS) is required at the location and time where the student is served. There must be some exchange with the student for the meal—name, ticket, PIN#, card, etc. Students in Pre-K were having counts taken in the classroom. The other grades stop by a table and the cashier states their name and checks the tray. However about a third of the students walk by without actually stopping. It is important that the students stop in case the cashier is busy, he or she could miss counting a meal or enter a meal as reimbursable that does not have the required components. This is especially important since the Superintendent plans to change the current lunch system and have individual teachers act as the POS for their students. All of the teachers and subs must be trained to have the students stop long enough to be counted and to have their meals checked. The teachers must also receive annual civil rights training. If this method of POS is deemed inaccurate at the next review, then that system will no longer be allowed.
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Ideas for an alternate entree and new recipes for dried beans/legumes were provided. Information on utilizing the DoD fresh fruits and vegetable part of USDA Foods was discussed. Information on Healthier US Challenge and the Fresh Fruit Vegetable Program was provided.

**Org - Level Commendations**

Description
APPLICATIONS/BENEFIT ISSUANCE: 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. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.
CIVIL RIGHTS: The And Justice for All civil rights poster was posted in the cafeteria. 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. SFA on-site monitoring was completed to ensure the school is meeting program requirements.



**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Harmony Comm School District (28340000)**  
**Dates: January 11-13, 2017**

**GENERAL:** There were numerous meal pattern errors during the 2013-2014 Administrative Review, and a repeat of those errors would have resulted in fiscal action. Under the current director, these errors have been corrected and the meal pattern is now in compliance with regulations. The director and her assistant work hard to provide nutritious, healthy meals to students that are also appealing. Their hard work in these areas is greatly appreciated.

**HACCP/FOOD SAFETY:** The SFA has a district-wide written Food Safety plan. A copy of the written plan was available at the site reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. The latest Health Inspection Report was posted in a publicly visible location. There were no critical areas noted on the report. Food Service workers wore proper hair restraints, aprons, and practiced good gloving procedures. Good food safety procedures were observed.

**MEAL COUNTING & CLAIMING:** Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of December were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. Power School is used as the school's POS system. There was a POS for K-6 students, and the POS was organized and orderly. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. All students selected a reimbursable meal.

**MEAL REQUIREMENTS & COMPONENTS:** The Food Service Director, FSD, does a good job of menu planning and following the meal pattern. 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, and included fresh fruits and vegetables. Menus included several homemade entrees, homemade bread, buns, and rolls. Standardized recipes are used for food production. Water was available in the cafeteria and includes a water bottle filler. At least two types of milk are offered at lunch. Several low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the lunch Menu Worksheet for the school selected for review for a specified week during the review period. Nutrient analysis was not required.

**PROCUREMENT:** The SFA has a The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. The main vendor bid includes a Buy American Provision. The SFA ensures that no vendors have been debarred or suspended by USDA.

**RESOURCE MANAGEMENT & RECORD KEEPING:** The Resource Management section of the Off-Site Assessment tool was completed on time. There were no unresolved findings from the previous Administrative Review or from a state audit. 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 indicated by the PLE tool. The district does not charge indirect costs to the food service program. The SFA very effectively utilizes its USDA entitlement for commodities. The district just passed a comprehensive Code of Ethics that covers Procurement.

**VERIFICATION:** The correct number of applications were verified, 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.

**WELLNESS POLICY:** The district has wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The wellness policy is available to the public on the district's website. The superintendent's secretary signed up for a wellness policy webinar to be held soon.