

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Hartley-Melvin-Sanborn Comm School District (28620000)
On-site Review Dates: February 21, 23, 27, 2017

Program Year: 2017
Month of Review: January
Lead Reviewer: Deann Murphy
Org Representative(s): Lynnette Soden

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	10 student determination errors were made out of the 168 students reviewed in the sample. 2 of these errors were related to verification.	All determination errors were corrected on-site. No further corrective action needed.	
200 - Verification	V-0200	Verification was not completed until December 5, which is after the required completion date of Nov. 15.	The SFA will explain how they intend to complete verification so that they are done no later than Nov 15 each year.	I plan to start in October, when completing the verification I will only do 1 follow up process instead of 2. This will shorten my response time greatly because I won't have to wait the 10 days twice. I will be able to have the entire process completed by Nov. 15 for sure.
700 - Resource Management	V-0700	The SFA does not have a Procurement Plan in place to guide their Procurement decisions.	The SFA will submit their completed Procurement Plan to the State Agency. The SFA should use the Procurement Plan template provided on the Department of Education website.	
800 - Civil Rights	V-0800	The SFA is altering the meal pattern for a student who does not have a disability as an accommodation to a food allergy. If a medical professional does not state the allergy is due to a disability, the SFA cannot change the meal pattern.	The SFA will explain how they will accommodate students with special dietary needs appropriately.	We will only alter the meal plan if the student has a disability marked on their doctor note. And if the substitution is made we will make sure it meets the compliance guidelines.
1000 - Local School Wellness Policy	V-1000	The district does not have an active Local Wellness Committee at this time as they have never met. The assessment of the policy goals has not been completed or made public as required by the final rule on Local Wellness Policy issued July, 2016.	The SFA will 1) state when (give a specific date) the wellness committee will meet. Submit meeting minutes if the committee has met prior to your response. 2). Submit your assessment of the goals of the Local Wellness Policy. 3). State how/when you will make the assessment public. If you are posting the assessment to the district website, please give the web address where it can be found.	Wellness Committee plans to meet 4/26/17 @ 7am. Goals will be assessed at that meeting time. Our SIAC met on 3/30/17 @ 7pm. The policy was reviewed at that meeting. Input from the committee was welcomed. The minutes from that meeting are on the district website http://www.hartley-ms.k12.ia.us/board_education.cfm?subpage=2133205 After the goals are reviewed by the Wellness Committee they also will be posted on our District Website.
1100 - Smart Snacks	V-1100	The Gatorade in the HS vending machine that is sold during the school day is not compliant with Smart Snacks regulations.	The SFA will 1). explain how they will become Smart Snacks compliant in their vending machine. 2) State who will be responsible to ensure Smart Snacks compliance in the future.	The HS Principal contacted the vendor and the product was switched to the G2 instead of the Gatorade. The HS Principal will be the person in charge of compliance of the vending machine in the future.
1200 - Professional Standards	V-1200	The SFA is not currently tracking Professional Standards training hours for nutrition or non-nutrition staff. There are several non-nutrition	The SFA will submit their completed tracking form showing all nutrition and non-nutrition staff who are involved in the school nutrition program. The tracking	FSD will be the person in charge of tracking the training for all staff.

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

Hartley-Melvin-Sanborn Comm School District (28620000)

On-site Review Dates: February 21, 23, 27, 2017

		staff who have not yet met their training hours.	form needs to identify training for the 16 staff identified during the review who need Professional Standards training, i.e. 1 FSD, 2 Kitchen managers, kitchen staff who work over 20 hours weekly, subs, 7 non-nutrition staff including POS cashiers in all buildings, business manager, Authorized Rep, Confirming Official plus any other non-nutrition staff that the SFA identifies. The SFA will also state who will be in charge of tracking the training for all staff in the future.	
Resource Mgt Comprehensive Review	V-RMCRF	The non-program Food Revenue tool shows that non-program food costs greatly exceed non-program food revenue. The Business Manager feels that non-program food costs were calculated in error, resulting in a need to significantly increase non-program food revenue.	1). The SFA will re-calculate the non-program food revenue tool using the 5 day reference period and instructions given on-site. They will submit the re-calculated tool to the State Agency. 2). If the re-calculated tool continues to show that non-program food costs exceed non-program food revenue, the SFA will explain how they will remedy that.	We are going to charge the Headstart Program more for their meals to increase our non program income.

Site - Level Findings: Hartley-Melvin-Sanborn Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA uses "Serve Only" at breakfast in the Elementary which requires all students to take all foods served on the menu, including milk. 4 students did not take milk at breakfast.	The SFA will explain how they intend to ensure that all students take all items on the menu at breakfast, including milk.	FSD reviewed procedure with the Kitchen Manager at the Elem. about Offer vs. Serve. It was explained the difference and how it works. Breakfast will be a Serve Only Procedure. Kitchen Manager, POS staff and lunch room observers will monitor this procedure to make sure all requirements are being met.
1700 - Afterschool Snack	V-1700	Currently the After School Snack Program regulations are not being followed. There is no "And Justice For All" poster in the room where the snack is served. Food production records are poor and are not followed. Students are given an option to take one component when 2 components are required. OVS is not part of the program so students MUST take both components in order to claim the snack for reimbursement. There are no Point of Service counts maintained. On-site monitoring has not been done this year. Snacks that require refrigeration are not kept at the proper temperature until served. Currently the site has not kept adequate records and so have not been claiming the snacks for reimbursement.	1). The SFA will submit fully completed After School Snack food production records for the month of March, 2017. 2). The SFA will submit Point of Service records for the month of March, 2017 showing how many students actually received their full 2 component snack each day. 3). The SFA will submit monitoring records showing that the program has been monitored at least once this school year and the name of the person that will be in charge of conducting monitoring in the future. 4.) The SFA will explain how they intend to follow proper food safety practices, including food storage temperatures.	The after school snacks/milk will stay in the fridge in the kitchen area until tutoring starts at 3:30pm. Then remaining snacks/milk will be returned to kitchen fridge immediately after serving snacks.

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	124 a. Certification and Benefit Issuance Review Method:	When working with applications, please enter the received date so that you know applications are being determined within the required 10 days. Also,

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Hartley-Melvin-Sanborn Comm School District (28620000)
On-site Review Dates: February 21, 23, 27, 2017

		make sure to include any reported child income as part of the income determination so that determinations are complete.
200 - Verification	212 If a student's eligibility changed due to verification,	If there is no or inadequate response to a verification request by the household, the SFA must give one documented follow-up attempt either by phone, e-mail or in writing. If the household still does not respond within a reasonable amount of time, the SFA should deny the household benefits in writing, giving them 10 calendar days to appeal. The day the letter is sent is day 1 of the appeal period. If no appeal is made, the SFA has up to 10 operating days to change the student's benefit status. All of this needs to be done so that Verification is complete by November 15. Verification is considered complete when the letter of adverse action is sent.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable):	All field trip sack lunches provided must meet the full nutrition requirements for the grade level being served, i.e. K-8 1 oz M/MA, 1 oz eq. grain, 1/2 cup fruit, 3/4 cup vegetable, 1 cup milk, etc. since these are not OVS. Beginning July 1, 2017 the USDA requires that all SFAs have a local negative balance policy for their district. Guidelines for developing the policy can be found at https://www.educateiowa.gov/pk-12/nutrition-programs/national-school-lunch-program under the heading "Meal Charge Policy."
700 - Resource Management		Much TA given on developing a Procurement Plan and Code of Conduct. The Code of Conduct needs to include either the disciplinary action that will be carried out if the Code is not followed OR a link to an existing policy describing such action. Discussed the differences between Micro-purchases, informal and formal purchases, the bid process required for each, Debarment statements need to go with bids for vendors to sign, contract management, etc. The Authorized Rep was shown how to access the Procurement plan/Code of Conduct template on the DE website. The Procurement plan needs to be re-done annually using projections for the next school year and before bid specifications are sent. Discussed the districts local purchase threshold and how that impacted what types of contracts needed to be obtained for each procurement event.
800 - Civil Rights	801 Does the School Food Authority have a Public Release?	The Public Release must be sent to local media outlets at the beginning of each school year. The media does not have to publish it, but the SFA should keep a record that it was sent and a copy if it was published.
800 - Civil Rights	805 How are students with special dietary needs accommodated?	The State Agency Diet Modification form and milk substitution list were e-mailed to both the Authorized Representative and the FSD. If a meal pattern change is to be made, a medical provider must state that it is due to a disability and list the required changes. If it is not due to a disability or is a parent request, the SFA should try to accommodate, but cannot change the meal pattern.
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	The posted menu needs to have the shortened non-discrimination statement listed in a font the same size as the smallest print: "This institution is an equal opportunity provider."
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? If NO, explain.	Written information given and discussed with the Superintendent about the Local Wellness Policy. There should be a Wellness Committee that meets at least annually made up of a variety of stakeholders. An assessment of the Local Wellness Policy goals needs to be done at least every 3 years and made public. Best practice is to have 1 assessment per building. Current policy says that assessments will be repeated every 5 years and

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Hartley-Melvin-Sanborn Comm School District (28620000)
On-site Review Dates: February 21, 23, 27, 2017

		uses outdated language, i.e. USDA SMI which should be the USDA Administrative Review under Monitoring.
1100 - Smart Snacks	1100 What are the SFA's food sale policies? List all types of food/beverage sales to include the selling of non-food items in combination with food items.	The Authorized Rep. was e-mailed a link to the Alliance for Healthier Generation website. This website provides the Smart Snacks calculator and a product list which will help the district know what products are complaint for each grade level.
1200 - Professional Standards	1219 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. i.e. entered into a tracking mechanism.	The SFA was e-mailed a copy of various tracking templates that they can use to track Professional Standards training for all staff. They need to designate one person to keep track of all necessary staff's training hours.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	Each site in the SFA needs a copy of the HACCP manual. Non-production sites can have SOPs geared toward their needs and do not need the entire manual. Best practice is to review all SOPs each year with all staff.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements? If NO, explain.	The SFA is eligible to be a summer feeding site. Encouraged them to consider this and contact their State Agency consultant if they wish to proceed. The Summer Meet-up flier was e-mailed to the SFA to post on their website and/or include in their spring newsletter. The flier was sent in both English and Spanish. Also discussed promoting breakfast at least 2 times annually, including breakfast being for everyone, times offered and price. Consider promoting it at each semester, PT conferences, during National School Breakfast Week, etc.
Resource Mgt Comprehensive Review	7 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	Written and verbal instructions were given on-site explaining how to properly calculate non-program food costs.

Site - Level Technical Assistance Hartley-Melvin-Sanborn Elementary School (0409)

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	318 At the selected school(s), does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	The Elementary POS cashier was not paying attention to the meal count during lunch/breakfast. She was checking papers, talking to staff, etc. and not really making sure students were putting in complete numbers, their own numbers, etc. This is a potential problem that should be addressed by the SFA.
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Recommend serving salsa as part of the meal line, i.e. pre-portioned cups, etc. in order to make sure it counts as part of the 3/4 cup offered vegetables for the day. Currently salsa is served on the condiment table as an "Extra." Also, recommend being more specific with food production records so that anyone helping in the kitchen would easily know what a serving is, i.e. 5 chicken nuggets instead of 2 oz chicken nuggets, etc.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Recommend the FSD provide extra training on OVS with Elementary staff. True OVS allows the students to choose from all components on the menu. Currently staff allows students to choose milk, fruit and/or vegetable and the rest of the meal is pre-plated for them. Students should be allowed to decline any part of the meal, but must have 3 items on their tray with one being 1/2 cup fruit/vegetable.
800 - Civil Rights	810 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits? If NO, describe reason.	The most recent USDA poster was provided to the SFA to hang in a prominent location.
900 - SFA On Site Monitoring	904 Was corrective action in the general areas of review that are readily observable required?	There is a new SFA on-site monitoring form available on IowaCNP Download forms which includes General areas. This can be used next year when completing your required SFA on-site monitoring. Recommend

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Hartley-Melvin-Sanborn Comm School District (28620000)
On-site Review Dates: February 21, 23, 27, 2017

		the FSD regularly visit each site during the school year to observe practices and ensure requirements are being met in addition to the annual on-site monitoring duties.
1300 - Water	1300 Is free potable water 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)?	Free potable water must be provided to all students at breakfast as well as at lunch.
1400 - Food Safety	1403 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	The SFA must request 2 health inspections at each site annually if the health inspector does not come 2 times. Keep a copy of the request on file.
1700 - Afterschool Snack	1700 Were any areas identified requiring technical assistance or corrective action? If YES, explain.	The SFA is encouraged to read and follow the After School Snack Program Handbook found on IowaCNP under Download forms as many of the requirements of the program were not met. The handbook has a sample menu, production record and meal count template and monitoring form as well as the requirements for what needs to be served.

Org - Level Commendations

Description
All the Nutrition staff have met or exceeded their required Professional Standards training hours for this year.
Benefit documents were organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, denied applications were correctly determined. The correct and current benefit issuance list was available. Applications were complete with SS numbers. Income was only converted to annual when there was more than one frequency of income. Free meals are extended to all members in the household. Waivers are provided to applicants and indicate specific fees. Eligibility is kept confidential.
Fiscal action for the review is calculated at less than the USDA disregard so no claim adjustment will be needed.
The correct number of applications were verified and were correctly selected from error prone applications. The applications selected for verification were confirmed prior to verification.
The District has a Local Wellness Policy that was recently reviewed and approved by the Board. The policy is available to the public on the District website. It contains goals in each of the 3 required areas, Nutrition Education, Physical Activity and Other School based wellness activities.
The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided to all staff. Ethnic/racial information is collected and the form is completed. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements.
The FSD keeps a file of Smart Snacks Calculator print-outs showing that the a la carte served at the HS are compliant.
The FSD uses standardized recipes, component templates, and keeps up to date CN/PFS labels showing how each food or recipe credits. She also keeps track of the calories, saturated fat and sodium levels using the USDA menu certification worksheets Simplified Nutrition Analysis tool.
The SFA has a district-wide written Food Safety plan that includes the required elements.
The SFA utilizes it's USDA Foods dollars well. Last year they used 123% of their allotted USDA Foods dollars.

Site - Level Commendations Hartley-Melvin-Sanborn Elementary School (0409)

Description
Menus met all daily and weekly minimum nutrition requirements at both breakfast and lunch. The SFA uses many low or reduced sodium foods and fruits packed in water or light syrup to reduce calories and sodium in menus. Water was available at lunch as required. Students seemed to have sufficient time to eat. Staff were friendly to student customers. All meals at lunch were reimbursable with a gentle nudge

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

Hartley-Melvin-Sanborn Comm School District (28620000)

On-site Review Dates: February 21, 23, 27, 2017

from staff to take a full 1/2 cup portion of fruit or vegetable.

The latest Health Inspection Report was posted in a publicly visible location at the Elementary. Temperature logs are maintained for coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean.