

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Holy Trinity Catholic Schools Inc.-Ft.Madison (23228000)
Dates: January 18-19, 2017

Program Year: 2017
Month of Review: December
Lead Reviewer: Cheryl Benson
Org Representative(s): Michael Sheerin

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	<p>The application selected for verification was verified incorrectly. The household submitted a W-2 instead of current income documentation, such as pay stubs. Only households that are self-employed, or whose income cannot accurately be determined from pay stubs can use W-2 documentation since that documents last year's income. (See page 24 of Eligibility Manual) The original income application was correctly determined as free. In completing the application, the household only used base wage instead of including commissions. Using the W-2 submitted for Verification, the household qualifies for reduced benefits. However, the director thought that commission was not included in household income for determination of benefits, and so the household incorrectly remained as free after verification. The set pay was not documented by the household, there was no documentation that commission is not a regular part of the household's income, and all normal income must be included in the determination of benefits. Following submission, the</p>	<p>For your response, send a Letter of Adverse Action changing the household from free to reduced. At the same time, contact the household and request the correct, current documentation for verification. The household should be given a set time to respond, but no more than two weeks. Submit by attaching a copy of the letter of adverse action. Submit current income documentation from the household. Submit any notification of another change in benefits if the new documentation submitted changes household benefits from reduced to either paid or free. Also revise the Verification Report on IowaCNP.</p>	

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		household was not changed from free to reduced, correct documentation of income was not obtained by the SFA, and the Verification Report incorrectly indicates there was no change in benefits for the household. In summary, the documentation submitted for verification was incorrect, and even though the submitted documentation indicated a reduction in benefits to reduced, the household was not changed from free to reduced benefits.		
	V-0700	(1) SFAs are required to have a written procurement plan and code of ethics for those procuring on behalf of Child Nutrition Programs 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 group, evaluation method (bottom line or line item), and information on contract management. The SFA must also have a Code of Ethics that includes language about accepting items of monetary value, disciplinary actions, and checks and balances. Holy Trinity does not have a written procurement plan. There is a start on the Code of Ethics, but it is missing disciplinary language. (2) Prior to the review, a set of Procurement questions were submitted to the SFA for completion. The form was only partially completed.	(1) For your response, submit a copy of the SFAs written procurement plan. (The state prototype is available at www.educateiowa.gov , click on A-Z index, click on "S" and then click on School Nutrition Procurement.) Also submit a copy of your full Code of Ethics that includes disciplinary language. (2) Submit a copy of the completed procurement questions. If further corrective action is required after reviewing the responses, it will be sent at that time.	
700 - Resource Management	V-0700	(1) Students at the Early Childhood Center receive reimbursable meals that are claimed by the SFA. Meals are not directly paid for by the Pre-K households; instead, households pay a single tuition fee. Since payment for meals is not automatically deposited into the Child Nutrition fund, the SFA must be able to provide	(1) For your response, submit monthly invoices from August through December for meals provided to the EEC center that show the number of meals and amount owed to the CN account. The meals invoices should indicate the number of free, paid, reduced, and adult meals and the meal charge for each category that should have been deposited into the CN account.	

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		documentation that the proceeds from the meals have been deposited. (2) Actual invoices from purchases made at Hy-Vee for the high school were not available for review so that allowable expenses could not be determined.	Then submit documentation that the amounts indicated on the invoices have been deposited into the CN account. Future amounts must be deposited in a timely manner or else interest must be paid to the CN account. (2) For your response, submit copies of all Hy-Vee receipts from December 2016.	
700 - Resource Management	V-0700	(1) 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 completing the Non-program Revenue tool if that section of the report is correct. If the report is not correct, then the separate Non-Program Revenue tool must be completed. (2) There is a Financial Report under the Application's tab on IowaCNP that must be completed annually. The report has not been completed.	(1) For your response, submit a copy of a completed Nonprogram Revenue Tool. If the tool indicates that sufficient revenue is not being generated, also submit a plan to increase revenue from nonprogram sales. (The NPR tool is available in Download Forms.) (2) Complete the Financial Report on IowaCNP.	
1000 - Local School Wellness Policy	V-1000	The Local Wellness Policy (LWP) committee has not updated the policy to align with the Healthy Hunger Free Kids Act. The policy must be reviewed and updated at least every three years. Along with the review and update, the goals in the policy must be assessed for each building and the results of those assessments made available to the public. The assessment must determine the extent that the district is in compliance with the policy, and a description of progress made in attaining the goals of the policy. The new USDA wellness policy	For your response, submit a copy of the assessment of goals of the LWP for the elementary school and indicate how they will be made available to the public. Indicate how stakeholders will be made aware and encouraged to participate in the committee, and submit a copy of minutes from the first meeting of the wellness committee as well as a timeline for completion of an update of the policy.	

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		<p>requirements also include assurance that potential stakeholders are made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy. Potential stakeholders include students, parents, PE teachers, food service staff, school health professionals, school board, administration, and general public.</p>		
<p>1200 - Professional Standards</p>	<p>V-1200</p>	<p>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 other than directors and managers (20 hours/week or more) must have 6 hours, and other part-time staff must have 4 hours each year. A 'director' is responsible for the management of day-to-day operations for the entire district, and each district must designate at least one person as director. The director must have documented at least eight hours of food safety training every five years. '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. At Holy Trinity, training hours are not being tracked, none of the staff have completed the required hours of training, and the Director has not had food safety training.</p>	<p>For your response, submit a tracking tool that indicates training already completed for the director, two managers, one full-time and three part-time employees along with documentation of training. If the number of hours do not meet minimum requirements, then also submit a plan to complete the hours of training required. Finally, submit documentation that the Director has completed eight hours of food safety training.</p>	

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<p>1400 - Food Safety</p>	<p>V-1400</p>	<p>A complete Food Safety/HACCP plan includes comprehensive Standard Operating Procedures, SOPs, at each site; a Process List of menu items; critical control points indicated on recipes; temperature logs with corrective action indicated; annual training; and a plan to periodically review and revise HACCP. HACCP Principles include identifying hazards, monitoring procedures, establishing corrective actions, verifying procedures, and record keeping. The food safety plan at Holy Trinity Elementary is missing several components. There were no Standard Operating Procedures available, no temperature logs for dishwasher, coolers, freezer, milk cooler, or thermometer calibration. There was also food stored less than 6-inches off the freezer floor, there was food stored in the cooler in tin cans, and some areas that appeared less than clean and organized. Annual training has not been conducted.</p>	<p>For your response, submit copies of all SOPs that are now in place at the elementary building. Be sure the SOPs are comprehensive and cover all applicable areas of the operation. Submit two weeks of temperature logs for coolers, freezer, dishwasher, and thermometer calibration. Also submit documentation that the kitchen manager at the elementary has completed the Food Safety module on Iowa Learning Online Professional Development. Finally, indicate how the SFA will ensure that food is not stored on the floor or in tin cans, and that the storage areas will be clean and orderly and who is responsible for monitoring this.</p>	
<p>1500 - Reporting and Recordkeeping</p>	<p>V-1500</p>	<p>The Administrative Review process is divided into three parts: Off-site questions and forms, the On-site review; and Responding to corrective action. SFAs are asked to complete a series of off-site questions prior to the on-site review. Completing the questions prior to the on-site review allows the process to proceed more smoothly and decreases the time needed on-site. If the questions are not completed prior to the review, then they must be completed during or after the on-site review. The majority of off-site questions have not been completed.</p>	<p>For your response, complete the off-site questions. If further corrective action is required due to responses, the SFA will be notified.</p>	

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Site - Level Findings: Holy Trinity Elementary School (8111)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Food Production Records, FPRs, serve many purposes--inventory control, history of what works and what doesn't, participation, and they can help with forecasting. Besides that, they are required by regulation in order to document that a reimbursable meal is being served. FPRs must include the date, school, all food items served as part of a reimbursable meal including condiments; planned serving sizes for all food items for all grade groups, adults, and a la carte; the number of planned servings for all food items including condiments for each grade group, adults, and a la carte; the total amount of each item prepared in measurable amounts such as each, pound, or #10 can; the amount of each food item left over; and the actual number served for each grade group, adults, and a la carte. FPRs at the elementary indicated the same number of planned portions for every food item even though the building uses Offer vs Serve. The total quantity prepared does not match the number of planned servings. All food items that are part of a reimbursable meal are not included. The SFA offers an alternate meal of a hot dog and bun daily. The bun is not included and no condiments are included. Often the specific fruit served that day is not indicated by name. When things such as broccoli or carrots are served, indicate whether it is fresh or frozen or canned.	For your response, submit one week of Food Production Records from the elementary. Also submit documentation that the kitchen manager has completed the Food Production Records module on Iowa Learning Online Professional Development.	
500 - Offer versus Serve	V-0500	(1) Offer vs Serve, OVS, was not correctly implemented at the elementary. The Point of Service, POS, is at the beginning of the line. When the POS is at the beginning of the line, then the last person in line must ensure that a reimbursable meal is selected. Staff on the line clearly did not understand the rules of OVS. Students were not selecting a half cup of fruit and/or vegetable and in one case, did not have at least three components on his tray. There were four meals recorded as non-reimbursable, but without intervention during meal service, the number would have been higher. (2) For grades K-6, students must be offered at least one ounce-equivalent of grain per day and minimum 8 per	For your response, at least two staff at the elementary must complete the Offer vs Serve module on Iowa Learning Online Professional Development and submit copies of the certificates. Also have them complete the three Group Activity Worksheets (attached below), sign/date the worksheets, and submit copies. Also indicate how information will be communicated daily to let line staff know what constitutes a reimbursable meal each day.	

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		<p>week, one ounce-equivalent of meat/meat alternate per day and minimum 9 per week, 3/4 cup of vegetable, 1/2 cup of fruit, and 1 cup of fluid milk. At the beginning of meal service, the only vegetable being placed on students' trays was two carrot sticks. According to the Food Buying Guide, it takes three 4-inch by 1/2-inch carrot sticks to equal 1/4 cup of vegetable. Since carrots were the only vegetable offered, it would take 9 carrot sticks to equal 3/4 cup of vegetable. Less than the 3/4 cup can be put on the students' trays as long as the students understand they can have more. It was clear that the students did not understand that. Students can be asked if they want more or signage can indicate that they can have more.</p>		
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Org - Level Technical Assistance

Area	Question	Comments
		<p>Technical assistance was provided on completing a comprehensive written procurement plan and written code of ethics. The code of ethics must include language about accepting items of monetary value, disciplinary actions, and checks and balances. A prototype procurement plan is available on the Procurement in Child Nutrition Programs area of the DE website, www.educateiowa.gov. Beneath the prototype procurement plan is a handout that explains the plan column by column. There are also webinars and other resources at this site.</p>
100 - Certification and Benefit Issuance	100 Does the SFA meet one of the following criteria:	<p>SFAs that demonstrate 8% or higher error rate on applications must conduct an Independent Review of applications until the SFA can demonstrate no more than 5% application errors. A second review requires a re-evaluation of the original determination before the household is notified of eligibility. There is also a report that must be filed with the state agency. For more information, see page 55 in the Eligibility Manual. The SFA's error rate exceeded 8%, so the SFA will be required to conduct Independent Reviews next school year.</p>
100 - Certification and Benefit Issuance	101 Who is the determining official for certifying household applications (Names and/or position titles)?	<p>When determining applications, gross income must be used. Income includes all sources such as wages, tips, commissions, bonuses, base military pay, unemployment, etc. For a full list of income sources, refer to page 23 of the Eligibility Manual. (2) Households that indicate self-employment must complete the second page of the application from the previous year's W-2 which subtracts out business expenses. If a household has part income from wages and part income from self-</p>

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		employment, they must be listed separately. See page 24 in Eligibility Manual.
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.	Whenever households are denied benefits (page 62 or Eligibility Manual) or when benefits are reduced (a household goes from free to either reduced or denied, or a household goes from reduced to denied) the household must be informed in writing. The written notification must give the household ten days to appeal, inform them of how to appeal, state contact information for the Hearing Official, inform the household of the cost of the meals, let the household know they can reapply at any time their situation changes, and include both the USDA and Iowa non-discrimination statements.
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.	Technical assistance was provided on requirements for the Wellness Policy. A folder with resources was provided on-site, and links and resources were also emailed to the SFA.
1200 - Professional Standards	1206 a. Did Full-Time school nutrition staff, meet the training requirements?	It is highly recommended that the two kitchen managers be sent to training this summer. New Managers/Healthy Meals training in August would provide an overall review of program requirements as well as networking with other food service staff.
1200 - Professional Standards	1208 Is the SFA tracking training hours on an annual basis? If not, please describe how training hours are being tracked.	<p>SFAs are required to track training hours for Professional Development regulations. Both an Iowa and a USDA tracking tool was shared with the SFA as well as the USDA site for locating training. 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.)</p> <p>Technical assistance was also provided on training for non-SFA staff. Staff not paid from Child Nutrition funds and who provide only nominal assistance to the program must at a</p>

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		<p>minimum, have Civil Rights training. If they perform any duties that include food, there should also be some food safety training. Non-SFA staff who provide more than nominal assistance must have at least four hours of training per year.</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>Whether the district participates in the Summer Food Service Program, SFSP or not, outreach to households at the end of the school year is required since children may travel to other towns during the summer. For information on summer, SFSP, locations in Iowa, go to complete information about promoting SFSP, go to https://www.educateiowa.gov/pk-12/nutrition-programs-0</p> <p>One resource that could also be shared is the National Hunger Hotline http://www.whyhunger.org/findfood. 1-866-3-Hungry or 1-877-8-Hambre. There is also information on the federal website with ideas for outreach brochures at http://www.fns.usda.gov/sfsp/raise-awareness. This information could be shared via websites, newsletters, phone calls, flyers, etc.</p>
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	<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>
700 - Resource Management	710 Did the SFA sell nonprogram foods including, but not limited to, a la carte foods (e.g., milk; 2nd entrees; Smart Snacks), catering (e.g., foods/beverages for school board meetings; foods for outside entities & programs), and/or adult meals (e.g., meals for teachers, parents, etc.)?	<p>Technical assistance was provided on completing the Nonprogram Revenue Tool. Calculate average program meal prices for lunch and breakfast times the number of meals to determine program food costs. Subtract that from total food costs to determine nonprogram food costs. Then do the same with revenue. Determine all revenue--state, federal, and household--paid for reimbursable meals. Subtract that revenue from total revenue to determine nonprogram revenue.</p>
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	<p>(1) Technical assistance was provided on completing the Ethnic/Racial form. For this form, all students who applied for benefits-free, reduced, and denied--are divided into two identities: Ethnic Identity and Racial Identity. The total in each column for Ethnic Identity must match the total in each column for Racial Identity. Also, each row should equal the total number in column 1. (For example: the total number of Hispanic or Latino applicants must equal the total of numbers awarded free meal status, reduced meal status, and those that did not qualify.) (2) A new And Justice for All poster was provided for the elementary site. The poster must be located in a</p>

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		visible location and should not be blocked by a clock.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	SFAs with more than one building site must annually conduct an on-site monitoring by February 1. The deadline has not passed yet, but monitoring from last year could not be located. It is highly recommended that the SFA conduct the self-monitoring every year to ensure accurate meal counts.

Site - Level Technical Assistance Holy Trinity Elementary School (8111)

Area	Question	Comments
		Participation in Child Nutrition Programs and satisfaction of participants may be increased by offering more choices. The more choices of fruits and vegetables that can be offered, the more likely it is that students will participate in the meals. Packages of carrots can be offered daily along with a hot vegetable. Pre-portioned fruit can be offered in a variety each day.
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?	The meal pattern is set up so that nutrients and quantity requirements overlap for grades K-8, so it is possible to offer the exact same meal and meal quantities to those grades. However, nutrients and quantities do not overlap for grades 9-12 with any other grade group, so if the meal and meal quantities being offered are the same for grades 7-12 at the high school, then the meals are out of compliance. It is highly recommended that menus at the high school be reviewed to ensure compliance with the two grade groups being served at the high school.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation, did all reviewed meals during the review period indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students? If NO, explain any errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record the number of meals observed missing required meal components on the S-1, 15. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 16.	Technical assistance was provided on creating standardized recipes and how to determine nutrients and component contribution. A standardized recipe form was shared as well as a website for determining nutrients.
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 And Justice for All poster must be in a publicly visible location where it can be easily read by participants. The poster provides information on filing a discrimination complaint. There is a poster at the elementary, but it is half covered by a clock, and the poster is old and outdated. A new poster was provided during the on-site review.

Org - Level Commendations

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Description
<p>APPLICATIONS/BENEFIT ISSUANCE: Benefit documents were organized and available. The current application form and guidelines were used, benefits are accurately transferred to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were correctly determined, signed and dated by the household member and the SFA, were complete with SSN's and case numbers, and all applications were determined within ten days. Access to benefit information is correctly limited. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.</p>
<p>CIVIL RIGHTS: The And Justice for All civil rights poster was posted in the cafeteria. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The current state and federal non-discrimination statements are provided.</p>
<p>HACCP/FOOD SAFETY: The SFA has a partially completed written Food Safety plan. The latest Health Inspection Report was posted in a publicly visible location. Food Service workers wore proper hair restraints and practiced good gloving procedures.</p>
<p>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 appear accurate. JMC 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, FPRs, were on file for all meals claimed for reimbursement for the review period.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: 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. Labels used for producing meals were on file. A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Standardized recipes are used for most food production. Water was available as required. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheet(s) for each school selected for review for a specified week during the review period.</p>
<p>PROCUREMENT: The SFA had copies of bids on file. The main vendor bid included a Buy American clause. Invoices are on file for products purchased.</p>
<p>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. Money is not transferred out of the account to support other programs. The SFA is extremely effective in utilizing its USDA entitlement for commodities.</p>
<p>WELLNESS POLICY: The district has a 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.</p>