

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Netherlands Reformed Christian School (56078319)
On-Site Review Dates: April 12-13, 2017

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	6 students listed on one application were found to be over income after State Agency review of verification. This was not correctly determined by the SFA. The resulting 8.82% error rate will cause the SFA to have to complete a second review of all applications received next school year.	1.) State your intentions to verify all income listed on the selected application and to use gross income when determining eligibility. 2). The SFA will need to have a second review of applications during the 2017-18 school year and complete form FNS-874 to show that their error rate has dropped below 5%.	
700 - Resource Management	V-0700	The SFA does not have a written Code of Conduct for the Foodservice program or a written Procurement Plan.	The SFA will develop a written Code of Conduct and a written Procurement Plan and submit them to the State Agency. The Code of Conduct should either list the actions the school will take if the Code is breached OR link it to an existing policy that states that information.	
1000 - Local School Wellness Policy	V-1000	The Local Wellness Policy has not yet had its goals assessed by the Wellness Committee and this assessment needs to be made public.	1.) The SFA will explain how and when they plan to assess the goals of the Local Wellness Policy. If the assessment has already been made prior to this corrective action response, please submit the assessment to the State Agency. 2). The SFA will state how they plan to make both the latest Wellness Policy and the assessment of its goals available to the public.	
1200 - Professional Standards	V-1200	Professional Standards training is not currently being tracked.	The SFA will submit their completed tracking form showing all staff names (nutrition and non-nutrition) who are involved in the NSLP, the hours they need for the year, and the trainings/hours they received. The SFA will also state who will be responsible to complete this annually.	
1200 - Professional Standards	V-1200	4 non-nutrition individuals are involved in NSLP (Determining Official, Confirming Official, 2 cashiers) and have not completed their required 4 hours Professional Standards training.	The SFA will state how and when the Determining Official, Confirming Official, and 2 cashiers will obtain their needed 4 hours training. One hour must include Child Nutrition Civil Rights training.	
Resource Mgt Comprehensive Review	V-RMCRF	The SFA incorrectly transfers money out of the School Nutrition Account when possible to cover indirect costs, i.e. utilities, secretary salaries, etc. No indirect cost rate or direct cost pool is used to	The SFA will explain how they will calculate their indirect cost rate and what direct costs they will base this on in the future.	

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		calculate this.	
Resource Mgt Comprehensive Review	V-RMCRF	The Non-program food revenue tool was calculated incorrectly, showing that non-program food costs/revenues were equal. The bookkeeper stated she does not believe she calculated costs/revenues correctly.	The SFA will re-calculate the non-program food revenue tool for SY2015-16 and submit the corrected tool to the State Agency. If non-program food costs are greater than non-program food revenue, the SFA will explain how they plan to fix this.

Site - Level Findings: Netherlands Reformed Christian School (8319)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Based on food production records, the SFA is short on legumes during the review week for K-8 grades. Only 1/4 cup was planned for these grades instead of the required 1/2 cup for the week. Also, the SFA only offered 1.5 oz. eq. grains for the 9-12 graders on Tuesday during the review week. Minimum grains required per day for 9-12 graders is 2 oz. eq.	Please explain how you intend to ensure that K-8 students are offered a full 1/2 cup legumes each week and how you intend to ensure that 9-12 graders are offered at least 2 oz. eq. grains daily.	
1100 - Smart Snacks in School	V-1100	A la carte foods sold to students have not been run through the Alliance Calculator to determine if they are compliant or not. The entrée sold a la carte that day is exempt and all beverages sold are already compliant with all grade levels so these foods do not need to have a calculator printout.	The SFA will enter the nutrition information for a slice of homemade bread and a peanut butter sandwich into the Alliance Calculator and submit the compliance print-out for each to the State Agency.	
1400 - Food Safety	V-1400	The SFA is not keeping refrigerator, freezer, dish machine, or milk cooler temperatures.	The SFA will submit 2 weeks of temperature logs for the milk cooler, refrigerators, freezer, dish machine.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	107 a. When and how are households notified of students' certified eligibility?	Your JMC household notification letter needs to be approved by the state agency annually.
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.	When using ICAVES, if all reported income is the same frequency, use the appropriate tab to determine income. For example, if all reported income is monthly, use the monthly tab, if all reported income is weekly, use weekly tab, etc. Only use the annual tab if different income frequencies are provided. Recommend attaching ICAVES documentation to each application in case questions arise in the future. Also, discussed with the Determining Official filling in "Received By" date on each application.
100 - Certification and Benefit Issuance	130 Does the direct certification list utilized by the SFA:	Recommend applying for and using E-Lookup in order to determine students who might be directly certified. This can be done with all students prior to the beginning of the school year and with new students so that no application needs to be completed by the families.
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	Discussed with the Determining Official how to accurately complete the Verification Collection Report in the future. Also, all incomes listed on the

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		original application need to be verified, including any reported student income.
200 - Verification	207 Based on the review of verified applications:	When reviewing verification documents, you must use gross income instead of net income to correctly determine benefit status. Please educate families on this as best as possible when they are filling out their applications.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable):	Discussed with the secretary that non-district students should be charged the full adult price as they are not receiving subsidized meal prices. Also, discussed with the Principal the USDA requirement to have a Negative Balance policy in place by July 1, 2017. This local policy should be made known to all households in the district and it needs to be followed.
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.	A copy of a complaint policy for school nutrition programs and a form to complete when filing a complaint was sent to the Principal. It is recommended that the SFA has a policy/procedure in place if a parent should file a complaint about the School Nutrition Program.
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	The shortened non-discrimination statement needs to be on all posted menus, i.e. "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.	Please add the original approval date and each revision date to the wellness policy so that it shows when it was last reviewed/revised. The Local Wellness Committee should include a student.
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.	Emailed the FSD templates that can be used to track Professional Standards training. One person in the SFA needs to track all training for all staff throughout the year.
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 Summer Meet-up flier was e-mailed to the SFA to send out to households before the end of the school year. This should be done annually.
Resource Mgt Comprehensive Review	2 For each of the categories selected, what process(es) did the SFA use to ensure that all funds received from the sale of nonprogram foods were deposited into the SFA's nonprofit school food service account? Describe Processes:	Recommend having a second person check school nutrition deposits regularly to add another level of integrity to the program.
Resource Mgt Comprehensive Review	4 Did the SFA apply the indirect cost rate to the correct direct cost base?	Discussed with the NSLP bookkeeper how to properly calculate indirect costs if no indirect cost rate has been obtained from the USDE. The SFA may only take up to 10% from the direct cost pool that includes school nutrition labor, supplies, travel expenses.
Resource Mgt Comprehensive Review	7 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	Written and verbal guidance given to the secretary to properly calculate non-program food costs/ non-program food revenue.

Site - Level Technical Assistance Netherlands Reformed Christian School (8319)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	325 b. Were the counts by category correctly used in the Claim for Reimbursement?	Strongly recommend the SFA contact JMC to see if they will change the grade groupings to K-12 so that the 2 grade levels no longer need to be consolidated. This would help decrease the risk of mistakes due to human error. The SFA should use the Claims Edit Check report when filing the monthly claim instead of the summary report.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	There is at least 1 cup fruit offered daily to the HS students, but this is not reflected in the food production records. Please make sure FPR show that you are offering at least 1 cup fruit daily to 9-12 graders.

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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.	Both the "And Justice For All" poster and the most recent food inspection needs to be posted in a public place, i.e. not in the kitchen.
1400 - Food Safety	1402 Is a copy of the written food safety plan site specific and available at each school?	A link to the Iowa State Extension website for HACCP information and sample SOPs was sent to the FSD.
1400 - Food Safety	1409 a. Did any review of products indicate violations of the Buy American provision in 7 CFR 210.21(d) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable? If yes, proceed to b, if no proceed to next question.	Discussed with the SFA the need to follow the Buy American clause, to put this into their bid specifications and to check all products from their vendors to ensure they are made/processed in America. Exceptions to this are mandarin oranges, bananas, pineapple.
Dietary Specifications Assessment Tool - Lunch	24 Students are offered salt:	It is very difficult to meet the sodium restrictions when a salt shaker is available for student use. Based on the more restrictive sodium levels allowed in the 2017-18 school year, strongly recommend getting rid of the salt shaker and providing other non-sodium seasonings instead.

Org - Level Commendations

Description
Benefit documents were organized. The current application form and guidelines were used, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. Original applications were correctly determined, applications were complete with SSN's and all applications were determined within ten days. Access to benefit information is correctly limited. Eligibility is kept confidential.
Calculated fiscal action for this review will be less than the USDA disregard level so no claim adjustments will be needed.
The correct number of applications were verified and were correctly selected from error prone applications. The verification process was completed on time. The application selected for verification was confirmed prior to verification.
The district has a wellness policy on file that was recently reviewed. There are goals to promote student wellness, nutrition education and promotion, and physical activity.
The Resource Management section of the Off-Site Assessment tool was completed on time. January receipts that were reviewed, indicated appropriate and allowable expenditures. The Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool. The SFA effectively utilizes its USDA entitlement for commodities and takes advantage of DoD for fresh fruits and vegetables. Reports are filed on time, and records are maintained for at least three years plus the current year.

Site - Level Commendations Netherlands Reformed Christian School (8319)

Description
Students have access to free water at lunch as required.
The Food Service Director, FSD, and manager do an excellent job of menu planning. Food is mostly "homecooked" and very tasty. There is good meal participation at all sites. The salad bar offers many fresh vegetables. All grains used are whole-grain rich. All meal components were available at the beginning of meal service on the days of observation and throughout the meal service. Menus offer different portions for all grade groups, i.e. K-5, 6-8, 9-12 in order to maximize the number of calories allowed to each group. Detailed Food Production Records and many CN/PFS labels are kept on file showing documentation of how foods contribute to the meal plan. Recess is scheduled before lunch service. Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. All students were observed to have a reimbursable meal during the day of the review. Offer vs Serve is done correctly.
The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled.
The school utilizes volunteers to help prepare and serve meals daily.

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