

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Newell-Fonda Comm School District (46440000)**  
**Review Dates: 01/10/2017 – 01/12/2017**

**Program Year:** 2017  
**Month of Review:**  
**Lead Reviewer:** Christine Crow  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The received date is to be documented on each application that the School Food Authority receives. Applications are to be determined, the household notified and the benefit status entered into the Point of Service system within 10 calendar days from receipt of the application. The received date was not included on the applications and therefore State Agency was not able to determine if the eligibility status was determined in the required timeframe. Technical assistance provided.	State the process the School Food Authority will implement to ensure that the received date is documented on each application to show that all applications are determined, the household notified and the benefit status entered into the POS system within 10 calendar days from receipt of the application.	
200 - Verification	V-0200	Before sending the letter to the household informing them that they have been selected for verification, the School Food Authority should attempt to find the students on Elookup. If found, the student will be directly verified to receive free meal benefits. Technical assistance provided.	State your intentions to directly verify students on applications that have been selected for verification.	

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	V-0700	Procurement: Each procurement plan must contain a signature page, a general list of products being procured and their specifications, signed debarment certification worksheets by all vendors and a code of conduct. There weren't any signed debarment certification statements available for the SFA's bread and milk vendors. Technical assistance provided.	Submit signed debarment certification statements for the bread and milk vendors.	
800 - Civil Rights	V-0800	The ethnic/racial form must be completed annually by November 15. This form was not completed upon State Agency arrival and therefore State Agency was not able to ensure that applications were approved without discrimination. Technical assistance provided and the School Food Authority promptly completed this form. No discrimination was observed in determining the eligibility status of student's income applications.	No further corrective action required.	
1000 - Local School Wellness Policy	V-1000	According to the final rule, it is a requirement that each school within the district assess their implementation of the goals described in the Local Wellness Policy and make that assessment available to members of the public. The wellness committee leader has completed the assessment of the policy goals and intends on putting that on the schools website. Technical assistance provided.	Describe when the assessment will be made available to the public or provide the website where the assessment can be found online.	
1100 - Smart Snacks	V-1100	There are 3 vending machines throughout the school, 2 of which sell	Describe the plan that will be implemented to ensure that beverages	

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		<p>beverages. All foods and beverages must meet Smart Snack regulations for the lowest grade group in the school. Many of the beverages did not meet Smart Snack requirements for the kindergarten grade group. Examples include G2 and 10 ounce juice servings. The foods sold in vending do meet Smart Snack requirements. Technical assistance provided.</p>	<p>sold during the school day will meet Smart Snack requirements for the lowest grade group.</p>	
1200 - Professional Standards	V-1200	<p>It is required that cashiers, the authorized representative and all other staff that have responsibilities within the school nutrition program receive civil rights training and training on their job duties. There was not proof that the cashiers received civil rights training. Technical assistance provided.</p>	<p>Submit documentation that the 2 cashiers received civil rights training.</p>	
Revenue from Nonprogram Foods Testing Chart	V-NPFTC	<p>The school food service recently started vending meals to the local day care in August 2016. Although a breakfast and lunch meal and 2 snacks have been provided for both children and adults, no contract has been signed indicating the price that will be paid back to the SFA for the cost of those meals and no payment has been received. The price for a child and adult breakfast, lunch and snack must be determined and the School Food Service Account must be reimbursed. So far this year, 1229 child breakfast meals, 278 adult breakfasts, 344 adult lunches, 1289 child lunches, 2409 child snacks and 375 adult snacks have been</p>	<p>Submit a copy of the contract signed by the SFA and the daycare that details the price of a breakfast, lunch and snack. Submit a copy of the invoice that shows the daycare has paid the SFA for the meals and snacks and confirm that they will continue to pay for all meals and snacks provided.</p>	

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		provided. Technical assistance provided.		
Resource Mgt Comprehensive Review	V-RMCRF	It appears that the non-program revenue as a percentage of total revenue does not cover the cost for non-program foods as a percentage of total food cost possibly because it does not include all of the non-program food revenue and/or expenses. The business manager was notified as she was out of the office during the on-site review.	Correct the non-program revenue tool to include all non-program foods and submit the corrected non-program revenue tool for 2015-2016 to show that the non-program revenue is equal to or greater than the non-program food costs, as a percentage of total food revenue and total food costs, respectively. If it does not, describe how the SFA will ensure that non-program food revenue as a percentage of total revenue will begin covering the cost for non-program foods as a percentage of total food cost going forward.	

**Site - Level Findings: Newell-Fonda Community School District (0409)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Breakfast	V-0300	The edit check for the number of free breakfasts served in December did not match the number of free meals claimed. There were 8 additional free breakfast meals claimed in December than what was on the edit check. After investigation with the secretary and IT person, it was determined that the number on the claim, which matched the point of service summary sheet from Infinite Campus and was accurate. The error was due to an inaccurate categorization of grade groups in the documentation for a single student. The inaccurate student information and edit check information were corrected resulting in matching claim information. No	No further corrective action necessary.	

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		further corrective action necessary.		
400 - Meal Components and Quantities - Breakfast	V-0400	The daily requirements for Offer versus Serve at breakfast are that 1 cup fruit, 1 cup fluid milk, and 1 ounce grain equivalent are made available. In order to be claimed as having a reimbursable breakfast, students are required to have 3 items on their tray, one of which must be 1/2 cup fruit or 100% fruit juice. On the day of review, State Agency observed confusion regarding what constituted as a fruit. Students were given the option of taking 1/2 cup applesauce or 1/2 cup yogurt and granola parfait as their fruit serving. Yogurt is considered a meat/meat alternate component and not a fruit component. State Agency provided staff immediate guidance on this requirement to ensure the remainder of students were instructed to take 1/2 cup fruit. Despite this, there were 8 students who were observed as not taking a fruit or juice and were counted as taking a reimbursable breakfast. Although students had the required serving of grain made available to them (omelet, toast and/or cereal) and 1 cup of milk, they did not have 1 cup of fruit and/or 100% fruit juice made available to them as is required. Technical assistance provided.	Submit documentation of staff training on the offer versus serve breakfast requirements. Describe how the SFA will ensure that all students who are claimed as taking a reimbursable meal have 3 items on their tray, one of which being a 1/2 cup fruit or 100% fruit juice.	
400 - Meal Components and Quantities	V-0400	According to the food production records, during the review period, there was one day at breakfast when	Submit one week of food production records for breakfast to show that all menu components were provided in the	

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- Breakfast		there was only 1/2 fruit served when one cup must be made available to all students at all breakfast meals. Technical assistance provided.	correct serving size requirements. Include supporting documentation including CN labels and standardized recipes.	
400 - Meal Components and Quantities - Lunch	V-0400	Upon observation of lunch and breakfast meals while on-site, there was no portion control of condiments for the 4-12th grade students. Students were liberally taking cinnamon and sugar at breakfast and ranch, cheese, pickles, and ketchup at lunch thus putting them over the calorie and sodium requirements. This is a repeat finding.	Describe how the School Food Authority will control condiments for grades 4-12.	
400 - Meal Components and Quantities - Lunch	V-0400	Food production records were incomplete as the total actual numbers and planned servings are not available, milk is not written on the food production records, and the total quantity is not documented in a measureable amount for all menu items. Therefore, State Agency was not able to ensure that enough food was available for all planned or actual number of students. CN labels were not approved labels. CN labels must be taken directly from the box. Alternatively, a copy or picture of the actual label can be on file to document how all commercial combination products credit towards the meal pattern. If a CN label is not available the Product Formulation Statement is also acceptable. For homemade combination menu items, it is required that a standardized recipe be used and	Submit one week of complete food production records for lunch to show that all menu components were provided in the correct serving size requirements. Include supporting documentation including CN labels and standardized recipes. Describe how the School Food Authority will begin incorporating whole grain rich items for bread, cereals, waffles, and noodles and provide written confirmation that grain items ordered and served will be whole grain rich items.	

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		<p>on file. Standardized recipes must include critical control points, ingredients and their weights/measures, directions, serving utensil size, yield, portions, and how a portion size credits towards the meal pattern. Some of the recipes were not standardized including the hashbrown casserole recipe. Therefore it was unclear how much starchy vegetable was provided in one serving. This is a repeat finding. All grain items must be whole grain rich. The waffles, rice, bread, rice crisp cereal, 1 packet of rice krispie cereal, breakfast pizza, macaroni and cheese, and spaghetti served during the review period were not whole grain rich. Since this is a repeat finding from the 2013-2014 Administrative Review, breakfast meals from 12/12/2016 will not be reimbursable. These meals are less than the disregard and therefore no fiscal action will be taken. According to the available production records and supporting documents during the review period for lunch, all students were short on their starchy vegetable subgroup requirement of 1/2 cup. The 9-12 grade students were short on the amount of fruit that they received one day as only 1/2 cup was available and 1 cup must be made available. Technical assistance provided.</p>		
1700 - Afterschool Snack	V-1700	Food production records for all snacks claimed for the Afterschool Care Snack Program must be available and kept	Submit one week of food production records and the menu for the Afterschool Care Snack Program.	

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		on file for at least 3 years plus the current year. Currently, there are menus but there aren't any food production records for these snacks. Technical assistance provided to the food service director.		
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**Org - Level Technical Assistance**

Area	Question	Comments
1400 - Food Safety	1401 If conducted as part of the Administrative Review, are SFA contracted and self-operated warehouses, storing all foods (commercial and USDA) properly? If NO, explain.	While on-site, the State Agency observed boxes of food in both the dry storage and freezer areas. Food should be kept at least 6 inches off of the floor. Upon giving technical assistance to staff, State Agency was informed that it is their normal practice to keep foods up off of the floor. However they were short staffed due to an illness and had not had time to put food away from the weekly delivery. Technical assistance provided.

**Site - Level Technical Assistance Newell-Fonda Community School District (0409)**

Area	Question	Comments
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.	The tuna found in storage was made in Thailand. If available, all foods purchased must meet the Buy American provision. Canned tuna that is made in the USA is available as a commodity product. Technical assistance provided.

**Org - Level Commendations**

Description
AFTERSCHOOL CARE SNACK PROGRAM: • The program is area eligible according to October 2016 data as >50% of students are Free or Reduced Price eligible. •



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Afterschool Care Snack Program menus indicate that the required 2 components are served to students. • The counting and claiming process is done accurately at the point of service and the point of service count sheets match the number of snacks claimed in December 2016. • Upon discussion with the program director, there are a variety of education and enrichment activities offered daily. The director has planned activity ideas in a binder and is working on training new staff members on these activities. • The Afterschool Care Snack Program has received a monitoring review within the first 4 week of the program’s initiation. No corrective action items were documented.

**CERTIFICATION AND BENEFIT ISSUANCE:** • The School Food Authority (SFA) provides the 30 day carryover of the previous year’s eligibility status. • The direct certification lists were downloaded and on file. • All applications were on file and error prone applications were flagged. All applications were determined accurately. • Letters of denial were provided to all families whose income was over the guidelines. • Current applications and guidelines were used. Applications were complete with social security numbers, family member names, parent signatures and staff signatures and dates.

**CIVIL RIGHTS:** • The School Food Authority offers Limited English Proficiency households an interpreter as needed and applications in the preferred language. • The And Justice for All poster is displayed in a public location. • Diet modification statements are on file for students who have special dietary needs. The food service director and school nurse work closely with families and students to ensure that these dietary needs are met. • The non-discrimination statement is on program materials. • The public release was sent to the local media at the beginning of the school year. • Civil rights training was completed for all food service staff and documentation is on file to prove this training occurred. • The district’s complaint procedure was on file and included all required elements.

**COMPETITIVE FOODS:** The school nurse has nutrition calculator printouts of all products sold and conducts monthly audits of all products sold in vending machines.

**FOOD SAFETY:** • The food service director and one staff member are ServSafe certified. • The last two food inspection reports are posted in a public location. Neither inspection observed any food safety findings. • Good food safety practices were observed while on-site including hair restraints, clean uniforms, and gloves. • Temperatures were monitored and recorded for food, milk coolers, refrigerators, freezer and dry storage. • The School Food Authority has a HACCP plan at the school. • The HACCP plan contains all of the required Standard Operating Procedures and is individualized for the school’s needs.

**MEAL COUNTING AND CLAIMING:** • The information in the application was accurate when compared to the food service line and point of service system. • The lunch and breakfast counts on the day of review appeared reasonable when compared to the December 2016 lunch and breakfast edit checks. • All meals counted and claimed for all grade groups during the observed lunch meal were reimbursable.

**MEAL PATTERN:** • The menus and daily dated food production records are on file for all meals claimed. • All menu components were offered to students for breakfast and lunch during the review period and during the on-site review. • At least 2 different and approved milk types are provided to students. • Signage is posted for students and staff so that they are aware of what is being offered for both breakfast and lunch. • The food service staff and school nurse have diet modification statements on file for students with special diet needs and work with families to meet those needs. • During the review period for breakfast, the daily and weekly milk and grain serving size requirements were met for all grade groups. • During the review period for lunch, the daily and weekly grain, meat/meat alternate, and milk serving requirements were met. The weekly fruit and vegetable (including the dark green, red/orange, bean/pea, and other vegetable subgroup) requirements were met for all grade groups.

**PROCUREMENT:** • The School Food Authority (SFA) is a member of a purchasing group. • The SFA had their bid documents available. • The SFA had a code of conduct and their purchase threshold policies available.

**PROFESSIONAL STANDARDS:** • The food service director has professional standards documentation on file to prove that the food service staff received training and a training plan on future training topics that will be provided to ensure all staff receive the required number of hours. • Professional standards tracking information is also available as required and included all of the food service staff.

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**REPORTED AND RECORD KEEPING:** All food and nutrition documents are saved for at least 3 years plus the current year.

**SCHOOL BREAKFAST AND SUMMER FOOD SERVICE OUTREACH:** •The School Food Authority promoted the School Breakfast Program and the Summer Food Service Program through newsletters, flyers, menus, their website, and signs around town.

**SCHOOL WELLNESS POLICY:** • The district’s Local School Wellness Policy contains all of the required elements and is made available to the public through their website. • The Local School Wellness Policy was last reviewed and approved by the School Board on 12/12/2016. • The wellness policy leader is working with a RDN Wellness Coach in the Team Nutrition Meet the Challenge project to update and implement goals within the wellness policy. • The district has a wellness committee that contains a variety of stakeholders.

**VERIFICATION:** The verification process and verification report were completed on time. • The correct number of applications were picked for verification (3) and they were picked from error prone applications. • All applications to be verified were confirmed and signed by a confirming official before notifying the families. • Letters of notification for verification selection and letters of the results of the verification procedure were provided to the families selected. • Families provided accurate documentation to prove their income and the School Food Authority accurately determined eligibility based on documents provided. Letters of adverse action that included all required information were provided to the family whose benefit eligibility status was reduced.

**WATER:** Free, potable water is available through a water bottle filling station in the cafeteria.