

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Tri-County Comm School District-Thornburg (64620000)**  
**Dates: January 24-25, 2017**

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

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	(1) In order to use information from the benefit application for school fees, the household must sign a waiver giving the SFA permission to use the application for that purpose. The waiver must indicate each specific fee that will be waived and the dollar amount of each fee. Tri-County had a waiver, but it did not state specific fees or dollar amounts. (Even if waivers are provided, if the waiver is not signed and dated, the fees cannot be waived.) Look on page 73 of the Eligibility Manual for disclosure requirements. (2) All applications must be signed and dated by both the household and the SFA. Some applications were missing household dates, and a few were missing SFA signature and/or date.	For your response, (1) submit a copy of the waiver that will be used from now on that includes specific fees and dollar amounts. (2) This error was discussed during the on-site review. No further action is required.	
200 - Verification	V-0200	The household selected for verification was incorrectly	For your response, send a letter of adverse action to the household and	

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		verified. Eligibility is based on the household's gross income, but the SFA verified free benefits for the household using net income. When gross income is used, the household does not qualify for either free or reduced benefits and should have been changed to paid at the time documentation was provided for verification.	attach a copy of the letter below. Also revise your Verification Report to reflect correct information. Indicate the date the verification report was revised.	
1000 - Local School Wellness Policy	V-1000	<p>There is no evidence of assessment of progress on wellness policy goals or all stakeholders participating or outreach to those stakeholders. The Healthy Hunger Free Kids Act of December 2010 included additional requirements for the school wellness policy. All required stakeholders-parents, students, food service staff, school health professionals, PE teachers, administration, school board, and the general public-must be made aware of their ability to participate and encouraged to participate. 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> <p>The policy also includes some outdated references to whole grains and Healthy Kids Act/Smart Snack regulations.</p>	For your response, indicate how all stakeholders will be notified and encouraged to participate. Submit a copy minutes or notes from the latest review/update of the policy, and also submit a copy of the assessment of building goals once that is completed. Finally, indicate a timeline for updating the policy.	

**Site - Level Findings: Tri-County High School (0109)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal	V-0400	(1)Two cereals, cocoa puffs and	(1) For your response, indicate what	

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<p>Components and Quantities - Breakfast</p>		<p>rice cereal, and doughnuts that are being used for breakfast are not whole grain-rich as required. There was also block margarine in storage that contains trans fat. (2) Signage explaining what constitutes a reimbursable meal is required for both breakfast and lunch at the beginning of each separate food line. For lunch, the sign(s) must indicate that a reimbursable meal includes a minimum of three components, one of which must be 1/2 cup of fruit or vegetable. The signage must also indicate which food items fulfill which component. For breakfast, the sign must indicate how many items each food item fulfills. The SFA's lunch sign does not indicate which food items fulfill each component, and there was no signage at breakfast.</p>	<p>products will be purchased that are wholegrain-rich and trans fat free to replace these items and how the SFA will ensure all grains purchased are WG rich and free of trans fats. (2) For your response, indicate how lunch signage will be made compliant, and also indicate when signage was added for breakfast.</p>	
<p>500 - Offer versus Serve</p>	<p>V-0500</p>	<p>The SFAs site application on CNP indicates that Offer vs Serve, OVS, is used for all grades for both breakfast and lunch. Observation of meal service did not validate that. OVS is not being utilized for grades PK-2.</p>	<p>The SFA changed the CNP application during the on-site review to Serve Only for grades PK-2. (Serve Only requires that the minimum quantities be served for all students—3/4 cup vegetable, 1/2 cup fruit, 1 grain/day and 8 grains/week; 1 meat/meat alternate per day and 8 meat/ma per week, and 1 cup of milk) No further corrective action is required.</p>	

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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	107 a. When and how are households notified of students' certified eligibility?	Whenever households are denied benefits (page62 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, include 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.
100 - Certification and Benefit Issuance	139 Does the SFA account for benefits that have been extended to students living in a household that is receiving SNAP, TANF, or FDPIR benefits? If NO, explain. Record errors on the SFA-1.	1) Technical assistance was provided on indicating other household members on direct certification lists. The names can be written on the DC list next to the household member who is on the list, or a separate list of DC names and matching household members can be maintained. It is important to indicate in some way how each student is eligible for benefits. (2) Technical assistance was also provided on accessing the Potential List twice each month at the same time as the regular DC list. If this list is not accessed and filed, students who should be receiving free benefits could be missed. (3) Technical assistance was provided on the Community Eligibility Program, CEP, where all students in the building would receive free meals. The SFA should attempt to determine via Direct Certification as many households as possible, and then check the rules for CEP to see if that is a viable option for the district. For more information and resources, go to <a href="https://www.educateiowa.gov/community-eligibility-provision-schools-cep">https://www.educateiowa.gov/community-eligibility-provision-schools-cep</a>

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1000 - Local School Wellness Policy	1006 How does the public know about the results of the most recent assessment on the implementation of the Local School Wellness Policy? Provide documentation to support the response (or appropriate web address(es)).	There are new requirements to report out to the community on the results of the assessment, the extent that the district is in compliance with their policy, and a description of progress made in attaining the goals of the policy. A folder with information and resources was provided during the on-site review.
1200 - Professional Standards	1210 Did the employees that work outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program receive training applicable to their duties related to the program?	Technical assistance was 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 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. The Iowa Tracking Tool was also discussed and the director can use one tracking tool for all employees instead of a separate one for each employee.
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?	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 <a href="https://www.educateiowa.gov/pk-12/nutrition-programs-0">https://www.educateiowa.gov/pk-12/nutrition-programs-0</a> .Another resource that could be shared is the National Hunger Hotline <a href="http://www.whyhunger.org/findfood">http://www.whyhunger.org/findfood</a> . 1-866-3-Hungryor 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> .

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		<p>This information could be shared via websites, newsletters, phone calls, flyers, etc.</p> <p>Breakfast outreach which includes locations and times of meal service, must be conducted at the beginning of the school year and throughout the year. Outreach at the beginning of the year should be sent at the same time as registration materials. Offer continuing outreach for breakfast via announcements, newsletters</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?	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.
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?	SFAs that participate in a cooperative purchasing group such as AEA Purchasing are responsible for all procurement regulations just as if they were purchasing independently. All procurement and contract documents should be available including the RFP or IFB, all contract conditions, and a current list of products and prices. Any products not on the current list must be competitively procured. A sampling of prices should be checked at least monthly.
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?	Technical assistance was provided on continuing to complete the written procurement plan and written code of ethics. The code of ethics has language about accepting items of monetary value, disciplinary actions, and checks and balances, but the disciplinary actions need to be indicated in the code or policy. The SFA should look at the previous year's expenses for a full list of vendors paid from Child Nutrition funds and include all vendors in the written plan.

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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>The Nonprogram Revenue Tool was completed on-site. The tool indicated that insufficient funds are collected. However, since the SFA only sells milk (\$.50) and adult meals (\$3.75), they are exempt from increasing prices to cover the deficit. The possible deficit may be from incorrectly determining revenue and/or expenses for nonprogram food. (2) Improving the financial status of the Child Nutrition account was discussed with the director. The possibility of selling some a la carte options was discussed. Parents should be notified if this becomes an option and allowed to opt out. There are several options-- a la carte items can be sold at the same time as a reimbursable meal, sold with or without requiring a reimbursable meal or students may be told to wait until all students have a reimbursable meal before selling a la carte. The items can be sold 'cash-only' or charged to their account. There are many options. Anything sold a la carte must meet Smart Snack regulations, and the SFA must have documentation of compliance. Further ideas for improving finances was emailed to the director.</p>
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	<p>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.)</p>

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**Site - Level Technical Assistance Tri-County High School (0109)**

Area	Question	Comments
1400 - Food Safety	1406 Were the selected relevant temperature logs available for review? If YES to specify which date was selected. If NO explain.	Monitoring is an important part of the SFA's food safety/HACCP plan. Part of monitoring is temperature logs. The logs must be maintained for food served, as well all coolers and freezers including all milk coolers, dishwashers, and thermometer calibration. These logs serve two main purposes: first, to ensure that food is being served and stored safely, and second to serve as documentation of good food safety practices in the case of a food borne illness outbreak.
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?	Technical assistance was provided on changing the method of meal counting at the POS, point of service. It is recommended that an additional table be placed in front of the computer along with a keypad where students can enter their own pin numbers. This allows the cashier to better check trays for meal compliance and slows the students down to ensure that their meals are recorded. This would also allow the cashier to better monitor condiment usage.
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	(1) Technical assistance was provided on crediting amounts for meal pattern requirements. Vegetables and fruits credit in 1/8 cup increments while meat/meat alternate and grains credit in 1/4 ounce equivalent increments. If the amount of creditable food is in-between a creditable amount, it is always rounded down. (2) Starchy vegetables can only be credited at breakfast if at least 2 cups of any other vegetable sub-group is offered during the week. This can easily be accomplished by offering vegetable juice or a vegetable such as carrots every day. (3) Juice may be offered at breakfast as long as it does not exceed 50% of fruit offered over the course of the week. If a fruit and a juice is offered

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		daily, that would meet the 50% amount.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students?	Sign templates for breakfast and lunch are available at the state website at <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/supporting-school-meals">https://www.educateiowa.gov/pk-12/nutrition-programs/supporting-school-meals</a> . Lunch signage includes the Menu Blank Sheet which indicates each component and the SFA can fill in the food item. The breakfast sign has spaces to enter each component food item and how many items it credits for in the meal.

**Org - Level Commendations**

<b>Description</b>
<p><b>APPLICATIONS/BENEFIT ISSUANCE:</b> 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. All applications were correctly determined, were complete with SSN's and case numbers, and all applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.</p>
<p><b>CIVIL RIGHTS:</b> The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided food service staff and documented. A copy of the district's public release was on file, documenting that it was submitted to local media. No discrimination was observed. The current state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school's website.</p>
<p><b>HACCP/FOOD SAFETY:</b> The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site reviewed, and Standard Operating Procedures, SOPs, have been implemented in the kitchen. The latest Health Inspection Report was posted in a publicly visible location. There were no critical areas noted on the report. Temperature logs are maintained for most coolers. The kitchen and storage areas were very orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.</p>
<p><b>MEAL COUNTING &amp; CLAIMING:</b> 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. PowerSchool is used as the school's POS system. There was a POS for all students, and the POS was organized and orderly. Pre-K and first grade hand in cards; all other grades state their pin number. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during</p>

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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 an excellent job of menu planning and offering choices, and the district has good participation. 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. 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 for lunch and breakfast, and included many fresh fruits and vegetables. Menus included many homemade entrees, and standardized recipes are used for food production. Water was available as required. At least two types of milk are offered. Several low fat and 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 Menu Worksheet(s) for each school selected for review for a specified week during the review period. Nutrient analysis was not required.

**PROCUREMENT:** The SFA has a written Procurement Plan that includes procurement methods and documentation for main purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA also has a written Code of Ethics/Conduct. Main supplies are procured through AEA Purchasing co-op which helps keep prices down and spreads the responsibility for bidding among more people.

**PROFESSIONAL STANDARDS:** Tracking was provided that documents that the director received the required 12 hours of annual training, other full-time staff received at least 6 hours of annual training, and part-time staff completed at least 4 hours. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.

**RESOURCE MANAGEMENT & RECORD KEEPING:** The Resource Management section of the Off-Site Assessment tool was completed on time. Financial records that were reviewed, indicated appropriate and allowable expenditures. 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 Non-Program Revenue, NPR, tool was completed on site. 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 very effectively utilizes its USDA entitlement for commodities.

**SBP & SFSP OUTREACH:** School Breakfast Program, SBP, outreach was sent out at the beginning of the year to inform families of the availability of the program. Reminders of the SBP were also sent out throughout the school year. Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer.

**VERIFICATION:** The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, 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 a current 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. Potential stakeholders are made aware of their ability to participate on the wellness committee.