

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Union Comm School District (65360000)**  
**Date of Review: April 18<sup>th</sup> – 20<sup>th</sup>, 2017**

**Program Year:** 2017  
**Month of Review:** March  
**Lead Reviewer:** Donna Matlock  
**Org Representative(s):** Travis Fleshner

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	The application(s) subjected to verification were not properly selected in accordance with the sample size option used. Two of the three applications verified were not "error prone".	Describe your plan to select the correct number of "error prone" applications for the method of verification used.	ICAVES "annual" calculation was used for ALL applications whether they were annual, monthly, weekly, etc. ICAVES will be properly used. Example: weekly income will be used under the "weekly" tab, monthly income will be used under the "monthly" tab, etc. Annual will only be used if it is an annual income or a "mixed" income.

**Site - Level Findings: Union Middle School (0250)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Org - Level Technical Assistance**

Area	Question	Comments
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.	SFA uses ICAVES tool for determining household applications. The "annual" tab is used for applications indicating one income source by frequency. Annual tab is only used for multiple income frequencies. Using individual tabs based on income frequency provides accurate sampling of "error prone" applications used for "verification" process.
200 - Verification	209 Does the SFA's verification notification letter include all required information? If NO, explain.	SFA needs to update parent letter for declining benefits.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	SA provided a copy of the "Racial/Ethnicity form" to the SFA for completion prior to onsite visit. SFA submitted a form that is used for "all" enrolled students and reported to the DE annually.
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	SFA needs to update the non-discrimination statement on all forms and letters.

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900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	SA discussed with SFA that "meal counts" and signatures need to be on forms to ensure current system provides accurate meal counts and meal patterns and portions are met.
1000 - Local School Wellness Policy	1002 When and how does the review and update of the Local School Wellness Policy occur? Provide documentation to support the response (or appropriate web address(es)).	Discuss with SFA that wellness policies are to be reviewed and assessed every 3 years.
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.	For food items to be sold during the school day, fruit juices must be 100% fruit/vegetable juice. Wellness policy states that juices must be at least 50% fruit juice.  USDA requires SFA's to review and assess wellness policies every 3 years.
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.	SA shared resources of trainings and tracking tools with FSD.
Resource Mgt. Comprehensive Review	9 If the SFA found that it was out of compliance with the revenue from non-program foods revenue requirements, did the SFA take further steps to sufficiently increase its non-program food prices, add sufficient funds to its nonprofit food service account, and/or take other actions to adequately resolve the problem?	SFA's non-program revenue is not sufficient to cover the non-program food costs based on previous information. SFA didn't feel the food costs and revenue were accurate numbers so SFA redid the tool with more accurate data and indicates SFA is compliant.

**Site - Level Technical Assistance Union Middle School (0250)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	SA shared with SFA the credible milk substitution list.
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students?	SA is sending new updated "And Justice for All" posters for all buildings as SFA had old versions hanging on wall.
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Discussed with FSD about completing FPR's (food production records) fully to include "quantity prepped-number of servings, pounds, cans.
900 - SFA On Site Monitoring	901 a. Was the on-site review of the lunch counting and claiming procedure completed prior to February 1?	Onsite Monitoring forms were not fully complete; missing signatures, meal count boxes are blank, overt identification section not completed. Discussed with SFA these areas are to ensure accurate meal counts are consistent, meal pattern and serving portions are met, and signatures identify and confirm actual monitoring is completed accurately.

**Org - Level Commendations**

Description
<ul style="list-style-type: none"> <li>• Benefit documents, as well as all paperwork, were very well organized.</li> <li>• 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.</li> <li>• The correct and current benefit issuance list was available.</li> <li>• All applications were correctly determined, signed and dated by the household member and the SFA, were complete with case numbers, and all applications were determined within ten days.</li> <li>• Income was only converted to annual when there was more than one frequency of income.</li> <li>• Rollover applications were removed if the household did not apply within thirty days of the school year.</li> <li>• Access to benefit information is correctly limited.</li> <li>• Free meals are extended to all members in the household.</li> <li>• Waivers are provided to applicants and indicate specific fees.</li> <li>• Eligibility is kept confidential.</li> <li>• The SFA has a back-up system for benefit issuance documents and system.</li> </ul>

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<p>• 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. • Outreach included announcements, newsletters, the school website, posters, etc. • 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. • The information was shared via websites, lunch menus, newsletters, phone calls, flyers, etc.</p>
<p>• The And Justice for All civil rights poster was posted in the cafeteria. • 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 food service staff and documented. • A copy of the district's public release was on file, documenting that it was submitted to local media. • The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. • 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 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>• The correct number of applications were verified. • 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.</p>
<p>• 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 and the most recent assessment of the policy are available to the public. • Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.</p>
<p>• The Resource Management section of the Off-Site Assessment tool was completed on time. • Financial records that were reviewed, indicated appropriate and allowable expenditures. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. • 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, and no increase in prices were required. • 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 effectively utilizes its USDA entitlement for commodities. • A comprehensive review of finances was not required. • Reports are filed on time, and all records are maintained for at least three years plus the current year.</p>

**Site - Level Commendations Union Middle School (0250)**

Description
<p>• Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of March were accurate and complete. • Point of Service (POS) counts and filed claims appear accurate. • 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. • Cashiers are trained, and daily edit checks are performed. • All students selected a reimbursable meal without having a prompt to select a ½ cup of fruit or vegetable as one of the three required components.</p>
<p>• Students may purchase a second entrée and/or a second milk at lunch. Second entrees are correctly documented on production records. • Documentation was available to show that all foods and beverages sold to students during the school day met Smart Snack and Healthy Kids Act standards, including food sold in the cafeteria, vending machines, school stores, and fundraisers. • The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.</p>
<p>• The Food Service Director, FSD, does a superior job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat. • 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 and within each building. 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 included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption. The SFA provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal. • Menus included many homemade entrees, and standardized recipes are used for food production. • Water was available as required. • Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one or two of the five components. • At least two types of milk are offered. • Many low fat and low sodium food items were observed in storage. • Students had sufficient amount 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. • Nutrient analysis was not required.</p>
<p>• 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(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each 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 all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Good food safety procedures were observed.</p>
<p>Breakfast: • Signage was posted explaining what constitutes a reimbursable meal. A monthly breakfast menu is also posted. • Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one of four items offered at breakfast.</p>

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