

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Liberty Comm School District (69750000)
Dates: January 31-February 2, 2017

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	(1) In order for an application to be considered complete, it must be signed and dated by an adult member of the household. Two applications were missing adult signatures. (2) One application was determined incorrectly since student income was overlooked. The household was determined as free but qualifies for reduced benefits. (For information on individual households for benefit issuance and verification errors, go to Review Attachments and open SFA-1 and SFA-2)	(1) For your response, indicate the date(s) the signatures were obtained. (2) For your response, send the household a letter of adverse action and then reduce benefits after the ten days. Submit a copy of the letter by attaching below.	
200 - Verification	V-0200	(1) Three households did not submit at least one month's income documentation for verification, and verification was not completed on time. (2) One household did not submit documentation for the second household income. The director indicated that the household indicated that the second job was lost. The loss of the job still needs to be documented. (3) Not all gross income was included in the verification determination for	(1) This error was discussed on-site and the director will obtain one month's documentation in the future. No further corrective action is required. (2) For your response, obtain documentation that the second income of \$350 is no longer received by the household. This may be affirmation from the employer or some other notification that the income is no longer received. (3) For your response, send letters of adverse action to the two households and attach copies below. (4) Select another application for verification	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Liberty Comm School District (69750000)
Dates: January 31-February 2, 2017

		two households. Both households will go to paid status when based on the documentation that was submitted for verification. (4) One household that was verified was directly certified in August and should not have been in the pool of applications to be verified. (5) Changes in benefits from these items have made the report on CNP for Verification incorrect.	to replace this application. Submit copies of pay documentation, the front page of the application, and determination after verification. (5) Once #4 is completed, go into CNP and revise the Verification Report.	
700 - Resource Management	V-0700	Beginning July 1, 2016, SFAs were required to have written standards of conduct that pertain to employees purchasing on behalf of Child Nutrition Programs. The standards must include language about conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. There was no written code of conduct pertaining to CNP purchases.	For your response, submit a copy of your code of conduct that covers the four indicated areas.	
800 - Civil Rights	V-0800	(1) Ethnic/Racial data must be gathered, documented, and maintained with applications at least annually. The information is documented for all students who have applied for benefits whether the students qualify for benefits or are denied. (2) All organizations participating in Child Nutrition programs must submit a Public Release to local media annually to notify the public of program availability. The release is available in Download Forms on CNP.	(1) For your response, complete the Ethnic/Racial form and attach a copy below. (2) For your response, indicate who will ensure that the release is submitted to local media next fall. Both of these errors are a repeat from error from the 2014 review.	
1100 - Smart Snacks	V-1100	All food sold to students from midnight until a half hour after the end of the day must meet Smart Snack regulations and documentation of compliance with the regulations must be available for review. Food sold to students includes the cafeteria, vending machines, school	(1) For your response, indicate the date these beverages were removed from both vending machines and submit a list of products now being sold in the machines. Indicate who will be responsible for checking products before they are added to the vending machines. Alternately, indicate	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Liberty Comm School District (69750000)
Dates: January 31-February 2, 2017

		stores, school cafes, fundraisers, etc. Beverage vending machines at both the middle school and high school are out of compliance. 20 ounce containers of Gatorade that are over allowed calories and are noncompliant were for sale at both the high school and middle school. The middle school also has Lifewater and Aquafina with added sweeteners for sale. (2) Second entrees must be documented on Food Production Records to ensure that regulations are followed.	that the machines are locked except for a half hour after the end of the school day until midnight. (2) This error was addressed in another area. No further response is required.	
1400 - Food Safety	V-1400	(1)A complete 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. There were no SOPs at the elementary school; the director was working on them for all buildings at the central office. The same error was cited during the 2014 review when there were not SOPs at the middle school. The SOPs at the main office for the elementary still need several added such as: hand washing, gloving procedures, tasting methods, eating and drinking in the workplace, cleaning up bodily fluids, machine ware washing, pest control, responding to a food borne illness, responding to a physical hazard found in food, visitors in the kitchen, how to respond to an emergency, how to handle a recall, and training new and current employees. There is also not a plan to regularly update the plan and conduct annual training. (2) The latest health inspection report must be posted in a publicly visible location in the cafeteria.	(1) For your response, submit a list of all SOPs that will be in place at each building. Indicate the date they will be available, where they will be stored at each site, and how staff will be trained each year. (2) For your response, indicate where the report is posted, when it was moved to the publicly visible location, and who is responsible for updating the report. This is a repeat violation from the2014 review.	

Site - Level Findings: West Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities -	V-0400	(1)Food Production Records, FPRs, serve many purposes--inventory	(1) For your response, submit one week of lunch FPRs from the elementary that	

Iowa Department of Education
 Bureau of Nutrition and Health Services
 State Review Summary Report
 West Liberty Comm School District (69750000)
 Dates: January 31-February 2, 2017

Lunch	<p>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. (An example was provided.) FPRs at West Elementary do not include milk, most of the condiments, planned servings for second entrees and adult meals, and leftovers are not indicated. (2) Students in grades 1-2 are not offered the fruit/vegetable bar, so their only vegetable is the one offered on the line. Students in grades K-8 must be offered at least ¾ cup of vegetable each day. However, grades 1 and 2 are only offered ½ cup on some days. (3) 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</p>	<p>include all of the required elements. (2) For your response, indicate how students in grades 1 and 2 will be offered at least ¾ cup of vegetable per day. (3) For your response, indicate how correct signage for both breakfast and lunch will be posted. (4) For your response, indicate how you will ensure that all grains at lunch and breakfast will be whole grain rich. (Note: A repeat of errors #2 or #4 at the next Administrative Review may result in loss of reimbursement.)</p>	
-------	--	---	--

Iowa Department of Education
 Bureau of Nutrition and Health Services
 State Review Summary Report
 West Liberty Comm School District (69750000)
 Dates: January 31-February 2, 2017

		<p>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 daily menu is posted for lunch and a sign indicates that three components, including a fruit/vegetable is required. However it does not indicate which food item fulfills what component. There is not signage for breakfast. (4) Beginning SY 2014-15, half of all grains offered at lunch and breakfast must be at least 50% whole grain (whole grain rich). There are many items in storage and on invoices that are not whole grain rich: cocoa puffs, rice cereal, oyster crackers, saltines, animal cookies, sugar cookie dough, pretzels, egg roll, muffin-cake-brownie mixes, waffles, biscuits, several Bernard products, etc.</p>		
500 - Offer versus Serve	V-0500	<p>(1) In order for lunches to be reimbursable when using Offer vs Serve, OVS, students must select at least three of the five required components (meat, grain, fruit, vegetable, milk) and one of those components must be at least a half-cup of fruit, vegetable, or a combination of the two. For breakfast OVS, students must select at least three items, and one of the items must be at least a half cup of fruit/juice. One lunch and three breakfasts did not include a half cup of fruit or vegetable. Also, staff did not correctly understand that breakfast OVS is based on items and not</p>	<p>(1) For your response, provide training on OVS for appropriate staff and submit documentation of the training. (2) For your response, conduct a review of all four sites for lunch and for two sites for breakfast and submit copies of the forms</p>	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Liberty Comm School District (69750000)
Dates: January 31-February 2, 2017

		<p>components. (2) Schools with more than one building are required to conduct a self-monitor of counting and claiming at all buildings for lunch and half of the building sites for breakfast once a year by February 1. The monitoring has not been completed this year or last year, and this is a repeat violation from the 2014 review.</p>	
--	--	--	--

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 (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.
100 - Certification and Benefit Issuance	113 a. Who has access to the benefit issuance system and/or documentation? (Names and/or position titles):	In order to use information from the benefit issuance process 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. West Liberty had a waiver, but it did not state specific fees. The waiver was immediately corrected and will be used in the future.
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)).	The local wellness policy committee has not updated the policy to align with the Healthy Hunger Free Kids Act. Technical Assistance was provided on Wellness Policy, and additional requirements for the policy from The Healthy Hunger Free Kids Act of December 2010. More information is available at http://www.fns.usda.gov/school-meals/local-school-wellness-policy . There are new requirements to report out to the community on the results of the assessment of building goals. A prototype form was provided as well as additional information and resources.
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.	The following beverages are allowable for all grades: plain water-with or without carbonation; unflavored low fat milk,

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Liberty Comm School District (69750000)
Dates: January 31-February 2, 2017

		<p>unflavored or flavored fat free milk, 100% vegetable and fruit juices with no added sweeteners—with or without carbonation. For milk and juice, grades K-5 can be sold up to 8 ounce portions while grades 6-12 can be sold up to 12 ounce portions. Only grades 9-12 may have additional beverages that are no calorie or lower calorie. These include:</p> <p>No more than 20-ounce portions of calorie-free, flavored water (with or without carbonation); and other flavored and/or carbonated beverages that are labeled to contain < 5 calories per 8 fluid ounces or = 10 calories per 20 fluid ounces.</p> <ul style="list-style-type: none"> • <input type="checkbox"/><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/><input type="checkbox"/> No more than 12-ounce portions of beverages with = 40 calories per 8 fluid ounces, or = 60 calories per 12 fluid ounces. <p>Some allowable beverages that may be purchased for all grades are carbonated juices such as Fruit 66, Izzy, and Switch</p>
1200 - Professional Standards	1206 a. Did Full-Time school nutrition staff, meet the training requirements?	<p>Be sure to correctly document staff training. When in-house training is conducted, have all present sign-in and include dates and times as well as topics covered. There is a sample sign-in sheet in Civil Rights manual.</p>
200 - Verification	203 Describe the SFA's verification process (including SFA's verification for cause process).	<p>The letter requesting income documentation for verification states that one month's income be submitted. Be sure that you receive at least one month's income documentation for each income source for all verified applications. One month gives a clearer picture of what the applicant's normal income actually is, and it gives a clear indication of the frequency of the income. (2) Only self-employed persons may use last year's income documentation for verification. (3) Households should be given a reasonable amount of time to respond and at least one reminder if they do not respond, but the report should not be late in order to make frequent reminders to households to respond. (4) Be sure the letter of adverse action that is sent when benefits are decreased or denied includes contact information for the Hearing Official.</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.</p>

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Liberty Comm School District (69750000)
Dates: January 31-February 2, 2017

		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?	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 inChild 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.
800 - Civil Rights	805 How are students with special dietary needs accommodated?	For a disability, a licensed prescribing medical professional completes the form and checks that the student has a <i>disability</i> and indicates what life function (<i>caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, working, reading, concentrating, thinking sleeping, eating, lifting, bending, communicating, operation of major bodily functions, such as immune system, normal cell growth, digestive, bowel and bladder</i>) that the disability affects. The SFA is <i>required</i> to accommodate the disability per Americans with Disabilities Act. In the case of a disability, you are allowed to deviate from the meal pattern if that is indicated. <i>A documented disability is the only time you are allowed to deviate from the meal pattern and still claim the meal for reimbursement.</i> (Example: A student may be allowed to substitute orange juice for milk and still credit the juice as a milk component.) If it is not a disability, then a medical professional fills out the form, but does not check that the student has a disability, then it is a <i>medical condition, such as an allergy or intolerance</i> , then the <u>meal pattern must be met</u> otherwise the meal cannot be claimed. Schools are <i>not required</i> to accommodate allergies or intolerances, but are encouraged to do so if the accommodation can be reasonably met. The form does not have to be completed annually if the information is correct. The SFA should contact the household to determine whether the information on the form is still current.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	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.)

Site - Level Technical Assistance West Elementary School (0409)

Area	Question	Comments
------	----------	----------

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Liberty Comm School District (69750000)
Dates: January 31-February 2, 2017

1400 - Food Safety	1406 Were the selected relevant temperature logs available for review? If YES to specify which date was selected. If NO explain.	Be sure thermometers are inside all coolers and freezers. The outside thermometers are often not accurate and food safety depends on correct holding, cooling, and cooking temperatures.
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.	Labels and all crediting and nutrient information for products used as part of a reimbursable meal must be maintained by the SFA. That includes CN labels, Manufacturer's Formulation Statements, nutrition labels, etc. The labels should come directly from the product and can be removed from the case, photographed, or photocopied. Whenever a new/updated product or a replacement product is received, the new label must be obtained. All labels for all reimbursable meals, including breakfast and lunch, must be maintained on file by the SFA.
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.	The Healthy Hunger Free Kids Act, HHFKA, requires the use of standardized recipes for any food item that is altered in any way. Standardized recipes must have the Name of the Recipe, the Number of Servings, Ingredients, and Directions for Preparation, Serving Size, Total Yield, Component Contribution, and Critical Control Points. It is helpful if the recipe also has serving utensils to use and serving suggestions. Recipes at the elementary are not on standardized forms and do not include all required items such as total yield, component contribution, and some critical control points. It is recommended that the SFA work towards replacing the current recipes with more standardized ones. Recipes that are already standardized can be found for most dishes and then customized for use.
600 - Dietary Specifications and Nutrient Analysis	605 Based on the Nutrient Analysis, did the school meet the Dietary Specifications (Calories, Saturated Fat, Sodium, and Trans Fat) for the appropriate age/grade group being served?	In order to stay within requirements for calories, sodium, and saturated fat, it is recommended that lower fat dressings, sour cream, lower sodium soups and bases, etc., be purchased. It is also highly recommended that condiments be better portioned. For example, placing bottles of catsup on the tables increases consumption and makes it difficult to control sodium levels.

Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were 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 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. 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. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided food service staff. 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>

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Liberty Comm School District (69750000)
Dates: January 31-February 2, 2017

HACCP/FOOD SAFETY: Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. 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.

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 and filed claims appear accurate. JMC is used as the school's POS system. There was a POS for all students, and the POS was organized and orderly. Students stop at the POS and state their individual PIN number. 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.

MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, does a good job of menu planning and offering choices. Choices in entrees, fruits, and vegetables increases participation and provides opportunities for each child to find meal components for lunch and breakfast that they will eat. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. 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. Labels were on file for most products. A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Grades 3-5 at the elementary are provided a Fruit-Vegetable Bar that encourages students to select a reimbursable meal. Water was available as required. At least two types of milk are offered. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheet(s) for the school selected for review for a specified week during the review period. Nutrient analysis was not required.

PROCUREMENT: The SFA has a fairly comprehensive written Procurement Plan that includes procurement methods and documentation for most purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events.

PROFESSIONAL STANDARDS: Training is being tracked and documented as required. The tracking tool indicated that most of the staff has completed the required number of hours, and there is a plan in place to complete hours for all staff. The director does a good job of attending state-sponsored training in the summer.

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. Outreach included announcements, newsletters, the school website, 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 website, newsletters, church bulletins, flyers sent home, etc.

VERIFICATION: The correct number of applications were verified 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 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, and all required stakeholders participated.