

**Iowa Department of Education  
Bureau of Nutrition and Health Services  
State Review Summary Report  
Emmetsburg Catholic School (20888102)  
December 12 – 14, 2017**

**Program Year:** 2018  
**Month of Review:** December  
**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	One application was approved as reduced when they are paid eligible according to their income and family size. Technical assistance provided to the determining official who sent a copy of the letter of notification of eligibility to the family informing them of their benefit reduction while the SA was on-site.	Send a copy of the point of service print out that shows the eligibility status of the student listed in the SFA-1 has been changed to paid. Provide written confirmation that the determining official will take the certification and benefit issuance webinar in the 2018 - 2019 school year.	
200 - Verification	V-0200	The student's application that was selected for verification was on the Direct Certification list in 09/2017 and therefore should not have been part of the verification pool. TA provided to the verifying official.	Provide written confirmation that the verifying official will take the verification training webinar in the 2018-2019 school year.	
800 - Civil Rights	V-0800	The menu does not contain the non-discrimination statement. All materials that contain information about the school nutrition program must contain the USDA and Iowa non-discrimination statements. The abbreviated statement can be used on documents with limited space. The most current statement can be found here: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs#Federal_Civil_Rights_Statement">https://www.educateiowa.gov/pk-12/nutrition-programs#Federal_Civil_Rights_Statement</a>	Submit a copy of the menu that has the non-discrimination statement.	
1000 - Local	V-1000	The wellness policy contains many of the	Describe when the policy will be revised to	

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School Wellness Policy		required elements but does not contain language on food and beverage marketing. The SFA has not assessed the implementation of the specific goals written within the policy and the full wellness policy has not been provided to the public. Both the policy and assessment must be updated at least once every 3 years and both must be made available to the public. Technical assistance provided on the required elements of the wellness policy and the assessment. Sample policies and other wellness activity resources can be found here: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/school-wellness">https://www.educateiowa.gov/pk-12/nutrition-programs/school-wellness</a>	include all elements, when the assessment will be conducted and how they will be made available to the public.	
1200 - Professional Standards	V-1200	The food service director must have 12 hours of school nutrition program training annually, while the part time staff, including the authorized representative, must have 4 hours of training in school nutrition programs annually. Currently the food service director needs 11.5 hours, the part time food service staff needs 3.5 hours of training, and the authorized representative needs an additional 1.0 hour of training to meet their annual training requirements. Documentation such as certificates or agenda logs must be on file to prove that training was provided. Training provided must also be tracked to ensure all staff receive the required training opportunities. Technical assistance provided on training opportunities and tracking tools.	Describe how the food service director, part time food service staff and authorized representative will receive the remainder of their training hours for 2017-2018 school year. Submit a copy of the tracking tool that the SFA will begin using.	
Resource Mgt Comprehensive Review	V-RMCRF	SFAs cannot have more than 3 months of operating costs in their nonprofit school food service account without gaining approval from the SA. Currently the SFA has over 8 months of operating costs in	Describe how the SFA plans on spending down their account balance.	

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		their account and have not requested approval from the SA. Technical assistance provided to the principal on allowable costs.		
Resource Mgt Comprehensive Review	V-RMCRF	The SFA didn't include all of the non-program foods sold when calculating the non-program food costs. The SFA sells the following non-program foods: adult meals, 2nd entrees, a la carte peanut butter sandwiches, extra milks, snack juice/milk, and any foods purchased for other student or church groups. Technical assistance provided on what a non-program food consists of and how to calculate non-program food costs and revenue.	Calculate the non-program food costs and complete the non-program food revenue tool found in Download Forms (NSLP 150) to show that the non-program food revenue, as a percentage of total food revenue, is equal to or greater than the non-program food costs, as a percentage of total food costs.	

**Site - Level Findings: Emmetsburg Catholic School (8102)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Documentation from a medical, prescribing official is on file informing the SFA of student's special dietary needs. The prescribing official did not provide a written order for a milk alternative for any of the students. The SFA has communicated with families in regards to student's preferences and is offering juice, water and 2% milk as an alternative to the flavored skim and white skim milk options. If a milk alternative is made available to students without a written order from the prescribing official, it must be nutritionally equivalent to cow's milk (soy milk or lactose free milk). Alternatively, there must be documentation from a prescribing official that states the prescribed milk alternative. Acceptable cow's milk options include unflavored 1%, flavored or white skim milk but does not include flavored 1% milk or flavored or unflavored 2% or whole milk.	Provide written confirmation that the 2% milk, juice and water will not be provided to students without documentation from a prescribing official. Describe the process that will be implemented to ensure the correct documentation is received from families when students have special dietary needs.	

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		Technical assistance provided to the food service director on approved milk options, milk alternatives that are nutritionally equivalent to cow's milk, required documentation for students with special dietary needs and the Diet Modification Form.		
1100 - Smart Snacks in School	V-1100	The SFA currently sells homemade peanut butter and jelly sandwiches as an a la carte item. The SFA does not have a standardized recipe, nutrition specification information or a Smart Snack nutrition calculator print out to ensure the sandwich meets Smart Snack regulations. Peanut butter and jelly sandwiches are considered a Smart Snack entrée item and their nutrition specifications would have to meet that of Smart Snacks for entrees. TA provided on Smart Snack nutrition requirements and the nutrition calculator.	Provide a standardized recipe for the peanut butter and jelly sandwich and a Smart Snack nutrition calculator printout that shows the sandwich is approved.	
1400 - Food Safety	V-1400	SFAs are required to have a Hazard Analysis Critical Control Points (HACCP) food safety plan available on-site. There is no food safety plan available. Technical assistance provided to the food service director on what a HACCP plan is and sites available to assist in developing this plan. Iowa State University also provides a HACCP class every summer to assist in developing plans.	Submit a table of contents for the SFA's HACCP plan, one standard operating procedure that will be included in the plan and a timeline of when the plan will be completed.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	127 Is household notification of eligibility consistent with the responses provided on the Off-Site Assessment Tool? If NO, explain.	The SFA must check the Direct Certification (DC) download list twice monthly to ensure all DC students are receiving benefits. Households must be notified of their DC status through either

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		the SA approved letter or the SA template letter of notification of eligibility status found in Download Forms. TA provided.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable):	When lunch is sent and served during field trips the meal count must be taken at the point of service, when meals are being distributed to students. Currently the POS roster is completed at the beginning of the school day for field trip meals. TA provided on ways the SFA can implement POS counts while on field trips.
700 - Resource Management		<p>Procurement: Technical assistance was provided to the principal on the following procurement terms and requirements:</p> <ol style="list-style-type: none"> <li>1. Information was provided on federal purchasing thresholds (the SFA does not have a local purchasing policy) and the micro-purchase and small purchase threshold requirements.</li> <li>2. Information was discussed on providing bid documents to at 3 vendors when conducting a small purchase. Bid information provided to vendors must be documented and include quality specifications for all items to be purchased, all other terms and conditions that will be considered when awarding the bid including (but not limited to) delivery times, additional supplies needed (coolers, thermometer, clean crates etc.), the Buy American provision and a termination clause (required if spending more than \$10,000).</li> <li>4. Contract management requirements reviewed.</li> <li>5. Elements required to be included in a procurement plan including a signature page, code of conduct, and a debarment certification statement to show that potential vendors have not been suspended by the USDA are also required.</li> </ol> <p>The SFA is strongly encouraged to attend a procurement training class for additional procurement details.</p>

**Site - Level Technical Assistance Emmetsburg Catholic School (8102)**

Area	Question	Comments
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	The rice crispy bar served to students during the review period was made with cereal that is not whole grain rich. Technical assistance provided on the whole grain rich requirement and whole grain rich cereal. The FSD agrees to contact the primary vendor to purchase whole grain rich cereal for the bar.

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	action in the appropriate field on S-1, 16.	
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.	A copy of the "And Justice For All" poster is on display in the cafeteria next to the cashier. The full size (11" x 7"), color poster is required. Technical assistance provided and the SA agrees to send a poster to the SFA.
1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	The food safety inspection report is required to be posted in a public location. When the SA was on-site the report was posted behind the service counter. Technical assistance provided and the FSD agreed to post the report next to the cashier.
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.	Canned tuna that was made in Thailand was found in storage. All agricultural products purchased must meet the Buy American provision. Canned tuna is processed in the USA and is sold as a USDA commodity food product. Technical assistance provided to the FSD.

**Org - Level Commendations**

Description
CERTIFICATION AND BENEFIT ISSUANCE: • The 30 day carryover of eligibility status is provided to students who were eligible for meal benefits in the previous school year. • Income applications are processed within the 10 day timeframe. • Benefits are extended to all members in a household. • Applications contain all of the required elements including dates, signatures and social security numbers. • The SFA provides households that apply and denied benefits the correct letter of notification of eligibility. • Benefit information is kept confidential and distributed to students in a confidential manner.
CIVIL RIGHTS: • Civil rights training was provided to all staff with school nutrition program responsibilities. • The racial ethnic form was completed and shows that no discrimination was made in determining the eligibility status of students. • No discrimination was made to students during the lunch service.
FOOD SAFETY: • The food service director is ServSafe certified. • The food service staff exhibited good food safety practices. • Temperatures are monitored and recorded for foods and all cooling equipment. • Foods are stored properly.
MEAL COUNTING AND CLAIMING: • All students received a reimbursable meal during the on-site, observed lunch. • The lunch point of service was organized and orderly to allow for students to be counted correctly. • The number of students counted and claimed during the on-site meal observation was reasonable when compared to the count during the month of review. • The claim submitted for the review period matches the edit check report.
MEAL PATTERN REQUIREMENTS AND NUTRITION QUALITY: • The menu certification worksheet completed for the review period shows that all of the daily and weekly requirements have been met for the fruit, vegetable, all vegetable subgroups, meat/meat alternate, grain and milk components. • The observed lunch meal met all of the daily meal pattern requirements for all of the menu components for all grade groups. • Signage is posted describing the menu items being served. • Two different and approved types of milk are offered to students. • Students have access to free, potable water and they are allowed to bring their water bottles to school. • Many homemade items are served to students and standardized recipes are available for all items served during the review period and day of review. • CN labels are available for all combination food items served during the review period. • Food production records are on file for all meals claimed during the review period. • The monthly menu provides a variety of entrée options. • Portion sizes of condiments

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are limited. • The SFA provides offer versus serve to their K-8th grade students. • K-4th grade students participate in recess before their lunch period. • The SFA provides lunch to the 4 year old preschool students. The preschool students are co-mingled with the k-8th grade students and are provided the NSLP menu.

**NEGATIVE BALANCE POLICY:** - The SFA has a policy describing how negative student lunch accounts will be handled. - The policy was distributed to all families at registration and a hard copy is included in the registration packet for any families enrolling in the middle of the year.

**PROCUREMENT:** The SFA has a procurement plan that contains all products to be purchased in the 2017-2018 school year. - The SFA has a code of conduct that contains all of the required elements. - The SFA utilized the correct purchasing methods according to the federal purchase thresholds (the SFA does not have a local purchasing policy). - Contract management is conducted as the principal checks invoices to ensure that prices charged match the bid prices and by the food service staff who ensures products ordered are delivered. - The micro-purchases made by the SFA are done correctly.

**PROFESSIONAL STANDARDS:** • All staff with school nutrition responsibilities received civil rights training. • Training documentation was on file for all training received.

**RESOURCE MANAGEMENT:** • Purchases made during the review period were allowable expenses. • The SFA charges the correct student paid lunch price according to the PLE tool and the correct adult lunch price, according to USDA requirements. • All income paid to the school food service account went directly into the account.

**SCHOOL WELLNESS POLICY AND COMPETITIVE FOODS:** • The wellness policy contains elements on nutrition promotion and education, physical activity, goals for other school based activities, nutrition standards for foods sold to students during the school day and standards for foods provided to students. • The local school wellness policy has been revised in the past 3 years. • The SFA has implemented a before school walking program for students and recess before lunch for their K-4th grade students. • Snacks are sold to students in the afternoon and all are Smart Snack approved foods and beverages.

**SUMMER FOOD SERVICE PROGRAM OUTREACH:** The SFA informs families of the Summer Food Service Program through newsletters and fliers sent home at the end of the year. The SFA does not participate in the School Breakfast Program and therefore is not required to provide outreach.

**VERIFICATION:** • The SFA sent the correct letter of notification of verification selection and verification results to the family selected to participate in verification. • The correct number of applications were selected to verify. • The application selected for verification was confirmed of its original eligibility status prior to notifying the family. • The verification process and report were completed on time.