

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Central Valley Comm School District (62640000)
January 30 – February 2, 2018

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	<p>In review of the income applications and Direct Certification lists, the SA found one student who was provided free benefits as the SFA mistakenly thought she was on the DC list. The student was not found on the DC list and therefore should have been paid. There were 2 applications that were determined incorrectly. After reviewing the income and family size SA discovered one application that was determined as free when it was actually reduced and another was determined to be reduced when it was actually paid. There were three applications reviewed with discrepancies found in the number of people listed in the household. The SFA contacted each family to verify household size and all applications were determined accurately. TA provided to the determining official on reviewing household size and other information listed on the application to ensure its accuracy. TA also given on incorrect applications and letters of notification of eligibility to send. Letters of notification of eligibility status was sent to families whose eligibility</p>	<p>Provide written confirmation that the determining official will watch the certification and benefit issuance webinar for the 2018-2019 school year.</p>	

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		status was reduced, notifying them of their changed status. The JMC point of service was updated with the new status.		
200 - Verification	V-0200	The SFA collected verification on 4 households when they were supposed to verify 3 applications, as they followed the 3% standard verification process. Technical assistance provided on selecting the correct number of applications to verify. A confirming official must confirm that the original determination of eligibility was calculated correctly and sign on the confirming official line prior to notifying the family that they have been selected for verification. There was no confirming official signature on the applications selected for verification. Technical assistance provided to the verifying official on confirming official responsibilities. One of the applications selected for verification received reduced benefits according to the paystub information provided. The family was notified of their decreased benefits but the student's eligibility status was not updated in JMC. TA provided to the SFA who immediately notified the family and updated the eligibility status to the correct benefit level in JMC. Fiscal action may be taken.	Provide written confirmation that the verifying official will watch the verification webinar for the 2018-2019 school year.	
1000 - Local School Wellness Policy	V-1000	The wellness policy is required to include certain elements and the SFA's current policy is missing a policy on food and beverage marketing. The wellness policy does contain the other required elements (nutrition education and promotion, physical activity, other school based activities, nutrition standards for all foods sold to students	Describe the following: 1. When the wellness policy will be updated to include all required elements. 2. When an assessment will take place at each school to show their progress on implementing the goals written within the wellness policy.	

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		<p>during the school day and standards for foods and beverages not sold to students). The current policy contains some outdated meal pattern information and there is not a current assessment of the wellness policy goals. The policy and the assessment of policy goals must be reviewed and updated at least once every 3 years. The updated policy and assessment of policy goals must be made available to the public. There must also be a wellness committee that consists of various stakeholders such as parents, students, staff, teachers, administration and board members. There is no documentation (agenda, invitation and/or meeting minutes) of a wellness policy committee. Technical assistance and a resource folder were provided to the food service director and authorized representative on the wellness committee, assessment forms and policy regulations.</p>		
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Site - Level Findings: Redfield Middle School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	<p>The breakfast menu offered on the day of review met all of the daily breakfast requirements. There were 4 breakfast meals that were counted and claimed as being a reimbursable meal that only contained 2 items. A reimbursable breakfast must contain 3 items, one of which being a 1/2 cup fruit and/or juice. One student was counted and claimed as having a reimbursable meal even though fruit was not on the tray. SA notified the cashier and the mistake was immediately corrected. Technical assistance provided to the food service manager and director on reimbursable</p>	<p>Provide training documentation to show that the cashier and food service staff were trained on what a reimbursable breakfast consists of and how the cycle breakfast menu credits towards a reimbursable breakfast.</p>	

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		breakfast meals, fruit and breakfast training resources.		
900 - SFA On Site Monitoring	V-0900	SFAs with multiple sites are required to complete the on-site monitoring form for lunch for 100% of their sites by February 1. The SFA completed the lunch onsite monitoring form for 1 site for this school year. Technical assistance provided on the new on-site monitoring forms and the due dates.	Submit the completed lunch, onsite monitoring forms for the high school, middle school and Dexter elementary school.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	128 Is household notification of denied benefits consistent with FNS requirements? If NO, explain.	SFAs that utilize a letter of notification of eligibility that differs from the SA approved template letter must receive SA approval. Approval Request Forms will be in IowaCNP under Download Forms (NSLP022 for notification letters and NSLP024 for revised applications). The determining official must check their letter against the approval request form to ensure their letter contains the required elements and send it to Deb Linderblood for approval. Technical assistance provided to the determining official on sending their custom letter of notification of eligibility for approval prior to the start of the 2018-2019 school year.
700 - Resource Management		<p>PROCUREMENT:</p> <p>Technical assistance provided to the food service director on the following procurement items:</p> <ul style="list-style-type: none"> - Bids sent to vendors for products being procured must include detailed specifications on product quality and nutritional status, delivery requests, service requests, the Buy American provision, debarment certification statements and a termination clause if the SFA is spending over \$10,000.

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		<ul style="list-style-type: none"> - The procurement plan must also include a signature page to document all individuals involved in the procurement process. - The SFA's current purchasing policy states that the small purchase threshold is \$25,000 or less. Therefore, the milk should have been procured through a formal purchasing method instead of a small purchase method. Formal bid templates are available under Download Forms in the IowaCNP. Alternatively, the SFA could modify their purchasing policy to increase the small purchase threshold. - TA provided on contract award types (fixed price, fixed price with escalator clause, and cost reimbursable contract) and contract management requirements.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging discrimination within FNS School Meal Programs? If procedures are written, provide a copy.	<p>SFAs must have a complaint procedure that describes the procedures that will occur in the event of a civil rights complaint related to Child Nutrition Programs. SFAs are required to have a civil rights complaint procedure that follows the USDA guidelines listed here: https://www.educateiowa.gov/documents/nutrition-learning-tools/2017/10/iowa-civil-rights-complaint-procedure. Technical assistance provided on the required procedure and forms.</p>
800 - Civil Rights	805 How are students with special dietary needs accommodated?	<p>Soy milk and lactose free milk are nutritionally equivalent milk alternatives to cow's milk. If students within the district complete a diet modification form stating that they are unable to consume cow's milk, a nutritionally equivalent milk alternative must be offered. If students request a milk alternative be offered that is not nutritionally equivalent to cow's milk, a prescribing official must request the type of milk to be offered and sign the diet modification form. TA provided.</p>
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	<p>The Federal and Iowa nondiscrimination statements must be included on all materials that contain information about the National School Lunch or Breakfast Programs. The statements can be found on the IDOE Nutrition Programs website (https://www.educateiowa.gov/pk-12/nutrition-programs#USDA_Nondiscrimination_Statement) and must be included on the Nutrition Services link on the district's</p>

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		website and the menu. The nondiscrimination statements were not found on the menu or the nutrition services website upon SA arrival. TA provided and the website and menus were updated to include the Federal and Iowa nondiscrimination statements while SA was onsite.
1600 - School Breakfast and SFSP Outreach	1600 How did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	The SFA advertises the School Breakfast Program online through the monthly menu. In an attempt to increase breakfast participation, SA provides TA on advertising the breakfast program through quarterly newsletters, student surveys, taste testing, and signage posted on the front doors and throughout the school building.
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?	SFAs are required to notify families of the Summer Food Service Program (SFSP) annually even if they do not offer a SFSP. Students can visit any SFSP site so informing families of the program may be beneficial if they are traveling or if there is a SFSP site within their community. Promotional materials can be found on the IDOE website: https://www.educateiowa.gov/pk-12/nutrition-programs-0#Promotional_Resources
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?	The SFA's non-program food revenue tool shows that the non-program food revenue, as a percentage of total food revenue, does not adequately cover the non-program food cost, as a percentage of total food costs possibly due to miscalculation. TA and handout provided on what non-program foods consists of and how to calculate the non-program food costs.

Site - Level Technical Assistance Redfield Middle School (0172)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch		Field trip meals are serve only and therefore must have the full, daily serving size of each component with the sack lunch in order to claim. Therefore, K-8th grade students must have 1/2 cup fruit, 3/4 cup vegetable, 8 oz. milk, 1 oz. grain equivalent and 1 oz. meat/meat alternate. TA provided on menu options.
400 - Meal Components and Quantities - Lunch		TA was provided on increasing meal participation. Suggestions made include increased advertising of the breakfast program in newsletters and posters, taste testing new products, surveying students and recruiting high school students to eat lunch with the elementary students.

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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 food production records document how the vegetables and fruits credited towards the meal pattern as opposed to the serving size which led to confusion on the amount of romaine lettuce served. The serving size documented on the food production record was 1/4 cup when 1/2 cup was actually served. The serving size that was made available must be documented on the food production record to ensure that all daily and weekly meal pattern requirements have been met. Technical assistance provided to the food service director and site staff on food production record requirements and on how lettuce credits towards the meal pattern.
1100 - Smart Snacks in School	1106. Does the school hold fundraisers during the school day where students may purchase food or beverages? If yes, indicate whether or not the items are Smart Snacks compliant. If the items are not Smart Snacks compliant, did the school observe the State-defined limit on fundraisers?	Fundraisers that sell food intended to be eaten right away (suckers, baked goods, or hot pizza slices) that take place during the defined school day (midnight until 30 minutes after dismissal), must meet Smart Snack regulations. Technical assistance provided to the FSD and food service staff at the review site.
1300 - Water	1300 Is free potable water available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)?	There is a water fountain directly outside of the cafeteria. SA encourages food service staff to provide cups for students who would like a glass of water with their meal.
1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	Food safety inspection reports must be on display in a public location. When SA arrived onsite, the report was displayed in the kitchen. TA provided and staff immediately moved the food safety inspection report to a public location within the cafeteria.

Org - Level Commendations

Description
<p>CERTIFICATION AND BENEFIT ISSUANCE: • The SFA offers the 30 day carryover of eligibility for students who had benefits during the previous school year. • Income applications are processed within 10 days. • Direct Certification lists are downloaded twice monthly and on file. • Benefits are extended to all students within the household. • The applications are complete with all of the correct signatures, dates and social security numbers. • The racial ethnic form was completed to show that no discrimination was made when determining the eligibility status of students. • Applications that were denied were determined accurately. • The letter of notification of eligibility status was sent to all families on the Direct Certification list, families who applied and were denied benefits and those who applied and received free/reduced benefits.</p>
<p>CIVIL RIGHTS: • Civil rights training was provided to all staff with school nutrition program responsibilities. • The “And Justice For All” poster is on display in a public location. • The food service director works with the school nurse and families to ensure that all students who have special dietary needs have the required diet</p>

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modification forms on file and receive an accommodating diet. The food service director distributes the information to each school site. The public release was sent to the local media outlet. - No discrimination was observed.

FOOD SAFETY: • The HACCP Food Safety plan is on file at each site and contains all of the required information. • Good food safety practices were observed as staff wore hairnets, clean aprons, and gloves. • Food in the dry storage, refrigerator, and freezers were stored properly as food was at least 6" off the ground and leftover foods found in cold storage were dated and labeled. • Temperatures logs are available for daily monitoring of the refrigerators, freezers, milk coolers and dishwashers. • Foods found in storage met the Buy American provision.

MEAL COUNTING AND CLAIMING: • The point of service line at the review site for both breakfast and lunch is organized and orderly, allowing the cashier to ensure all students have a reimbursable meal. The cashier did an excellent job of checking trays to ensure all students had the required ½ cup fruit and/or vegetable. • The meal counts for breakfast and lunch, on the day of observation, are reasonable when compared to the counts during the review period. • The edit check report for breakfast and lunch meals served match the numbers submitted on the claim. • All students counted and claimed at the observed lunch had a reimbursable meal.

MEAL PATTERN REQUIREMENTS: - The SFA offers a cycle menu that offers a variety of entrée and vegetable options throughout the month. - The food production records are complete with total quantity prepared, planned serving sizes and number of servings, hot food temperatures, actual serving numbers and leftovers. - At least 2 approved types of milk was made available to students (1% white, fat free chocolate and fat free strawberry). - CN labels, standardized recipes and nutrition facts labels are on file for menu items served. - Signage is posted in the serving line that describes the menu and how it constitutes a reimbursable meal. - The observed breakfast and lunch menus met all of the daily menu requirements. - The daily and weekly meal pattern requirements were met for the breakfast and lunch meals served during the review period.

ON SITE MONITORING: • The SFA has completed the on-site monitoring forms for over 50% of their sites that serve breakfast prior to the February 1 due date.

PROCUREMENT: - The SFA has a procurement plan that includes all planned purchases for the 2017 – 2018 school year and a code of conduct that contains all of the required elements. - In the 17-18 school year the SFA selected the lowest price bidder for milk and bread. - The SFA saved the Martin Brothers AEA price lists and conducted contract management for goods purchased. - The food service director attended procurement training during the 2017-2018 school year. - The group purchasing organization (AEA) agreement and procurement documentation is kept on file.

PROFESSIONAL STANDARDS: • The SFA uses a tracking tool to ensure all staff with school nutrition program responsibilities met their training requirements. • Documentation is on file to show that all staff with school nutrition program responsibilities received the required number of training hours. • The district hired a new food service director after July 1, 2015 and the new director met the hiring standards. • All staff with school nutrition program responsibilities received civil rights training. • The food service director and at least one food service staff member at each school site are ServSafe certified.

RESOURCE MANAGEMENT: • The SFA efficiently uses USDA commodity foods as 92% of their allotment was spent in the previous school year. • The SFA has a negative balance policy that is distributed to all families at time of registration. • The SFA is charging the correct paid student lunch price, according to the PLE tool and the correct adult lunch price, according to USDA requirements. • All revenue generated by the child nutrition programs is directly deposited into the school nutrition account. - All school nutrition program documents are kept for 3 years plus the current year.

SCHOOL WELLNESS POLICY AND COMPETITIVE FOODS: • The policy is made available to the public as it is located on the SFA's website and has been reviewed in the past 3 years. • The competitive food and beverages (a la carte and vending items) sold to students at the review site meet Smart Snack regulations. • Nutrition calculator printouts are on file to show all foods sold meet the Smart Snack regulations.

VERIFICATION: • The verification process and report were completed on time. • Applications selected for verification were selected from error prone applications first. • The SFA followed up with families who did not provide proof of income after the letter of notification of verification selection was sent. • The SA approved template letters of notification of verification selection and results were sent to families selected for verification. • The verifying official determined eligibility correctly based on the income information provided.