

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
All Saints School-Cedar Rapids (10538101)
Review Dates: January 17, 18 and 19, 2018

Program Year: 2018
Month of Review: December
Lead Reviewer: Deb Linderblood
Org Representative(s): Marlene Wilson, Food Service Director

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The SFA currently does not have a back-up person for the Determining Official who is trained to process applications or to complete the verification process and the verification report.	State below the staff position that will be a back-up person for the Determining Official. Also state how this individual will be trained on how to process applications, complete verification and also how to complete the verification report.	
100 - Certification and Benefit Issuance	V-0100	The SFA has not been trained on how to enter eligibility determination dates into their Total Access Point of Sale system thus there is no documentation as to what date student's eligibility status was put into the system.	State your intentions and identify a timeline for when the Food Service Director will receive training on how to input the eligibility date and use the 30 day carryover function of Total Access.	
200 - Verification	V-0200	The Determining Official did not have proper documentation from the household selected for verification. This individual has not listened to the Verification webinar or the Verification Reporting webinars recently. TA provided on where to find the recorded version of these webinars.	State your intentions that the Determining Official (Verifying Official) will listen to the Verification and the Verification Reporting webinars each year.	
300 - Meal Counting and Claiming	V-0300	The SFA has not been completing the Edit #1, #2 or #3 on the edit check report thus they are not ensuring that meal counts do not exceed enrollment or attendance adjusted enrollment.	Complete and attach the Edit Record for Student Meal Counts for the month of January showing that the Edit #1, #2 and #3 are being completed. TA was provided on how to complete these three edit checks.	
700 - Resource Management	V-0700	The SFA has not obtained debarment statements from Anderson Erickson or Pan-O-Gold.	Obtain and attach a signed debarment statement from Anderson Erickson and Pan-O-Gold.	
700 - Resource Management	V-0700	The SFA's School Nutrition Account Policy does not state that students who qualify for free meals shall never be denied a reimbursable meal.	Revise and attach your School Nutrition Account Policy showing that the statement "students who qualify for free meals shall never be denied a reimbursable meal" is added to the policy. State your intentions to distribute the policy to all households and also to All Saints staff.	
800 - Civil Rights	V-0800	The Iowa non-discrimination statement is not on the SFA's nutrition page of their web site and the short version of the USDA non-discrimination statement is not on the SFA's menus. Provided a copy of the current Iowa non-discrimination	Add the Iowa non-discrimination statement to your Nutrition web page. State below the date the statement was added. Also, attach a copy of your February 2018 menu with the short version of the USDA non-discrimination statement added to the	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
All Saints School-Cedar Rapids (10538101)
Review Dates: January 17, 18 and 19, 2018

		statement to the Food Service Director. This is a repeat finding.	menu.	
800 - Civil Rights	V-0800	The SFA does not have Diet Modification Request Forms for students who need a dietary modification. TA provided that a diet modification form should be obtained from a medical professional for students who need dietary modifications. Emailed and printed the form and provided it to the Food Service Director. Also, students were able to select juice in place of milk if parents requested that their child avoid cow's milk. Water and juice are not nutritionally adequate to milk and cannot be substituted for milk without a medical waiver completed by a medical professional is on file. This is a repeat finding. A nutritionally adequate milk substitute can be provided if a family requests due to milk intolerance or avoidance. Reviewed the portion of the form where the SFA can identify the milk substitute that the SFA will provide for students who need a substitution for cow's milk. Provided a list of milk substitutes that are nutritionally equivalent to cow's milk.	State your intentions to obtain Diet Modification Request Forms for all students needing dietary modifications. Also, state the milk substitute you will offer for those students when parent's request that a milk substitute be used in place of regular cow's milk.	
800 - Civil Rights	V-0800	The SFA has not completed the racial/ethnic form for school year 2017-2018. Provided the SFA with the racial/ethnic form and provided instructions on how to complete the form.	Complete and attach the racial/ethnic form for school year 2017-2018.	
1000 - Local School Wellness Policy	V-1000	The SFA currently does not have a wellness policy and thus also have not completed an assessment of the goals. TA provided on where to find sample wellness policies and the assessment form on the Department of Education web page. Encouraged the SFA to set goals that are of interest to them, reasonable and attainable. Discussed that the wellness policy needs to be made available to the public and that it can be on the SFA's webpage in the board policies and that it is also good to have it on the nutrition web page if they have one.	State your plan and a timeline for: 1.) developing a Local Wellness Policy 2.) how the public will be made aware of the Wellness Policy 3.) determining guidelines for foods sold on the campus and determining goals to promote student health, nutrition promotion, nutrition education, and physical activity 4.) when an assessment of the Wellness Policy will be completed and by whom 5.) how the assessment will be made available to the public.	
1200 - Professional Standards	V-1200	The Food Service Director has not been tracking training hours of the nutrition staff. TA provided that tracking can be completed on a routine basis, such as monthly, or it can be done as training is completed. Emailed the Food Service Director the Iowa Individual Training Tracker and reviewed how to complete the form.	Complete and attach a training tracker worksheet for each of the three nutrition employees showing the training they have completed so far in school year 2017-2018.	
1400 - Food Safety	V-1400	The Food Safety Plan does not have documentation that the Standard Operating Procedures have ever been reviewed/ revised to be sure that they reflect the nutrition service's practices.	State your intentions to review/revise the nutrition services standard operating procedures on a yearly basis and document with a date and initials that the procedure was reviewed/ revised.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
All Saints School-Cedar Rapids (10538101)
Review Dates: January 17, 18 and 19, 2018

Resource Mgt Comprehensive Review	V-RMCRF	In school year 2016-17 no indirect costs were charged to the nutrition account. The School board has decided to begin charging indirect costs to the nutrition account beginning in school year 2017-18. The SFA was not going to use an indirect cost rate to do this when the Administrative Review was started. The SFA was planning to use square footage to charge the nutrition account for items such as electricity and gas. TA provided that this is not an allowable procedure for charging indirect cost to the nutrition account. Explained that the SFA needs to establish an indirect cost rate that does not exceed 10% and that this rate is then applied to food service labor, supplies and travel. Provided the SFA with the Non-public booklet from the DE web site on indirect cost.	State your intentions to use an indirect cost rate to charge the nutrition account for items such as electricity, gas and equipment repair.	
Resource Mgt Comprehensive Review	V-RMCRF	After completing the 2016-2017 Financial Report on IowaCNP, the Non-program revenue tool showed that the non-program revenue does not contribute adequately to total revenue.	State below the steps you will take to increase your non-program food revenue so that it adequately contributes to total revenue.	

Site - Level Findings: All Saints School (8101)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	The current meal counting and claiming system does not prevent inaccurate claims and is not completed at the point of sale. The meal counting and claiming system utilized at All Saints School relies on teachers to bundle student ID cards in the classroom and deposit them in the cafeteria at the beginning of the meal service line. The cards are scanned and meal charges assessed by the Food Service Director after the students have received their meal and taken their seats in the cafeteria.	Students are required to present something (a ticket, name, ID#, etc.) at the point of service in exchange for their meal. For your corrective action, please describe your plan for how meal counts will be accurate and how they will be taken at the end of the serving line. This is a repeat finding from the review that was completed three years ago.	
400 - Meal Components and Quantities - Lunch	V-0400	Students go through the serving line and are reminded to get a milk out of the milk cooler that is after the last server sees the student's tray. Five students did not take a milk on the day of review. TA provided that since the SFA uses serve instead of offer vs. serve, all students must take a milk. TA also provided that since there is a milk cooler at the beginning of the serving line, this should be used so that the last server can then make sure that each student has all five components on their tray.	State your intentions to have the milk at the beginning of the serving line and that the last server will be sure that every student has all five components on their tray.	
1100 - Smart Snacks in School	V-1100	The SFA has not been using the Smart Snack calculator to determine if side dish items are compliant to sell a la carte. TA provided on where to find the USDA Smart Snack calculator and did an example product with the Food Service	Complete the USDA Smart Snack calculator for 5 side items that are sold a la carte and that are compliant. Attach a copy of the page showing that the item is compliant. State your intentions to only sell side items as a la carte that are Smart Snack compliant.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
All Saints School-Cedar Rapids (10538101)
Review Dates: January 17, 18 and 19, 2018

		Director.	
--	--	-----------	--

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.	TA provided that the annual tab on ICAVES should only be used if a household reports their income on an annual basis or if income is reported in more than one frequency (ex. husband is paid weekly and the wife is paid monthly). If all income is reported in one frequency (ex. weekly) then the corresponding tab should be used on ICAVES.
100 - Certification and Benefit Issuance	133 Are the Direct Certification lists retained on file by the SFA? If NO, explain.	TA provided that the SFA needs to download and print the direct certification and potential list every July and twice a month every other month of the school year. TA also provided on how to use the Elookup function and how to download to cart.
200 - Verification	208 a. Did the SFA attempt to directly verify selected applications?	TA provided that after selecting a household to verify, the SFA should enter the students into Elookup and if they are found this household is directly verified so then the household does not need to be sent a letter of selection.
700 - Resource Management		TA provided on where to find and how to complete the 3 bids and a buy form, the No Bid Vendor Statement and the Micro-purchase Log. Discussed changes that were needed to the SFA's off-site procurement questions and that the SFA should set a mileage distance in which they will set as their parameter for how far out they will spread the wealth when doing micro-purchasing. Encouraged the SFA to keep a separate tab for each vendor when completing the micro-purchasing log.
800 - Civil Rights	804 Has the School Food Authority received any written or verbal complaints alleging discrimination in FNS Programs in the current or prior school year?	TA provided on where to find the USDA complaint procedure to use if the SFA would have a complaint alleging discrimination within the Food Service Department.
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.	TA provided that since the SFA sells sides a la carte then these food items must be run through the Smart Snack calculator to insure that they are Smart Snack compliant. Also discussed that any accompaniments that come with the a la carte item must be included when putting the food item into the Smart Snack calculator.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.	TA provided that each SFA must have an individual that is identified as the Director. Thus the lead employee in the nutrition department must have the required 12 hours of training per year that is required of directors. The department does not have anyone that would be considered a manager.
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?	TA provided on where to find promotional materials to promote the SFA's breakfast program on the Department of Education's web page.
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?	TA provided that even though the SFA does not have a Summer Food Service Program they still need to inform eligible families about the availability and location of Summer Food Service Programs. TA provided on where to find promotional materials on the Department of Education web page.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
All Saints School-Cedar Rapids (10538101)
Review Dates: January 17, 18 and 19, 2018

Resource Mgt Comprehensive Review	1 Did the SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency?	SFA is planning to charge indirect costs to the non-profit school food service account. TA provided that if their organization has never received a negotiated indirect cost rate, they can use up to a 10% de minimis rate which can be used indefinitely. The categories identified as a part of indirect costs cannot be charged individually to the nonprofit school food service account. An indirect cost rate may be applied to food service labor, non-food supplies and food service travel expenses which creates a pool of money to pay those items. E-mailed SFA two documents regarding indirect cost.
-----------------------------------	--	---

Site - Level Technical Assistance All Saints School (8101)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Prior to starting to serve lunch, TA was provided that since the SFA has elected not to use offer vs. serve then students must be served 3/4th cup of vegetable at lunch. Encouraged the Food Service Director to consider planning menus to include 1/2 cup of one type of vegetable and 1/4th cup of another type of vegetable to encourage students to consume more vegetables and not be over whelmed with the volume of the amount served if only one type is served in the 3/4th cup amount.
400 - Meal Components and Quantities - Lunch	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	TA provided that unless a medical professional orders that a student is to have juice in place of milk, a milk substitute that is nutritionally comparable to cow's milk must be substituted. Showed the Food Service Director a list the State Agency has compiled of some milk substitutes that are acceptable.
Dietary Specifications Assessment Tool - Lunch	9 How often are bacon, bacon bits, pepperoni, chow mein noodles, pickles, olives, packaged crackers and/or croutons available to students?	TA provided that in order to serve chow mein noodles, which were not whole grain rich, the SFA would need a whole grain rich exception. The Food Service Director decided to discontinue offering them to students.

Org - Level Commendations

Description
Certification and Benefit Issuance: Benefit documents were very well organized. The current application form and guidelines were used and the one denied application was correctly determined. All applications were correctly determined, signed and dated by the household member and the SFA and were complete with SSN's and case numbers where applicable. 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.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided for food service staff and was documented. The SFA submitted the annual Public Release to the local media. No discrimination was observed. The correct state and federal non-discrimination statements are provided on all material describing the program.
Fiscal Action: Due to the \$600 disregard, this review will not result in any fiscal action.
Food Safety: The SFA has a written Food Safety plan that includes all required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers, and refrigerators. Food temperatures are recorded on the daily food production record. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. The Food Service Director is Serve-Safe Certified.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
All Saints School-Cedar Rapids (10538101)
Review Dates: January 17, 18 and 19, 2018

<p>Local Meal Charge Policy; The SFA has developed a meal charge policy. The policy was e-mailed or mailed to all households and staff were informed of the contents of the policy.</p>
<p>Meal Components and Quantities: The Food Service Director does a god job of menu planning. 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. The menus met weekly and daily meal pattern requirements for Kindergarten through 5th grade. 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 are offered throughout the month, including many fresh fruits and vegetables. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals.</p>
<p>Meal Counting and 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 counts and filed claims appear accurate. Total Access is used as the school's POS system. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records were on file for all meals claimed for reimbursement for the review period.</p>
<p>Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of December 4-8, 2017 for breakfast and lunch. The worksheets showed that all meal components were offered at breakfast and lunch and all vegetable sub-groups were offered at lunch. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that All Saints School is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, controlling the portion sizes of condiments, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats. A nutrient analysis was not required.</p>
<p>Procurement: The SFA has a written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, and the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances.</p>
<p>Professional Standards: All nutrition staff have started to obtain their required training for school year 2017-2018. Two of the three nutrition employees were hired at the start of the school year and participated in new employee orientation training.</p>
<p>Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.</p>
<p>Resource Management: All expenditures that were reviewed appeared allowable. 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 tool was completed and prices were increased as required. The Non-Program Revenue tool was completed via the Financial Report on IowaCNP. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for USDA Foods, utilizing 111% of their PAL dollars in school year 2016-2017.</p>
<p>School Breakfast Outreach: School Breakfast Program outreach includes putting the breakfast menu on the monthly menu. Once a year parents are invited to come in and have breakfast with the students. The SFA has also done tray displays of the breakfast meal and also puts the breakfast menu on a display board.</p>
<p>Smart Snacks: Students are able to purchase foods via a la carte sales. Exempt leftover NSLP entrees are only sold the same day they are initially offered. Beverages sold meet the standards for Kindergarten through 5th grade.</p>
<p>Verification: The correct number of applications were verified. The process was completed on time. The application(s) selected for verification were confirmed prior to verification.</p>
<p>Water: Free potable water is available to all students for lunch and for breakfast via a water fountain just outside of the cafeteria.</p>
<p>Wellness Policy: The following individuals are involved in reviewing and updating the Local Wellness Policy: administration, teachers, parents, board member and students. Potential stake holders are made aware of their ability to participate in the Wellness Committee via the SFA's handbook.</p>