

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Audubon Comm School District (04140000)
SNP - Review ID: 4555

Program Year: 2018
Month of Review: January
Lead Reviewer: Brenda Windmuller
Org Representative(s): Carla Christensen

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	During the on-site review, one benefit application was determined free and should have been reduced.	SFA will submit a plan on how they will comply with USDA Benefit Issuance guidelines and avoid errors in the future.	
900 - SFA On Site Monitoring	V-0900	The On-site monitoring documentation for the elementary was not available during the review.	SFA will submit the On-site monitoring forms for the Elementary already completed during the 2017/2018 academic year OR re-do the process and submit the completed form.	
1000 - Local School Wellness Policy	V-1000	The SFA has not completed a Wellness Policy Assessment within the past 3 years.	Submit a date on when the SFA will complete the Wellness Policy Assessment and how the SFA intends to make the assessment available to the public.	
1200 - Professional Standards	V-1200	ANNUAL TRAINING: Annual Professional Development has not been completed as required by staff working with the School Lunch Program. Evidence is not available to document previous year's training completion. Additionally, all Food Service staff and SFA employees working with the School Lunch Program are required to take 1 hour of Civil Rights annually as part of the required training hours.	Create a plan to assure that all positions who provide functions to the safe and compliant operation of the USDA School Nutrition Program will be trained to carry out those duties. The SFA will: 1. Submit an updated training tracker tool documenting training completed to date. 2. Submit a plan on how the training requirements will be fulfilled for the 2017/2018 academic year. Include a list of the topics to be covered and the number of CEH for the topics and the date to be completed. 3. Submit a date of when the SFA intends to conduct .5 hour of Civil Rights Training for all personnel, completing the required 1 hour for the year.	

Site - Level Findings: Audubon High School (0109)

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Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	124 a. Certification and Benefit Issuance Review Method:	One application approved to receive benefits was not signed by parent. One application approved to receive benefits was not signed and dated by Determining official. Both applications were corrected during on-site review.
700 - Resource Management		<ul style="list-style-type: none"> • The school food service written procurement plan should be revised to include signatures of individual(s) responsible for making food service procurement decisions. The procurement event page on the written procurement plan should be revised to reflect the correct procurement methods, contract award type, and solicitation evaluation method used for some procurement events. • The School Food Authority (SFA) is a member of a Group Purchasing Organization (GPO). In SY 2017-2018, the SFA's agreement with the GPO includes food purchases only. The SFA should contact the GPO to add to the agreement vendors for both ware washing and small wares. Keep a copy of the signed agreement with GPO with other procurement documents. • The written code of conduct did not identify the specific board policy that make a reference to disciplinary action. A number of board approved policies that reference disciplinary action were identified. Write in the policy(ies) number and title(s) on the school food service code of conduct that would apply to officers and employees who violate procurement procedures. • It is recommended that the school food service written procurement plan be reviewed once a year in February. This is the time when most SFAs start making decisions on the upcoming school year's procurement. It is best practice to keep a separate procurement event page for each school year. This practice will help ensure that the correct procurement method is identified based on the estimated value of a particular purchase. • Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a Buy) and formal methods of procurement.

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		<p>Please refer to the state-prototype templates posted on IA_CNP.</p> <ul style="list-style-type: none">• When using micro-purchase method, purchases must be equitable distributed, to the maximum extent practicable, among vendors to "spread the wealth."• When procuring milk and bread, along with specifications (descriptions) for all items to be procured, the estimated annual usage for each item should be provided. To ensure the district selects a responsive vendor with the overall lowest price (bottom line), the cost of each item on price quotation request should be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template calculate extended cost for milk was provided. A similar process should be used for bread products.• It is best practice to include the school calendar when requesting pricing from vendors to ensure deliveries are not made during holidays, snow days, etc.• For milk, other things to consider when requesting price from vendors are: is pricing requested for paper cartons or plastic bottles, coolers to be provided at no charge, Hazard Analysis Critical Control Plan (HACCP) plan to ensure clean crates and milk cartons are delivered, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should inform vendors whether a firm, fixed price or a fixed price with economic adjustment (escalator clause) is requested.• For bread, provide vendors with a package count/package weight/weight per serving for each of bread product. Review current school year bread product purchases to include any regularly purchased items when requesting price quotes. Unless exemption has been granted, bread made with enriched flour should be removed from price quotation letter. Bread products should be 100 percent whole grain or whole grain-rich (50 percent whole grain).• For the current school year, the food service director is purchasing bread from the prime vendor. The local vendor who was selected to supply bread products is not responsible. The school district should inform vendor.• The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and the description of the product solicited by GPO. Prices on the invoice should match bid pricing or be lower
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		<p>unless SFA was given advance written notification per solicitation of any price increase. Food items procured by the SFA not on the GPO solicitation must be procured using appropriate procurement methods.</p> <ul style="list-style-type: none"> • Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-domestic agricultural commodity is accepted. • A price comparison document should be maintained for items the food service purchasing from another broadline distributor and not the GPO prime vendor. • Food service equipment repair and preventive maintenance will be an indirect cost to school nutrition funds. Stay tuned for additional guidance from IDOE finance department.
1000 - Local School Wellness Policy	1005 Obtain a copy of the most recent assessment on the implementation of the Local School Wellness Policy.	<p>Provided technical assistance to complete and post the district's most recent Wellness Policy Assessment on the implementation of the Local School Wellness Policy. The assessment should include specific goals and track the implementation of those goals. The Wellness Policy Assessment Template was provided. Superintendent was given a packet of information put together by Team Nutrition.</p>
1200 - Professional Standards	1216 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.	<p>FSD and staff have not yet completed the required Professional Development hours. Hours must be completed between June 30 and July 1 each year. SFA should maintain records documenting completion of said hours. Training should include 1 hour of Civil Rights training each year. Training resources were shared with the FSD.</p> <p>Training hours should meet the following guidelines:</p> <p>Director- 12 hours annually</p> <p>Manager- 10 hours annually</p> <p>Full-Time Staff- 6 hours annually</p> <p>Part-time Staff- 4 hours annually</p>
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?	<p>Breakfast Promotion: The USDA requires SFAs to promote their breakfast program at least 2 times annually to households. Promotion should include breakfast price, times available and should encourage all students to attend. National</p>

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		School Breakfast week is March 5-9, 2018, and is a good time to promote breakfast.
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Site - Level Technical Assistance Audubon High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	The elementary school is serving Silk almond milk to two students with dietary modification for lactose intolerance. Almond milk does not contain the same nutrient content as cow's milk, therefore is not an acceptable substitution. A list of approved milk substitutions was provided to the FSD.
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students?	The High school has the required signage, Offer vs Serve requirements and the daily menu. The Elementary needs some updated signs. FSD was directed where to order new signs. The elementary school should also be posting the menu daily.
400 - Meal Components and Quantities - Lunch	407 a. Has the school offered the planned menu for the day of review?	SA and FSD discussed ways of improving production records. Overall, SFA is doing a great job; be aware of when one uses ambiguous terms like "one pan" and switching back and forth between weight and volume units of measure. SFA has a guide which references how many 1/2 cup servings of vegetables come from a 5 lb. case of vegetables. This is ideal and provides evidence of planned servings.
1400 - Food Safety		TA was given to FSD that cafeteria tables should be cleaned and sanitized between lunch groups.
1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	The most recent food safety inspection report should be posted in a publicly visible location. While visible, it was too far away to read. The FSD relocated the report during site visit.
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.	One jar of Wow Butter was on the shelf at the Elementary. Wow Butter does not comply with "Buy American" regulations. It was determined that the Wow Butter belongs to a student, SFA agreed to return it to the student on the day of review.
Dietary Specifications Assessment Tool - Lunch	3 Low-fat, fat-free milk products are used. This includes yogurt and cottage cheese.	Two 5 lb. tubs of cottage cheese were found in the cooler with 4% fat content. Crackers on the salad bar were not whole grain. TA was given to ensure compliance with these items in the future.

Org - Level Commendations

Description

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<p>APPLICATIONS/BENEFIT ISSUANCE (100): 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 transferred in a timely manner to the POS system, and denied applications were correctly determined. Applications are available to families on the SFA's web site. 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. Free meals are extended to all members in the household. Eligibility is kept confidential.</p>
<p>CIVIL RIGHTS COMPLIANCE (800): Ethnic/racial information is collected and the form is completed. No discrimination was observed. The "And Justice for All" poster is visible to program participants. The non-discrimination statement is included on program materials.</p>
<p>LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years and is posted on the district's web site. The policy has nutrition education, physical activity and other wellness goals included. A wellness committee is in place which meets one time per year. The committee is made up of students, faculty, staff, and community members.</p>
<p>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 January 2018 appeared accurate and complete and matched the numbers reported on the January claim. Food Service Staff ensured each student received the required meal components.</p>
<p>MEAL PATTERN: All students observed on the on-site visit had a reimbursable meal, the menu was complete with all food groups represented and served in their proper quantity. Offer vs. Serve was implemented properly and staff was monitoring food items on trays. Water was available to all students during meal times. Menus for the month of review contained all required components in their proper quantity. Students at the high school had three choices daily: hot entrée, sub sandwich or salad bar. These choices contribute to a high participation rate. (78%)</p>
<p>MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, does an excellent job of maintaining production records and planning and offering choices. Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. SFA does a good job of monitoring students with different meal patterns in the same building. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file and well organized. Standardized recipes are used for food production. Signage was posted explaining what constitutes a reimbursable meal at the high school.</p>
<p>PROCUREMENT: The food service director attended the Procurement Regional Training in Avoca. The SFA has a written Procurement Plan that correctly identifies the federal and local purchase thresholds. The estimated value and procurement method for some procurement events is correctly identified. When using the micro-purchase method, each transaction with the vendor was below the local micro-purchase threshold of \$3,500. The purchase prices were reasonable. The invoices from vendors were well-organized. The invoices had a date, vendor name and address, and items purchased were identifiable. The district used the small purchase method to obtain price quotations for milk and bread. Two vendors were contacted bread price quotations. Both the bread and milk procurement was in compliance with the local small purchase threshold of less than \$30,000. The district is a member of a Group Purchasing Organization. A review of milk invoices validated the district was receiving the products as bid and prices were charged as bid.</p>
<p>RESOURCE MANAGEMENT & RECORD KEEPING (700): The Resource Management section of the Off-Site Assessment tool was completed on time. The Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool. The SFA effectively utilizes its USDA entitlement for commodities. Reports are filed on time, and all records are maintained for at least three years plus the current year. The district has a negative balance policy in place. Errors fell below the \$600 disregard, no fiscal action is required.</p>
<p>SUMMER PROMOTION (1600): The SFA does an excellent job of promoting the Summer Food Service Program, SFSP, at their site. Advertising is done through local newspapers, social media, the web site, parent teacher conferences, flyers and the local Chamber of Commerce. The SFSP works in conjunction with the 21st Century grant and LAUNCH program awarded to the district.</p>
<p>VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was completed on time. The SFA had at least one person attend training.</p>

Site - Level Commendations Audubon High School (0109)

Description
<p>GENERAL: Staff at the high school are warm and friendly. They interact with the students in a positive way. The FSD has provides choices for students for breakfast from hot meals to quick meals off the snack cart. This has helped change the culture of the school where students want to go to breakfast. The dining room was full from 7:30-8:15am, a positive sign that students are starting their day nourished. This shift has consequently helped the bottom line of the School Lunch account as a result.</p>

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HACCP/FOOD SAFETY: The SFA has a district-wide written Food Safety plan that includes all required elements. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Four members of the kitchen staff are ServSafe certified.

SMART SNACKS (1100): Students are able to purchase foods from the snack cart. All foods sold meet the Smart Snack standards for nutrition content. Beverages sold meet the standards for the high school. Documentation was available to show that all a la carte sold to students during the meals met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.