

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
CLEAR CREEK AMANA SCHOOL zz (12210000)
Dates December 12-14, 2017

Program Year: 2018
Month of Review: November
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	Errors on 12 out of 500 applications were determined. Eleven students went from free benefits to paid status, five students went from reduced benefits to paid status, five students went from free benefits to reduced benefits, five students went from reduced benefits to free benefits, and one student went from paid status to free benefits. One application was missing the last four digits of the social security number. Some errors were miscalculations in determining, two applications were determined via "Administrative Approval" which essentially overrode federal income guidelines and is not allowed. One error was an error made during verification.	For your response, review all of the names on the SFA 1 and SFA 2 in Review Attachments. If benefits were decreased, send a letter of adverse action to the household and attach a copy of the letter below. If benefits were increased, indicate the date the benefits were changed. Finally, submit the last four digits of the missing social security number.	
200 - Verification	V-0200	One of three applications verified was verified incorrectly. The household submitted documentation from June. As stated in the verification notification letter, documentation must be from the time the household first applied until the current date. Pay documentation submitted indicated that pay is every two weeks instead of twice a month as entered on the application and as used for verification. When income was entered as every two weeks, the household is over income limits.	For your response, send the household a letter of adverse action notifying them of the change in benefits and providing ten days to appeal the decision. Submit a copy of the letter. Also amend the Verification Report to reflect this change.	
1500 - Reporting and Recordkeeping	V-1500	The SFA is required to submit documentation to the state agency by certain dates. Verification was not completed by the November 15 deadline, and an extension was not requested. Documents, and other off-site tools and questions required for the Administrative Review, were not completed in a timely manner or were not completed at all.	This error was discussed during the on-site review. No further response is required.	

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Site - Level Findings: North Bend Elementary (0427)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	This is a repeat violation from the 2015-16 review. A Point of Service (POS) is required at the location and time where the student is served. There must be some exchange with the student for the meal—name, ticket, PIN#, card, etc. North Bend Elementary does not have a POS for grades K-2. Students are supposed to stop at the cashier stand and state their name. The majority of students did stop by the cashier, but almost no student provided his or her name. On the day of observation, two students completely ignored the cashier and had to be brought back from their seats. Several others came only halfway to the cashier and then turned to go to a seat across the room. It is the duty of the cashier to determine whether students have a reimbursable meal. That cannot be accomplished from ten feet away. Lack of a POS typically leads to underclaiming.	For your response, indicate your plan to ensure that any students in the district who are not required to enter their 4-digit number into the keypad, are required to exchange something for his or her meal at both breakfast and lunch. Include a plan for additional monitoring--either by the director or a kitchen manager to ensure that the plan remains implemented. A third repeat of this error may result in fiscal action.	
300 - Meal Counting and Claiming - Lunch	V-0300	The District's Unpaid Meal Charge policy states that, "When the balance reaches \$0.00 a student may charge no more than \$11.00 or 4 lunch meals and no ala carte to this account." The Point of Service, POS, program is set to stop students from purchasing a meal or a la carte after the balance reaches \$11.00. However, cashiers at both buildings reviewed were observed making frequent overrides of the POS system to allow the purchase of meals. The SFA's POS should not require frequent overrides. Further, if the Meal Charge policy is not implemented consistently in all buildings, discrimination could result.	For your response, indicate whether the Meal Charge policy will be amended or whether the current policy will be fully and equally enforced.	
400 - Meal Components and Quantities - Lunch	V-0400	Meal service at North Bend Elementary is Serve Only; Offer vs Serve is not implemented. In Serve Only, all five lunch components--milk, grain, meat/meat alternate, fruit, and vegetable must be on the students' trays in at least the minimum required amounts in order to claim the meal as reimbursable. On the day of observation, thirteen students did not have milk on their trays, but the meals were counted as reimbursable. Those meals were added to the overclaim amount.	For your response, indicate your plan to train cashiers in Serve Only sites on the importance of having all five components on the tray in order to claim the meal. It is highly recommended that the director conduct one or two follow-up visits to ensure that Serve Only is being correctly implemented at North Bend Elementary.	

Site - Level Findings: Clear Creek Amana Middle School (0405)

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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	101 Who is the determining official for certifying household applications (Names and/or position titles)?	Technical assistance was provided on accepting benefit applications. Unless an application is selected for Verification, the application is to be accepted on face-value. It is recommended that when a household attempts to provide documentation of income that the SFA refuse the documentation. If the documentation is accepted, then it must be compared to what has been entered on the application. If the information does not agree, then the SFA must act on that knowledge.
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	109 Who at the SFA receives the direct certification documents from the state or local agency and who is responsible for issuing and updating the benefit list?	Anytime an application indicates a case number (even if it is only a name that is entered), the SFA should check Elook-up to see if the student is on direct certification. The same would apply when an applicant indicates a foster child. Direct certification automatically verifies that the household is eligible for free benefits, and (except for foster children) it extends to the entire household.
200 - Verification	206 When a confirmation review was conducted,	Technical assistance was provided on Confirmation Reviews. Prior to any other verification activity, a determining official, other than the official who made the initial eligibility determination, must review each approved application selected for verification to ensure that the initial determination was accurate. (page 71 Eligibility Manual) The confirming official then signs and dates the application(s)
700 - Resource Management		TA:(1) Technical assistance was provided on completing the SFA's written procurement plan. All procurement events should be included on the plan. The current plan only indicated five procurement events. The plan is meant to be a road map for how goods and services will be procured for the next school year. (2) The SFA's Code of Conduct does not clearly indicate disciplinary actions. Board Policy 401.2 states that food service employees cannot participate in conflicts of interest but does not state what will happen if employees violate the code. Examples of disciplinary actions would be verbal warning, written reprimand, suspension, and discharge.

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<p>700 - Resource Management</p>		<p>TA: Primary Vendor for Foods and Non-Expendable Supplies Request for Proposal</p> <ol style="list-style-type: none"> 1. Allows three weeks from Mandatory Pre-Proposal Meeting to Proposal Submission due date. Although not a federal requirement, potential vendors should be given a minimum of six weeks before the Request for Proposal (RFP) due date. Best practice is to allow a 8-12 weeks lead time. 2. Provide the location of the mandatory pre-proposal meeting to Section 1.1 RFP Instructions proposal schedule. 3. The specific federally-funded school nutrition programs procurement regulations are 7 CFR 210.16, if applicable (Food Service Management Companies) and 7 CFR 210.21. The federal procurement regulations should be 2 CFR 200.318-200.226 and Appendix II to Part 200. 4. The public notification should provide vendors contact information of individual at the school district from whom a full Request for Proposal (RFP) can be requested. 5. The USDA and Iowa non-discrimination statements should be added to the Request for Proposal (RFP). 6. In Section 3 of the proposal, add section on how vendor(s) will be notified of award/non-award. 7. Section 26.12 Criminal Background Checks seems to apply only to Iowa City school district. There is no additional narrative for other Group members. Add statement on how other Iowa City Rural Food Service Purchasing Group (ICRFSPG) members background checks requirements, if applicable. 8. The RFP should address how each Group member will handle exceptions to Buy American provision. Please refer to the sample language in USDA memo SP 38-2017 in Question and Answers #5 to be used in solicitations and contracts to comply with the requirement to retain records documenting any exceptions to the Buy American Provision. Additionally, the RFP should ask vendors to certify a product does meet Buy American Provision. Sample language to include is provided in the USDA memo. 9. Add information on piggybacking and what per Iowa City Rural Food Service Purchasing Group (ICRFSPG) constitutes a material change to the contract. 10. Add the USDA and Iowa non-discrimination statements to any future procurement documents. 11. Add language in procurement documents to ensure qualified small and minority businesses and women's business enterprises are solicited whenever there are potential sources. 12. Add to section 5.7 Cost Reimbursable Contract Provisions of RFP RBG-2018 the following statement: The selected distributor separately identify for each cost submitted for payment to the school food authority the amount of that cost that is allowable (can be paid from the Nutrition Fund) and the amount that is unallowable (cannot be paid from the Nutrition Fund). 13. Add information on how each district in Group will place an order with selected distributor.
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		<p>14. Add language in proposal on piggybacking and what constitutes a material change.</p> <p>Best Practice - Explain what compliance with Equal Employment Opportunity means. What do vendor(s) have to do. See language in state-prototype RFP template.</p> <p>It is recommended that additional prices be checked as often as possible to ensure that the SFA is receiving the correct prices from the bid. Money was recovered for some items.</p>
700 - Resource Management		<p>TA:Micro Purchasing: (1) Technical assistance was provided on Micro-Purchasing. Micro is only when there is no price comparison or bids or quotes. Purchases are simply made from a vendor. The prices must be reasonable and the purchases must be spread around to all qualified vendors. It is recommended that the SFA indicate on its Procurement Plan the distance the SFA is willing to travel for micro purchases.</p>
700 - Resource Management		<p>TA:Small Purchase Procurement: (1) Documentation must be kept for all procurement. For small purchase, specifications of what is being procured, vendors contacted, prices offered, and how the decision to select the vendor must be maintained. At least three vendors should be contacted. It is recommended that the small purchase threshold be increased so that dairy and bread do not require formal procurement.</p> <p>(2) Neither the dairy nor the milk bid included Buy American statement, delivery/service fees language, debarment statement, termination for cause which is required if the contract is more than \$10,000, Targeted Small Business language, and USDA and Iowa non-discrimination statements. Bottom line evaluation is recommended. The predicted quantity to be purchased should be included in the bid and multiplied out by the proposed price and all bid items added together. The bid is awarded to the lowest bottom-line price. Refer to Procurement documents in Download Forms on CNP for templates and guidance.</p>
700 - Resource Management		<p>SFAs are required to have a Meal Charge Policy and they are also required to notify households in writing. According to regulations,</p> <p>SFAs must ensure the policy is provided in writing to all households at the start of each school year and to households transferring to the school or school district during the school year. The following are methods SFAs could use to communicate the policy to families:</p> <p>Include a letter to households explaining the meal charge policy when sending “back-to-school” packets with student registration materials;</p> <p>Include the policy in the print versions of student handbooks, if provided to parents and guardians annually; and/or</p>

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		Include the written policy when using existing notification methods to inform families about applying for free or reduced price meals, such as distributing household applications at the start of the school year.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?	The non-discrimination statement on the front page of the website was correct, but a statement accessible via a link is the outdated statement. SA advised SFA to remove or correct the incorrect statement.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	Technical assistance was provided on completing the racial ethnic report correctly. Total applicants did not add up in column one.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	Annual on-site monitoring of breakfast was not completed prior to February 1st of the last school year. SFA was reminded that on site monitoring of 50% of breakfast sites is required. SFA plans to complete monitoring for the current school year by the required date and will include breakfast monitoring.
1000 - Local School Wellness Policy	1006 How does the public know about the results of the most recent assessment on the implementation of the Local School Wellness Policy? Provide documentation to support the response (or appropriate web address(es)).	Technical assistance was provided on providing the results of the most recent assessment of Wellness Policy goals to the public.
1200 - Professional Standards	1219 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. i.e. entered into a tracking mechanism.	SFAs are required to track training hours for Professional Development regulations. Both an Iowa and a USDA tracking tool was shared with the SFA during the 2015-16 review, but a district-wide tracking tool has not been implemented. The SFA is not required to use either of the tracking tools; they may choose a tracker of their own. Tracking must include name, position, part or full time, training name, length of time, area covered (there are four areas),and documentation.(Certificate, agenda, etc.) Training resources were also shared with the director, including Iowa Learning Online Professional Development, Iowa webcasts and webinars, Institute for Child Nutrition, an the USDA Professional Development site.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	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. At both sites reviewed, the available SOPs were minimal. Temperature logs for calibration was not maintained and only one dishwasher test strip was recorded. There should be a list of equipment at each site as well as SOPs concerning each piece of equipment. There should be a plan for receiving and storing deliveries. There should also be a Process List for all food items. Part of the required written HACCP plan is a list of all menu items divided into the three process categories. Process 1, No Cook includes items such as fresh fruit and vegetables, canned fruit, and cold sandwiches. Process 2, Same Day Service includes the majority of menu items such as cooked vegetables, hot sandwiches, and other entree items. Process 3, Complex Food Preparation includes items such as leftovers and entree items that are prepared the day before and then reheated. There are posters in the HACCP Guidance manual beginning on page 20

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		that visually explain how to handle each process. The Process List has not been completed.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements? If NO, explain.	Outreach for breakfast at the beginning of the year should include sites, times, and prices for breakfast. The outreach should be sent to households at the beginning of the school year as well as the reminders that are already being advertised during the year. SFSP—Stronger outreach for summer meal programs is recommended. The SFA could put a link to Iowa sites that are posted on the DE website as well as the National Hunger Hotline 1-866-3-Hungry or 1-877-8-Hambre.

Site - Level Technical Assistance Clear Creek Amana Middle School (0405)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	Technical assistance was provided on what constitutes a reimbursable breakfast. To help both staff and students determine what constitutes a reimbursable meal, the breakfast signage must include how many 'items' each food offered credits for. There is also a small sign on the cashier's stand that states three items must be selected and one must be a fruit. That sign, or a similar sign, should be posted on the chalkboard menu. Staff at the POS should be trained to look first for the fruit and then determine whether the student has at least two more items.
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. Old, outdated labels should be removed.
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.	A Food Production Record checklist was provided on-site. Food Production Records, FPRs, serve many purposes--inventory 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 #10can; the amount of each food item left over; and the actual number served for each grade group, adults, and a la carte.
1100 - Smart Snacks in School	1105. a. Review 10% of the food and beverages sold during the review month. Do foods and beverages sold to students during the school day (defined as 12am on a day of instruction to 30 minutes after the end of the official school day), including a la carte	One a la carte item was found to be non-compliant. The label said "made" with whole grains, but the first ingredient was not a whole grain. Item was removed from the line and is no longer for sale.

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	foods and beverages sold during meal services, meet Smart Snack standards? (Includes food items sold during non-exempt fundraisers) If NO, explain.	
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Site - Level Technical Assistance North Bend Elementary (0427)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Two non-whole grain mixes were observed in storage at the elementary building--White Cake Mix and Cornbread Mix. It is recommended that these be replaced by a whole grain rich product, but if not practicable, a waiver should be requested. There were also cucumbers in the cooler at the middle school that were not an American product. The vendor should be notified.

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, and benefits are accurately and frequently transferred to the POS system. A current benefit issuance list was available. All applications signed and dated by both the household member and the SFA, 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. Free meals are extended to all members in the household. 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 cafeterias reviewed. 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 and documented. Ethnic/racial information is collected and the form is completed. No discrimination was observed. SFA on-site lunch monitoring was completed to ensure that all schools are meeting program requirements. The current state and federal non-discrimination statements are provided on most materials describing the program including letters, pamphlets, and the school's website.</p>
<p>COMPETITIVE FOODS (SMART SNACKS/HKA): Documentation was available to show that the vast majority of foods and beverages sold to students during the school day met Smart Snack and Healthy Kids Act standards, including food sold in the cafeteria, vending machines, school stores, and fundraisers. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.</p>
<p>HACCP/FOOD SAFETY: A copy of the written plan was available at the site(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. The latest Health Inspection Reports were posted in a publicly visible location. There were no critical areas noted on the report. 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.</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 November were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. Meal Magic 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, FPRs, were on file for all meals claimed for reimbursement for the review period.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: The director menus numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Water was available as required. At least two types of milk are offered. Several low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheet(s) for each school selected for review for a specified week during the review period. Nutrient analysis was not required.</p>
<p>PROCUREMENT: The board purchasing policy, written procurement policy, and vendor paid lists were submitted. The SFA has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. The SFA purchases main supplies through a Group Purchasing Organization which helps keep prices down and spreads the responsibility for bidding among more people. The director had copies of the contract and bid prices. Bread and milk bids were also available for review.</p>

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PROFESSIONAL STANDARDS: Individual tracking sheets were provided that documents that the director received the required 8 hours of annual training, managers received the required 6 hours of training, and all other staff have received at least 4 hours of annual training. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.

RESOURCE MANAGEMENT & RECORD KEEPING: Financial records that were reviewed, indicated appropriate and allowable expenditures. 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, PLE, tool was completed and prices were increased as indicated by the PLE tool. Money is not transferred out of the account to support other programs. The SFA very effectively utilizes its USDA entitlement for commodities

VERIFICATION: 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.