

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Coon Rapids-Bayard Community School District (14130000)**  
**March 13 – 15, 2018**

**Program Year:** 2018  
**Month of Review:** February  
**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	There were 5 students who had complete income applications but the number of people in the household was different than the number of family member names listed on the application. The discrepancy changed the benefit status of 2 students (see SFA-1 for student information). One student had an income application with a Medicaid number and was approved as free. Medicaid does not automatically qualify someone to receive free meals. The student was provided free benefits since the beginning of the school year. On 3/2/18 this same student was on the DC list as "other free" and is now free. These errors will result in fiscal action. TA provided to the determining official on ensuring that all household members are listed on the application, valid case numbers, Medicaid status, and how to notify families of their eligibility change.	The SFA sent a letter of notification of eligibility status to the 2 families whose eligibility status changed and changed the POS to reflect their new eligibility status. Provide written confirmation that the determining official will watch the 2018-2019 benefit issuance webinar.	
200 - Verification	V-0200	Both applications selected for verification had decreased benefit status based on the income documentation provided for verification. The letter of verification results did not offer 10 calendar days for the family to appeal or 10 operating days following the appeal period for benefits to be reduced. The letter did not contain the USDA or Iowa non-discrimination statements as required. The SFA is	Provide written confirmation that the verifying official will take the verification training webinar for the 2018-2019 school year prior to starting the verification process.	

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		encouraged to use the State Agency template letter for the 2018-2019 school year. In addition, the confirming official signed one of the two applications selected for verification and did not confirm the original eligibility status prior to notifying the family that they were selected for verification. TA provided on verification letters, dates, and training opportunities.		
800 - Civil Rights	V-0800	The racial ethnic form has not been completed and therefore the State Agency cannot determine if denied applications were disproportionately submitted by minority households. The racial ethnic form is located in Download Forms and must be completed on October 1st and updated as new students enroll. Technical assistance provided to the authorized representative.	Submit a copy of the racial ethnic form.	
800 - Civil Rights	V-0800	All program materials, including menus, student handbooks and the SFA's website, must contain the Iowa and USDA non-discrimination statements. The most current nondiscrimination statements can be found here: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs#USDA_Nondiscrimination_Statement">https://www.educateiowa.gov/pk-12/nutrition-programs#USDA_Nondiscrimination_Statement</a>	Submit a copy of the April 2018 menu that contains the nondiscrimination statement.	
1200 - Professional Standards	V-1200	The authorized representative/determining official and the cashier at the elementary breakfast cafeteria have not received civil rights training. The authorized representative is required to have four hours of professional standards training in school nutrition programs annually, including civil rights training. The cashier must have civil rights training and other training applicable to her job responsibilities. TA on training requirements and civil rights training.	The authorized representative completed her civil rights training while SA was onsite. Documentation is attached. Send documentation that the cashier at the elementary breakfast cafeteria received civil rights training.	
Resource Mgt Comprehensive Review	V-RMCRF	The 2016-2017 financial report indicates that the school food service account has more than 3 months of operating costs. If the school food service account has more than 3 months of operating costs, the SFA must request State	Describe the SFA's plan on how they will spend down the school food service account balance.	

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		<p>Agency approval and have a plan on how to spend down their balance. Suggestions on utilizing funds may include serving more fresh fruits and vegetables, requesting an exemption to avoid raising paid student lunch prices for the next school year, provide wage increases to food service staff, purchasing new kitchen equipment, and/or hiring a part time or substitute employee. Technical assistance provided to the school business official and food service director.</p>		
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**Site - Level Findings: Coon Rapids-Bayard Jr. Sr. High School (0172)**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
300 - Meal Counting and Claiming - Lunch	V-0300	<p>All meal counts must be taken at the point of service. The preschool breakfast and lunch counts are currently based on attendance records. Technical assistance on point of service counts and documentation provided to the authorized representative, food service director and preschool teachers. The preschool teachers agree to have a daily breakfast and lunch roster that will be completed as students are eating. The roster will be provided to the FSD once daily so that she will count and claim students in the POS system.</p>	No further action required.	
400 - Meal Components and Quantities - Breakfast	V-0400	<p>The breakfast service for 5-12th grade students provided uncontrolled amounts of soy nut butter, jelly, and syrup to students. Since portion sizes were not controlled for these items, SA was not able to ensure that the calorie requirements were achieved. Condiment portions must be controlled in order to ensure calorie, fat and sodium restrictions are met. SA suggests limiting portion sizes by providing individual portions of the soy nut butter, jelly and syrup. The food service director immediately began portioning servings of these condiments in serving sizes of 2 Tbsp. soy nut butter, and 1 tbsp. jelly and 1 tbsp. syrup. No further corrective action required. There was not a label for the cereal offered to</p>	<p>Provide a copy of the cereal labels for the cinnamon toast crunch, frosted shredded wheat and Lucky Charms cereal provided to the 5-12th grade students OR provide written confirmation that the FSD will begin offering the cereal packs made available to the K-4th grade students. Provide a label for the cereal options that will be provided to the preschool students.</p>	

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		5-12th grade students and therefore the SA was not able to determine if the cereal was whole grain rich and if the serving size met the 1 oz. grain equivalent requirement. All grain items served must have a label to show that it is whole grain rich and how a serving credits towards the grain requirement. Two of the three cereal packs offered to the preschool students (who follow the CACFP meal pattern) contain more sugar than the CACFP requirement of 6 grams per ounce. The FSD is encouraged to work with the HeadStart dietitian in finding an approved cereal. Technical assistance provided to the food service director on the CACFP cereal requirements and appropriate labels.		
400 - Meal Components and Quantities - Lunch	V-0400	In review of items found in storage, SA discovered many grain items that were not whole grain rich including rice, elbow macaroni, egg noodles, waffles, stuffing mix, sugar frosted cereal and egg burritos. Unless the SFA has a whole grain rich exemption for specific items, all grain items must be whole grain rich. TA and a handout were provided to the FSD on whole grain rich items.	Describe the process that will be implemented to ensure all grains served are whole grain rich.	
400 - Meal Components and Quantities - Lunch	V-0400	The pizza burger served during the review period did not have an approved CN label and therefore, SA was not able to determine how it credited towards the meal pattern. All combination food items must have a CN label or a Product Formulation Statement. The food production records and CN labels provided for the review period indicate that the K-5th grade students were short on their daily (3 days) and weekly fruit requirements, short on their daily (2 days) and weekly total vegetable requirement and short on their dark green vegetable requirement, which is a repeat finding. The 6-8th grade students were short on their daily (2 days) and weekly vegetable requirement and short on their dark green vegetable requirement, which is a repeat finding. The 9-12th grade students were short on the grain	Provide one week of lunch food production records, CN labels and standardized recipes for all grade groups to show that all meal pattern requirements have been met.	

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		requirement for one day, which is a repeat finding. Fiscal action will be taken for these repeat findings. TA provided to the FSD on approved labels that are required for menu items, and the daily and weekly meal pattern requirements.		
1100 - Smart Snacks in School	V-1100	Beverages sold in vending machines must meet the Smart Snack regulations for the youngest grade group that has access, which is K-5th grade students. Students in K-5th grade are allowed to have plain water, 100% juice (8oz.), or milk. The vending machine contained G2, sweetened teas, and KickStart drinks which are not allowed for K-8th grade students. TA provided on Smart Snack beverages to the school nurse, authorized representative and food service director. All Smart Snack food and beverage items sold to students during the school day must meet Smart Snack regulations and have a nutrition calculator print out to show that they are compliant. The a la carte items sold and the vending machine beverages did not have the calculator print outs to show that they met regulations. In providing TA to the the food service director, we discovered that some a la carte food items are not approved. The FSD immediately removed those items from the a la carte line and agrees to no longer sell these items to students during the school day. The FSD also sells an a la carte breakfast sandwich that is likely over the Smart Snack requirements however, may be eligible to sell as part of a reimbursable entrée item.	Describe what beverages will be put into the vending machines or provide written confirmation that the vending machines will be off during the defined school day (midnight until 30 minutes after dismissal). List who will be responsible for ensuring that the vending machine contains approved items. Provide a nutrition calculator printout for 4 items that will be sold as a la carte items. Provide nutrition information on the breakfast sandwich and confirm that the SFA will no longer sell it as an a la carte item unless it is part of the reimbursable meal for that day or the day prior.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	103 At the beginning of the school year, how is benefit status handled for children who have not submitted an application for the current school year?	SFAs are required to extend free or reduced price benefits to students who were eligible in the previous school year for 30 operating days into the next school year. The SFA

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		currently extends benefits to 09/15 which is less than the 30 operating days. TA provided.
100 - Certification and Benefit Issuance	128 Is household notification of denied benefits consistent with FNS requirements? If NO, explain.	SFAs must notify families if their student is receiving benefits because they are on the Direct Certification list or if they complete an income application and are denied. SFAs can use either the State Agency (SA) template letter of notification of eligibility status or a SA approved letter when notifying families. If SFAs use their own letter of notification, it must be approved by SA before sending it out to families. Approval Request Forms (available in IowaCNP under Download Forms NSLP022) must be completed and sent to Deb Linderblood for approval. TA provided to the determining official.
100 - Certification and Benefit Issuance	133 Are the Direct Certification lists retained on file by the SFA? If NO, explain.	The Direct Certification lists must be downloaded twice monthly and kept on file (hard copy or electronic copy) for at least three years plus the current year. Although the SFA downloaded the lists, they were not saved and kept on file. TA provided.
700 - Resource Management		<p><b>PROCUREMENT:</b></p> <ul style="list-style-type: none"> <li>-The procurement plan must include all purchases made with the school nutrition fund, including micro-purchases. TA provided on the local small purchase threshold, purchasing methods (sole source, micro-purchase, small purchase and formal purchase methods), contract management and contract types that were awarded to vendors.</li> <li>-SFAs are required to ensure that the vendors they conduct business with have not been suspended by the USDA. They can check on <a href="http://www.sam.gov">www.sam.gov</a> or have an authorized representative from the company sign a debarment certification sheet to confirm that they have not been suspended.</li> <li>-Bid documents must not only include product and delivery specifications, but must also include the Buy American provision and any other details that may be considered when evaluating the bid. SFAs may use the 3 Bids and a Buy template in Download Forms (NSLPPROC008).</li> </ul> <p>Price lists provided by the milk vendor and prime vendor</p>

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		<p>must be saved for 3 years plus the current year.</p> <ul style="list-style-type: none"> <li>·The SFA currently is a part of a group purchasing organization and also purchases food and supplies through another prime vendor. If they continue to use an additional prime vendor, they must send out a bid to multiple prime vendors for the products that they will purchase.</li> <li>·SA encourages SFA to attend procurement training and find additional resources in Download Forms.</li> </ul>
1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements? If NO, explain.	The assessment of the wellness policy goals must be made available to the public. The wellness leader provided the most recent assessment and TA was provided on ways to make it available to the public. The wellness leader agrees to put a copy on the school's website. No further action required.
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.	Professional standards training must be tracked for all employees with school nutrition program responsibilities. Sample tracking tools are available through USDA: <a href="https://www.fns.usda.gov/school-meals/professional-standards">https://www.fns.usda.gov/school-meals/professional-standards</a> and the IDOE: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition">https://www.educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition</a> TA provided to the FSD.
Resource Mgt Comprehensive Review	1 Did the SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency?	The district does not currently charge the school nutrition account for any indirect costs. If the general fund would like to recover the costs of any indirect costs (administrative costs, custodian costs, pest control, equipment repair, water, utilities etc.) they can apply the unrestricted indirect cost rate to the direct cost base of food service labor and benefits, food service supplies (not including food), and food service travel costs. TA provided to the business official.
Resource Mgt Comprehensive Review	6 Did the SFA:	The 2016-2017 financial report states that the non-program food revenue adequately covers the non-program food cost. Non-program foods are foods in which the school food service account purchased but aren't reimbursed for by the USDA. Non-program foods include adult meals, 2nd entrees, 2ndmilks, kindergarten and preschool snacks

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		(milk), a la carte items, catering to parent teacher meetings and catering to student events. Program foods include any reimbursable breakfast and lunch meal that the SFA submits a claim and receives reimbursement for. TA and a handout provided to the school business official on what a non-program food is and how to calculate the non-program food costs and revenues.
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**Site - Level Technical Assistance Coon Rapids-Bayard Jr. Sr. High School (0172)**

Area	Question	Comments
800 - Civil Rights	810 Is the USDA “And Justice for All” poster displayed in a prominent location and visible to recipients of benefits? If NO, describe reason.	The elementary breakfast cafeteria does not have an “And Justice For All” poster on display. TA and an additional poster were sent to the SFA to display.
1400 - Food Safety	1403 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	SFAs are required to have two food safety inspections a year. If they have not received two at each site they must email their inspector to request another inspection. TA provided.
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 must be posted in a public location. Currently it is posted in the food service director’s office. TA provided on appropriate places to post the inspection.

**Org - Level Commendations**

Description
CERTIFICATION AND BENEFIT ISSUANCE AND VERIFICATION: • Benefits are extended to all students within the household. • Applications are complete with all of the required staff and parent signatures, dates and social security numbers. • Eligibility status was accurately transferred to the point of service system. • The SA template letter of notification of eligibility status was provided to families who were on the Direct Certification list. • Applications were processed within 10 operating days. • The determining official checks the Direct Certification list twice monthly. • Applications that were over the income guidelines were denied accurately. • The correct number of applications were selected for verification (2). Applications were selected from error prone applications first. • The verifying official followed up with families who did not respond after being given the letter of notification of verification selection. • The eligibility status was determined accurately based on the income information provided by families. Eligibility status was changed in the point of service system when benefits changed. • The verification process and report were completed on time.
CIVIL RIGHTS: - The SFA sent the public release to the local media outlet. - Civil rights training was provided to all food service staff. - The food service director and school nurse have appropriate documentation on file for all students with special dietary needs and they work with families to ensure students get the correct diet while

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at school. - The “And Justice For All” poster was on display in a public location.
FOOD SAFETY: • The SFA has a HACCP plan that contains all required Standard Operating Procedures. • Food temperatures are monitored and recorded. • The temperatures of all milk coolers, freezers and refrigerators are monitored and recorded. • Food is stored 6” off the floor. • The food service director and head cook are ServSafe certified.
MEAL COUNTING AND CLAIMING: - The claim during the review period matches the count on the edit check. - The count on the day of review was reasonable when compared to the count during the review period. - The point of service line for breakfast and lunch was orderly and organized to allow staff to ensure that all meals were reimbursable. - All meals counted and claimed during the onsite breakfast and lunch observation were reimbursable meals. Offer versus serve was implemented accurately.
MEAL PATTERN REQUIREMENTS: • Food production records are available for all meals claimed during the review period and are complete with information on all menu items served, serving sizes, total quantity amount served, planned number of servings, leftovers, and number of 2nds served. • CN labels are available for most of the menu items served during the review period and during the on-site review. • At least 2 different, approved types of milk are available. • The review period lunch food production records indicate that the daily and weekly requirements were met for the fruit, meat/meat alternate, milk, vegetables and all of the vegetable subgroups for the 9-12th grade students. • The review period lunch food production records for K-8th grade students met the daily and weekly requirements were met for grain, meat/meat alternate, milk, red/orange, bean/legume, other, and starchy vegetable subgroups. • The review period breakfast food production records and menus indicate that the daily and weekly requirements were met for the grain, fruit and milk components. • Signage was posted in both breakfast cafeterias and the lunch cafeteria to inform students of what constituted a reimbursable meal. • Water was available to students during breakfast and lunch meal service. • Foods found in storage met the Buy American provision. • The preschool student breakfast and lunch meal met the CACFP meal pattern during the day of review and review period as all of the components were available in the required serving sizes. The CACFP meal pattern is being followed and students are only provided unflavored milk. All grains offered to preschool students during the review period and day of review were whole grain rich. The teachers ate with the students and talked to them about the menu items served. Good food safety practices were observed.
PROCUREMENT: • The SFA has a procurement plan that contains all of the required information for their milk, bread and prime vendor. • The SFA has a signature page and a code of conduct that includes all of the required elements. • Bids were sent for the milk and bread and included product and delivery specifications and due dates of when bids responses are due. Bids were sent to more than one vendor for the milk and bread.
PROFESSIONAL STANDARDS TRAINING: • All food service staff received the required number of training hours in school nutrition programs. • Appropriate documentation is on file for all training opportunities received by the food service staff. • All food service staff received civil rights training.
RESOURCE MANAGEMENT: - The SFA is charging the correct paid student lunch price based on their PLE tool and the correct adult lunch price based on the USDA requirement. - The SFA efficiently uses their USDA commodity foods, as 101% was used in the previous school year. - The non-program food revenue, as a percentage of total food revenue, adequately covers the non-program food costs, as a percentage of total food costs. - The SFA has a negative balance policy that is provided to all families upon registration. - All expenses made during the review period were allowable. - Program documents are kept for 3 years plus the current year. - School nutrition program revenue is directly deposited into the school nutrition account.
SCHOOL WELLNESS POLICY: - The wellness policy contains all of the required elements and is made available to the public as it is on the district’s webpage. -The district has a wellness committee that contains a variety of stakeholders. The SFA informs potential stakeholders of wellness committee meeting times at registration and on the district’s website. - The policy and the assessment of policy goals have been updated within the past 3 years.
SUMMER FOOD SERVICE AND SCHOOL BREAKFAST PROGRAM OUTREACH: • Families are informed about the Summer Food Service Program as the school provides information through social media and the local newspaper. • Families are informed about the School Breakfast Program through the registration information.