

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Eldora-New Providence Comm School District (20070000)
Dates of Review: February 6-8, 2018

Program Year: 2018
Month of Review: January
Lead Reviewer: Deb Linderblood
Org Representative(s): Christi Giguere

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The SFA had 8.62% application errors so next school year will be required to do an Independent Review of Application which requires a second person to confirm the eligibility determination. Three applications were missing a social security number and/or an adult signature. One application was determined to be reduced price but was incorrectly entered into the POS system as free. One household was identified as being directly certified but were not found on any of the direct certification lists. Four households were receiving benefits but had not turned in an application. One household was determined to be reduced price but should have been denied.		
200 - Verification	V-0200	The SFA did not give the household 10 calendar days in which to appeal a downward adjustment to their benefit status following verification. TA was provided that the SFA must give 10 calendar days from the date of the results letter for the household to appeal a downward adjustment. The benefit level then must be changed in the point of service system within 10 operating days from the end of the appeal period.	State your intentions to give households 10 calendar days in which to appeal a downward adjustment to their benefit status and that you will then change the benefit status in your point of sale system within 10 operating days following the end of the appeal period. Attach a sample "Results Letter" showing the correct dates have been applied.	
700 - Resource Management	V-0700	The SFA does not have a nutrition code of conduct policy with progressive disciplinary action steps.	Develop and attach a nutrition code of conduct policy that contains progressive disciplinary action steps or refers to a separate policy that has progressive disciplinary action steps and attach a copy of this policy.	
700 - Resource Management	V-0700	The SFA does not have debarment statements for Anderson Erickson or Bimbo Bakery.	Obtain and attach signed debarment statements from Anderson Erickson and Bimbo Bakery.	
700 - Resource Management	V-0700	The SFA's current Meal Charge policy does not state that a student who is approved for free meals cannot be denied a meal no matter what the balance is and a student, that has cash to pay	Add the following statement to your Meal Charge policy "a student who is approved for free meals cannot be denied a meal no matter what the balance is and a student, that has cash to pay the price of the	

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		the price of the meal that day, cannot be denied a meal even if the payment does not completely put the account in a positive balance.	meal that day, cannot be denied a meal even if the payment does not completely put the account in a positive balance." Attach a copy of the revised policy.	
1000 - Local School Wellness Policy	V-1000	The SFA has not reviewed or revised their wellness policy since 2/18/13. Goals should be developed that are ones that the SFA wants to achieve. The SFA has not designated at least one school official who has the authority and responsibility to ensure each school complies with the wellness policy. The SFA has not completed the building progress reports or the triennial assessment. TA provided on where to find updated sample wellness policies as well as the Local Wellness Policy Progress Report. Gave the SFA the following handouts: 1.) Does Your Wellness Policy Measure Up 2.) Non-Food Classroom Reward and Celebration Ideas.	State your plan and a timeline for 1.) when you will review/revise your wellness policy 2.) how you will go about determining goals that are relevant, achievable and measurable 3.) designating at least one school official who has the authority and responsibility to ensure each school complies with the wellness policy 4.) completing the triennial building progress reports and a triennial assessment 5.) how you will make the wellness policy and assessment available to the public.	
1200 - Professional Standards	V-1200	The Determining Official has only completed one hour of Professional training in school year 2017-2018 and her training hours have not been tracked.	Attach documentation showing that the Determining Official has obtained additional training in school year 2017-2018. TA provided she needs 4 hours of training per year and that she should listen to the Application Approval and Direct Certification webinar each year. TA also provided that she should give the Food Service Director a copy of her certificates from the training she completes so that her hours can be added to the tracking form.	
Resource Mgt Comprehensive Review	V-RMCRF	The SFA has not been including the food cost or food revenue from second milks in their calculations on their Non-program food revenue tool. Also, the tool is showing that the SFA's non-program revenue does not contribute adequately to total revenue.	Using the USDA non-program food revenue tool, recalculate your non-program food costs and non-program food revenue for school year 2016-2017. Complete and attach the USDA non-program revenue tool. After doing this determine, if your non-program food revenue is not contributing adequately to total revenue state below what steps you will take to increase non-program food revenue.	

Site - Level Findings: Eldora-New Providence High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	All students are currently not stopping at the point of sale to make an exchange of some sort with the cashier (many students walk by as they state their unique identification number to the cashier without there being an exchange such as the cashier stating their name). The cashier has to try to input the student's number and attempt to verify that the student took a reimbursable meal and thus, it is easy for a student to be entered incorrectly into the point of sale system or to get by the cashier without having a reimbursable meal. On the day of review at lunch, ten students did not have 1/2 cup of fruit or vegetable on their tray and the cashier did not see this and did not	State your intentions to purchase key pads so that students have to stop at the point of sale and put in their unique identification number and allow the cashier to check their tray to verify that they have a reimbursable meal or state your plan for how you will educate and enforce that students must stop at the point of sale, state their unique identification number and allow the cashier to check their tray to determine if they have a reimbursable meal before they leave to take their seat.	

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		send the student back to get the fruit and/or vegetable.		
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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?	TA provided that at the end of the 30 day carry-over period, households do not need to be sent a letter that they are being changed to paid status and if the SFA does send a letter it should not give the household the right to appeal as they did not submit an application.
100 - Certification and Benefit Issuance	128 Is household notification of denied benefits consistent with FNS requirements? If NO, explain.	TA provided that denied households must be notified in writing. Also explained that if the SFA uses notification letters from their POS system, these letters must be approved yearly by the State Agency. A Request For Approval form located on IowaCNP must be completed and e-mailed as a word document along with the SFA's free, reduced, denied and direct certification notification letters.
100 - Certification and Benefit Issuance	130 Does the direct certification list utilized by the SFA:	TA provided that if the homeless liaison deems a student as homeless he/she should write a letter stating the child's name, that they are homeless and sign and date the letter. The letter should be kept on file by the Determining Official.
200 - Verification	206 When a confirmation review was conducted,	TA provided that prior to sending the letter to the household informing them that they were selected for verification, the confirming official must confirm that the application was approved correctly. This individual should then sign the application that confirmation was conducted. Also, discussed that if a household does not submit the required documentation that one follow-up attempt is required.
700 - Resource Management		Reviewing invoices from the Prime Vendor, there were no items found on invoices that were not on the bid and no items had an invoice price that did not match the price on the original bid response or the monthly price lists. The food service director should spot check invoices to ensure products delivered match the order and the specifications of the product solicited. Price on the invoice should match bid pricing. Items not in the bid specifications must be procured using the appropriate procurement methods. 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. The prime vendor

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		must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification at equal or lesser price.
700 - Resource Management		TA provided that when the SFA does micro-purchasing they must spread the wealth. Showed where to find the micro-purchasing log on IowaCNP which should be kept for each vendor that the SFA does micro-purchasing with. Also showed the SFA the 3 bids and a buy form to use for small purchasing and informed them that an updated version will be coming out that has terms and conditions. Discussed that when the SFA gets quotes back from the vendor that they may have to determine a unit price of items such as buns to be able to compare the prices and select the vendor with the lowest overall price.
700 - Resource Management		TA provided that when the SFA does micro-purchasing they must spread the wealth. Showed where to find the micro-purchasing log on IowaCNP which should be kept for each vendor that the SFA does micro-purchasing with. Also showed the SFA the 3 bids and a buy form to use for small purchasing and informed them that an updated version will be coming out that has terms and conditions. Discussed that when the SFA gets quotes back from the vendor that they may have to determine a unit price of items such as buns to be able to compare the prices and select the vendor with the lowest overall price. Also discussed that the SFA needs to monitor their AEA contract by making sure what is delivered matches what was ordered as well as comparing the prices on the invoices with the quoted bid prices to be sure the SFA was charged the accurate price. The SFA also needs to check to be sure products sent are produced and manufactured in the United States (Buy American). The vendor should obtain permission from the SFA prior to sending any product that was not produced and manufactured in the United States.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?	TA provided that the SFA needs to use the updated USDA and Iowa nondiscrimination statements. E-mailed the Food Service Director the most current versions.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging discrimination within FNS School Meal Programs? If procedures are written, provide a copy.	TA provided on where to find the USDA procedures for receiving and processing complaints alleging discrimination in the food service department.
1200 - Professional Standards	1210 Did the employees that work outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program receive training applicable to their duties related to the program?	TA provided that the Food Service Director should add the Determining Official to her tracking tool and keep a copy of training certificates from training this individual completes.
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 on where to find Summer Food Service Program outreach materials on the Bureau web site.

Org - Level Commendations

Description

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<p>Certification and Benefit Issuance: The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. All applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Waivers are provided to applicants. The SFA has a back-up system for benefit issuance documents and system. One other person besides the Determining Official is trained on how to approve applications.</p>
<p>Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided for all food service staff, as well as the Determining Official, and was documented. The SFA submitted the annual Public Release to the local media. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed.</p>
<p>Fiscal Action: Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for January seem to be needed.</p>
<p>Food Safety: The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site reviewed. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers, refrigerators and for the dishwasher. Food Temperatures are documented on the daily food production records. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Food Service workers practiced good gloving procedures. Opened food items are labeled and dated. Christi Giguere, Pat Brekke and Hatti Walther are ServSafe certified.</p>
<p>Local Meal Charge Policy: The SFA developed and approved a meal charge policy in the summer of 2017. The policy was e-mailed or mailed to all households and staff were informed of the policy.</p>
<p>On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and breakfast prior to February 1st.</p>
<p>Procurement: The Food Service Director attended the Regional Procurement Training in Eldora. The SFA has a written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases. The plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA is part of the AEA purchasing group and has a signed agreement for food, small wares and chemicals. A signed agreement with the Group Purchasing Organization for SY 2017-2018 is on file. The signed agreement states that the school district agrees to procure food (excluding bread and milk) and non-food supplies through the Group's awarded Prime Vendor.</p>
<p>Professional Standards: The Food Service Director has far exceeded the required twelve hours of professional training that is required per year. She attended the SNAI yearly conference, Manager's Update and the regional Procurement Training. She has also participated in several "What's New in School Nutrition" webinars. All nutrition staff have obtained the required training for school year 2017-2018. The Food Service Director is tracking staff training using the Iowa training tracker tool.</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. No indirect costs are charged the food service program. Money is not transferred out of the account to support other programs. The SFA is effectively utilizing its USDA entitlement for USDA Foods. The SFA has spent 57% of their PAL dollars so far in school year 2017-2018 to date so is on track to use their allotted dollars. The SFA participates in DD, DOD and Diverted foods.</p>
<p>School Breakfast and Summer Food Service Program Outreach: School Breakfast Program outreach consisted of breakfast menus being available online and during registration. Meal prices are online, at registration and in school offices. Articles about school breakfast were added to the newsletter. Summer Food Service Program outreach consisted of the school's website having information on locating the nearest Summer Food Service Program.</p>
<p>Verification: The correct number of applications were verified and were correctly selected from error prone applications. The process was completed on time. The SFA had at least one person attend training. The verification report was completed accurately and on time.</p>
<p>Wellness Policy: The public is made aware of the SFA's wellness policy via the district's web site. The following individuals are involved in reviewing and updating the Local Wellness Policy: Food Service Director, nurse, health teacher, Superintendent, Principals, school board member, parents and students. Potential stake holders are made aware of their ability to participate in the Wellness Committee. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.</p>

Site - Level Commendations Eldora-New Providence High School (0109)

Description
<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 9-12th graders. 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 for lunch—including many fresh fruits and vegetables. At least two types of milk are offered. Many 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 at both breakfast and lunch. The Food Service</p>

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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.
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 January were accurate and complete. Point of Service (POS) counts and filed claims appear accurate. JMC 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. Cashiers are trained and appeared aware of what constitutes a reimbursable meal. Edit checks are performed.
Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of January 15 - 19, 2017 for breakfast and lunch at the High School. The worksheets showed that all meal components and vegetable sub-groups were offered. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the High 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, 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 flavor station is available that has pepper, Mrs. Dash, salt free all purpose seasoning and garlic and herb seasoning that students can use in place of salt.
Offer vs. Serve: Offer vs. Serve is being implemented properly. Cafeteria staff have been trained on offer vs. serve. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at breakfast and lunch.
Smart Snacks: Students are able to purchase foods via a la carte sales, vending machines, and from the Snack Shack. All foods sold meet the Smart Snack standards for nutrition content. Exempt leftover NSLP entrees are only sold the same day or the day after they are initially offered. Beverages sold meet the standards for the 9-12th grade students. Documentation was available to show that all a la carte sold to students during the meals met Smart Snack standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.
Water: Free potable water is available to all students for lunch and for breakfast in the commons area which is connected to the cafeteria..