

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Exira-Elk Horn-Kimballton CSD (21510000)**  
**SNP - Review ID: 4547**

**Program Year:** 2018  
**Month of Review:** October  
**Lead Reviewer:** Brenda Windmuller  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	<p>PROCUREMENT PLAN: The SFA is required to have a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for awarding, reviewing, documenting and monitoring procurement events. The SFA must also have a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. All bids should include a Buy American Provision. The SFA should have debarment statements on file for each vendor. The SFA's administrators need a better understanding of their role in procurement and the regulations.</p>	<p>The SFA will submit a draft of the code of conduct which includes disciplinary actions to be taken by the district. Include a date of when the policy will be presented to the school board for acceptance. The SFA will also submit a plan of how persons responsible for writing and awarding contracts will complete additional training on procurement via online courses or review of materials from the earlier face-to-face class.</p>	
1000 - Local School Wellness Policy	V-1000	<p>WELLNESS ASSESSMENT (1000): Assessment of Wellness Policy was not completed. Completed assessment is required to be made public.</p> <p>The district is required to invite stakeholders to participate in the wellness committee and/or have documentation of the invitation. Stakeholders should include: parents, teachers of physical education, school administrators, students, school health professionals, general public, school food service and school board members. Attendance records and meeting minutes should be kept.</p>	<p>Submit a timeline and plan on when the district will be assessed on the implementation of the Local School Wellness Policy. Include a plan on how this information will be made available to the public. Include a list of people serving on the Wellness Committee and their relationship to the district and community.</p>	

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1400 - Food Safety	V-1400	SOP: It was observed that not all district employees are familiar with, know where to find or follow the district's Standard Operating Procedures as they pertain to food safety and sanitation. Employees at the Middle School were not following the district's SOP for hair restraints and were not maintaining production records and food temperatures logs.	The HACCP Manual must be moved to a location where all employees have access to and know where to find it. Foodservice employees at both buildings will read all policies and sign a statement acknowledging that they have been provided with the policies, have read the policies, understand the policies and agree to follow the polices. The SFA will submit a copy of the signature page for all employees.	
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**Site - Level Findings: Exira/Elk horn-Kimballton High School (0109)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1400 - Food Safety	V-1400	The most recent Health Inspection Report was not posted in a location visible to the public.	The Site Manager corrected this during site visit. No further action required.	

**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		<p>PROCUREMENT: Technical assistance was provided on completing a written Procurement Plan and Code of Conduct.</p> <p>The SFA did have a completed plan. SA worked with SFA to make a few modifications. SFA should add to the plan: ware wash, cleaning supplies, and POS updates as appropriate. SA worked with SFA to better understand the thresholds. Materials from the training class, to include power points, were shared with the Administrative Assistant and Superintendent.</p> <p>For the Code of Conduct, the Local Education Agency has various policies but they are related to school board behavior, not to procurement by the SFA, and do not indicate disciplinary actions. If the SFA chooses to use the State Agency Code of Conduct template, please include specific disciplinary actions that will occur if the Code is not followed or provide a link/policy number of an existing policy that explains what disciplinary actions will occur.</p> <p>Procurement Plan and Code of Conduct must be completed annually. The SFA Should start the process in the early spring. The plan is meant to guide spending in a fiscally responsible way. All sites should be working off of the same plan.</p>

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		<p>Must have signed debarment certifications on file.</p> <p>The Signature page must be completed.</p> <p>We reviewed the purchasing thresholds and compared to the local board policy. Three types of purchases, (Federal Thresholds):</p> <p><b>Micro-purchase-</b> under or equal to <b>\$3500</b> (or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.</li> <li><input type="checkbox"/> Purchases should be distributed around community, not just one store.</li> </ul> <p><b>Small Purchases-</b> Purchases that are <b>under \$150,000</b> (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Include all terms and conditions</li> <li><input type="checkbox"/> Include terms: Buy American and Equal Opportunity</li> <li><input type="checkbox"/> Attain Signed Debarment Statements</li> <li><input type="checkbox"/> Awarded on lowest price (unless written documentation to justify)</li> <li><input type="checkbox"/> Maintain documentation</li> </ul> <p><b>Formal Purchase-</b> Purchases equal to and <b>exceeding \$150,000</b> (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised.</li> <li><input type="checkbox"/> Include all requirements of a small purchase</li> <li><input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</li> <li><input type="checkbox"/> Everything must be in writing.</li> </ul>
1000 - Local School Wellness Policy	1005 Obtain a copy of the most recent assessment on the implementation of the Local School Wellness Policy.	Provided SFA with a template for completing the Wellness Policy Assessment. Provided SFA with additional documents to further understanding of Wellness Policy requirement.
1200 - Professional Standards	1218 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	ANNUAL TRAINING: SFA was advised to maintain a spreadsheet with all staff, tracking training classes as they occur. Documentation should include names of staff attended, date attended and length of time for each class. All Food Service staff and SFA employees working with the School

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		<p>Lunch Program are required to take 1 hour of Civil Rights annually. Training hours should meet the following guidelines:</p> <p><u>Director- 12 hours annually</u></p> <p><u>Manager- 10 hours annually</u></p> <p><u>Full-Time Staff- 6 hours annually</u></p> <p><u>Part-time Staff- 4 hours annually</u></p>
1500 - Reporting and Recordkeeping		The staff at the SFA lacks clarity on who's responsibility it is to complete each task. It is advisable that the team works together to identify who will be responsible for completing the on-site monitoring and tasks related to procurement as well as other pieces of the program.
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.	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. A link to ideas for promoting breakfast and posters was provided.

**Site - Level Technical Assistance Exira/Elk horn-Kimballton High School (0109)**

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	<p>OFFER VS. SERVE: Technical assistance was provided for SFA to hang signage up that explains what a student must take to complete a reimbursable breakfast. Further clarification was provided on Items vs. components at breakfast and that students do not have to select milk as one of their three item.</p> <p>SFA had OvS on original application, upon discussion during entrance meeting, it was discovered that Serve only is the process being used at lunch for elementary students. The application was changed while on site.</p>
1400 - Food Safety		FOOD HANDELER: SFA was advised that the state of Iowa has a new law going into effect on January 1, 2018. Each site must have a certified food handler on site during all operation hours.

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**Org - Level Commendations**

Description
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. The correct and current benefit issuance list was available. All applications were correctly determined, applications were complete with SSN's and case numbers, 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. Waivers are provided to applicants and indicate specific fees. Eligibility is kept confidential. No fiscal action will be required.
CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. 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.
COMPETITIVE FOODS (1100): Competitive foods and beverages sold to students during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) meet Smart Snack guidelines as outlined by the Smart Snacks Guidelines. The SFA operates a unique system by having the local FFA chapter run this program. The FFA instructor maintains a vending machine in her classroom which allows for monitoring the use of the machine. The instructor orders products for the machine, and runs each item through the Smart Snacks Calculator. FFA members are responsible for stocking the machine.
LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years. The policy has nutrition education, physical activity and other wellness goals included.
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 October appeared accurate and complete. There was a point of service (POS) at the point where meals are served for all students observed at lunch. 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.
On-site Monitoring (900): The on-site monitoring forms were completed for 100% of the SFA's sites by the deadline.
PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases. The Administrative Assistant responsible for the School Lunch Program Financials does an excellent job of distributing small purchases for bid and documenting the process. Disbarment statements are collected from all small and formal purchases. All AEA contracts are kept on file.
RESOURCE MANAGEMENT & RECORD KEEPING (700): The Resource Management section of the Off-Site Assessment tool was completed on time. October receipts that were reviewed, indicated appropriate and allowable expenditures. The Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool. Reports are filed on time, and all records are maintained for at least three years plus the current year.
VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification. The SFA had at least one person attend training.

**Site - Level Commendations Exira/Elk horn-Kimballton High School (0109)**

Description
HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes most 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. Food Service workers at the review site wore proper hair restraints and practiced good gloving procedures. The site had a health inspection within the past year and provided evidence that a second was requested.
MEAL REQUIREMENTS & COMPONENTS: All meal components were available at the beginning of meal service on the days of observation and throughout meal service. Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each 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. Water was available as required. 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 Lunch. A monthly menu is also posted. The elementary cafeteria was very well supervised, and staff interacted well with the students. Food service staff was polite and respectful to students, other staff, and each other. All students were observed to have a reimbursable meal during the day of the review, with an occasional friendly prompt by staff to take a serving of fruit. The SFA has opted to do serve only for the elementary school.

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