

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Gehlen Catholic Schools (36008000)
On-Site Review Dates: April 10-13, 2018

Program Year: 2018
Month of Review: March
Lead Reviewer: Deann Murphy
Org Representative(s): Mindy Scheitler

Site - Level Findings: Gehlen Catholic School Incorporated (8104)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Breakfast menu and food production records show that students may take an excess amount of grains and juice. For example, up to 18.5 oz eq. grains are offered during the review week and this is a cycle menu so it is a systemic problem. Also, 1/2 cup - 1 cup fruit is offered along with 1 cup juice daily which exceeds the limit of no more than 50% juice at meals. Breakfast signage is posted telling students that they must take 3 items, but no signage exists telling students what the limits are at breakfast.	The SFA will submit documentation showing how they are limiting breakfast choices to no more than the 10 oz. eq. grains weekly and 50% of fruit choices as juice as required by the National School Breakfast Program. Documentation can be from menus, food production records, signage, invoices, CN/PFS documentation, etc. or a combination of these.	
400 - Meal Components and Quantities - Lunch	V-0400	During the day of review lunch service 10 students did not take a full 1/2 cup serving of fruit/vegetable which is required to make a reimbursable lunch.	Ten meals will be disclaimed once the April 2018 claim is filed which will count towards potential fiscal action for this review. No further corrective action is needed for this finding.	
400 - Meal Components and Quantities - Lunch	V-0400	Based on the Review week menu, Food Production Records and crediting documentation, menus did not meet meal pattern requirements. Inadequate Meat/Meat Alternate and grains were served for all grade levels (K-5, 6-8, 9-12) with the main meal. Grains offered to the 9-12 graders with the alternate sub sandwich for the week did not meet the requirement of 2 oz eq. grain daily or 10-12 oz eq. weekly. The salad bar option provided excess (up to 15 oz eq.) Meat/Meat Alternate choices weekly and inadequate grains (less than 2 oz eq daily and less than 10 oz eq. weekly), putting menus at risk for non-compliance with calorie and sodium requirements. Supporting documentation from the vendor does not clearly show component contributions for all food items served.	The SFA will provide the State Agency with 1 week of menus (main meal, alternate sandwich entree option and salad bar option) for all grade groups that are compliant with meal pattern requirements. Documentation should include completed food production records showing what was actually served and proper documentation from the manufacturer that supports crediting information. Menus should provide M/MA and Grain components within their target ranges for each grade group for each entree option so that their calories and sodium levels are within required levels.	

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Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	The SFA has not made the assessment of their local wellness policy available to the public as required.	The SFA will state how and when they intend to make the assessment of their local wellness policy available to the public.	
1200 - Professional Standards	V-1200	The SFA is not tracking their Professional Standards training hours appropriately for all staff involved in the Child Nutrition Program. Non-nutrition staff (determining official and confirming official) have not yet started their training for SY2017-18.	1). The SFA will submit documentation (copies of certificates, training sign-in sheets, etc.) showing that the determining and confirming official have each received their required 4 hours of training. Part of this training needs to include Civil Rights. 2). The SFA will also submit a completed Training Tracker showing everyone involved in the Child Nutrition Program, hours needed, hours and training topics completed, etc.	
Resource Mgt Comprehensive Review	V-RMCRF	Currently the non-profit school nutrition fund is covering the cost for all staff meals. Only staff involved in lunch/breakfast production may have a free meal as an allowable expense for the school nutrition fund. All other meals must be paid for by another source.	The SFA will state how they will appropriately cover the cost of staff meals in the future. The SFA will also submit an accounting document showing how many staff meals and dollars were inappropriately charged to the non-profit school nutrition fund in SY2017-18 and a line item transfer or deposit from another source showing that the non-profit school nutrition fund was reimbursed for those same meals.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency? If NO, explain.	The Determining Official needs to fill in the "Received by" date when the SFA receives each application to ensure they are determined within the required 10 operating days. The SFA uses ICAVES to process applications. If a household gives only one income frequency, please use the correct tab on ICAVES. For example if a family lists all monthly income, use the Monthly tab to calculate income. If multiple income frequencies, annual or self-employment incomes are given, use the annual tab.
100 - Certification and Benefit Issuance	130 Is household notification of denied benefits consistent with FNS requirements? If NO, explain.	Please make sure all denied applicants are notified in writing.
300 - Meal Counting and Claiming	308 Have alternate points of service been approved by the SA?	Pre-school meal counts should be taken at the point when the meal is actually served to the students in the classroom, not based on attendance. Recommend having a roster on the meal cart daily where Pre-school staff can check off when a student has been served a tray. This can then be entered into Infinite Campus by the Food Service Director for an accurate

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		meal count. Also, it is best practice to allow family style meal service with Pre-school students for developmental growth. Discussed with FSD and Pre-K teachers ways to make this possible.
700 - Resource Management (2018)		<p>PROCUREMENT:</p> <p>1. It is difficult to tell what has been charged to the nutrition fund and then invoiced to Pre-School or catering, etc. as many items are being charged to the single account that are not compliant to the School Nutrition Program. It is not being marked on the receipt as to what foods are for what program. Recommend separating school nutrition purchases from Pre-school purchases so that it is clear what foods are being purchased for what program. Only creditable foods and allowable supplies should be purchased with National School Lunch funds.</p> <p>2. Using the Micropurchase method, funds must be spread equitably between vendors - recommend 3. The SFA was using two local grocery stores, but had issues with billing at one of them. If this is a problem that cannot be resolved, recommend documenting the problems and using another vendor to "Spread the wealth" instead.</p> <p>3. Milk - allow a minimum of four (4) weeks from date quotations are requested to due date to allow vendors adequate time to respond. The specifications should include whether paper or plastic containers are required, firm or escalator price, coolers, delivery temperature, rotating milk, school calendar, Buy American and other Terms and Conditions such as debarment, non-collusion, termination for cause and convenience, straws, nutritionals if desired. Bottom line pricing should come from extended cost calculation based on annual usage of each item. Recommend using the Small Purchase document on IowaCNP for milk, bread and second prime vendor solicitations.</p> <p>4. The SFA should keep documentation of all solicitations sent to vendors. If you feel a vendor will not return a price quote, send a No Bid form which can be found on IowaCNP Download Forms along with the solicitation and ask them to return that.</p> <p>5. If the SFA chooses to specify a brand name of the product they want, they must also state "or equal" allowing other brands to be offered by the competing vendors.</p> <p>6. Prime Vendor - all items requested for a procurement event need to be solicited from 3 vendors. The SFA cannot reach out to a single vendor to do exclusive business with them. Solicitations should include everything the SFA wishes to purchase for the coming year and need to include terms and conditions, etc. See TA under Deans above. A Prime vendor needs to submit a bid with price list where, if chosen, the SFA can compare prices charged with those prices quoted throughout the year.</p> <p>7. Contract Management includes not only checking the invoice to ensure the products ordered are the</p>

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		<p>ones that are delivered, but also spot checking prices to ensure that the price charged was the guaranteed vendor price quoted. AEA Purchasing provides original pricing as well as price updates.</p> <p>It is recommend that the SFA checks prices on each invoice against these price updates and asks for credits if there is a discrepancy. Any substitutions should be approved prior to the vendor sending them. Substitutions should be the same or better quality at the same or lower price. Check all agricultural products for Buy American compliance. Keep all price lists for 3 years + current year. Lists can be kept electronically.</p> <p>8. The SFA used 93% of their allotted USDA Foods dollars in SY2016-17. The State Agency recommends using at least 95% of their allotment. In SY2017-18, the SFA still has money left to spend as well. Please contact the State Agency USDA Specialist to move some of your money into Diverted Products to be able to utilize your dollars more effectively.</p> <p>9. The District needs to add what disciplinary actions will be taken if the Code of Conduct is breached.</p> <p>10. Discussed with the FSD specific Procurement events that should be added to and removed from next year's Procurement Plan. Indirect costs need to be taken off since the general fund will need to pay for those, i.e. equipment repair, bug spray, etc. A Procurement plan for next school year should be started in early spring prior to solicitations going out to vendors.</p>
800 - Civil Rights	805 How are students with special dietary needs accommodated?	Documentation for special diets need to have a medical provider signature, i.e. MD, DO, PA, ARNP. An RN cannot sign as the medical provider. Without proper documentation special diets outside of the meal pattern cannot be claimed for reimbursement.
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	The Pre-K staff need Civil Rights training annually since they are serving and overseeing meal service in their classroom. A one-page document was e-mailed to the FSD that the Pre-K staff can review and sign/date annually. The FSD should keep this training document in her Professional Standards files. Pre-K staff should also have adequate training in food safety and in correctly using the POS roster at meal time.
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 Local Wellness Committee needs to take a look at their wellness policy and update it, specifically in the areas of foods and beverages sold at school sponsored events and frequency of policy assessment updates (needs to be every 3 years instead of 5 years). Please date the current assessment as to when it was completed. Both the Local Wellness Policy and the assessment of it's goals need to be posted publicly.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing in comments section.	Recommend adding your Cleaning up of Bodily Fluids SOP in your HACCP manual. Also, please make sure the Pre-school program has adequate food safety SOPs in their room for handwashing, temperature control, cleaning tables, etc. A sample classroom SOP was e-mailed to the FSD for reference.

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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.	The SFA needs to promote their breakfast program to households a minimum of twice annually. Promotion should consist of reasons why students should eat breakfast, menu, times available, price. Consider promoting it at the beginning of each semester, PT conferences, website, National School Breakfast Week (March), etc. Breakfast promotion ideas can be found at https://www.educateiowa.gov/pk-12/nutrition-programs/school-breakfast-program .
Resource Mgt Comprehensive Review	4 Were breakfasts and lunches served to teachers, administrators, custodians and other adults priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the lunch?	Only adults directly involved with the lunch program may have a free lunch. This is an allowable expense for the School Nutrition Fund. All other adult meals must be paid for by another means, i.e. individuals paying for their own meal, General Fund, Donations, etc.

Site - Level Technical Assistance Gehlen Catholic School Incorporated (8104)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	All meals must have 1/2 cup fruit or vegetable in order to be a reimbursable meal. Tri-tators count as 1/4 cup each so if that is the only fruit or vegetable taken, students would need 2 tri-tators or add another fruit/vegetable to their tray. TA was given on-site.
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Discussed with the FSD meal pattern requirements and e-mailed her several resources to help streamline menu development and Food Production Record completion. Currently many menu items portions are split between K-5 and 6-12 graders. Sixth -8 grade portions need to be similar to K-5 portions in order to stay within required calorie and sodium ranges. Also, the FSD needs to have appropriate documentation on file showing how food credits. CN labels from the actual package is best practice. When these are not available, contact the manufacturer directly (not the vendor or sales rep) for a Product Formulation Statement on entrees that include Meat/Meat Alternate or Grain. USDA Food labeling information can be found at https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets
1400 - Food Safety	1407 Were on-site (or Off-site, if observed) storage violations observed? If YES, explain.	Recommend increased shelving in the storeroom so staff can store canned goods off the ground. Current storage space is limited.
1400 - Food Safety	1409 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable? If yes, proceed to b, if no proceed to next question.	Discussed with the FSD the need to specify to vendors the Buy American requirement. If the vendor sends non-domestic products, the SFA should either return the products to the vendor or keep an exception log, noting the product received, the date and justification as to why the SFA kept the product, such as insufficient quantities or high price domestically, etc.

Org - Level Commendations

Description
Benefit documents were organized. All applications were correctly approved or denied. Access to benefit information is correctly limited. Eligibility is kept confidential. Verification was completed correctly. All applications had a second review by the confirming official.

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The And Justice for All civil rights poster was posted in the cafeteria. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated. Ethnic/racial information is collected and the summary form is completed. No discrimination was observed. The shortened non-discrimination statement is on the posted menu.

The district has a local wellness policy that is posted on its own tab on the school website. They also have a wellness committee made up of all appropriate stakeholders which meets to discuss ways to improve wellness in the district. The policy contains all the required goals and the district has completed the wellness policy assessment.

The SFA has a written Procurement Plan that includes federal thresholds, procurement methods and documentation for most purchases. The plan indicates those responsible for monitoring procurement events. The SFA also has a written Code of Conduct which includes conflicts of interest, accepting items of monetary value and checks and balances.

Site - Level Commendations Gehlen Catholic School Incorporated (8104)

Description
Meal counts during the on-site review were reasonable when compared to the (March) review month counts. Meal count totals for the month of March appeared accurate and complete. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
The SFA has a written Food Safety/HACCP plan that includes most required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for coolers-including milk coolers, freezers, food served, and a chemical log was kept for the dishwasher. Food Service workers wore proper hair restraints and practiced good gloving procedures.
There are 3 choices for students to choose from each day for lunch and options for breakfast daily. Food Production records are kept for all meals served. Water was offered at both breakfast and lunch as required. Many low fat/low sodium foods were observed in storage. All grains served were whole grain rich. Competitive foods were appropriately charged to individual students. Entrees served the day they are menued are offered as seconds.