

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Grinnell-Newburg Comm School District (27090000)
Dates of Review: December 5-9, 2017

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Currently the only individual who has access to the benefit issuance system to enter a household's eligibility status is the Food Service Director. If she was unable to perform these duties no one is trained to assume them.	Determine and state below who will be trained to be a back-up for the Food Service Director to enter eligibility determinations into the Point of Sale system.	
100 - Certification and Benefit Issuance	V-0100	One free and reduced price application was denied incorrectly due to the Determining Official entering the wrong number of household members into ICAVES.	The household's eligibility status was corrected while the State Agency was on-site and the household sent a notification letter and the SFA is refunding their money. No further action is required.	
200 - Verification	V-0200	The Notice of Adverse Action printed from Infinite Campus is only giving households 9 days in which to appeal. TA provided that the household must be given 10 calendar days to appeal starting with the date of the letter.	Contact Infinite Campus and inform them that households must be given 10 calendar days to appeal starting with the date of the letter. Attach a corrected letter or attach their response indicating that they will be correcting the Notice of Adverse Action letter.	
700 - Resource Management	V-0700	The SFA does not have a Code of Conduct policy that includes the disciplinary action procedures for non-contract employees.	Develop and attach a nutrition code of conduct policy that includes disciplinary action procedures. TA provided that the State Agency has a code of conduct template which is part of the Procurement Plan excel workbook that can be tailored to become a policy for the SFA's nutrition department. The SFA should inform the Board that the nutrition department has a code of conduct.	
800 - Civil Rights	V-0800	The USDA non-discrimination statement on the SFA's nutrition web page is not the current version. Also the short version of the USDA non-discrimination statement on printed menus as well as menus posted on the district's web site are not the current version.	Update the USDA non-discrimination statement on the district's nutrition web page so that it is the current version. Also, update the short version of the USDA non-discrimination statement on the printed menus as well as the menus posted on the district's web nutrition web page. State below that the web site has been updated and indicate the date that this was completed. Also, attach a copy of a printed menu with the current short version of the USDA non-discrimination statement.	
800 - Civil Rights	V-0800	Four of the current nutrition staff have not had civil rights training during school year 2017-2018.	Provide civil rights training for the four individuals who have not had the training in school year 2017-2018.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Grinnell-Newburg Comm School District (27090000)
Dates of Review: December 5-9, 2017

			Attach a sign-in sheet with their signatures indicating that they had the training.	
--	--	--	---	--

Site - Level Findings: MIDDLE SCHOOL (0209)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1400 - Food Safety	V-1400	SFA's food safety plan contains a Standard Operating Procedure that states that thermometers will be calibrated and also has a form to use for documenting that the thermometers were calibrated.	Begin to calibrate thermometers and document when they were calibrated. Attach documentation showing that thermometers were calibrated.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	126 Are the correct conversion factors used when processing applications that indicate more than one income frequency? If NO, explain.	TA provided that if income is reported in only one frequency then the income should not be converted to an annual amount. On ICAVES the annual tab should only be used if income is reported in more than one frequency.
200 - Verification	208 a. Did the SFA attempt to directly verify selected applications?	TA provided that prior to sending the verification letter to the households informing them that they have been selected, SFAs are encouraged to attempt to locate the household on ELookup. If someone in the household is found, then the household is directly verified and the letter of selection does not need to be sent.
700 - Resource Management		TA provided with the Food Service Director that on the procurement plan under the determination method, the prime vendor would be cost reimbursable as rebates are provided during the duration of the contract. E-mailed the Food Service Director the State Agency's formal and small purchase checklist and showed her the three bids and a buy document on IOWACNP. Informed the Food Service Director that she needs to have a debarment statement from each vendor that she procures goods and services from and showed her that there is a debarment statement as part of the Procurement plan document. Also discussed that if when vendors submit quotes for products and they are for different pack sizes, the Food Service Director should keep her documentation where she determines an each price and then compares extended pricing in order to select the vendor with the lowest bid. Upon reviewing invoices versus prices quoted by the SFA's prime vendor it was noted that on several meat items, the vendor quoted weekly market pricing. TA provided that the vendor must send the SFAs who are part of the CBC purchasing group these weekly market prices so that the SFA can check to be sure they are charged these prices. Also discussed that when awarding bids the Food Service Director should do this in writing so that she has documentation of who the bid was awarded to.
800 - Civil Rights	805 How are students with special dietary needs accommodated?	TA provided that the State Agency has revised the Diet Modification Form. Provided a copy of the new form to the Food Service Director. Discussed

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Grinnell-Newburg Comm School District (27090000)
Dates of Review: December 5-9, 2017

		<p>that modifications are required by USDA to accommodate a disability and that this is defined as a person who has a physical or mental impairment which substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such an impairment. “Major life activities” are broadly defined and include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working. “Major life activities” also include operation of a major bodily function, including but not limited to, functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions.</p>
1000 - Local School Wellness Policy	1000 Provide a copy or appropriate web address of the current Local School Wellness Policy.	<p>TA provided that the SFA's wellness policy needs to be reviewed and revised every 3 years. When revising the policy the SFA need to include Smart Snacks in School nutrition standards for all foods and beverages sold at each school during the school day (before school and 30 minutes after school) and include policies for food and beverage marketing. TA also provided that the SFA's current policy states that they will complete an assessment of the local school wellness policy every 5 years and this is to be completed every 3 years. Informed the Food Service Director where she can find the State Agency's handout "Does Your Wellness Policy Measure Up?", and two sample wellness policies on the Department of Education's web page.</p>

Site - Level Technical Assistance MIDDLE SCHOOL (0209)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	<p>SFA currently does not have any students who need a milk substitute. TA provided that if the SFA needs a milk substitute for student(s) that it must be nutritionally equivalent to cow's milk. The State Agency has a list on their web site of some milk substitutes that are equivalent to cow's milk.</p>
1400 - Food Safety	1402 Is a copy of the written food safety plan site specific and available at each school?	<p>TA provided that when the Food Service Director reviews/revises Standard Operating Procedures she should include her initials as well as the date when documenting the review/revision. Also discussed that all Standard Operating Procedures need to accurately reflect the practices of the nutrition department. The current Standard Operating Procedures are from Iowa State and appear to be printed directly from their web-site and not tailored to reflect the department's actual practices.</p>

Org - Level Commendations

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Grinnell-Newburg Comm School District (27090000)
Dates of Review: December 5-9, 2017

Description
<p>Certification and Benefit Issuance: All benefit documents were very well organized in a notebook. 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. All applications were correctly determined, signed and dated by the household member and the SFA, were complete with Social Security Number's and case numbers, and all applications were determined within ten days and often on the same day as they were received. 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. 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 cafeteria, services are offered for Limited English Proficient households, annual civil rights training was provided for most food service staff and 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. SFA's on-site monitoring was completed to ensure that all schools are meeting program requirements. The correct state and federal non-discrimination statements are provided on all material used for eligibility and verification.</p>
<p>Fiscal Action: Fiscal action for this review is less than the allowed USDA disregard for both NSLP and SBP so no claim adjustments are 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, food served and the dishwasher. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures.</p>
<p>Local Meal Charge Policy; The SFA developed and approved a meal charge policy on August 22, 2017. The policy was e-mailed to all households and staff were informed of the policy. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.</p>
<p>On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and 100% were completed for breakfast prior to February 1st. If corrective action was needed, a follow-up visit was conducted to be sure the correction was implemented.</p>
<p>Procurement: The Food Service Director attended the State Agency's Regional Procurement Training in Newton. The Food Service Director completed the nutrition procurement event plan for school year 2017-2018 and identified the types of purchasing methods that should be used (micro, small or formal). The Food Service Director has the managers at each school contact her if they need to do a micro-purchase so that she can inform them which store to shop at so as to spread the wealth. Specifications allow pricing to be submitted for an equal product. The Prime vendor contract included all of the required Federal terms and conditions. The Prime Vendor Request For Proposal had the Buy American provision. The Request For Proposal had evaluation criteria with price as the primary factor. The Food Service Director maintains sufficient records for all Procurement activities. The Food Service Director monitors all contracts to ensure contract terms and conditions are being met and for cost reimbursable contracts that discounts, credits and rebates are returned to the Child Nutrition account. Members of the Central Buying Consortium meet regularly to also monitor contracts as a group. The Food Service Director is ordering their USDA Foods in sufficient quantities to use their allotted dollars by the end of the school year. The SFA is participating in diverted foods and DOD.</p>
<p>Professional Standards: The Food Service Director has completed 14.5 hours of her required 12 hours of training for School Year 2017-2018. Two of the Managers have completed 11 hours and three have completed 4.5 hours of their required 10 hours of training for School Year 2017-2018. All nutrition employees and staff with duties related to the nutrition program have started to obtain their required training. Additional training is planned to be held in March and May of 2018 and if any staff need additional training the SFA uses the Department of Education's on-line tutorials or other on-line training.</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, and no increase in prices were required. No indirect costs are charged the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for commodities.</p>
<p>School Breakfast and Summer Food Service Program Outreach: School Breakfast Program outreach was sent out at the beginning of the year to inform families of the availability of the program. Reminders of the SBP were also sent out throughout the school year on menus. Summer Food Service Program outreach included: fliers, newspaper ads, and e-blasts sent out before school was out for the summer.</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 application(s) selected for verification were confirmed prior to verification. The Food Service Director participated in the Verification webinar training. The verification report was completed accurately and on time.</p>
<p>Wellness Policy: The SFA's wellness policy was reviewed and revised on February 24, 2016. The public is made aware of the SFA's wellness policy and assessments via the district's web site. The following individuals are involved in reviewing and updating the LWP: Food Service Director, building principals, school nurses, teachers, PE teachers, school board member, parents, and students Potential stake holders are made aware of their ability to participate in the Wellness Committee. The SFA completed an assessment of their wellness policy on November 17, 2016. 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 MIDDLE SCHOOL (0209)

Description

Iowa Department of Education

Bureau of Nutrition and Health Services

State Review Summary Report

Grinnell-Newburg Comm School District (27090000)

Dates of Review: December 5-9, 2017

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 the age/grade group at the middle school. 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 on a bar that is located before the hot offerings. 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.

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 October were accurate and complete. Point of Service counts and filed claims appear accurate. Infinite Campus is used as the school's POS system. Each POS was organized and orderly. 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. Daily edit checks are performed.

Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of October 16-20, 2017 for breakfast and lunch at the middle school. The worksheets showed that the menus meet the meal pattern for required components and quantities. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the middle 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, controlling the portion sizes of condiments, 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 nutrient analysis was not required.

Offer vs. Serve: Offer vs. Serve is being implemented properly. All students observed selected 1/2 cup of fruit and/or vegetable. 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. All foods sold meet the Smart Snack standards for nutrition content. Exempt leftover NSLP entrees are only sold the same day that they are offered. Beverages sold meet the standards for the various age groups of students. Documentation was available to show that all a la carte items 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 via a water fountain.