

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Harris-Lake Park Comm School District (28460000)**  
**On-Site Review Dates: November 14-16, 2017**

**Program Year:** 2018  
**Month of Review:** October  
**Lead Reviewer:** Deann Murphy  
**Org Representative(s):** Shirley Taylor

**Site - Level Findings: Harris-Lake Park Elementary School (0409)**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
400 - Meal Components and Quantities - Breakfast	V-0400	No breakfast signage is available to tell students what they need to take to make a reimbursable meal and what foods count as 1 items vs. 2 items. Signage is required.	The SFA will submit to the State Agency a picture or a copy of the completed breakfast signage that they will be using.	
400 - Meal Components and Quantities - Breakfast	V-0400	The FSD provides the same "breakfast buffet" daily so does not have actual Food Production Records each day. These are required.	The FSD will submit 1 week of completed breakfast food production records showing the menu items served, quantity prepared, portion size of each item and the amount left over each day.	
400 - Meal Components and Quantities - Lunch	V-0400	The SFA is serving 2% lactose free milk for a disability where the medical provider did not specify this and also for non-disability related menu changes. 2% milk exceeds the fat allowance in the meal pattern and is not allowed.	The SFA will submit a copy of the label they will use as an acceptable milk substitute.	
400 - Meal Components and Quantities - Lunch	V-0400	The SFA served less than the required 1/2 cup fruit on Friday of the review week; i.e. serving only 1/2 orange to the Elementary students which equals 1/4 cup. Also, there were no legumes provided on the review week menu. The legumes served in the chili during that week were counted as a M/MA. Upon an expanded menu review, there were several weeks that did not contain legumes.	The SFA will submit one week of December menus, Food Production Records for main meal plus the Garden Bar and necessary CN/PFS labels showing that all 5 components are offered each day and that meet the minimum quantities each day and week. All subgroups need to be represented for the week.	
500 - Offer versus Serve	V-0500	The SFA has stated that they are following OVS at lunch on their application, but they are actually "serving" students without asking them if they want each menu item as required with OVS. The students choose what they want from the Garden Bar which is located after the POS and after the last server has ensured they have a reimbursable meal. This Garden Bar is how the FSD incorporates the majority of her vegetable subgroups. Staff have not been trained on OVS rules.	The SFA will state if they wish to continue with OVS or change to "Serve Only" serving style and update their application as needed. * If the SFA chooses OVS, they will explain how they intend to offer all menu items to students and ensure each student receives a reimbursable meal. 2). The SFA will submit documentation showing that all staff at the Elementary have received adequate training on OVS rules. <b>OR</b> * If they choose Serve Only serving style, they will explain how they intend to provide all menu items on each students tray, how they will ensure all vegetable subgroups will be met, and who will be responsible to	

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			ensure that each student receives a reimbursable meal.	
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**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
Resource Mgt Comprehensive Review	V-RMCRF	The SFA's Non-Program Food Revenue tool from SY2016-17 shows that the SFA did not generate adequate revenue from the sale of non-program food, i.e. adult meals, second meals, a la carte, etc., to adequately cover their costs. Reimbursable meals cannot subsidize non-program food.	The SFA will explain how and when it will increase non-program prices to cover non-program costs.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	113 a. Who has access to the benefit issuance system and/or documentation? (Names and/or position titles):	Recommend having a back-up for the benefit issuance system in case something were to happen to the Determining Official. Often the Confirming Official is a good person to be the back up.
100 - Certification and Benefit Issuance	124 a. Certification and Benefit Issuance Review Method:	FIP numbers from Minnesota cannot be accepted in Iowa since FIP is a State program and Minnesota guidelines may be different than Iowa guidelines. Out of state applicants must complete an income application to qualify for benefits.
200 - Verification	208 a. Did the SFA attempt to directly verify selected applications?	SFAs are encouraged to try to directly verify student names on E-Lookup before notification letters are sent to households requesting their income documents. If the student's name is found on E-Lookup, the verification process is complete and the household does not need to provide proof of income.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable):	<p>Non-district students and second full meals need to be charge the full adult price as these meals are not subsidized by federal, state and commodity dollars.</p> <p>Currently the Elementary students tell the cashier what a la carte items they want to buy and then they tell the kitchen staff what they want. It is difficult for the kitchen to know for sure what a la carte items the student has purchased when the cashier sits so far away. Recommend a ticket system or some other system so the kitchen knows what has been charged to the student's account.</p>
700 - Resource Management		Much TA was given to the FSD regarding procurement, including record keeping requirements on micropurchases, what is necessary to include in the solicitation documentation for small purchases, contract management and on the Code of Conduct. Currently the Code of Conduct is missing the entire section dealing with disciplinary actions. Assistance provided to help complete the written procurement plan.

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800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	The shortened non-discrimination statement needs to go on all menus distributed or posted. The full federal and state non-discrimination statement needs to go on all other forms used for the NSLP/SBP.
1200 - Professional Standards	1221 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	The SFA needs to add the Confirming Official, the MS/HS cashier and the part time aide in the Elementary to the training tracker and ensure they receive a minimum of 4 hours Professional Standards training annually as well. The 4 hours can include Civil Rights training and Blood Borne Pathogen training. Please add these topics to the tracker as appropriate.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	The Standard Operating Procedure dealing with Clean Up of Bodily Fluids was e-mailed to the FSD to add to her HACCP manual.

**Site - Level Technical Assistance Harris-Lake Park Elementary School (0409)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students?	Sample Breakfast signage was e-mailed to the FSD today to place at the front of the breakfast line daily explaining what students must take for a reimbursable meal and how each food item is counted.
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Yogurt portion served at breakfast is not a full portion, i.e. 2 oz yogurt = 1/2 M/MA so cannot be counted as a full "item" towards a reimbursable meal. The FSD should increase the yogurt to a 4 oz serving to = 1 M/MA.
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?	The SFA is providing 2% lactose free milk as a milk substitute for several children. The milk sub is not related to a documented disability in most cases. In the case of the child with a documented disability, the medical provider did not state what to substitute for cow's milk. In these cases, the SFA must follow the meal pattern requirements and use either 1% or FF lactose free milk or another nutritionally equivalent substitute.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Food Production Records need to include all menu items served, including the alternate sandwiches served and these records must be completed daily for both the main meal as well as the garden bar and kept on file for 3 years + the current year. Standardized recipes are needed for all menu items with 2 or more foods included. CN labels or Product Formulation Statements need to be on file for all entrees, mixed foods, i.e. M/MA + grain, and grain foods that you want to credit properly.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Under OVS, all students must be asked if they want each food served. Currently the SFA is serving the main meal to the Elementary students at lunch, but offering milk and Garden Bar items. The most current OVS manual was e-mailed to the FSD today for more information. Staff needs to be trained on all OVS rules if that is the serving style the Elementary plans to use.
1400 - Food Safety	1402 Is a copy of the written food safety plan site specific and available at each school?	A written, updated copy of your SFAs HACCP manual needs to be placed in both kitchens, i.e. Elementary and MS/HS kitchen. Use the SOPs in the manual for staff training.
1400 - Food Safety	1406 Were the selected relevant temperature logs available for review? If YES to specify which date was selected. If NO explain.	Temperature storage records are currently being kept, but have not been recorded for periods of time in the past. Temperature records for food, food storage, and the dishmachine must be checked as stated in your Standard Operating Procedures and these records must be kept on file for a minimum of 6 months.

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1400 - Food Safety	1407 Were on-site (or Off-site, if observed) storage violations observed? If YES, explain.	Several boxes were found in the freezer of the floor. The freezer is very full. Boxes need to be stored 6" off the freezer floor.
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**Org - Level Commendations**

Description
Benefit documents, and other paperwork needed for the review, were extremely 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. The correct and current benefit issuance list was available. All applications were correctly determined, applications were complete with SSN's 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. Eligibility is kept confidential.
Foodservice staff are on track to meet their Professional Standards training for the 2017-18 school year. The FSD is required to have 12 hours, full-time (over 20 hours a week) employees need 6 hours, part-time and office staff/cashiers need 4 hours training annually.
Minimal, if any, fiscal action will be taken and will be under the USDA disregard so no claim adjustments will be needed for this review.
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. Annual civil rights training was provided to all staff and documented. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that documentation is on file. Ethnic/racial information is collected and the form is completed. No discrimination was observed. SFA on-site monitoring was completed last year to ensure that all schools are meeting program requirements.
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 selected for verification was confirmed prior to verification. The SFA had at least one person attend training.
The district does a nice job in promoting both breakfast and summer feeding, putting articles, menus, prices, meal times and encouragement to eat in newsletters that go out to families.
The district has a current wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The latest assessment of the policy was available. They have a wellness committee that is scheduled to meet very soon. The committee is made up of a variety of stakeholders. The policy and goal assessment will be posted/distributed to households after the committee meets.
The FSD includes as many Homemade items and commodity foods on the menu as possible to improve quality and decrease costs. Calorie, saturated fat, trans fat and sodium requirements seem to be met with planned menus. There is good meal participation in the school. 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 lunch. All students took a reimbursable meal during the on-site review.
The SFA has a district-wide written Food Safety plan that includes most required elements. The latest Health Inspection Report was posted in a publicly visible location. Food Service workers wore proper hair restraints and practiced good gloving procedures. The FSD is in the process of reviewing SOPs. She recently attended a HACCP training program.
The SFA has a written Procurement Plan that includes federal thresholds, procurement methods and documentation for purchases, the plan indicates those responsible for monitoring procurement events. The SFA also has a written Code of Conduct. The School Board is in the process of setting local procurement thresholds. The FSD recently attended a training on Procurement.

**Site - Level Commendations Harris-Lake Park Elementary School (0409)**

Description
Meal counts during the on-site review were reasonable when compared to the (October) review month counts. Meal count totals for the month of October appeared accurate and complete. There was a point of service, POS, at the beginning of the meal line and foodservice staff ensure that a reimbursable meal is taken. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
Students are encouraged to take a reimbursable meal at both breakfast and lunch so minimal competitive foods are sold to students.
The Elementary has a Garden Bar which allows students to take a variety of fresh vegetables daily. The Garden Bar contributes to many of the subgroups needed to meet minimum menu requirements.

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