

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Highland Comm School District (29770000)
Dates: November 14-16, 2017

Program Year: 2018
Month of Review: October
Lead Reviewer: Cheryl Benson
Org Representative(s): Donna DeWolf

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The following benefit errors were reviewed: (1) In order to be considered a complete application, applications based on income must indicate the last four numbers of an adult household member's social security number, or indicate that he or she does not have a number. Four income applications were missing SSNs. Two of the households later became directly certified so no SSN is required. (2) One application was accidentally approved as a three person household instead of a two person household. The household qualifies for reduced benefits instead of free benefits. (3) One application indicated three people in the household but was determined with four people since another student was living in the household. However, the application did not reflect four people. Based on the application, the household would be reduced instead of free. (4) Applications must be determined using the frequency of income indicated on the application. Only applications with more than one frequency of income can be converted to annual income.	For your response: (1) The two missing SSNs were obtained during the on-site review. No further response is necessary. (2) The letter of adverse action notifying the household of the change from free to reduced and giving the household time to appeal the decision was obtained during the on-site review. No further response is necessary. (3) The fourth household member was added to the application during the on-site review. No further response is necessary. All errors have been added to the potential overclaim. (4) This error was discussed during the on-site review. No further action is required.	
700 - Resource Management	V-0700	The district has purchased an insurance policy to cover equipment repairs. During the 2016-2017 school year, three repairs were paid out of the Child Nutrition account: for garbage disposal, refrigerators, and for repair of a steamer. If the insurance company reimbursed the district for any of those repairs, then the insurance reimbursement must be deposited back into the Child Nutrition account.	For your response, submit a copy of the insurance policy section(s) that indicate what equipment repairs are covered. If any of the indicated repairs (refrigerators, disposal, steamer) are covered, submit documentation that the insurance reimbursement was deposited back into the Child Nutrition account. Also indicate whether any repairs have been made for this school year, and if so, indicate whether those funds have been returned to the CN account. Finally, indicate who will be responsible for ensuring that all insurance reimbursement will be returned to the CN	

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			account if the repair is paid for from CN funds.	
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Site - Level Findings: Highland High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	111 What is the SFA's procedure for extending free school meal eligibility to all children who are members of a household in which one person in that household is receiving SNAP, TANF, or FDPIR benefits?	SFAs are required to extend free meal benefits to everyone in a household where even one student is directly certified to receive benefits. Technical assistance was provided on documenting other students in the household. A separate list may be maintained showing that the students share a household or the other household members can be written on the direct certification list to indicate they are also in that household.
700 - Resource Management		Technical assistance was provided on proper procurement procedures and thresholds. (1) The SFAs threshold is \$3500 for micro and \$55,000 for small purchase. If using micro purchasing, the purchases must be 'spread around' to all possible vendors. If that isn't possible, then micro purchasing should not be used for that purchase. Only purchases from vendors need to be included on the procurement plan. Things such as hotels for conferences or employee time do not need to be included. (2) When getting bids for things like milk and bread, use quantities purchased last year and multiply out the cost to be sure you are getting the lowest bottom line price. Be sure to include all required terms and conditions such as Buy American, Opt-out clause, Clean Air/Water, etc. There are procurement documents in Download Forms on IowaCNP that spell out these terms and when they must be used. Look at the bottom of download forms for NSLPPROC001 through 013 for a decision tree, small purchase instructions, micro purchase log, etc. (3) Update the written procurement plan soon. It is intended to be a planning tool for procuring goods and services for the next school year. That means you may not have vendors indicated since you don't know who will be awarded the contracts for next year. (4) Be sure to keep all records for three years plus the current year including all increases in milk prices from the escalator clause in your contract. (4) It may be helpful for the business manager to attend the summer procurement training.
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	The SFA has a written Code of Ethics/Conduct which includes conflicts of interest and accepting items of monetary value. However, neither disciplinary actions that will be taken if the code is violated nor what checks and balances are in place to ensure that no one person has control over any area of Child Nutrition finances are not clear. Two examples of code of ethics prototypes were emailed to the director. The signature page of the written procurement plan also needs to be completed.

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700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	It is recommended that cash paid on the breakfast line for a la carte be rung up at the time of the sale. If a student's account is blocked from purchasing breakfast, a general 'Cash Sales' account could be set up, or some other method implemented to ensure the sales are correctly accounted for. Cash should not be accepted and then not entered into the system at the time of the sale.
800 - Civil Rights	801 Does the School Food Authority have a Public Release?	Technical assistance was provided on documenting that the Public Release was submitted to local media. The SFA can keep a copy of the newspaper if the release is printed, or a copy of the email or fax to show the release was submitted.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	Technical assistance was provided on completing the racial/ethnic form. The form must include all students who applied for benefits whether they were eligible or not eligible for benefits. Ethnicity and racial identity are two separate categories that all students are determined under.
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	Both the USDA and Iowa non-discrimination statements must be printed on all material associated with Child Nutrition Programs such as handbooks, letters, pamphlets, and websites. The letter sent out to notify households of the new lunch account policy was missing the statements. The director realized the error after the letter was mailed. The statements are also not currently on the district's website due to a revamping of the site, but they will be added back to the site soon.
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.	Both the Wellness Policy and the assessment of individual wellness policy goals for each building must be made available to the public. The SFA plans to make the assessment of goal available on the district's website as soon as updates to the website are completed.
1200 - Professional Standards	1219 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. i.e. entered into a tracking mechanism.	Technical assistance was provided on Professional Standards and training. The Iowa tracking tool was shared with the director and the director completed the form during the on-site visit. It is recommended that regular monthly training time be set aside to assist in meeting hours.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	One way to provide annual food safety training and provide required training hours for staff while getting all staff involved in food safety, is to have food service staff assist in updating Standard Operating Procedures, SOPs. To do that, divide current SOPs among staff and have them determine whether the procedure and corrective action on the SOPs is current practice or not. If not, the SOP needs amended. Also have staff review SOP prototypes that are available on the ISU website, select new SOPs that should be added to Highland's plan, and review those SOPs for compliance with how food safety is done at Highland.
1400 - Food Safety	1402 a. Does the SFA store a majority of commercial food products used at each school reviewed? If yes, skip proceed to the next question as the review of Buy American compliance will occur at each reviewed school through question 1409.	The SFA utilizes several reach-in coolers in the high school kitchen. It may be more economical, increase storage capacity, be easier to organize, and provide more stable temperatures if the reach-ins were replaced with a walk-in cooler. It is also recommend that the SFA put an alarm on the outside walk-in freezer. Different options were discussed. The ideal solution would be to build an enclosure that would house both a walk-in cooler and walk-in freezer where the freezer entrance is inside the cooler.
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?	Whether the district participates in the Summer Food Service Program, SFSP or not, outreach to households at the end of the school year is required since children may travel to other towns during the summer. For information on summer, SFSP,

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		locations in Iowa, go to complete information about promoting SFSP, go to SFSP section of Iowa DE website. Another resource that could also be shared is the National Hunger Hotline 1-866-3-Hungry or 1-877-8-Hambre. There is also information on the federal website with ideas for outreach brochures at USDA website . This information could be shared via websites, newsletters, phone calls, flyers, etc.
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Site - Level Technical Assistance Highland High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	Technical assistance was provided on combinations of reimbursable meals for breakfast to increase participation. The SFA was only crediting one item for several entrees that could credit for two items. Changing entrees to credit for two items may help increase breakfast participation in reimbursable meals instead of students purchasing the items a la carte. It might help to have examples of what constitutes a reimbursable breakfast for students to see.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation, did all reviewed meals during the review period indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students? If NO, explain any errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record the number of meals observed missing required meal components on the S-1, 15. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 16.	Technical assistance was provided on Food Production Records, FPRs. Records reviewed were mostly complete, but need to be more accurate on condiments. Some records do not indicated planned number of servings per grade group, but instead have a note out to the side to indicate how many portions were used. The note does not break down the amount used by grade group. On the vegetable bar FPRs, the beginning and ending amounts for lettuce are not the same unit. Lettuce prepared is in pounds while lettuce leftover is in cups. In order to calculate usage, the same unit must be used.
1100 - Smart Snacks in School	1104. Where are students able to purchase foods during the school day?	A la carte prices are extremely low. It should never be less expensive to purchase the parts of the meal individually than it is to buy a reimbursable meal. Low prices often have the effect of using free and reduced reimbursement to subsidize a la carte purchases. Neither of these are acceptable practices. While there is no hard and fast rule for the amount of increase between purchase price and selling price, the amount should take into account staff time, processing, food cost, supplies used, and other expenses such as wear and tear on equipment. Many schools do a three times markup on less healthy items while adding a smaller markup on healthier food choices to encourage good eating habits.
1400 - Food Safety	1406 Were the selected relevant temperature logs available for review? If YES to specify which date was selected. If NO explain.	Food safety is a very important part of Child Nutrition Programs and logging temperatures is an important part of food safety. In order to maintain records, thermal strips from the dishwasher should be kept as documentation that the machine is operating properly. For the same reason, documentation should be kept when thermometers are calibrated to demonstrate they are working properly.

Org - Level Commendations

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Description
<p>APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were very well organized. 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. The correct and current benefit issuance list was available. All applications were signed and dated by the household member and the SFA, and all applications were determined within ten days. 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. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.</p>
<p>BREAKFAST: Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. Offer vs. Serve, OVS, was correctly implemented. Students have a variety of meal components to select at breakfast including several hot and cold options.</p>
<p>CIVIL RIGHTS: The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided food service staff and documented. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. Ethnic/racial information is collected and the form is completed. No discrimination was observed. Last year's SFA on-site monitoring was completed to ensure that all schools are meeting program requirements.</p>
<p>COMPETITIVE FOODS (SMART SNACKS/HKA): High School students may purchase a wide variety of food and beverages during meals and throughout the school day. Second entrees are correctly documented on production records. Documentation was available to show that all foods and beverages sold to students during the school day met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.</p>
<p>GENERAL: The Child Nutrition Programs at Highland CSD are under good management. Organization was excellent, the staff responded immediately to all requests and worked hard to implement changes immediately. They were open to suggestions and very helpful. It's obvious that the food service staff have a good grasp on their individual duties and work well together. Their hard work and dedication are appreciated.</p>
<p>HACCP/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(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. The latest Health Inspection Report was posted in a publicly visible location. There were no critical areas noted on the report. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.</p>
<p>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 were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. There was a POS for all students, and the 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, FPRs, were on file for all meals claimed for reimbursement for the review period. All students selected a reimbursable meal without having a prompt to select a ½ cup of fruit or vegetable as one of the three required components.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, does an excellent job of menu planning and offering choices. Providing students with entrée, fruit, and vegetable choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat, and fresh fruits and vegetables are offered every day, including a fruit and vegetable bar at the high school. 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. 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. Water was available as required. Offer vs. Serve, OVS, was correctly implemented. 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. Signage for the fruit and vegetable bar was especially helpful. A monthly menu is also posted. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheet(s) for the school selected for review for a specified week during the review period. Nutrient analysis was not required.</p>
<p>PROCUREMENT: 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, and specifications were well-written and comprehensive. The SFA ensures that no vendors have been debarred or suspended by USDA. The SFA purchases main supplies through EIPG co-op which helps keep prices down and spreads the responsibility for bidding among more people. The director had copies of the contract and bid prices. Bread and milk bids were also available for review.</p>
<p>PROFESSIONAL STANDARDS: There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented. The Iowa Tracking Tool is being used.</p>
<p>RESOURCE MANAGEMENT & RECORD KEEPING: The Resource Management section of the Off-Site Assessment tool was completed on time. Financial records that were reviewed, indicated appropriate and allowable expenditures. 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, PLE, tool was completed and prices were increased as indicated by the PLE tool. The new Meal Charge Policy is in place and the policy was distributed in writing to households as required. The district does not charge indirect costs to the food service program. Money is not transferred out of the account to support other programs. The SFA very effectively utilizes its USDA entitlement for commodities.</p>

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SBP & SFSP OUTREACH: School Breakfast Program, SBP, 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. Outreach included announcements, letters to households, posters, and student input. Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year about the SFSP program in Washington, Iowa.

VERIFICATION: The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, 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.

WELLNESS POLICY: 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 wellness policy is available to the public on the district's website. Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.