

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Hull Christian School (07478305)
On-Site Review Dates: April 24-25, 2018

Program Year: 2018
Month of Review: March
Lead Reviewer: Deann Murphy
Org Representative(s): Randal Ten Pas

Site - Level Findings: Hull Christian School (8305)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Menus do not meet the meal pattern requirements in the following ways: 1) inadequate starchy vegetables were planned during the review week. 2). not all grains served were whole-grain rich and the SFA does not have an exemption to serve enriched grains. 3). FPR do not show that K-5 graders are being offered adequate vegetables many days during the review week, but on-site observation showed that they do take adequate vegetables with OVS.	The FSD will repeat the review week menu for corrective action and fix the menu errors. Please submit completed FPR that show the foods and quantities that were served to K-8 graders. Clearly show that all grains served are whole-grain rich, that all vegetable subgroups are met and that all students are offered adequate vegetables daily.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1200 - Professional Standards	V-1200	The FSD and kitchen staff have not yet met their training requirements for SY2017-18. The FSD needs 12 hours annually and the FT kitchen staff need 6 hours annually. The newly hired bookkeeper needs 2 hours training prior to June 30, 2018 and 4 hours annually thereafter. Teachers mark students at the POS and ensure they have taken a reimbursable meal so they need 4 hours training annually.	1). The SFA will state their plan as to how they will ensure the FSD, FT kitchen staff and bookkeeper will meet their required Professional Standards training prior to June 30, 2018. 2). The SFA will also state how they will ensure POS operators meet their Professional Standards training needs annually.	

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.	Use the appropriate column on ICAVES when calculating incomes with same frequency. For example, if a household provides only monthly income, use the Monthly tab when determining the application. Only use the Annual tab for households that report mixed incomes, annual income

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		or self-employment income.
200 - Verification	206 When a confirmation review was conducted,	The confirming official needs to confirm and sign the application prior to a letter being sent to the household asking for verifying documents. Encouraged the SFA to check E-Lookup prior to sending the letter to the household as well. If the child's name is found on E-Lookup, the verification process for that family is complete once benefits are changed if necessary.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable):	Sack lunches do not use Offer vs. Serve so all 5 components must be provided in their full quantities in order to claim them for reimbursement. A sack lunch must contain (for grades K-8) at least 1 oz Meat/Meat Alternate, 1 oz eq. whole-grain rich grain, 3/4 cup vegetable, 1/2 cup fruit and 1 cup milk.
700 - Resource Management		<p>PROCUREMENT:</p> <p>1. Micropurchases need to be spread equitably. There are now 2 local stores that the SFA could use for micropurchases. Encouraged the FSD to use the micropurchase log to track purchases. Only foods that comply with the child nutrition program should be purchased with child nutrition funds. For example, coffee, coffee filters, popcorn and non-whole grain rich foods should not be purchased with child nutrition funds unless it is being invoiced to another entity. If the SFA is buying for another entity, i.e. Rally Day, etc., purchases should be on a separate receipt or clearly marked as such and then invoiced to that entity for payment into the nutrition fund. The bookkeeper should cross-check purchases prior to payment to ensure they are appropriate.</p> <p>2. The SFA needs to put together a solicitation document that includes clear and accurate product specifications for all the products they want to buy from vendors for the year, federal, state and local terms and conditions, debarment, etc. and send the same information to 3 vendors for each procurement event. Encouraged the FSD to use the Small purchase template found in IowaCNP. The SFA may also wish to send a No Bid form to vendors who have not responded in the past. Vendors should be given at least 4 weeks to respond with price quotes. The SFA should determine who to award the contract to based on extended pricing for milk and bread. Vendors should send the SFA updated price lists if prices change throughout the year, which the SFA needs to keep for 3 years + the current year. Contract management involves checking to make sure the items delivered meet the items originally solicited, that Buy American requirements are met, and spot check invoice pricing as compared to price quotes.</p> <p>3. The State Agency encourages all SFAs to use at least 95% of their Planned Assistance Level (PAL) from USDA Foods. The FSD may wish to find more menu options that utilize USDA Foods. In SY2016-17, the SFA used 90% of their PAL and in SY2017-18, the SFA used 77% of their PAL.</p> <p>The SFA is using the state-prototype Code of Conduct policy. The SFA policy states that disciplinary actions for violations of the code are "noted in the HCS Employee Handbook." The Handbook specifies</p>

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		<p>disciplinary actions for teachers, but does not address support staff so this should either be updated or specified separately on the SFA Code of Conduct.</p> <ul style="list-style-type: none"> • It is best practice to include the school calendar when requesting pricing from vendors to ensure deliveries are not made during holidays, vacation days, etc. • In the milk solicitation, other things to consider when requesting price from vendors are: prices are for paper cartons or plastic bottles, coolers will be provided at no charge, HACCP plan to ensure clean crates and milk cartons, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should state whether a firm fixed price or a fixed price with economic adjustment (escalator clause) is requested. • Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-domestic agricultural products are accepted listing the date the item is accepted, item name and country of origin and justification for keeping the product, i.e. price too high for domestic product or domestic product is unavailable at this time, etc.
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.	A member of the foodservice staff should be invited to give input to the wellness policy as part of the wellness committee. Recommend updating the language of the wellness policy to reflect the Administrative Review that occurs every 3 years instead of the SMI that occurred every 5 years. The Progress report should be dated and updated at least every 3 years by the wellness committee. This needs to be made public, i.e. posted on the school website, sent out to all households in a newsletter or e-mail, etc. It cannot only be available in the office.

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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.	The Iowa Excel Training tracker was sent to the SFA in order to capture all required information. All staff involved in the nutrition program need to be recorded on one tracking form to ensure all staff receive adequate training each year. Required training hours and resources were discussed with staff on-site.
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.	A copy of the school's HACCP manual needs to be kept in the kitchen. Kitchen staff should review the Standard Operating Procedures annually. SOPs for "Cleaning Up Bodily Fluids" and "Sack Lunch Meals" were e-mailed to the FSD to add to the HACCP manual. Also, recommend recording dish machine test strips daily.
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.	Summer Meet Up flier was sent to the SFA to send out to households annually each spring. The flier contains a phone number and website telling families where they can access free summer meals across the state.
Resource Mgt Comprehensive Review	2 For each of the categories selected, what process(es) did the SFA use to ensure that all funds received from the sale of nonprogram foods were deposited into the SFA's nonprofit school food service account? Describe Processes:	Discussed with staff the need to cover all food, supply and labor costs when purchasing items for another entity.
Resource Mgt Comprehensive Review	3 Did the SFA apply the correct indirect cost rate for the appropriate year?	TA given regarding indirect costs. The SFA may take up to 10% of their direct cost base to cover indirect costs such as utilities, administration costs, equipment repair and preventative maintenance, etc. The direct cost base is a sum total of Foodservice staff salaries + benefits + non-food supplies + travel. Bookkeeping should clearly show the amount that was transferred from the foodservice fund into the general fund each year to cover indirect costs.

Site - Level Technical Assistance Hull Christian School (8305)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Please make sure that the 4 oz cups of pre-dished fruit actually contain 1/2 cup fruit. All students must take at least 1/2 cup fruit/vegetable in order to claim the meal as reimbursable.
400 - Meal Components and Quantities - Lunch	406 If school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	Multiple resources were sent to the FSD to help with menu planning and Food Production Records. Suggest serving a K-8 meal pattern with the same portions offered to all grades as per the meal pattern requirements. Discussed with the FSD that all grains must be whole grain rich since the SFA does not have a State Agency exemption to serve enriched grains. All vegetable subgroups must be met. Foods that have 2 or more ingredients together need to have a standardized recipe. E-mailed resources to the FSD to help her find/develop standardized recipes. Also discussed using crediting information (CN/PFS) to determine appropriate component contributions.
1400 - Food Safety	1405 Was the SFA's written food safety plan implemented? If NO, explain.	Recommend placing a cart in the hallway for students to place dirty dishes after lunch in order to decrease the amount of cross-traffic in the kitchen between food served and dirty dishes.

Org - Level Commendations

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Description
Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used. The determining official checked all student names on E-lookup at the beginning of the school year for anyone who might qualify for Free benefits. Denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were correctly determined. They were complete with SSN's and parent signature and all applications were determined within ten days. Access to benefit information is correctly limited. Eligibility is kept confidential. The appropriate number of applications were verified correctly and verification was completed on time.
No fiscal action is anticipated for this review so no claim adjustment should be needed.
The And Justice for All civil rights poster was posted in a public place. Civil rights training was provided to all staff. Ethnic/racial information is collected and the summary form is completed. No discrimination was observed. The current state and federal non-discrimination statements are on all household notifications and the shortened non-discrimination statement was on the posted menu.
The district has a current wellness policy on file. There are guidelines for foods sold and goals to promote student health, nutrition education, and physical activity. A wellness committee meets regularly and keeps meeting minutes. The latest assessment of the policy was available.
The Resource Management section of the Off-Site Assessment tool was completed on time. The Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool. Reports are filed on time, and most records are maintained for at least three years plus the current year.
The SFA has a written procurement plan that identifies anticipated procurement events, federal and local thresholds, and persons responsible for contract management. They also have a Code of Conduct that identifies conflicts of interest, accepting items of monetary value, and checks and balances.

Site - Level Commendations Hull Christian School (8305)

Description
During the meal service reviewed, students had 2 vegetables and 4 fruits to choose from. Students could take 1 or more choices of each. All components were available before, during and after meal service on the day of review in overall quantities that met the meal pattern requirements. Labels and food production records were neatly filed in a binder. The menu is posted on the school website each month. Signage is available educating students that they must take 3 components with one being a 1/2 cup fruit or vegetable to make a reimbursable meal. Teachers mark the POS at the end of the line after students show them their tray containing a reimbursable meal. Water is available as required. Offer vs. serve is done correctly. Seconds are offered on the entrée served, milk, and bread for an a la carte charge - fruits and vegetables are offered at no charge. Some low sodium/low fat foods were found in storage in order to help meet calorie, saturated fat and sodium requirements.
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. There was a point of service at the end of the line as stated on the application. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
The latest Health Inspection Report is posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers, and food served. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Teachers assisting with food also wore gloves.