

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Johnston Community School District (32310000)
Dates of Review: 1/4/2018 – 1/10/2018

Program Year: 2018
Month of Review: November
Lead Reviewer: Jean Easley
Org Representative(s): LaRae Doll

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	The confirming official is to review, sign and date applications pulled for verification prior to sending out letters notifying households of verification.	For your response, state your understanding of the timeline for confirming applications for verification and how the procedure will be changed moving forward.	

Site - Level Findings: Johnston Senior High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Quaker Chewy Granola Bar (.84 oz.) does not credit for one grain. One breakfast meal observed should not have been a reimbursable breakfast because of this.	For your response, describe your plan to ensure all grains offered for breakfast credit for one or two grains as posted on signage.	
400 - Meal Components and Quantities - Lunch	V-0400	Alternate Meals appear on signage to be insufficient in Grain or Meat: Yogurt Meal: choice of Granola (1 oz) or Muffin (2 oz) is short one 1 Grain when Granola is selected. Bagel Meal: there is a choice of cheese stick or Sun-Butter cup each credit for 1 M/MA, is short 1 M/MA. Sun-Butter & Jelly Meal: short .5 Grain because Sun-Butter Sandwich credits for 1.5 Grain. Self-Serve sign states meal includes 1/2 cup fruit and vegetable, when requirements are 1 cup is to be offered to Grades 9 - 12.	For your response, revise and attach "Student Lunch Meal Guidelines" sign and "Self-Serve Guidelines" sign.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	118 How frequently are updates made to the point of service and benefit issuance document(s)?	Preschool students do not eat meals yet are included on the Benefit Issuance list. These students should be removed from the Benefit Issuance for accurate eligibility information.
700 - Resource Management		PROCUREMENT: 1). Discussed the issue of nutrition-related equipment maintenance and repairs are now to be covered under "indirect costs". It was explained that we are seeking further clarification and to expect additional information be provided to Iowa SFAs. 2). Technical assistance was provided that sole source can be used for Point-of-Service (POS) and Recipe and Costing software updates. When procuring new software, a competitive procurement must be conducted.

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		<p>PROCUREMENT:</p> <p>3). Two board approved policies were identified related to employee disciplinary action. These are: Policy 401.2 - Employee Conflict of Interest and Policy 404.1R - Code of Professional Conduct and Ethics Regulation. Both these policy numbers can be cited in the Code of Conduct disciplinary action statement.</p> <p>4). The Prime Vendor solicitation should include the correct USDA and Iowa non-discrimination statements.</p> <p>5). The Prime Vendor solicitation allows for piggybacking, that is, adding entities after contract is awarded to a vendor. A provision must be added to the solicitation to allow "piggybacking." This should include specifying dollar value or percentage of increase to original estimated value of a contract to avoid creating a material change. If there is a material change in the contract a competitive procurement must be conducted.</p> <p>6). Milk solicitation should be issued as a Request for Proposals (RFP). The most recent solicitation was issued as a sealed bid. When an Invitation for Bid (IFB) or sealed bid is used, the vendor with the lowest overall price (bottom line) must be awarded the contract. The milk solicitation document shows that both formal methods of procurement - Invitation for Bid (IFB) and Request for Proposal (RFP) methods are used interchangeably. Documentation showed factors other than price alone are used to evaluate vendor responses. Food service director would prefer to continue using student taste-testing results to select a milk vendor. Identify the evaluation criteria clearly in the milk solicitation document prior to public notification of the milk request for proposals. Price should be the primary factor and weighted higher than other factors.</p> <p>6). Required federal terms and conditions must be included in both small purchase (3 Bids and a Buy) and formal methods of procurement. See state-prototype small purchase and RFP/IFB templates posted in IA-CNP.</p> <p>7). Be sure keep any email correspondence with vendors or documentation of calls to vendors when using the small purchase methods.</p> <p>8). When purchasing local produce be sure to "spread the wealth" and divide purchases equitably among local producers. In SY 2016-2017, a one-time purchase was made for Iowa corn. In the current SY, if local produce is to be purchased only once in the SY, a different vendor must be used.</p> <p>9). The Prime Vendor solicitation identifies "tuna" as an exception to meeting the Buy American Provision. Tuna is available in the U.S. in sufficient quantities and therefore should not be an exception.</p> <p>10). The solicitation must clearly explain how points will be deducted for each evaluation factor identified in the evaluation criteria on a request for proposal. The evaluation process should be objective.</p>
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging discrimination within FNS School Meal Programs? If procedures are written, provide a copy.	Shared USDA complaint process and the form: http://www.fns.usda.gov/civil-rights
800 - Civil Rights	805 How are students with special dietary needs accommodated?	There is an updated Diet Modification Form. Please update the form available on the school website (NutriSlice program).

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1000 - Local School Wellness Policy	1005 Obtain a copy of the most recent assessment on the implementation of the Local School Wellness Policy.	A Wellness Assessment is required every 3 years. An Assessment is unavailable as Wellness Policy was recently updated/approved. An assessment is planned to be completed for each school by end of the school year. Consider how completed assessment will be shared with community. We see many schools with a wellness tab on the district webpage. In addition to the policy, it is a great way to share assessment, meeting updates, invite community participation & other wellness-related materials, such as ideas for healthy classroom parties or link to district Nutrition and Health.
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Site - Level Technical Assistance Johnston Senior High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	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.	Food Production Records provide Fruit and Juice planned servings, however, completed records do not capture type or quantity of fruit or fruit juice used. FSD and HS Manager had already began to address this issue by listing specific fruits offered daily; and will quantify and document usage by how many pans are used. The same can be done for fruit juice.

Site - Level Technical Assistance Henry A Wallace Elementary School (0412)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch		Homemade Granola Standardized Recipe lists each serving as being 1 ounce with a contribution of 1 oz Grain. A sample serving was found to weigh < 1 oz and also was less than 1/4 cup volume as required according to Exhibit A Grain Chart. Recommend further study of this issue to ensure offering a minimum of one grain consistently for the reimbursable Yogurt Meal. Consider if a larger container should be used or use of a packaged 1 oz granola product?

Org - Level Commendations

Description
APPLICATIONS: Benefit documents are well organized. The current application form and guidelines are used, direct certification is downloaded twice a month as required, benefits are accurately transferred to the POS system, and denied applications were correctly determined. Determining Official is well-organized; most applications were determined within a day or two of being received. Access to benefit information limited to a few individuals. Waivers are provided to applicants and indicate specific fees. The SFA has a back-up system for benefit issuance documents and system.
CIVIL RIGHTS: Annual civil rights training is provided annually to all nutrition staff & documented. Civil rights posters were posted in cafeterias, services are offered for Limited English Proficient households. The SFA submitted annual Public Release to local media. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected. No discrimination was observed. On-site monitoring is completed annually ensuring all schools meet program requirements. The correct state & federal non-discrimination statements is listed on nutrition materials.
HACCP/FOOD SAFETY PLAN: A district safety plan includes all required components. New staff are trained using this resource. A copy is available at each location.
LOCAL MEAL CHARGE POLICY: The SFA developed and approved a meal charge policy. The policy was mailed to all households and staff informed and follows policy.
MEAL COUNTING & CLAIMING: Meal counts during the on-site review are reasonable when compared to review month counts. There is a Point of Service at the end of the line; POS counts and filed claims appear accurate. No overt identification of students receiving benefits was observed. Food Production Records are on file for all meals claimed for reimbursement.

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No fiscal action is required as result of Administrative Review.
PROCUREMENT: The Food Service Director attended the State Agency's Regional Procurement Training in Des Moines. The written procurement plan for SY 17-18 is available. The local micro-purchase and small purchase thresholds were correctly identified. The procurement event page of the written procurement plan for school year 2017-2018 was completed. The use of micro-purchase method is minimal. A review of invoices validated the School Food Authority (SFA) is compliant with micro-purchase threshold and costs were reasonable. The small purchase method was used primarily to purchase Smart Snack complaint beverages for a la carte sales at the high school. The food service director makes every effort to get pricing from three vendors. Documentation of the price comparison included photos of the different flavors and price. A review of invoice validated the items solicited were purchased. The formal procurement method is used for Prime Vendor, Milk, Bread, Chemicals and Fresh Produce. The SFA is a member of the Central Buying Consortium (CBC). Prime Vendor, chemicals, and fresh produce is a group purchase procurement. Milk and bread are procured independently. Cost analysis is conducted at contract renewal or prior to issuing a new solicitation. Specifications allow pricing to be submitted for an equal product, thereby keeping the procurement process open and competitive. The Prime vendor contract included all of the required Federal terms and conditions. The Request For Proposal for Prime Vendor had evaluation criteria identified with price being the primary factor. The Food Service Director maintains sufficient records for all Procurement activities. The Food Service Director and her administrative staff monitor invoices to ensure contract terms and conditions are being met. Cost reimbursable contracts are monitored to ensure that discounts, credits and rebates are returned to the Child Nutrition in a timely manner. Members of the Central Buying Consortium meet regularly to also monitor contracts as a group. The Food Service Director is doing an excellent job using the allotted Planned Assistance Level (PAL) for USDA Foods. In SY 2016-2017, 100% of the Planned Assistance Level (PAL) for USDA Foods was utilized.
PROFESSIONAL STANDARDS: Professional Development is provided to all nutrition staff. Annual Training Spreadsheet is maintained showing at a glance which staff have been trained on the following for SY17: Food Safety & Sanitation, Federal Lunch & Breakfast Meal Requirements, Combi Oven Training, Dish Machine/Warewash training, FPR/HACCP/SOP Book review, Thermometer Calibration/Knife Skills/Sharpening, Employee Differences, Smarter lunchrooms, How to Motivate & Engage Gen Z, SNAI. Employee training hrs are tracked with number of target training hrs. An annual "Welcome Back" training ensures all staff understand regulation and policies.
RESOURCE MANAGEMENT: All expenditures reviewed appeared allowable. net cash resources do not exceed three operating months. The SFA effectively utilizes USDA entitlement for USDA Foods. The Non-Program Revenue, NPR, tool was completed, and no increase in prices were required. Money is not transferred out of the account to support other programs.
VERIFICATION: 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. Applications were confirmed. Determining Official attends training.
WELLNESS: The district has a wellness policy revised in SY17. There are guidelines for foods sold on campus and goals to promote student health, nutrition promotion, nutrition education & physical activity. Potential stakeholders are made aware of their ability to participate on the wellness committee. An assessment of each school's progress in meeting the wellness policy goals is planned later this school year.

Site - Level Commendations Johnston Senior High School (0109)

Description
FOOD SAFETY: Food Safety practices are observed. Many staff are ServSafe Certified. A copy of the written HACCP plan is available at the High School. The latest Health Inspection Report is posted in a publicly visible location. Temperature logs are maintained for all coolers, freezers, food served as required.
MENUS and NUTRITION: The Nutrition Director does a superior job of menu planning and offering choices. A scatter system allows high school customers to select from a variety of reimbursable menus: Self-Service Station (Pasta Bar during onsite review), Pizza, Deli, Grill, Soup and Salad Bar. Standardized recipes are used. Food Production Records are maintained. Food Waste is minimized with use of Offer versus Serve.
NUTRITION STAFF: cashiers are well trained in their understanding of a reimbursable breakfast and lunch and offer versus serve. They are observed to be friendly, helpful and encouraging to student customers, alerting them discreetly when money is due on their account, or suggest to take a fruit or vegetable to make a reimbursable meal instead of a la carte pricing if it saves money for the student.
SMART SNACKS: a la carte options are available in the cafeteria, snack window and vending. All items meet smart snack nutrition standards with documentation on file for each item. Paper Cups are available for water; meeting requirement that free potable water is always available.

Site - Level Commendations Henry A Wallace Elementary School (0412)

Description
FOOD SAFETY: Good food safety procedures were observed. A copy of the written plan was available at Wallace. 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, dishwasher, and thermometer calibration.
MENUS and NUTRITION: Menus meet meal pattern requirements. Menus are posted on Wallace website complete with nutritional information as well as a photo if you hover over the menu item. During site review, I could review and compare nutrition details for Nacho Meal or Cheese Quesadilla. Black Beans, Baby Carrots, Apricots. Apple. Carbohydrate Counts and Ingredient List is available for anyone with special diet concerns. A user friendly tool for parents and students!

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NUTRITION STAFF at Wallace are observed to be knowledgeable of meal pattern and Offer vs Serve; they are observed to be friendly and encouraging to students. Nutrition staff is helpful with younger students in learning to enter their individual PIN at point of service.

REIMBURSABLE MEALS: All lunches observed were reimbursable. Signage was posted explaining what constitutes a reimbursable meal for both breakfast and lunch. Offer vs. Serve, OVS, was correctly implemented. At least two types of milk are offered. Water was available as required. Students had sufficient of time to eat after receiving meals.