

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Keokuk Comm School District (33120000)
Dates: April 17-19, 2018

Program Year: 2018
Month of Review: March
Lead Reviewer: Cheryl Benson
Org Representative(s): Sarah Wetzel

Site - Level Findings: Keokuk Middle School (0209)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	(1) The portion of hash browns which were offered the day of review and also four days in March provide only 1/4 cup of vegetable instead of 1/2 cup. For one day in March, grades K-5 were only offered the hash brown as a vegetable, so they were 1/2 cup short of required vegetable. For the day of the on-site observation, 10 meals had insufficient fruit/vegetable due to this and were added to the overclaim. (2) Several cereals being used for breakfast are not whole-grain rich as required for the meal pattern. The cereals observed were all the Hospitality brand. (Rice cereal, cocoa rice cereal, and fruit whirls)	For your response, (1) indicate whether menus that include hash browns will be changed to a larger 1/2 cup portion or whether cashiers at all sites will be trained to have students select additional fruit or vegetable if the hash brown is selected. (2) Submit ingredient labels of replacement cereals and indicate how you will check grains to ensure they are at least 50% whole grain. (A repeat of this error on the next review may lead to fiscal action.) Technical assistance was provided on ensuring that all grains offered for breakfast and lunch are at least 50% whole grain. Deliveries should be checked, labels should indicate a whole grain as the first ingredient, and specifications in bid documents should indicate whole grain rich requirements.	
500 - Offer versus Serve	V-0500	Offer vs Serve, OVS, has been implemented at the Middle School. (1) For lunch, students must take at least three of the five components offered, one of which must be a half cup of fruit or vegetable. (Milk, Grain, Fruit, Vegetable, Meat/Meat alternate) Five Salad Bar meals were not reimbursable on the day of observation because they only had two components. (2) For breakfast, students must be offered three components (Fruit/juice, Milk, Grain), but the components must be offered in at least four food items. Regardless of how many food items the SFA offers at breakfast, students must select at least three food items one of which must be a 1/2 cup fruit/juice/vegetable. The SFA thought that students had to take one less food item than was being offered. (3) To assist with OVS at both lunch and breakfast, there must be signage posted explaining what constitutes a reimbursable meal. There was no breakfast signage posted. This is a repeat error from the	For your response, have all regular and substitute cashiers at the Middle School view the Build a Healthy Lunch and Build a Healthy Breakfast webcasts (link was sent to director). Submit a sign-in sheet with dates/times each staff person completed the webcasts. Signage for breakfast was implemented during the on-site review.	

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		last review.		
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Site - Level Findings: George Washington Elementary School (0454)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1900 - Fresh Fruit and Vegetable Program (FFVP)	V-1900	Per cost documentation, the cost of 2000 (6.5" x 7") clear sandwich bag is \$11.56. The unit cost per bag would be \$0.006 and rounded to two decimal places would be \$0.01. The reimbursement claimed should be 21.60 if three decimal places used or \$36.00 if two decimal places is used. The school claimed \$108.00. The over-claim is \$72.00 (using \$0.01 per snack bag). The individual preparing claims stated they had made an error.	Fiscal action was applied to the review period of March.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
Resource Mgt Comprehensive Review	V-RMCRF	At the end of each school year, the SFA must determine whether the percentage of revenue from non-program food sold is equal to or greater than the percentage of money spent on non-program food. Both the Financial Report on IowaCNP and the USDA Non-Program Revenue Tool indicate that sufficient revenue was not generated from non-program sales. However, it appears that the calculation may be incorrect.	For your response, recalculate and submit the Non-Program Revenue Tool. If the tool still indicates that revenue is insufficient then submit a plan to increase non-program revenue to cover the negative portion.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	133 Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified? and Benefit Issuance Error Worksheet, SFA-1.	Technical assistance was provided on documenting students who are Homeless. The Homeless Liaison does not need to complete a benefit application for the students. He or she can provide the director with a list of students' names, the date they became Homeless/Eligible for benefits. See page 38 in the Eligibility Manual.
100 - Certification and Benefit Issuance	141 Does the SFA account for benefits that have been extended to students living in a household that is receiving SNAP, TANF, or FDPIR benefits? If NO, explain. Record errors on the SFA-1.	Technical assistance was provided on documenting other students in a household where at least one person is Directly Certified. All students in a household with a DC student are also free, but there must be some documentation of how they were determined as free. This can be done by writing names on the DC list or by creating a separate spreadsheet or other method.

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<p>700 - Resource Management</p>		<p>PROCUREMENT:</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Add the following district policy to the school food service written procurement plan code of conduct. The district policy that addresses discipline for employees violating their job duties is 405.1 Employee Conflict of Interest and the policy addressing gifts is 405.3 Gifts to Employees. Please state both policy number and title. • <input type="checkbox"/> A public notification in a major circulating newspaper in the school district's service area is required when using either of the formal methods of procurement - Invitation for Bid (IFB) or Request for Proposal (RFP). A copy of the printed advertisement must be retained with the procurement documentation. • Required federal terms and conditions must be included when procurement is conducted using small purchase and formal methods of procurement. Please refer to the state-prototype templates posted on IA_CNP. • When using the micro-purchase method, purchases must be equitably distributed among vendors to "spread the wealth." • When procuring milk and bread, along with specifications for all items to be procured, the estimated annual usage for each item should be provided. To ensure the district selects a responsive vendor with the overall lowest price, the cost of each item on price quotation request or bid must be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template to calculate extended cost for milk was provided. A similar process should be used for bread products. • It is best practice to include the school calendar when requesting pricing from vendors to ensure deliveries are not made during holidays, snow days, etc. • In the milk solicitation, other things to consider when requesting price from vendors are: 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. • Allow vendors a minimum of four weeks from date vendor is contacted to the due date for milk and bread procurement. For any formal procurement, it is best practice to allow 8-12 weeks from the time the bid/proposal is issued to the due date of the bid/proposal. This is to allow the vendor adequate time to respond. • <input type="checkbox"/> A designated school food service individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-domestic agricultural commodity is accepted. • <input type="checkbox"/> The contract with the Prime Vendor is a fixed price contract. This means there should be no price increases for the duration of the contract. The district, however, is receiving price increases for items in the market basket regularly. The district has the option for one more year to renew the contract. It is recommended that an amendment be added at renewal to ensure prices will remain fixed during the contract renewal year. • <input type="checkbox"/> Retain all documentation for any food service contract that was renewed
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		<p>after the initial contract year passed. Any renewal and contract modification documentation should be maintained.</p> <ul style="list-style-type: none"> • <input type="checkbox"/> When adding another district or entity to a fixed price contract, that is, allowing entities to piggyback; language should be added that prevent a material change in the original contract. • <input type="checkbox"/> Food service equipment repair and preventive maintenance will be an indirect cost to the school nutrition fund. Any additional questions can be directed to the school finances at the Iowa Department of Education.
700 - Resource Management (2018)	709 Did the SFA sell second meals, Smart Snacks, and/or catering (e.g., foods/beverages for school board meetings; foods for outside entities and programs)?	<p>Technical assistance was provided on completing the Non-Program Revenue Tool. Previous USDA Memos were shared as well as information on how information from the CAR is used in the financial report on IowaCNP. The SFA may use a period of a few weeks to estimate the remaining weeks of the year. Starting with food costs for program (reimbursable meals--breakfast, lunch, FFVP) food and then subtracting from total food costs will result in non-program food costs. Then calculating reimbursement from program food and subtracting that from total food reimbursement will result in non-program food revenue. Those figures can be entered into the NPR tool.</p>
800 - Civil Rights	805 How are students with special dietary needs accommodated?	<p>Students who require special diets must be accommodated as soon as the SFA becomes aware of the issue as long as the diet does not deviate from the meal pattern. Whether or not the SFA requires the household to submit a special diet form/request, is a local decision. If the diet modification requires a deviation from the meal pattern, then the State Agencies Diet Modification Request Form that is signed by a medical professional who is licensed to prescribe medications must be on file before the diet is accommodated. The form does not need to be replaced each year, but the SFA should contact the household at least once a year to determine if there are changes. Diet accommodation cannot be accomplished solely via Offer vs Serve. The SFA must be able to offer all required components in order to claim a meal for reimbursement.</p>
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.	<p>A folder was provided during the on-site review with an assessment of the district's current wellness policy, a letter to the superintendent, information on reviewing and assessing the policy, and other assorted resources for food service and teachers.</p>
1100 - Smart Snacks	1100 What are the SFA's food sale policies? List all types of food/beverage sales to include the selling of non-food items in combination with food items.	<p>Smart Snack regulations allow the entree from breakfast and lunch to be sold the same day it is menued plus the following day. All other food items sold to students must be documented as compliant with Smart Snacks by running the items through the Alliance calculator. This includes all sides such as french fries or fruit crisp. The director worked on this during the on-site review and will bring all items into compliance.</p>
1200 - Professional Standards		<p>Directors of Child Nutrition Programs have many responsibilities--benefit applications, verification, procurement, meal planning, special diets, recipes, food production records, civil rights, self-monitoring, food safety, staff training, reports, debt collection, financial management, repairs, inventory management, and the list goes on. For a district of this size, a part-time or full-time assistant is not unusual and may be helpful. Often a secretary or food service assistant deals with applications and claims in order to free up more time for the director to complete other duties.</p>

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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.	While the director has a food safety, HACCP, plan, the collection of Standard Operating Procedures is not comprehensive. SFAs should have a comprehensive collection of Standard Operating Procedures, SOPs. Annual food safety training as well as regular updating of the food safety plan are both required. In order to complete all three of these, the director could divide up all of the current SOPs as well as all of the SOPs available and have staff review the procedures, and adapt them for how food safety is carried out at their SFA. This would accomplish all three-- training, a comprehensive collection of SOPs, and regular updating.
Resource Mgt Comprehensive Review	1 Did the SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency?	When completing the off-site Resource Management questions, the SFA indicated that Indirect Costs were being charged to the Child Nutrition account. However, indirect costs are being charged directly which is not permitted. Any utility such as trash collection and electricity cannot be directly charged to the CN account. Salaries, wages, and benefits for staff who assist in food service duties but are not food service employees, such as secretaries and custodians, cannot be directly charged to the CN account. Further, things such as kitchen equipment repair, fees for on-line payment collection, vehicle maintenance, pest control, recharging fire suppression systems and other items that go into calculating the Indirect Cost Rate cannot be directly charged to the CN account. All of these costs must be paid from the General Fund. The district may then decide to charge the CN account via the unrestricted Indirect Cost Rate. When charging the CN account indirect costs, all federal programs in the district must also be charged. The Indirect Cost Manual was provided to the SFA.
Resource Mgt Comprehensive Review	7 During the Resource Management review period, did the SFA purchase equipment with an acquisition cost of \$5,000 or more?	SFAs must have State Agency approval before purchasing any equipment that costs \$5,000 or more. The director can contact her consultant to start the process. This information was shared with the director for information purposes only.

Site - Level Technical Assistance Keokuk Middle School (0209)

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	317 a. Based on meal observation, does the meal counting system as implemented prevent overt identification of students receiving free and reduced price benefits?	The POS screen at the Middle School visibly displays the account balance of students. This practice can lead to overt identification of free and reduced students. It is recommended that the balance be removed or changed to statements like "low balance," or fix the position or screen so that it cannot be read by anyone other than the cashier.
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 must indicate planned quantities and serving sizes for all non-reimbursable food items. This generally includes adult meals and a la carte sales. It is important to not include those items in with reimbursable food in order to make a possible nutrient analysis more accurate and in order to document compliance with Smart Snack guidelines. Production records for the Salad Bar meal does not indicate measurable amounts on most items which is an important part of

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		documentation.
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	The Salad Bar meal uses large and small cardboard boats for service. The boats make it more difficult for the cashier at the POS to determine whether the students have a reimbursable meal or not. Food cannot be seen through the sides of the boats and the depth of the boats make it difficult to see what is in the bottom. It is recommended that some other service dishes be used.
800 - Civil Rights	810 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits? If NO, describe reason.	Technical assistance was provided on posting the And Justice for All poster in a publicly visible location. The poster informs participants of who to call or where to write to file a discrimination complaint, so it must be in a location where it can be read. The poster was moved during the on-site review.
1400 - Food Safety	1403 a. In the comments section, list the dates of the two (2) most recent food safety inspections	Technical assistance was provided on requesting two health inspections per year, per site regardless of whether the site is a preparation kitchen or a satellite kitchen. The director sent a revised message to the inspector during the on-site review.
1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	The Health Inspection Report was not posted in a publicly visible location as required. The report was moved during the on-site review.
1400 - Food Safety	1406 Were the selected relevant temperature logs available for review? If YES to specify which date was selected. If NO explain.	The SFA maintains all required temperature logs for food, coolers, freezers, dishwasher, etc. It is highly recommended that temperature strips be used at least weekly and kept on file as documentation that the dishwasher is reaching the correct temperature to sanitize dishes.

Site - Level Technical Assistance George Washington Elementary School (0454)

Area	Question	Comments
1900 - Fresh Fruit and Vegetable Program (FFVP)	1901 Did the cost documentation provided support the school's FFVP claim for reimbursement? If NO, explain. Record any unsupported Program costs in the Comments section. Combine amount with any applicable amount in 1902 and record on the S-1, 21. Unsupported costs and/or unallowable costs must be recorded on the Fiscal Action Workbook.	A review of the March claims showed that the amount claimed for the snack bags (small supplies/other operational costs) was incorrectly calculated. Therefore the amount claimed was higher. Per cost documentation provided, the unit cost per bag would be \$0.006 rounded to three decimal places. The reimbursement claimed for March would be \$21.60. When two decimal places is used the claim amount goes to \$36.00. Going forward, use three decimal places to calculate cost per unit for snack bags. There was one unallowable item on the March reimbursement. This item was denied for March reimbursement. The item is grapple. Grapple is not a variety of apple but an apple infused with grape juice.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1905 Is the FFVP widely publicized within the school? If NO, explain.	FRESH FRUIT AND VEGETABLE PROGRAM: George Washington Elementary. The Fresh Fruit and Vegetable Program (FFVP) is not widely publicized to the parents and community. Discussed ways this can be facilitated. The school has a community computer screen where the program information and snack of the day can be displayed. The program can be promoted on the school's FaceBook page as well as school newsletter. Recommend using information from Pick a Better Snack parent

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		newsletter as well as the Team Nutrition morning Public Service Announcement (PSA) to promote the program. Information on these resources were emailed to the food service director.
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Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were 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. Over 400 applications were reviewed and all applications were correctly determined, were signed and dated by the household member and the SFA, were complete with SSN's and case numbers, 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.</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. A copy of the district's public release was on file, documenting that it was submitted to local media. Ethnic/racial information is collected and the form is completed. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. The current state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school's website.</p>
<p>COMPETITIVE FOODS (SMART SNACKS/HKA): Students may purchase a second entrée, side, and/or a second milk at lunch as well as a selection of a la carte items. Documentation was available to show that a la carte 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>FRESH FRUIT AND VEGETABLE PROGRAM: George Washington Elementary School- The Fresh Fruit and Vegetable Program (FFVP) was observed at the George Washington Elementary School. The FFVP is available to all enrolled elementary students (Grades 4 & 5) at no cost. The FFVP is provided on all operating/school days. The FFVP is offered during the school day outside the meal service time of the National School Lunch Program(NSLP) and School Breakfast Program (SBP). There is a designated area for the Fresh Fruit and Vegetable program snacks in the office supply room. Snacks are placed off the ground on two racks of shelving unit and easily accessible. One or two students from each classroom pick up the snack of the day between 9:00 - 9:30 a.m. Prepared snacks are individually bagged. Students count out the snacks and carry to classroom on brown plastic trays. All fruits and vegetables served in March were allowable. On day of review, the snack of the day was star-fruit. Snack service was observed in three fourth grade classrooms. Teachers talked about the snack of the day. Teachers are very appreciative of the program and the positive impact it has had on their students. The monthly claim for March 2018 was validated. The amount of labor for FFVP is written into employee contracts. FFVP operational and administrative labor is tracked on a calendar. A Fresh Fruit and Vegetable (FFVP) Standard Operating Procedure (SOP) is available. The SOP for FFVP and nutrition education materials (Pick a Better Snack) are provided to the teachers at the beginning of the school year.</p>
<p>HACCP/FOOD SAFETY: The SFA has a district-wide written Food Safety plan, and a copy of the written plan was available at the site 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, dishwasher, and thermometer calibration. 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 March were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. Wordware is used as the school's POS system. There was a POS for all students, and the POS was organized and orderly; students enter an individual pin # or scan a card. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: The Food Service Director and Manager do a good job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. Documentation indicated that foods purchased and food production ensured meals contained the required components. 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 were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption. Standardized recipes are used for food production. Water was available as required. 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 The Food Service Director completed the Menu Worksheet(s) for each school selected for review for a specified week during the review period.</p>
<p>PROCUREMENT: The food service director attended the procurement regional training held in Burlington. A written procurement plan for SY 2017-2018 is available. The plan identifies the procurement events, and the estimated value, procurement method, and contract type for each procurement event. A review of the selected vendors documents showed: The correct procurement method was used -small purchase method for both milk and bread Documentation to detail the history of procurement events is available and well organized. The director has conducting proper procurement. She has a one-page list of vendors contacted for solicitation of products and services. This list documents the product/service needed. Under each is listed the business, business address, the name and email/phone of the contact person at the</p>

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business. The list documents if business responded with no-bid letter/email to show more than one vendor was solicited. Specifications were fairly well-written and bids contained several of the required terms and conditions. The product specifications allow for an "equal" product if a brand name is specified. At least two qualified vendors were contacted for each procurement event.

PROFESSIONAL STANDARDS: Tracking was provided that documents that the director received the required 12 hours of annual training, managers received the required 10 hours of training, and most other full-time staff have received at least 6 hours of training, and most other part-time staff have received at least 4 hours of annual training. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.

RESOURCE MANAGEMENT & RECORD KEEPING: Financial records that were reviewed, indicated appropriate and allowable expenditures. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. 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 district does not charge indirect costs to the food service program. Money is not transferred out of the account to support other programs. Reports are filed on time, and all records are maintained for at least three years plus the current year

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. Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer.

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 applications selected for verification were 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 and the most recent assessment of the policy are available to the public. Potential stakeholders are made aware of their ability to participate on the wellness committee.