

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Lamoni Community School District (34650000)**

**Program Year:** 2018  
**Month of Review:** October  
**Lead Reviewer:** Jean Easley  
**Org Representative(s):** Stacy Jones, Velma Wengryn, Chris Coffelt

**Site - Level Findings: Lamoni High School High School (0172)**

<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	During the on-site review, 2 breakfast meals counted were not reimbursable. Additionally, nutrition staff was unaware of the 1/2 cup fruit requirement for a reimbursable breakfast.	Plan a nutrition staff inservice to review breakfast meal pattern requirements. For your response: 1. submit an attendance sheet for a staff review of breakfast requirements by watching the webcast "Rise and Shine: It's Breakfast Time". Training time will count for Professional Standards for all nutrition staff. 2. attach CN labels, product formulation statement or recipe for: breakfast wrap, french toast, omelet, muffin, breakfast pizza from focus week of review.	
400 - Meal Components and Quantities - Breakfast	V-0400	Signage is not available near the beginning of service line to identify the components of a reimbursable meal or explain Offer vs Serve. Missing signage is a repeat finding. Lunch poster provided by consultant. A breakfast poster template was shared. Another resource is found here: <a href="http://www.educateiowa.gov/pk-12/nutrition-programs/supporting-school-meals">www.educateiowa.gov/pk-12/nutrition-programs/supporting-school-meals</a> . Many schools work with their AEA to print for an inexpensive option.	For your response, attach a photo of posted breakfast and lunch signage. State your understanding of the requirement for maintaining signage near beginning of service line to identify the components of a reimbursable meal.	
400 - Meal Components and Quantities - Lunch	V-0400	Preschool has new meal pattern requirements required to have been implemented beginning 10/1/2017. Refer to Technical Assistance for resources regarding new meal pattern requirements.	For your response, submit a preschool menu planned to be served in January for breakfast and lunch.	
400 - Meal Components and Quantities - Lunch	V-0400	Food Production Records for breakfast and lunch are incomplete. This is a repeat finding. Required to include: All menu components/items offered as part of a reimbursable meal (list how each credit), planned serving sizes to meet minimum meal pattern requirements for each grade level served. Preschool, K - 5, 6-8, and 9-12. Additionally, two menus were insufficient for Grain: Chicken Nugget menu served 11/18 was insufficient in Grain for PK - 12. On 11/30 hamburger bun used credited for 1.5 oz grain, therefore Grade 9-12 was short .5 grain.	For your response, 1. submit one week of FPR records for Breakfast, Lunch, Fruit/Vegetable Bar, and Afterschool Snack. 2. Staff Inservice: Watch FPR webcast training and submit attendance of this training. Count training for professional standards training for all. <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts">https://www.educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts</a> . 3. State your intention of attending Healthy School Meals Summer Short Course training, or another way you will ensure understanding of meal pattern and documentation requirements.	
1100 - Smart Snacks in School	V-1100	Flavored Water is not compliant with Smart Snacks for students younger than Grades 9 - 12.	State your understanding that a la carte beverages are subject to Smart Snack standards. Describe a plan how you will ensure that all a la carte food items sold to grades 6th-12th grade meet Smart Snacks requirements.	

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1400 - Food Safety	V-1400	Food Safety observations: Cases of food were observed stored on floor in the freezer, temperature sheets are not kept for milk coolers, hair restraints are not used and non-food service personnel enter kitchen without hair restraints. Plan annual food safety training for nutrition staff training.	For your response, state your plan for addressing the above issues.	
1700 - Afterschool Snack	V-1700	The Afterschool Snack Program Menu does not meet meal pattern requirements, Food Production Records are not maintained, Students had not been required to take both components, On-Site Monitoring was not completed in the first 4 weeks and the Point of Service Tally Sheets had just began to be used 10/20/17. Please consult the guidebook or ask consultant when questions arise. Fiscal action will be assessed for October snacks missing a component.	For your response, submit a cycle menu for Afterschool Snack, one week of completed Food Production Records, and a completed On-Site Monitoring Form. State your understanding on-site monitoring is to be completed within the first 4 weeks of school. State the planned date the second monitoring form will be completed.	

**Org - Level Findings**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
1000 - Local School Wellness Policy	V-1000	Wellness Policy: An assessment or progress report is to be posted along with the wellness policy and made available to the public. Recommend posting on website along with message on how community is invited to participate.	For your response, share your plan and timeline for completing an assessment of your local wellness policy and how it will be shared with the community, including how an invitation to be involved is extended.	
1100 - Smart Snacks	V-1100	The Vending in the cafeteria does not offer compliant beverages for K - 12 students. This is a repeat finding. Because the vending is available to all students, beverages must be compliant for youngest grade. Water is acceptable for all students. Not Compliant: Kiwi Strawberry Snapple is not compliant for any student as calories are 190. Diet Snapple Half and Half provides 10 calories and is compliant for Grades 9 - 12 only. BAI sparkling juice is compliant only for Grades 9- 12 assuming it provides 10 calories per 16 ounces. Smart Snack information can be found here: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/smart-snacks-school">https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/smart-snacks-school</a>	For your response, state your understanding that all items offered must meet federal Smart Snack guidelines. Please state no additional beverages will be ordered until compliance is verified. State your plan for vending and who will be responsible for overseeing products are compliant.	
1500 - Reporting and Recordkeeping	V-1500	NON-PROGRAM FOODS Revenue from sale of non-program foods must generate at least the same proportion of SFA revenue as they contribute to food costs.	For your response, state your intention continue to review and price non-program foods high enough to trend towards compliance.	

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**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		PROCUREMENT: A Procurement Plan has been developed. Plan to review and update your plan annually. Continue to document Micro and Small Purchases made for school nutrition program and organize documentation of procurement events. The next Administrative Review will review Micro, Small and Formal purchases. Monitor AEA contract pricing and maintain documentation of price changes. Be aware and expect ongoing guidance and training opportunities for training on Procurement from Bureau of Nutrition. All bids are to include a Buy American Provision. Formal Procurement IFBs and RFPs are required to be advertised.
1000 - Local School Wellness Policy	1001 How does the public know about the Local School Wellness Policy? Provide documentation to support the response (or appropriate web address(es)).	WELLNESS: Wellness Policy and Assessment of Goals is to be reviewed every three years, not five years. How is the community and others invited to participate with Wellness? Post Wellness Assessment along with Policy. This is also an excellent location to invite community to be involved in wellness.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.	ANNUAL TRAINING: Recommendations for all nutrition staff: Meal Pattern Review for Lunch, Breakfast and Afterschool Snack, Offer versus Serve and HACCP Standard Operating Procedures. Shared webcasts to watch as a group: Meal Pattern 101 (Lunch) Rise and Shine: It's Breakfast Time (breakfast), Summer Short Course Training "Healthy School Meals" (breakfast, lunch, food production records and required documentation). Team Nutrition Webcasts on Food Production Records. <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition">https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition</a> . There are updated Civil Rights Training on IowaCNP under Download Forms.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	FOOD SAFETY PLAN: A HACCP plan was created following previous review. Standard Operating Procedures should be pertinent and be implemented in your operation and reviewed with staff annually; sign and date. Refer to checklist in FOOD SAFE SCHOOL ACTION GUIDE. Attend HACCP Summer Short Course Training or HACCP Boot Camp trainings next fall. SFAs must also have either two food safety inspections per year for each site, or have documentation that two inspections were requested.

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**Site - Level Technical Assistance Lamoni High School High School (0172)**

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	318 At the selected school(s), does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	MEAL COUNTING: Recommend allowing students to enter their own personal PIN number into the keypad instead of cashier so cashier focus on confirming that meals are reimbursable.
400 - Meal Components and Quantities - Lunch		Continue collecting CN labels and Product Formulation Statements for all products served in cycle menu to correctly verify how all products credit in meal pattern. A Product Formulation Statement is an alternative for crediting information when you cannot get a CN label. Note this is not the specification sheet from your distributor. Technical Assistance on how to use the Exhibit A Grain Chart for crediting bread and grain items which may not have documentation.
400 - Meal Components and Quantities - Lunch		PRESCHOOL MEAL PATTERN: A new preschool meal pattern which was required to be implemented by October 2017. Lamoni preschool classrooms serve family style in the classroom, so it will be expected to move forward with serving the new meal pattern which includes less sugar (check labels on yogurt, cereal and no grain based "desserts"). Webcasts and resources can be found at: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition">https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition</a> and in "Download Forms" in IowaCNP.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve? If NO, explain and list the technical assistance provided.	Technical Assistance on implementing a Share Table to reduce food waste. Offer vs Serve should be first reinforced as a means to control unopened foods such as fruit, juice and milk. Refer to Food Waste handout for guidance from Department of Inspections and Appeals regarding sharing only foods without time/temperature concern to minimize food safety issues. A campaign on limiting food waste by reinforcing Offer vs Serve and starting a "share table" may be a great wellness policy project!
600 - Dietary Specifications and Nutrient Analysis	603 Were any areas identified during the Off-site review requiring technical assistance or corrective action prior to the beginning of the On-site portion of the review?	BREAKFAST MEAL PATTERN: Staff were unaware of the 1/2 cup fruit requirement for breakfast.
800 - Civil Rights	811 Did meal service observations on the day of review indicate that program benefits were made available to all children without discrimination? If NO, explain.	DIET MODIFICATIONS: When a Diet Modification Form is on file pertaining to a milk intolerance, there should be a milk alternative offered. Acceptable milk alternatives can be SOY milk and LACTOSE reduced milk. Best practice to communicate with household regarding acceptability of milk. Offer versus Serve allows a student to decline milk but an acceptable product must be offered. List of milk alternative found <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/national-school-lunch-program">https://www.educateiowa.gov/pk-12/nutrition-programs/national-school-lunch-program</a> .
1700 - Afterschool Snack	1700 Were any areas identified requiring technical assistance or corrective action? If YES, explain.	AFTERSCHOOL SNACK PROGRAM: Technical Assistance provided on Snack menu to meet meal pattern requirements, completing Food Production Records, requiring both components and counting snacks by tally marks at the point of service and requirements to conduct on-site monitoring twice annually - once during the first 4 weeks of school and another by the end of the year. Refer to the Afterschool Snack Program Handbook in IowaCNP Download Forms for regulation guidance and a sample menu. You can always reach out to your state consultant.

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**Org - Level Commendations**

Description
<p><b>APPLICATIONS:</b> Benefit documents 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. Access to benefit information is limited. Free meals are extended to all members in the household. Waivers are provided to applicants and indicate specific fees. The SFA has a back-up system for benefit issuance documents and system.</p>
<p><b>CIVIL RIGHTS:</b> Civil rights poster was posted in the cafeteria. Annual civil rights training was provided to food service staff and documented. The SFA submitted the annual Public Release to local media. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination observed. SFA on-site monitoring was completed although meals are served at one site location. The correct state and federal non-discrimination statements are provided on all materials.</p>
<p><b>MEAL COUNTING &amp; CLAIMING:</b> Meal counts during the on-site review were reasonable when compared to the review month of October counts. Point of Service counts and filed claims appear accurate. There is a point of service at the end of the line for all students, and the POS is orderly. No overt identification of students who receive benefits was observed. Daily edit checks are performed.</p>
<p><b>PROCUREMENT:</b> A Procurement Plan has been developed which includes federal and local thresholds. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. The SFA ensures that no vendors have been debarred or suspended by USDA.</p>
<p><b>RESOURCE MANAGEMENT:</b> USDA foods usage trend has improved SY 2017 - 2018. 60% of Paid Assistance Level has already been effectively utilized this school year. A Meal Charge policy is in place and was provided to all households.</p>
<p><b>VERIFICATION:</b> Correct number of applications were verified and were correctly selected from error prone applications. Income sources were verified with at least one month's income, and process was completed on time. Applications selected for verification were confirmed prior to verification. The Letter of Adverse Action was completed correctly giving households 10 calendar days to appeal and benefits changed within 10 operating days following deadline of appeal. Determining Official attends webinar trainings annually.</p>
<p><b>WELLNESS POLICY:</b> The district has a 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. Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.</p>

**Site - Level Commendations Lamoni High School High School (0172)**

Description
<p><b>AFTERSCHOOL SNACK:</b> Lamoni CSD is "Area Eligible" to offer an Afterschool Snack Program where students receive a snack at no charge along with educational and enrichment activities.</p>
<p><b>FOOD SAFETY:</b> A written Food Safety plan is available. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for food served, refrigeration, freezers and dishwasher.</p>
<p><b>MEAL REQUIREMENTS &amp; COMPONENTS:</b> All meal components were available at the beginning of meal service on the day of observation and throughout meal service. All meals observed met at least the minimum daily requirements. A fruit and vegetable self service bar offers a variety of fresh fruits and vegetables. Water is available as required. Offer vs. Serve (OvS) was correctly implemented. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals.</p>
<p><b>SMART SNACKS:</b> Documentation was available to show that a la carte foods and beverages sold to students in the cafeteria met Smart Snack and Healthy Kids Act standards.</p>