

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Lawton-Bronson Comm School District (35550000)
On-Site Review Dates: January 23-25, 2018

Program Year: 2018
Month of Review: December
Lead Reviewer: Deann Murphy
Org Representative(s): Kristi Ver Steeg

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One student received meal benefits without an application on file.	An application was received from household during on-site review and proper determination was made at that time. No further action needed.	
1000 - Local School Wellness Policy	V-1000	The SFA does not have a formal wellness committee that meets on a regular basis.	The SFA will describe their plans for starting a wellness committee in the district and when (what month) they will hold their first meeting. The committee should invite input from variety of stakeholders, including at minimum a parent, student, foodservice personnel, PE teacher, nurse, school board, administrator and a member of the public.	

Site - Level Findings: Bronson Elementary School (0405)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	126 Are the correct conversion factors used when processing applications that indicate more than one income frequency? If NO, explain.	Discussed with the Determining Official to use the appropriate column in ICAVES when a single income frequency is given - only use the Annual column if annual income information is given or if multiple incomes are given. Also discussed the need for the SFA to have their computer system household letter approved annually by the State Agency before using it or use the State Agency prototype for all household notification. If the SFA prefers to use the letter generated from their own software, send it to Deb.Linderblood@iowa.gov along with form NSLP022.
200 - Verification	206 When a confirmation review was conducted,	Discussed with the Verifying official that it is not appropriate to have the

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		confirming official and the hearing official be the same person. The hearing official needs to be an unbiased person of higher authority than either the determining or confirming official. Also, only in cases where the LEA is aware of additional income or persons in the household should an application be verified for cause.
200 - Verification	212 If a student's eligibility changed due to verification,	Even if a household asks to be dropped from free/reduced price meals or refuses to provide documentation during the verification process, the SFA still needs to give them written notice of adverse action, 10 calendar days to appeal and up to 10 operating days to change their status in the POS.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable):	Visitors must pay the same as adult meals since they are not subsidized by federal, state and commodity dollars which lowers student prices.
700 - Resource Management		<p>PROCUREMENT:</p> <p>The district is using the state-prototype Code of Conduct policy. The local policy for disciplinary actions for violations of the code was not properly identified on the written code of conduct. TA provided that if an existing policy cannot be linked that includes disciplinary actions, these need to be added to the prototype used.</p> <p>Technical assistance given to include all anticipated purchases for SY 2017-2018 on the Written Procurement Plan.</p> <p>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 IowaCNP.</p> <p>When using the micro-purchase method, purchases must be equitably distributed among vendors to "spread the wealth."</p> <p>When procuring milk and/or 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 if these are going to be procured separately from your Group Purchasing Organization.</p> <p>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.</p> <p>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.</p> <p>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, 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.</p> <p>The food service director should spot check invoices from the Prime Vendor to ensure products delivered match the order and the specifications of the product solicited. Price on the invoice should match bid pricing. Items not in the bid specifications must be procured using the</p>

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		appropriate procurement methods. 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 commodity is accepted. Food service equipment repair and preventive maintenance should be an indirect cost to the school nutrition fund. Other indirect costs were communicated to the authorized rep.
1200 - Professional Standards	1221 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	Recommend the cashiers at each building have annual training on what makes up a reimbursable meal as well as how to run the POS.

Site - Level Technical Assistance Bronson Elementary School (0405)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students?	Breakfast signage should reflect actual items served and how they count toward the menu of the day. Current signage is an example template and does not reflect how the FSD actually counts the food items. A blank signage template was e-mailed to the FSD for future use.
1100 - Smart Snacks in School	1105. a. Review 10% of the food and beverages sold during the review month. Do foods and beverages sold to students during the school day (defined as 12am on a day of instruction to 30 minutes after the end of the official school day), including a la carte foods and beverages sold during meal services, meet Smart Snack standards? (Includes food items sold during non-exempt fundraisers) If NO, explain.	If an entree is served the day it is menued or the next day, it is exempt from Smart Snacks rules. All other entrees must meet Smart Snacks requirements and have calculator documentation.
1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	The most recent food safety inspection report needs to be posted in a public place in both schools in the district.

Org - Level Commendations

Description
Benefit documents, as well as all paperwork, were extremely well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. Applications on file were correctly determined and complete with SSN's and case numbers, 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. Eligibility is kept confidential.
Fiscal action seems to be less than the USDA allowed disregard so no claim adjustments will be needed for this review.
Food Service Director, School Nutrition Staff, and Authorized Representative work well together to manage the school nutrition program.
Professional Standards requirements were followed when hiring a new FSD. Both nutrition staff and non-nutrition staff have received training and most have completed their training requirements. All training is tracked to ensure minimum training hours are met.
The And Justice for All civil rights poster was posted in both cafeterias. Annual civil rights training was provided to all staff involved in the Child Nutrition Program 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 summary form was 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 can be found on all notification letters as well as the posted menu.
The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The applications selected for verification were confirmed prior to verification.

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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. An assessment of the policy goals was completed for each building.
The district makes the area summer feeding program information available to households so they can take advantage of free meals during the summer months. They promote breakfast to the students during the school year.
The Foodservice director does a good job in menu planning. All components and subgroups were provided in their minimum amounts in the review week menu. Calorie, saturated fat, trans fat and sodium levels seem to be met based on the completed dietary specifications assessment tool. Many low-fat/low-sodium foods were found in the storeroom. The FSD has planned some fun items into the menu, i.e. Jonny Pop, churro, etc. that students enjoy and contribute to the meal pattern requirements. When possible, students have choices between different types of fruit, vegetables and grains. Food production records were detailed, complete and on file for all meals served. Foodservice staff and the cashiers at the elementary were very pleasant and helpful to their student customers. All students had a reimbursable meal on the day of review. Water was available as required. CN/PFS/Nutrition Facts labels were very well organized and showed that all components were met.
The Resource Management section of the Off-Site Assessment tool was completed on time. December receipts that were reviewed indicated appropriate and allowable expenditures. The Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the tool. The SFA effectively utilizes its USDA entitlement for commodities, using 113% of their entitled funds in SY2016-17. They take advantage of Diverted Foods for processed food items and are considering participation in the DOD Fresh Fruit and Vegetable program. Reports are filed on time, and all records are maintained for at least three years plus the current year.
The SFA has a written Procurement Plan that includes federal and local thresholds, procurement methods, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA also has a written Code of Conduct which includes conflicts of interest, accepting items of monetary value, and checks and balances.

Site - Level Commendations Bronson Elementary School (0405)

Description
A la carte purchases are allowed with the 5-6 graders. These all meet Smart Snacks requirements with calculator documentation to back them up.
Meal counts during the on-site review were reasonable when compared to the (December) review month counts. Meal count totals for the month of December appeared accurate and complete. There was a point of service, POS, at the point where meals are served for all students observed. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
The SFA has a district-wide written Food Safety plan that includes the required elements. 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.