

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Maple Valley-Anthon Oto Comm School District (40330000)
SNP - Review ID: 4742

Program Year: 2018
Month of Review: January
Lead Reviewer: Brenda Windmuller
Org Representative(s): STEVE OBERG

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	1 application (2 students) approved as reduced should have been Denied.	SFA should describe how they will process applications in the future to ensure accuracy.	
1200 - Professional Standards	V-1200	PROFESSIONAL STANDARDS ANNUAL TRAINING: All employees working with compliance of the NSLP are required to meet a certain number of annual training hours as outlined in the TA; however, they must receive and complete training on the topics and areas applicable to his/her job. Training must be recorded.	Submit a plan to assure that all positions who provide functions to the safe and compliant operation of the USDA School Nutrition Program will be trained to carry out those duties. Include 1. A comprehensive list of all employees involved in the School Lunch Program, 2. What trainings they plan to take, 3. The date they plan to take the class and 4. The number of CEH for each class. 5. Include one-half hour of Civil Rights Training for each person in this plan which will complete the 1 hour of required training for 2017/2018.	

Site - Level Findings: Anthon Elementary (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
500 - Offer versus Serve	V-0500	During the On-site review 3 lunches did not contain the required components (1 had peas and milk only, 2 did not have fruits or vegetables.) 3 Breakfasts did not contain the required items (1 was missing fruit, 2 did not have 3 items.)	SFA will explain how they will monitor components/items on student's trays in the future to ensure that all students have a reimbursable meal. SFA will also identify whose responsibility it will be to check the trays.	

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1400 - Food Safety	V-1400	<p>Buy American: During storage facility observations review 2-3 products from each food category (grains, canned fruits/juice, canned vegetables/juice, herbs/spices, condiments, frozen fruit/juice, frozen vegetables/juice, frozen meat, refrigerated foods) labels were checked for the country of origin. Pineapple, tropical fruit and mandarin oranges you may not find being made in America.</p> <p>Canned tuna from Thailand was found in violation of the USDA Buy American policy. U.S. alternatives are readily available and affordable.</p>	SFA will submit a plan that describes how the SFA will ensure only American made products are purchased.	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	135 Did the SFA accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document? If NO, explain. Record errors on the SFA-1.	TA was provided to be sure benefit eligibility in POS reflect accurate and up to date eligibility status.
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>Must have signed debarment certifications kept on file.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Agreements valued at \$10,000 or more should have an exit clause.</p> <p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p>

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		<p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none"><input type="checkbox"/> All price adjustments throughout the year<input type="checkbox"/> All invoices<input type="checkbox"/> All contracts and agreements<input type="checkbox"/> All bids solicited<input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)<input type="checkbox"/> Documentation of why you selected a specific vendor<input type="checkbox"/> Copies of bid solicitation <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$3500 (or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.<input type="checkbox"/> Purchases should be distributed around community, not just one store. <p>Small Purchases- Purchases that are under \$150,000 (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none"><input type="checkbox"/> Include all terms and conditions<input type="checkbox"/> Include terms: Buy American and Equal Opportunity<input type="checkbox"/> Attain Signed Debarment Statements
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		<input type="checkbox"/> Awarded on lowest price (unless written documentation to justify) <input type="checkbox"/> Maintain documentation Formal Purchase- Purchases equal to and exceeding \$150,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used. <input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised. <input type="checkbox"/> Include all requirements of a small purchase <input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. <input type="checkbox"/> Everything must be in writing.
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	The lunch and breakfast menus are missing the non-discrimination Statement. Discussed with the FSD including this on all program materials. A copy was provided to SFA. All employees working with the NSLP are required to have 1 hour of Civil Rights Training each year. Only .5 hour has been completed so far in 2017/2018, must complete another .5 hour. SA shared ideas for this training.
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.	Completed Wellness Assessment was not available to the public. It was posted on the web site during on-site review. TA was provided that the Wellness Policy and Assessment must both be reviewed at least once every 3 years.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.	<p>The SFA should maintain detailed records of Professional Development to include employee's name, position, title of training, and date of training, length of training, topics covered, learning objectives, and sign in sheets or certificates of completion.</p> <p>Food Service Director was advised to maintain a spreadsheet tracking training. All Food Service staff and SFA employees working with the School Lunch Program are required to take 1 hour of Civil Rights annually. Training hours should meet the following guidelines:</p> <p>Director- 12 hours annually</p> <p>Manager- 10 hours annually</p>

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		<p>Full-Time Staff- 6 hours annually</p> <p>Part-time Staff- 4 hours annually</p> <p>Discussed possibility of group training.</p>
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.	The SFA is required to promote breakfast 2 times per year. SFA is doing this once at the beginning of the school year. SFA added a banner to their web site during the on-site visit to promote School Breakfast Week.
Resource Mgt Comprehensive Review	8 If so, was the equipment included on an approved State agency equipment list or did the SFA otherwise secure prior approval from the State agency before purchasing the equipment?	When purchasing equipment valued at \$5000 or more, SFA should look to see if the item is included on an approved State agency equipment list or SFA should secure prior approval from the State agency before purchasing the equipment?

Site - Level Technical Assistance Anthon Elementary (0409)

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)?	Each student must provide their name or number or other form of identification at the Point of Sale for each meal. POS operator must stay at station during entire meal service in order to accurately collect and record this information.
400 - Meal Components and Quantities - Lunch		<p>Lettuce mix on the salad bar was not 50% spinach and 50% Iceberg as indicated on the production records. SFA must follow recipes as it affects the crediting of the food in meal patterns.</p> <p>SFA should include on the production records the quantity of an item served. (example: Breakfast Bites, 3 each)</p> <p>One tri-tater is only 1/4 cup by volume, SFA should make adjustments to serving sizes to ensure adequate vegetables are served daily.</p> <p>Tavern meat (loose meat sandwich) is counted by weight, not volume. SFA should weigh how much meat fits in the volume scoop being used for service to ensure proper serving size. Record this on your recipe.</p>
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students?	SFA should be posting the menu daily for lunch and breakfast so that students know what to expect on the serving line. Posters showing students what they need to take to make a reimbursable meal are also important. A link to USDA posters was provided.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Reviewed OvS guidelines with staff for lunch and breakfast. At lunch students are required to take at least 3 components, one of which must be 1/2c fruit and/or vegetables. At breakfast students must take 3 item, one of which must be 1/2c fruit. Elementary

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		students at the Mapleton building are Serve Only, they must have the complete serving of all components every day. Discussed changing this site to OvS next year.
600 - Dietary Specifications and Nutrient Analysis		SA sent a copy of the NSLP Manual and the current Meal Pattern requirements to the FSD and the Anthon Site Manager.
1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	The most recent health inspection report was not posted in a visible location as required. The report was relocated during on-site review. Salad bar and storage containers being used are recycled butter and ice cream type tubs and not NSF approved containers. Advised SFA to replace containers with NSF, food safe containers.
1400 - Food Safety	1406 Were the selected relevant temperature logs available for review? If YES to specify which date was selected. If NO explain.	SFA should keep temperature records of food, coolers, freezers, and dishwashers for at least 6 months.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1905 Is the FFVP widely publicized within the school? If NO, explain.	The Fresh Fruit and Vegetable Program (FFVP) is not widely publicized to parents and community. Emailed two resources from Team Nutrition to the food service director and head cook. One resource is Fruit and Veggie morning announcements. The other is fruits and vegetables promotion ideas. For both these resource visit the Fresh Fruits and Vegetables Resources page on the Iowa Department of Education (IDOE) website. The school can also publicize the program by sending a family newsletter. See Pick a Better Snack Resources for sample family newsletters. Information of the program can be posted on the school website.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1907 a. Did the school choose to offer dip with the day's offering?	Fat-free and low fat dressing can be offered with fresh vegetables only. The amount of dip cannot be more than 1-2 tablespoons.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1909 Are teachers who are in the classroom with students during the FFVP meal service the only adults provided with fresh fruits and vegetables? If NO, explain.	It is allowable for teachers and teacher's assistants directly responsible for serving the fruit and/or vegetable to the students in the classroom to consume the FFVP fruits and vegetables. Teachers play a valuable role in modeling eating the fresh fruit and vegetable. Teachers who choose to participate with their students are strongly encouraged to include a nutrition education component to enhance positive role modeling. Nutrition education is not required every time a fresh fruit and vegetable snack is served. There are many nutrition education resources available on the Iowa Department of Public Health (IDPH) Pick a Better Snack webpage including teacher and educator lessons, family newsletters, and fact sheets on a variety of fruits and vegetables. The link to the Pick a Better Snack resources is: https://idph.iowa.gov/inn/pick-a-better-snack .

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1900 - Fresh Fruit and Vegetable Program (FFVP)	1910 Did the FFVP meal service follow HAACP principles and applicable sanitation and health standards, including the handling of any left overs? If NO, explain.	School food service do not have a Fresh Fruit and Vegetable Program Standard Operating Procedure (SOP). Sample SOP provided. Both teachers in the two classrooms visited stated following good food safety practices - students use hand sanitizer available in the classroom or students wash hands as snack is provided right after recess. The teachers use gloves to distribute the snacks. Students are provided napkins. All leftover snacks are discarded. Informed teachers and school food service to provide SOP to substitute staff as well. USDA memo SP 37-2013 addresses the need to establish standard operating procedures to include any part of the facility where food is stored, prepared, or served. For FFVP the snack is served in the classroom, therefore, the school must have a standard operating procedure that specifically addresses the service of the snack in the classroom. It is recommended that the standard operating procedure be shared via email or hard copy with the classroom teachers and substitute staff. Send a reminder after winter break to reinforce the message.
Dietary Specifications Assessment Tool - Breakfast	1 Are specifications considered when purchasing menu items and condiments to limit the following?	Shortening product containing Trans Fats was located in the store room. Product containing Tras Fats are not allowed by the program.
Dietary Specifications Assessment Tool - Lunch		Saltine crackers and Coco Munchies Cereal were found in the store room which were not whole grain rich. All product must be whole grain rich or SFA must have a waiver.
Dietary Specifications Assessment Tool - Lunch	8 Fresh, frozen, and/or low sodium or no sodium canned vegetables are offered, rather than reduced sodium or regular canned vegetables.	FSD was reminded to order low sodium products. Item of concern, canned Chili containing 1240mg of sodium per cup serving. Upon review students are seldom served the product and the portion size is 1/4 cup. FSD was asked to look for another option. FSD should also continue to monitor all canned vegetables coming in are low sodium. SFA was advised that they should never provide salt shaker to students. While this was not observed, staff said that they do provide it on occasion if asked.

Site - Level Commendations Anthon Elementary (0409)

Description

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Anthon Elementary: Food service staff pre-portion condiments and salad dressings to aid in portion control. Portion control is also monitored by using appropriate sized scoop and ladles as indicated in standardized recipes. All tables are sanitized and floors are swept between meal periods.

Certification and Benefit Issuance: Benefit documents, as well as all paperwork, were very well organized. Direct certification is downloaded twice a month as required, denied applications were correctly determined. All applications 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. Access to benefit information is correctly limited. Free meals are extended to all members in the household.

CIVIL RIGHTS (800): The And Justice for All civil rights poster was posted in both cafeterias. 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 form is completed. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. SFA has completed 1/2 of the required 1 hour Civil Rights training.

COMPETITIVE FOODS (1100): Competitive foods and beverages sold to students during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) meet Smart Snack guidelines as outlined by the Smart Snacks Guidelines. Vending machines in both buildings are turned off until 4:00pm every day.

FOOD SAFETY (1400): The SFA maintains a clean and well organized kitchen, following safety standards: food handling, recording temperatures, proper labeling and food storage. Food Service Staff took temperatures of food product and recorded the temperatures daily. Staff wore hair nets and gloves. SFA had a HACCP manual on site with all required components.

FRESH FRUIT AND VEGETABLE PROGRAM: Anthon Elementary School- The Fresh Fruit and Vegetable Program (FFVP) was observed at the Anthon Elementary School. The FFVP is available to all enrolled elementary students (PK - 5 only) at no cost. The FFVP is provided on all operating/school days. The FFVP is offered during the school day (afternoons) but 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 refrigerator. Temperature is checked daily. A temperature log is posted on the refrigerator. The refrigerator is clean and well organized. Snacks are labeled by classroom and dated. A weekly FFVP menu is posted on the refrigerator. Teachers pick up the snack of the day when class comes for lunch. Reviewer observed a couple of teachers picking up snacks. Both teachers washed their hands at the employee hand washing sink in the kitchen prior to picking up the snacks demonstrating good food handling practice. In the dry storage room there is a designated area for FFVP program supplies. The teachers can pick-up needed supplies - gloves, napkins for the snack service from this area. All fruits and vegetables served in January were allowable. On day of review, the snack was fresh strawberries. Although snack service in classroom was not observed, conversation with a couple of teachers indicated safe food handling practices are followed. Both teachers were very appreciative of the program and the positive impact it has had on their students. They are very willing to promote the program and conduct nutrition education with the snack as time allows. Leftover snacks are discarded. The monthly claim for January 2018 was validated. All claim information was well organized. The school receives a separate invoice for FFVP from prime vendor. No operational and administrative labor hours are currently claimed. All FFVP grant dollars are spent in purchasing fresh fruits and vegetables.

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 February appeared accurate and complete. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.

MEAL PATTERN: The menu was complete with all food groups represented and served in their proper quantity at the Anthon Building. Menus for the month of review contained all required components. Water was available to all students during meal times. SFA uses standardized recipes and maintains good production records.

PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events, and specifications were well-written and comprehensive. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest. SFA completed the signature page and the Off-site Procurement Tool. FSD attended Regional Procurement Training in October 2017.

RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed, indicated appropriate and allowable expenditures. The Paid Lunch Equity (PLE) tool was completed and prices were increased as indicated by the PLE tool. Reports are filed on time, and all records are maintained for at least three years plus the current year. SFA is resourceful and manages the funds in Lunch account well; apply for grants as opportunities arise. Recently awarded an equipment grant for a new cooler. Errors are not expected to exceed the \$600 USDA disregard level, no Fiscal Action will be required.

SUMMER PROMOTION (1600): The SFA does an excellent job of promoting their SFSP with reminder signs, posting menus on the website, newsletters and packets sent home with elementary students on Fridays. Numbers have been increasing over the years as they have been offering a consistent SFSP throughout the entire summer.

Superintendent, FSD, and Site Manager all have great attitudes about making improvements for the NSLP. They all had an eagerness to make modifications during the on-site review, fixing most issues on the spot.

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VERIFICATION (200): 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 SFA had at least one person attend training. The verification report was completed accurately and on time.

WELLNESS POLICY (1000): The district has a current wellness policy on file which was updated October 2017. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. Committee meets at least once per year. The latest assessment of the policy was completed. The SFA is incorporating wellness initiatives across the district to include FFVP education, fruit & vegetables available on salad bars, PE and science curriculum and students are encouraged to carry water bottles.