

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Marcus-Meriden-Cleghorn Comm School District (40680000)
On-Site Review Dates: February 13-15, 2018

Program Year: 2018
Month of Review: January
Lead Reviewer: Deann Murphy
Org Representative(s): Joe Mohning

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Five errors were made on 3 applications resulting in a 5.15% error rate for the district. Errors made were related to no Social Security number listed or no adult signature written on income applications.	3 of the 5 errors have been fixed on-site. The SFA will submit the remaining corrections to the State Agency.	
200 - Verification	V-0200	The Verification process was not completed accurately. There was no confirmation review done as required prior to sending out household notifications. The SFA did not follow up at least once with the household that did not respond prior to ending their benefit level. The Verification process was not completed by the November 15 deadline.	The SFA will describe the process they will use for verification. In the response, please address each of the following: 1). who will be the SFAs confirming official 2). who will follow up with non-responsive households after their verification notice has been sent and how will you document that this has been done and 3). state how you will ensure that the entire verification process will be done no later than November 15 each year.	1) It has been determined that a School Cook (Gina Meyer) will be the determining individual and the Business Manager (Joe Mohning) will be the confirming individual. 2) The Business Manager will follow up with the non-responsive households after their verification notice has been sent. The SFA will use a verification tracker in order to document each step is completed. 3) The Business Manager will begin the process on October 2nd. (This was not the current practice)
1000 - Local School Wellness Policy	V-1000	The local wellness policy has not been made accessible to the public as required. The SFA has not yet completed an assessment of policy goals or made their assessment available to the public.	The SFA will state when they plan to complete the assessment of the local wellness policy goals for Marcus-Meriden-Cleghorn CSD. They will also state how both the most recent local wellness policy and goal's assessment will be made available to the public. If the assessment has been completed, please attach it to your corrective action response. If you have already posted the policy and goal assessment, please write the website address where they can be found.	The SFA's School Improvement Advisory Committee will meet in April to go over the wellness policy as well as completing the assessment. Once this meeting is concluded the assessment and policy will be posted to the District's website (www.mmcruroyals.org).
1200 - Professional Standards	V-1200	The SFA is not tracking their Professional Standards training as required.	The SFA will complete a tracking form of their choice and submit it to the State Agency to show that completed trainings are being tracked for all staff involved with the child nutrition program. Two sample tracking templates were sent to the FSD. These templates contain the minimum information needed on the tracking form.	
Resource Mgt Comprehensive Review	V-RMCRF	The SFA has a net cash resource balance that exceeds the 3 month expense maximum allowed and there is no plan in place as to how to spend that down.	The SFA will submit their plan outlining how they intend to spend down their net cash resource balance to at or below 3 month's worth of expenses.	The SFA will use a couple of different options in order to reduce the cash balance. The first will be one-time expenses and the second will be reducing the costs of extra items on the menu. The one-time expenses will include the

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				<p>following: Re-tin mixing bowls (\$500), purchase a new steam table (\$1,500), purchase a new washer and dryer (\$1,000), overhaul the mixer (\$1,500), purchase new serving trays (\$1,500), and purchase an additional double door fridge (\$3,000). This will create approximately \$9,000 worth of expenses. The second option will not have as quick of a result but will draw down the cash balance over time. The cost of milk will be lowered to \$0.25 creating a \$1,500 decrease per year. The price of the second entree will be dropped from \$1.50 to \$1.00 which will decrease cash by \$2,500 per year. All other extra items will be sold at \$0.25 each and will create another \$1,000 decrease in cash per year. In total that would be a \$5,000 decrease per year and would get our cash balance in compliance in 5-6 years. We do not want to do this any faster with price decreases because once the number is hit they will need to be adjusted to remain stable. If we decrease the amounts too much then we will be in a position to be negative.</p>
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Site - Level Findings: Marcus-Meriden-Cleghorn Elementary (0427)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
500 - Offer versus Serve	V-0500	At breakfast, the SFA is serving a combination of Offer vs. Serve (OVS) and "Serve Only" where students are served all items on the breakfast menu, but offered the opportunity to decline milk or juice. Under "Serve Only," students must take all items on the breakfast menu. Under OVS, they must be offered every item and may decline anything as long as they take 3 items with one being 1/2 cup fruit/juice. The SFA application states they will use OVS for all grades at breakfast. Also, the current breakfast signage which is posted is an example template that does not reflect the menu served each day or show how food items are actually credited.	For your response, please address the following: 1). Since the SFA chooses to use OVS, they must submit training certificates for all foodservice staff showing that they have had training on OVS. 2). The SFA will submit signage for one day's breakfast showing that they are using appropriate signage at breakfast.	1) The SFA will use serve for breakfast starting February 20, 2018.
1100 - Smart Snacks in School	V-1100	Beverages in the vending machine located in the HS part of the school building are not Smart Snack Compliant. Smart Snacks limits beverages available to be sold to students during the school day as those up to 12 oz 100% juice and low calorie beverages with less than or equal to 10 calories per 20 fluid oz. The vending machine currently contains water, 15 oz 100% orange juice, Power Zero and Power-aid with 130 calories per 20 fluid ounces. Also, foods sold a la carte in the cafeteria must meet Smart Snacks requirements and require documentation showing that they are compliant. No documentation exists for these foods. Entrees sold with the reimbursable meal are exempt from the Smart Snacks rule.	The SFA will state 1). how they intend to become compliant with Smart Snacks in the vending machine and 2). who will be responsible to ensure only compliant beverages are stocked in the vending machine. The SFA has posted a sign stating that high calorie desserts will not longer be sold as seconds in the cafeteria so this portion of the finding seems to have been corrected.	The District is going to do one of two options. They are either going to remove the non-qualifying beverages in the vending machine or put the machine on a timer. This timer will have the non-qualifying beverages be unavailable for purchase from 30 minutes before school until 30 minutes after school. If the first option is selected the Student Council is responsible for the types of beverages in the machine. If the second option is chosen, the vending machine company, Chestermans, will assist us in setting up the schedule in the machine.

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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	128 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 complete the "Received By" date when each application is received by the district. Also, please use proper tabs on ICAVES when only a single income frequency is reported. Use the annual tab only if multiple income frequencies or annual or self-employment incomes are reported. Please double check number of names listed on applications vs. how many the family is claiming in the household. These do not always match, so should be confirmed with the household before the determining process is complete.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable):	<p>A sack lunch provided for a field trip is served using "Serve Only" meal style so all 5 components must be provided in their full quantities. This includes providing a full 3/4 cup vegetables to all K-4 students or 1 cup vegetables to HS students.</p> <p>The meal charge policy needs to be communicated to all households in the district and to any new students that move into the district as well as to staff. This can be done by posting the policy on the school website, including it in registration materials, student/staff handbooks, etc.</p>
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 identified on the written code of conduct. TA provided to enter policy number and title in the blank line on the state-prototype.</p> <ul style="list-style-type: none"> • Technical assistance was provided to include all anticipated purchases for SY 2018-19 on the Written Procurement Plan including micro-purchases, small purchases and Sole Source Purchases. • 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 template posted on IA_CNP.

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		<ul style="list-style-type: none">• When using the micro-purchase method, purchases must be equitably distributed among vendors to "spread the wealth." If more than one vendor is not available, the SFA needs to state that in writing annually in order to justify only using a single vendor for micropurchases.• 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, breaks, etc.• 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.• Allow vendors a minimum of four weeks from date vendor is contacted to the due date for milk and bread
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		<p>procurement. This is to allow the vendor adequate time to respond.</p> <ul style="list-style-type: none"> • 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 appropriate procurement methods. All updated price lists sent to the SFA by the Prime Vendor need to be kept for 3 years plus the current year. • Food service director or designated individual should check deliveries to ensure Buy American provisions are met. • Food service equipment repair and preventive maintenance should be an indirect cost to the school nutrition fund. <p>The SFA only utilized 92% of their USDA Foods allotment in SY2016-17. The SFA may wish to apply for the DOD program to be able to use some of their USDA Foods dollars for fresh fruits and vegetables. SFAs are encouraged to use at least 95% of their USDA Foods allotment annually.</p>
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	Form NSLP176 on IowaCNP under Download forms is the Public Release that must be sent to the local media annually before school starts. The SFA should keep a copy to show that the Public Release was sent.
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	All staff who take part in the Child Nutrition Program need to have annual civil rights training. If training is done individually, recommend staff take the quiz along with reading the Iowa Civil Rights manual and turn that into the FSD for accountability. Documentation should be kept showing who participated in the training for Professional Standards hours. Updated training using a Civil Rights Jeopardy game can be found on Download Forms and can be used for group training in place of the manual/quiz.
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	The shortened non-discrimination statement of "This Institution is an Equal Opportunity Provider" needs to be on all posted menus.

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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.	The most recent wellness policy needs to be made available to the public - it can either be posted on the school website or in the handbook, etc. An assessment needs to be done of the policy goals, preferably by the local wellness committee, at minimum of every 3 years. Best practice is to assess goals for each building. Since this district whole-grade shares with another school district, separate assessments are recommended for each school. The assessment also needs to be made public. A template of an assessment form was provided to the Superintendent.
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?	Both nutrition and non-nutrition staff still need to meet their professional standards training hours for the year. The FSD needs 12 hours for the year, kitchen staff who work over 20 hours a week need 6 hours training, both kitchen and non-kitchen staff who work with the program under 20 hours a week need 4 hours of training. All training needs to be tracked with one person in charge of the tracking. Certificates need to be on file in order to count the training. One hour annually needs to be from Civil Rights training. Trainings should be relevant to each person's job duties.
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 USDA requires SFAs to promote breakfast to households at least 2 times annually. Promotion should include encouragement to eat a healthy breakfast daily, menu, price and times available. The Summer Meet-Up flier was e-mailed to both the FSD and Business Manager to send to households annually in the spring. The flier promotes the summer feeding programs located throughout the state.

Site - Level Technical Assistance Marcus-Meriden-Cleghorn Elementary (0427)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	Breakfast signage was provided to the FSD to post at the beginning of the meal service line daily listing the menu items being served that day. The FSD has the discretion to determine how items credit, i.e. one item or 2 with a single item. Signage helps both staff and students better understand what they must take to make a reimbursable meal.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	The OVS manual was emailed to the FSD and the rules explained to her as to how to provide this meal service style to students. When using the Serve Only meal serving style with the younger students, every student must take every component on the menu unless they have proper medical documentation stating otherwise.
1400 - Food Safety	1405 Was the SFA's written food safety plan implemented? If NO, explain.	Clean dishes/pans should not be dried with a towel and recontaminated. All washed items should be air dried per food safety regulations. Also, boxes were found on the floor in the storeroom which is not allowed. All boxes should be stored at least 6" off the floor.
1400 - Food Safety	1409 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable? If yes, proceed to b, if no proceed to next question.	Broccoli from Mexico was found in the freezer. Non-American agricultural products should be returned to the vendor and not accepted. Exemptions of this rule are for pineapple, mandarin oranges, bananas which are allowed since they are not produced in the USA in adequate quantities.
Dietary Specifications Assessment Tool - Breakfast	19 Standardized recipes are followed: all ingredients are weighed or measured with standardized weight or measuring utensils.	Standardized recipes are required for all homemade products using 2 or more ingredients. Recipes should include ingredients, a standard yield, and HACCP guidelines, and may ideally include component contributions. Discussed finding pre-standardized recipes in Iowa GoldStar Recipes.

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		Healthy Kansas Recipes or USDA recipes and standardizing them to this SFA or standardizing your own recipes.
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Org - Level Commendations

Description
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 transferred in a timely manner to the POS system, and the denied applications were correctly determined. The correct and current benefit issuance list was available. Access to benefit information is limited. Free meals are extended to all members in the household. Eligibility is kept confidential.
The And Justice for All civil rights poster was posted in the cafeteria. 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 is completed. No discrimination was observed.
The correct number of applications were verified and were correctly selected from the error prone applications available. All income sources were verified correctly.
The district has a current wellness policy on file. There are goals to promote student health, nutrition promotion and education and physical activity. The district's SIAC committee serves as it's wellness committee and they meet at least annually.
The Resource Management section of the Off-Site Assessment tool was completed on time. November 2016 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 has a comprehensive Procurement plan started that dictates what type of purchases they intend to make for the year and how they will manage the contracts. They have a Code of Conduct, complete with conflicts of interest, accepting items of monetary value and checks and balances.

Site - Level Commendations Marcus-Meriden-Cleghorn Elementary (0427)

Description
Meal counts during the on-site review were reasonable when compared to the (January) review month counts. Meal count totals for the month of January appeared accurate and complete. There was a point of service, POS, at the beginning of the meal line. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records were on file for all meals claimed for reimbursement for the review period.
Menus met weekly and daily meal pattern requirements for each age/grade group within the district. The FSD is very aware of and tries very hard to ensure that student's calorie, saturated fat and sodium levels are met in her meal planning. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. Documentation of foods purchased and food production indicated meals contained the required components and quantities. Some CN labels as well as nutrition facts and ingredient labels used for producing meals were on file. Water was available as required. Students had sufficient of time to eat after receiving meals. The elementary cafeteria was well supervised, and staff interacted well with the students. Food service staff was polite and respectful to students, other staff, and each other. All students were observed to have a reimbursable meal during the day of the review.
The SFA has a district-wide written Food Safety plan that includes most required elements. 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, and dishwasher. The kitchen and storage areas were orderly and clean.