

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
MOUNT AYR CSD (45270000)
February 13-15, 2018**

Program Year: 2018
Month of Review: January
Lead Reviewer: Christine Crow
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One student receiving free benefits did not have any documentation proving the determined eligibility status. Technical assistance provided on required documentation and potential fiscal action for this error. The SFA contacted the family while SA was on-site and obtained a valid income application proving the student is free eligible. Three applications (five students) did not have adult signatures on their applications, thus making them incomplete. TA provided to the SFA on complete applications and the SFA obtained to correct signatures by the specified due date. The determining official provided the 30 day carryover of eligibility status to families but did not promptly change the eligibility status to paid after the 30 days. Students who received benefits in the previous year can receive their benefits for 30 operating days before they are changed to paid status. Benefits from a previous year must not be provided after the 30 operating days. Technical assistance provided to the determining official on requirements for 30 day carryover of eligibility status, what is required for an application to be considered complete,	Provide written confirmation that the determining official will take the certification and benefit issuance webinar for the 2018-2019 school year.	

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		importance of documentation, and strongly encourages the determining official to watch the certification and benefit issuance webinar annually.		
200 - Verification	V-0200	Prior to notifying families that they have been selected for verification, a confirming official (someone other than the determining official) must confirm that the original determination of eligibility is accurate and sign on the confirming official line. The SFA did not confirm the original determination of eligibility as no signature was available on the confirming official line. This is a repeat violation. TA provided on verification requirements.	Provide written confirmation that the verifying official will watch the verification webinar for the 2018 -2019 school year.	
800 - Civil Rights	V-0800	The ethnic racial form was not completed accurately and therefore SA was not able to verify if denied applications were disproportionately submitted by minority households. Technical assistance provided to the food service director on how to complete this form.	Submit a copy of the completed ethnic racial form.	
800 - Civil Rights	V-0800	The Federal USDA and Iowa non-discrimination statements must be included on all program materials including menus, student handbooks, and websites that contain information on the district's school nutrition programs. The statements are not included on the SFA's school food service webpage. Current statements can be found at the IDOE website: https://www.educateiowa.gov/pk-12/nutrition-programs#USDA_Nondiscrimination_Statement TA provided and the FSD modified the website to include the federal and Iowa non-discrimination statements: http://www.mtayschools.org/food-service No further action required.	No further action required.	
1000 - Local School	V-1000	The school wellness policy building assessment tool was completed to assess the	No further action required.	

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Wellness Policy		implementation of the wellness policy goals. The wellness policy and the assessment of the implementation of policy goals, both must be made available to members of the public. The policy is made available to the public through the district's website. Technical assistance provided to the food service director and superintendent who agree to put the assessment on the district's website.		
1100 - Smart Snacks	V-1100	The middle and high school building that serves 7-12th grade students, has a vending machine on during the school day that sells water, 10 oz. of 100% juice and Vitamin Water Zero. Although low calorie and no calorie drinks are acceptable for high school students, middle school students can only purchase plain water, 100% juice and milk on the school's campus, during the defined school day (midnight until 30 minutes after the dismissal). Technical assistance provided to the food service director on Smart Snack requirements.	Describe the SFA's plan on how they will ensure that only Smart Snack approved beverages will be sold to the students in the lowest grade group that have access to the vending machine. Provide written confirmation that the Vitamin Water Zero will no longer be made available to the 7th and 8th grade students during the defined school day.	
1200 - Professional Standards	V-1200	Non-food service employees that work 20 hours or less in school nutrition programs must have 4 hours of professional standards training annually, including civil rights training. The authorized representative was listed as the superintendent and had not received any training in school nutrition programs when SA arrived. It was decided while SA was on-site that the superintendent would no longer be the authorized representative and that the food service director would take over that role. The IowaCNP application was promptly changed to reflect the change in responsibilities. The cashier at the elementary school must have 4 hours of training annually. The HeadStart/preschool staff who complete the counting and claiming rosters must have civil	Send documentation that the HeadStart staff and the cashier at the elementary school have received civil rights training.	

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		rights training and training applicable to their job responsibilities (food safety, reimbursable meals etc.). The cashier at the elementary school has received some training, but no civil rights training was provided to her or the HeadStart staff. Technical assistance provided on the training requirements and training resources.		
Resource Mgt Comprehensive Review	V-RMCRF	The non-program food revenue tool information located within the IowaCNP 2016-2017 Financial Report was not calculated accurately as there aren't any program food costs entered into the report. Technical assistance and a handout provided to the food service director on what a non-program food is and how to calculate program and non-program food costs and revenue.	Complete the non-program revenue tool found in Download Forms (NSLP150) to show that the non-program food revenue, as a percentage of total food revenue adequately covers the non-program food costs, as a percentage of total food costs.	

Site - Level Findings: MOUNT AYR ELEMENTARY (0436)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	During the observed breakfast, there were 2 students who were counted as having a reimbursable meal when they had 2 items on their tray. SA immediately educated the cashier who required students to go back into the service line to get an additional item. There were 4 students who had less than 1/2 cup fruit on their tray (students had 1 orange slice or 1-2 strawberries) and were counted and claimed as having a reimbursable meal. Students must have 3 items on their tray including 1/2 cup fruit and/or 100% juice. Signage that explains how the menu items served constitutes a reimbursable meal must be posted to help inform students and staff what needs to be on the tray. Although breakfast signage was available, it did not have the correct menu items on it. SA provided TA to the food service director on posting the Building a Health	Submit documentation of training (attendance log or webinar certificate signed by all attendees) that was provided to food service staff on a reimbursable breakfast. Describe who will be responsible for posting breakfast signage daily to ensure students and staff are aware of how the menu items can constitute a reimbursable meal.	

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		Breakfast sign in the service line that describes how the menu items credit. FSD can make laminated signs since they use a cycle breakfast menu. SA provided technical assistance to all elementary food service staff, the cashier and the food service director on what is needed to constitute a reimbursable breakfast.		
400 - Meal Components and Quantities - Breakfast	V-0400	The food production records provided for the breakfast meals served during the review period did not include the serving sizes for all of the main entrée items served. Breakfast food production records did include the serving sizes for fruit, juice, cereal, and milk. The cinnamon roll recipe provided to SA during the review is not the same recipe that is actually being used. Therefore, SA was not able to ensure that all entrée items offered during the review period met the daily and weekly meal pattern requirements. SA encourages the FSD to work with the baker on using the correct cinnamon roll recipe and discarding all other recipes to ensure that the correct one is used going forward. TA provided.	Submit the cinnamon roll recipe that will be used going forward to show how the cinnamon roll credits towards the meal pattern requirements. Submit one day of breakfast food production records that are complete with the serving sizes for all menu items served.	
400 - Meal Components and Quantities - Lunch	V-0400	The school nutrition program makes many homemade items. Although they have standardized recipes on file for many of the homemade items served, the beef and noodles recipe and the Frito lay pie recipes do not provide adequate crediting information for SA to ensure that they are meeting the meal pattern requirements. The beef and noodles recipe used shredded beef that has a CN label. The CN label information was not utilized in determining the crediting information. The Frito lay pie recipe contained canned chili that did not have a CN label and SA was not able to determine how it credited towards the meal pattern. The noodles in the beef and noodle recipe are not whole grain rich. TA provided on	Submit the shredded beef CN label and the beef and noodles recipe that contains the correct crediting information. Submit the label for whole grain rich egg noodles that the SFA will begin using in their beef and noodle recipe. Submit the CN label for canned chili or a chili recipe and the Frito lay pie recipe that contains the correct crediting information. Alternatively, provide written confirmation that the Frito lay pie recipe will be taken off of the menu.	

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		resources for standardized recipes, how to determine the crediting information for a recipe, and whole grain rich items.		
1400 - Food Safety	V-1400	One food service staff person at each site must be ServSafe certified. The food service director is ServSafe certified but there is not a ServSafe certified employee currently at the elementary school. Technical assistance provided to the elementary food service staff and the food service director.	Describe when and who (from the elementary school) the SFA will send to a ServSafe class.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	101 Who is the determining official for certifying household applications (Names and/or position titles)?	The determining official is the person who determines the eligibility status of the income applications received. The secretary is listed as the determining official when the food service director is the person who actually determines the eligibility status of the income applications. Technical assistance provided.
700 - Resource Management		PROCUREMENT: The procurement plan must list all purchases to be made in the next school year including micro-purchases. The current procurement plan reports that dairy and bread were purchased through a formal procurement method when they actually were procured through a small purchase method. Bids sent out for milk and bread must include detailed product specifications, a debarment certification statement, the Buy American provision, and a termination clause (if spending more than \$10,000). Many procurement resources can be found in Download Forms in IowaCNP. TA provided to the FSD and authorized representative.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs? Provide a copy.	The SFA must have a complaint procedure to handle any civil rights complaints related to the School Nutrition Program. Procedures addressing these complaints must follow the following USDA procedures: https://www.educateiowa.gov/documents/nutrition-learning-

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		tools/2017/10/iowa-civil-rights-complaint-procedure TA provided.
Resource Mgt Comprehensive Review	1 Did the SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency?	Based on recent guidance SA received from the IDOE's school finance department, some expenses being charged to the school food service account are unallowable and should be charged as indirect costs. Administrative services, custodian services, garbage, pest control, equipment repair, phone, and utilities should be charged as an indirect cost to the school food service account. Be aware that additional details will be provided through the IDOE's School Finance department and/or the Bureau of Nutrition and Health Services.

Site - Level Technical Assistance MOUNT AYR ELEMENTARY (0436)

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Currently, students at the elementary school are required to take an entrée at lunch even though they are given offer versus serve meal service. Students may take the full serving of all components if they would like, but if students are provided offer versus serve, they must have the option to refuse any menu component as long as they have 2 components on their tray in the required serving size plus at least 1/2 cup fruit and/or vegetable. Technical assistance provided to the food service staff at the elementary school and the FSD.
1300 - Water	1300 Is free potable water available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)?	There is a water fountain directly outside of the elementary school cafeteria that students can use to get a drink of water during meals. SA encourages the SFA to make cups available to students in case any would like a glass of water with their meal.

Org - Level Commendations

Description
CERTIFICATION AND BENEFIT ISSUANCE: • Benefits are extended to all members of the household. • The applications selected for review were determined correctly and benefit status was transferred accurately to the point of service. • The letter of notification of eligibility status was sent to all families on the Direct Certification list and those families that completed an income application and determined to be free, reduced and denied. • Denied applications were determined accurately. • The SFA downloads the Direct Certification list twice monthly and keeps them on file. •

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CIVIL RIGHTS: • The SFA provides income applications and other program materials in Spanish to those families in need. A Spanish speaking employee is also available to translate as needed. • The food service director works with the school nurse and families to meet the needs of any students with dietary needs. The food service director is working to meet the needs of diabetic, gluten free and lactose intolerant students and offers students with a lactose intolerance a milk alternative that is nutritionally equivalent to cow's milk. • Civil rights training was provided to all food service staff with school nutrition program responsibilities. • The "And Justice For All" poster is on display in a public location. • Diet modification statements are on file for students requesting a special diet. • The public release was sent to the local newspaper at the beginning of the school year.

FOOD SAFETY: • The food service director provided a food safety training for all staff at the beginning of the school year. • The SFA has their most recent food safety inspection report posted in a public location and they requested 2 inspections annually as evidenced by a letter sent to the Department of Inspections and Appeals. • Temperature logs were available for hot foods, milk refrigerators, freezers, refrigerators, and the high temperature dishwasher. • The food service director is ServSafe certified. • Food found in storage was stored properly. • Good food safety practices were observed while SA was on-site.

MEAL COUNTING AND CLAIMING: • The point of service line was organized and orderly during breakfast and lunch at the elementary, thus allowing the cashier to ensure all students have a reimbursable meal. • All students at the observed lunch had a reimbursable meal. • The counts for breakfast and lunch were reasonable when compared to the meal count submitted on the claim for the review period. • The review period claim matched the edit check report meal counts.

MEAL PATTERN REQUIREMENTS AND NUTRITION QUALITY: • Food production labels, CN labels and nutrition facts labels are on file for meals and menu items claimed during the review period. • The SFA prepares many homemade items and has standardized recipes on file for many of the recipes prepared. • A fruit and vegetable bar is offered daily to all K-12th grade students ensuring a variety of fresh fruits and vegetables are offered. • Lunch food production records are complete with the menu items served, planned serving sizes, planned and actual number of servings, leftovers and substitutions. The food production records are available for the main entrée, milk, condiments, and fruit and vegetable bar. • At least 2 different and approved types of milk are offered to students. • The menu certification worksheets were completed by the food service director. • Foods found in storage met the Buy American provision. • The daily and weekly meal pattern requirements for all of the menu components, including the vegetable subgroups, were met for the lunch meals served during the review period. • The daily and weekly meal pattern requirements for fruit and milk components were met for the breakfast meals served during the review period. • Posters are on display promoting healthy foods and physical activity. • Lunch signage was posted to inform students how their menu items constituted a reimbursable meal. • Water is available to students during the breakfast and lunch meal as there is a water fountain directly outside of the cafeteria.

ON-SITE MONITORING TOOL: - The on-site monitoring form was completed for breakfast and lunch for the elementary school, preschool and high school prior to February 1.

PROCUREMENT: • The SFA has a procurement plan and a signature page documenting all involved individuals. • The SFA has a code of conduct that contains all of the required elements. • The SFA provided the vendor paid list and the off-site procurement questionnaire. • The SFA followed the correct purchasing methods according to their purchasing policies. • Bids sent to the milk and bread vendors contain information about delivery specifications, products to be procured, and when bid information is due back to the SFA.

PROFESSIONAL STANDARDS: • The food service director and the full time food service staff have received the required number of professional standards training hours for the 2017-2018 school year. • Professional standards training hours are tracked for all employees to ensure that they meet the number of training hours. • Documentation is on file to prove that the food service director obtained all required training hours. • All food service staff have received civil rights training this school year. • The food service director and some food service staff are ServSafe certified.

RESOURCE MANAGEMENT: - The SFA efficiently utilizes their USDA Commodity foods. - The SFA charges the correct paid student lunch price according to the PLE tool and the correct adult lunch price according to USDA requirements. - Revenue generated by the food service account is directly deposited into the school food service account. - All expenses made with school nutrition funds during the review period were allowable. - The school nutrition account has less than 3 months of operating costs in their account. - The SFA has a negative balance policy that is distributed to all families at registration. - School nutrition documents are kept for 3 years plus the current year.

SCHOOL WELLNESS POLICY AND COMPETITIVE FOODS: • The SFA's wellness policy and assessment of the wellness policy goals have been made available to the public as it is on their website. • The wellness policy contains all of the required elements and has been updated in the past 3 years. • The wellness policy assessment has been reviewed in the past 3 years. • A variety of stakeholders have been invited to participate in the revision of the wellness policy and its assessment as the school nurse sends out mass emails to staff and families about upcoming meetings. • Nutrition education is provided to students through posters, bulletin boards, classroom education, taste testing. - Competitive foods available at the

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elementary school met Smart Snack requirements. - The food service director has nutrition calculator printouts available for a la carte and vending items.

SFSP AND SCHOOL BREAKFAST PROGRAM OUTREACH: - The SFA informs families about the SFSP program through social media, information published in the local newspaper and the handouts available through the county public health office. - The SFA informs families about the school breakfast program through updates of monthly menus and signs.

VERIFICATION: • The SFA conducted the standard verification process (3%) and selected the correct number of applications to verify (3). • Applications selected for verification were selected from error prone applications first. • SA approved letters are sent to families notifying them that they've been selected for verification as well as the results of their verification. • The verification process and report were completed on time. • The verifying official collected the correct income information and determined the eligibility correctly.