

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Mount Pleasant Comm School District zz (45360000)
February 6-8, 2018

Program Year: 2018
Month of Review: December
Lead Reviewer: Cheryl Benson
Org Representative(s): Melaney Quereto

Site - Level Findings: Mount Pleasant Middle High School (0209)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Items used for reimbursable meals must have crediting information. (1) The SFA is offering a 4 ounce spoodle of Mandarin Orange Chicken as a 2 ounce equivalent of meat/meat alternate without any way to credit the amount. Meat/ma is credited by weight not volume. For the chicken, a 2.80 ounce by weight portion equals 2 ounce equivalents of meat/ma. Chicken Tetrizzini is counted as 2 ounces meat and 1 ounce grain, but the serving size is smaller than the serving size on the recipe and therefore only credits as 1.75 ounces of meat and .75 ounces of grain. The high school was short on meat/meat alternate that day. (2) A sugar cookie and brownie are frequently menued as 1 ounce equivalents of grain. Without either a CN label or a Manufacturer's Formulation Statement, the items must be credited using the Grain/Bread chart. According to the chart, the cookie equals ¾ ounce of grain while the brownie equals ¼ ounce of grain. (3) The standardized recipes for the Chef Salad and Parfait offered as alternate entrees at the high school need to be updated to reflect actual practice. (4) Fries and Pizza Rounds are sold daily at the high school without documentation that they meet Smart Snack regulations.	For your response, (1) indicate how you will determine the correct serving size for 2 ounce equivalents of meat/ma for the Mandarin Orange Chicken. 2.80 ounces could be weighed on a scale and then measured for volume. Also indicate whether the crediting for tetrazzini will be changed on production records or whether the serving size will be increased to one cup. (2) Indicate that the crediting amounts for the cookie and brownie were changed on all production records. (3) Submit copies of the amended Chef Salad and Parfait recipes. (4) Submit copies of calculator print-outs for the fries and pizza rounds. If they do not pass, indicate that they are no longer sold or submit documentation for replacement items.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	Direct costs are incurred specifically for a program and can be readily identified to a particular objective such as school food service. Examples include food, wages for staff working directly in school food service, and supplies used specifically for school food service. Indirect costs are incurred for the benefit of multiple programs and cannot be readily identified as specific with a	For your response, indicate that utilities, lunch account deposit charges, and other administrative costs currently being charged as direct costs to the Child Nutrition account will be paid by the General Fund and also indicate whether the district plans to then charge Indirect Costs for these items. Also indicate the date when these charges stopped being directly charged to the account. Finally submit the requested	

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		particular program. Indirect costs typically support administrative overhead such as accounting, payroll, facilities management, utilities, etc. Some direct charges are being charged to the Child Nutrition account that must either be paid out of the General Fund or charged as an indirect cost. Specifically, the district is charging 10% of electric costs, Revtrak and Paypal for lunch account deposit services, and also charging some administrative wages and custodial wages. There are other indirect cost issues that were shared with the Business Manager and request for documentation of several charges to the account.	documentation for purchases as indicated in an earlier e-mail and attached below.	
800 - Civil Rights	V-0800	Ethnic/Racial data must be gathered, documented, and maintained with applications at least annually. The information is documented for all students who have applied for benefits whether the students qualify for benefits or are denied.	For your response, complete the form for Ethnic/Racial data and submit a copy.	
1000 - Local School Wellness Policy	V-1000	Each individual goal in the district's Local Wellness Policy (LWP) must be assessed at least every three years in each building. The results of the assessments must be made available to the public. An assessment of goals has not been conducted.	Complete the assessment of goals for the Middle School and submit a copy. Also indicate how and when the results will be made available to the public. (Prototype form is attached.)	
Resource Mgt Comprehensive Review	V-RMCRF	Non-program revenue is revenue from all sales for non-reimbursable food, including adult meals, milk-only sales, a la carte sales, etc. The percentage of revenue for non-program sales must be equal to or greater than the percentage of food costs for non-program food. Non-program revenue, as reported on the 2016-17 Financial Report on IowaCNP indicates that an additional \$36,580 income is required for non-program sales.	For your response, submit a corrected Non-program Revenue Tool. If the corrected tool still indicates that non-program costs must be increased, submit a plan to increase prices. (Blank tool is attached below.)	

Site - Level Findings: Harlan Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Van Allen Elementary School (0454)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	131 Were all direct certifications (SNAP, TANF, FDIPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified? If NO, explain. Record errors on the Certification and Benefit Issuance Error Worksheet, SFA-1.	Direct Certification (DC) is the preferred method of determining benefits. By increasing the number of students who are free via DC, the SFA effectively decreases the number of applications that must be verified and also increases accuracy of benefit determination. The increase in DC would also help if the SFA ever applies for the Community Eligibility Provision. When households apply for benefits on an income application, and indicate in any way that they have—or might have—a case number, it is recommended that the SFA use E-lookup to see if the student can be directly certified.
100 - Certification and Benefit Issuance	134 a. Are free and reduced price benefits provided to students in a manner that assures confidentiality and prevents overt identification during meal service or at any other time in accordance with regulations and FNS Policy Memos.? If NO, explain.	It is recommended that waivers for school fees be more specific and state what fees are being waived. If the waiver itself is not made more specific, then there should be a document on file that indicates what fees are included in the waiver. Households should be able to ask what fees are included.
200 - Verification	202 Who serves as the confirming official? (Name and/or position title or software used is acceptable)	(1) Technical assistance was provided on checking the SFA's Infinite Campus system to ensure that the correct number of applications are verified. The SFA should add together the number of applications in Column A, #4-1, 4-2, and 4-3, multiply time 3%, and round up to determine if the system has selected the correct number of applications. (2) Technical assistance was provided on Confirmation Reviews. Prior to any other verification activity, a determining official, other than the official who made the initial eligibility determination, must review each approved application selected for verification to ensure that the initial determination was accurate. (page 103 Eligibility Manual) The confirming official then signs and dates the application(s). The SFA did not confirm applications prior to verification.
300 - Meal Counting and Claiming		The SFA has one central kitchen that satellites food to all other buildings. Currently, food production records (FPR) are individual for each building. It is recommended that a central FPR be used that includes all quantities for all buildings and grade groups and then use a Transport FPR for satellite sites. On the current FPRs, not all items have the serving size, planned number of servings, etc. The crediting (example-Chicken Tetrizzini) on some items was incorrect. Adult and a la carte planned servings must be separated from the reimbursable planned servings. Quantity prepared on FPRs for meals and for the vegetable bar must be in measurable amounts. (Example-when entering mandarin oranges, enter the number of #10 cans instead of simply saying 100 servings.) All food items must have all information. (Example--alternate entree choices are the same as the main entree choice.) The SFA should also track (at least weekly) the variety of cereals, muffins, fruit, etc. used at breakfast.

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700 - Resource Management		Procurement of milk and bread was conducted by the previous director, and documentation of those bids was not located. Also, there should be no more than four renewals after the original bid, so the SFA should rebid both milk and bread this year. The SFA is also required to have all documents related to their Group Purchasing Organization, including current and past prices, advertisement, original RFP, etc. The SFA should contact AEA Purchasing and request documents.
700 - Resource Management		Resources for Procurement were shared, including documents in Download Forms on IowaCNP and recommendations for terms and conditions when bidding. (1) Technical assistance was provided on Micro-Purchasing. Micro-purchase is when there is no price comparison or bids or quotes. Purchases are simply made from a vendor. When using Micro-purchase, the prices must be reasonable and the purchases must be spread around between all qualified vendors. A Micro-Purchase log is available in Download Forms. (2) Technical assistance was provided for Small Purchase. For small purchase, documentation must be maintained for specifications of what is being procured, vendors contacted, prices offered, and how the decision to select the vendor was determined. At least three vendors should be contacted. Recommendations were made for milk bids. The SFA should multiply out estimated quantities times the bid prices to determine a true 'bottom line' amount which helps determine which one is the lowest bid. (A form for this will be released soon.) The SFA should include terms in the bid such as milk coolers and replacement products if the bid product is not available. (3) To monitor bids, prices should be spot-checked at least monthly. (4) Be sure to include all applicable terms and conditions. For example, all food bids must include the Buy American statement, all bids with a value of \$10,000 and more must have Termination for Cause included, and all vendors must be checked to ensure they have not been debarred from doing business with the federal government. There are other terms and conditions, many of which are found in Section 5 of the state agency RFP and IFB templates in download forms on IowaCNP. (4) The SFA had individual cups of peaches that were not a domestic product. AEA Purchasing should be contacted as well as the vendor to indicate that they are not following the contract.
700 - Resource Management		Technical assistance was provided on completing a comprehensive written procurement plan. A prototype procurement plan is available on the Procurement in Child Nutrition Programs area of the DE website, www.educateiowa.gov . Beneath the prototype procurement plan is a handout that explains the plan column by column. There are also webinars and other resources at this site. There are also several procurement documents in Download Forms on IowaCNP at the bottom of the page.
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	Only 67% of the SFA's USDA Foods entitlement dollars were spent last year which means \$26,000 was left on the table. This year, only 56% has been spent so far, and there is only one more delivery of regular commodities. Only 16% of Diverted Food entitlement has been spent, and 42% of DoD funds. SFAs that spend less than 95% of their entitlement are considered as not fully utilizing assets. It is recommended that the SFA find ways to utilize more commodities,

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		such as offering fresh fruits on daily food bars in place of canned fruit, offer daily fresh fruit at all buildings, etc.
800 - Civil Rights	801 Does the School Food Authority have a Public Release?	All SFAs who participate in Child Nutrition Programs must submit the Public Release to local media each year before the beginning of school. Technical assistance was provided on submitting the release to the local newspaper and documenting the submission. The newspaper does not have to publish the release, and the SFA does not have to pay to have the release published.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	Technical assistance was provided on completing the Ethnic/Racial form. For this form, all students who applied for benefits-free, reduced, and denied--are divided into two identities: Ethnic Identity and Racial Identity. The total in each column for Ethnic Identity must match the total in each column for Racial Identity. Also, each row should equal the total number in column 1. (For example: the total number of Hispanic or Latino applicants must equal the total of numbers awarded free meal status, reduced meal status, and those that did not qualify.)
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	On-site monitoring must be conducted for all sites for lunch each year and for 50% of breakfast sites each year. Lunch monitoring was completed for the high school, middle school, and all elementary buildings, but has not been completed for Christamore or Wisdomquest.
1000 - Local School Wellness Policy		The district is encouraged to put the Wellness Policy (and also the assessment) in a more easily accessible location on the website, or to offer a link from a health page or the school meal's page.
1500 - Reporting and Recordkeeping	1500 Are reports submitted to the State Agency as required? If NO, explain.	The Letter of Notice to Review sent to the SFA in September indicated required questions and documents to complete and submit prior to the on-site review. Several items were not completed prior to the on-site review including the Breakfast Menu Worksheet, Written Procurement Plan, Off-Site Procurement Tool, and two sections of off-site questions--Wellness Policy and Professional Standards. All were completed during the on-site review except the Off-Site Procurement Tool. If the tool is not completed for the next review, that will be a corrective action since the SFA will receive a full procurement review next time, and the off-site tool is important for that review and the timeliness of submitting the off-site portion is extremely important.
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.	Breakfast (SBP) outreach this year was limited to signage and the district's website. Information and outreach for breakfast must be sent to households at the beginning of each year. Information should include sites and times where breakfast is offered as well as menus. The information can be sent home with registration materials, handed out at registration, etc.

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Resource Mgt Comprehensive Review	5 How does the SFA ensure that only allowable costs are charged to the nonprofit school food service account (e.g. staff training, the implementation of checks and balances/internal controls, etc.)?	Technical assistance was provided on allowable expenses. Only costs directly associated with operating Child Nutrition Programs (CNP) can be directly charged to the program. All other costs are either paid from the General Fund or charged as Indirect Costs. When charging indirect costs to CNPs, all other federal programs must also be charged indirect costs. Examples of indirect costs are: electricity, custodians, equipment repair, fuel and repairs for food service vans, etc.,
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Site - Level Technical Assistance Mount Pleasant Middle High School (0209)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation, did all reviewed meals during the review period indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students? If NO, explain any errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record the number of meals observed missing required meal components on the S-1, 15. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 16.	Food Production Records, FPRs, serve many purposes--inventory control, history of what works and what doesn't, participation, and they can help with forecasting. Besides that, they are required by regulation in order to document that a reimbursable meal is being served. FPRs must include the date, school, all food items served as part of a reimbursable meal including condiments; planned serving sizes for all food items for all grade groups, adults, and a la carte; the number of planned servings for all food items including condiments for each grade group, adults, and a la carte; the total amount of each item prepared in measurable amounts such as each, pound, or #10can; the amount of each food item left over; and the actual number served for each grade group, adults, and a la carte. (An example of both breakfast and lunch FPRs were provided as well as a FPR checklist.)
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation, did all reviewed meals during the review period indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students? If NO, explain any errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record the number of meals observed missing required meal components on the S-1, 15. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 16.	The SFA has one central kitchen that satellites food to all other buildings. Currently, food production records (FPR) are individual for each building. It is recommended that a central FPR be used that includes all quantities for all buildings and grade groups and then use a Transport FPR for satellite sites. On the current FPRs, not all items have the serving size, planned number of servings, etc. The crediting (example-Chicken Tetrizzini) on some items was incorrect. Adult and a la carte planned servings must be separated from the reimbursable planned servings. Quantity prepared on FPRs for meals and for the vegetable bar must be in measurable amounts. (Example-when entering mandarin oranges, enter the number of #10cans instead of simply saying 100 servings.) All food items must have all information. (Example--alternate entree choices are the same as the main entree choice.) The SFA should also track (at least weekly) the variety of cereals, muffins, fruit, etc. used at breakfast.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	When offering a self-serve vegetable and fruit bar, extra training for cashiers is recommended. Students go by the point of service quickly and cashiers must make immediate judgements on whether students have a reimbursable meal. All reimbursable meals must have at least a half-cup of fruit and/or vegetable on the tray. A list could be created from the Food Buying Guide to assist cashiers. For example, it takes six 1/2-inch by 4-inch carrots for a half cup of vegetable, or it takes two pear halves to equal a half cup of fruit. Another assistance would be the poster available through Team Nutrition that has pictures of several vegetables on trays to demonstrate serving sizes. It is also recommended that quantities that

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		students can take, especially fruit, be limited. Several students were observed taking multiple cups of fruits and vegetables and then observed throwing much of it away.
1400 - Food Safety	1406 Were the selected relevant temperature logs available for review? If YES to specify which date was selected. If NO explain.	High temperature dishwashers should be temped daily during the final rinse and the results logged. At least once a week, a test strip should be sent through the machine and then attached to the log. If temperatures are not hot enough, corrective action should be taken and the action should also be logged. When testing the dishwasher temperature with test strips, it is recommended that the test strips be saved as part of your documentation.

Site - Level Technical Assistance Harlan Elementary School (0409)

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Offer vs Serve (OVS) is intended to give students an opportunity to select the food they want to eat and to also save money since students do not have to take all components and food items. When implementing OVS, students must be allowed to select their own choices. At Harlan Elementary, the younger students' trays are essentially pre-plated. While it is okay to lead younger children more than older students, they still must have choices. It is recommended that teachers remind students each day when they get a meal count to politely say 'no' to any food they do not want on their trays. For a week or two, serving staff should ask each student if they want each item to get them used to having those choices. With a little coaching, even the youngest students are capable of making food decisions in a timely manner.
1400 - Food Safety	1405 Was the SFA's written food safety plan implemented? If NO, explain.	Harlan Elementary uses a student volunteer to help serve food which is a good experience for the students. Part of that experience should be Food Safety training on basic things such as hairnets, hand washing, and gloving. Either food service staff could conduct training in the classrooms, or provide information for teachers to pass on to students. It is then up to the staff on the serving line to ensure that good food safety practices are followed. If at all possible, it is recommended that a hand washing sink be installed in the cafeteria/gym area or that a portable washing sink be purchased.

Site - Level Technical Assistance Van Allen Elementary School (0454)

Area	Question	Comments
1900 - Fresh Fruit and Vegetable Program (FFVP)	1902 Is the cost documentation for allowable FFVP costs? If NO, explain. Record any unallowable Program costs in the Comments section. Combine amount with any applicable amount in 1901 and record on the S-1, 21. Unsupported costs and/or unallowable costs must be recorded on the Fiscal Action Workbook.	Technical assistance on FFVP administrative labor vs operational labor, and using vegetable dips was discussed as well as where to report the dip in the claim information.

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Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, 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. The correct and current benefit issuance list was available. 380 applications were reviewed and all were correctly determined, 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. Waivers are provided to applicants and indicate specific fees. The SFA has a back-up system for benefit issuance documents and system.</p>
<p>CIVIL RIGHTS: The And Justice for All civil rights poster was posted in both cafeterias observed. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided food service staff 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. No discrimination was observed. The current state and federal non-discrimination statements are provided on all material describing the program including letters and the school's website.</p>
<p>COMPETITIVE FOODS (SMART SNACKS/HKA): Students may purchase only milk a la carte at the elementary and middle school buildings. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.</p>
<p>FFVP: The fruit or vegetable is provided during the school day but outside of regular meal times. The program is publicized and proper food safety practices were observed.</p>
<p>HACCP/FOOD SAFETY: The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. Temperature logs are maintained for all coolers-including milk coolers, freezers, and food served. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.</p>
<p>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 December were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. There was a POS for all students, and the POS was organized and orderly. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. Cashiers are trained, and daily edit checks are performed. All students selected a reimbursable meal.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: During each month numerous choices of entrees, fruits, and vegetables are menued which increases participation and provides opportunities for students to have a lunch or breakfast he or she wants to eat. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. All meals observed met at least the minimum daily requirements. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. The SFA provides a Fruit-Vegetable Bar at the middle school that encourages students to select a reimbursable meal. Water was available as required. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals. Food service staff was polite and respectful to students, other staff, and each other.</p>
<p>PROCUREMENT: The SFA has a thorough written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. The SFA purchases main supplies through (Group Purchasing Org) which helps keep prices down and spreads the responsibility for bidding among more people.</p>
<p>PROFESSIONAL STANDARDS: The SFA followed regulations for the district's size category when hiring a new director. Excellent tracking and documentation was provided to show that the director received the required 12 hours of annual training, managers received the required 10 hours of training, other full-time staff have received at least 6 hours of training, and other part-time staff have received at least 4 hours of annual training. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.</p>
<p>RESOURCE MANAGEMENT & RECORD KEEPING: The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. There were no unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. The Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool.</p>
<p>VERIFICATION: Applications selected for verification 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.</p>
<p>WELLNESS POLICY: The district's Wellness Policy has guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The wellness policy is available to the public.</p>