

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Muscatine Comm School District (45810000)
Dates: January 8-11. 2018

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	<p>Letters are sent to households who have not completed an application during the 30-day rollover allowance. While this is a good courtesy to provide households, there were some errors on the letters. First the letters indicated that a new application runs through 10/5/2018. Applications are only for the current school year. By indicating that they are good through the first 30 days of the next school year, households would then have to be provided with a 30-day rollover after that date. Second, the letters allowed households ten days to appeal the change from last year's benefits to the current year where no benefits have been determined. When households do not apply for benefits, they do not receive ten days to appeal.</p>	<p>For your response, submit a copy of an updated letter with the correct information.</p>	
200 - Verification	V-0200	<p>(1) When using Standard Verification Method, applications for verification must be selected from error prone applications first. The SFA's system did not select error prone applications, and even selected two applications with FIP case numbers. (2) The letter of notification for verification indicates that at least one month's documentation of income must be submitted. One month's documentation was not submitted in some cases.</p>	<p>For your response, (1) indicate action taken to ensure that the applications selected for verification next year are selected from error prone applications. (2) Indicate how you will ensure that at least one month's income documentation is submitted.</p>	
1400 - Food Safety	V-1400	<p>A complete HACCP plan includes comprehensive Standard Operating Procedures, SOPs, at each site; a Process List of menu items; critical control points indicated on recipes; temperature logs with corrective action indicated; annual training; and a plan to periodically review and revise HACCP. HACCP Principles include identifying hazards, monitoring procedures, establishing corrective actions, verifying procedures, and record keeping. At Muscatine the available SOPs were</p>	<p>For your response, indicate the timeline for completing the compilation of Standard Operating Procedures, SOPs, for all building sites.</p>	

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		minimal. The director is planning to have kitchen managers begin the process of compiling SOPs for each building.		
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Site - Level Findings: JEFFERSON ELEMENTARY (0427)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	(1) All meal counts must be taken at the Point of Service (POS) at the time and location where the meal is served. Students must exchange something for his/her meal--name, card, ticket, pin number, etc. On the day of observation, one Pre-K classroom is taking meal counts in the classroom instead of at the POS. (2) The site has a vegetable/fruit bar that is located in the cafeteria, past the POS. Any food served past the POS does not count towards a reimbursable meal, but still counts towards total calories, sodium, etc., unless there is a person stationed full-time at the food bar. On the day of observation, students exited the POS without a reimbursable meal (no fruit or vegetable) and were expected to complete their meal from the food bar. There was no staff member posted at the food bar. The consultant followed up to make sure students did get a reimbursable meal, so the meals were not subtracted from the total meal count.	(1) For your response, indicate how you will ensure that a proper Point of Service is implemented immediately? It is recommended that special attention be paid to this issue during on-site monitoring. (2) For your response, indicate whether the food bar will be moved to a point before the POS, or whether the cashier will make sure that students have a reimbursable meal without including the food bar, or whether staff will be placed at the food bar at all times during meal service. (An unannounced follow-up visit may be conducted to ensure an accurate POS.)	

Site - Level Findings: Central Middle School (0209)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Site - Level Findings: Grant Elementary School (0418)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	113 a. Who has access to the benefit issuance system and/or documentation? (Names and/or position titles):	Since both the director and her assistant work with households to determine meal benefits, work on collecting overdue payments, collect information for special diets, and other private and sensitive information, it

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		is recommended that both be based in an office where other staff and especially other parents and community members may be able to hear phone and face-to-face conversations.
100 - Certification and Benefit Issuance	122 If the SFA is implementing CEP SFA wide skip questions 124-215 and proceed to question 314.	Technical assistance was provided on annual income. Page 24 of the Eligibility Manual indicates that income must be 'current income,' and defines current income as "the gross income...for the current month, or the amount projected for the first month for which the application is filled out, or for the month prior to application. If the income is higher or lower than usual and does not fairly or accurately represent the household's actual circumstances, the household may, in conjunction with determining officials, project its annual rate of income." While the SFA should not verify every annual income indicated on applications, there should be some indication at the time the application is submitted as to why the household is using annual income. It is recommended that the SFA request that households indicating annual income be asked to complete the self-employed section on page 3 of the application, or the SFA should make a note on the application, such as 'seasonal work' or 'erratic pay.'
100 - Certification and Benefit Issuance	136 Did the SFA update the benefit issuance document(s) accurately and in a timely manner, including those students that are new, transferred, or withdrawn? If NO, explain. Record errors on the SFA-1.	Technical assistance was provided on the method of determination of benefits for students. Whenever a household indicates a case number on an income application, it is recommended that the SFA use Elookup to determine whether the household is directly certified since that is the preferred method of determination. There were several students in the selected sample who were approved via income instead of DC. The SFA should go through the applications and check to ensure that all students who should be DC or in the POS as directly certified. It is also recommended that the SFA work with the POS vendor to improve accuracy. A flowchart with preferred methods of application determination is available in Download Forms of IowaCNP.
700 - Resource Management		<ol style="list-style-type: none"> 1. Used stainless steel buffet tables and a spring-loaded stainless steel tray dispenser were purchased. To ensure price was fair, the food service director should document a price comparison of similar equipment available at market price. 2. It was recommended that the small purchase method be used when procuring items such as local corn. In SY 2016-2017, local corn was purchased from the Friends of Muscatine FFA three times. Each transaction was below the micro-purchase threshold. When using the micro-purchase method, purchases must be equitably distributed among local growers to "spread the wealth." 3. Vendors should be allowed adequate time to correct non-compliance with contract specifications, terms and conditions. Allowing a pizza vendor only twenty-four hours to correct non-performance is too restrictive. 4. The Buy American Provision must be included in all procurement of unprocessed or processed agricultural commodities including pizza. 5. The pizza solicitation is a Request for Proposal (RFP) which includes an evaluation matrix. There is explanation on how each

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		<p>factor of the matrix is weighted. Each factor must be weighted with price being the primary factor.</p> <ol style="list-style-type: none"> 6. Federal required terms and conditions must be included when procuring using small or formal procurement. These include the debarment and suspension certification statement, Buy American Provision, termination for cause and convenience, Equal Employment Opportunity Requirement. Refer to the state-prototype small purchase and Request for Proposal (RFP) template. 7. The pizza Product Formulation Statement (PFS) submitted by the vendor awarded the contract was not correct. Pepperoni must have a Child Nutrition (CN) label to count as a creditable food. 8. If an evaluation matrix is to be used to evaluate vendor responses to proposal/offers, then this should be included in the original solicitation otherwise vendor responses should be awarded to the responsive vendor with the overall lowest price. 9. As best practice, allow milk and pizza vendors six weeks from date of issue of the RFP. For Prime Vendor, allow eight to twelve weeks. 10. For Prime Vendor procurement, the original solicitation is using the words "bids" and "RFP" interchangeably. These are two separate formal methods of procurement. 11. If entities are allowed to piggyback on a Prime Vendor contact after it is awarded, it is required that proposal provide what would constitute a material change. 12. Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-domestic agricultural commodity is accepted.
700 - Resource Management	710 Did the SFA sell nonprogram foods including, but not limited to, a la carte foods (e.g., milk; 2nd entrees; Smart Snacks), catering (e.g., foods/beverages for school board meetings; foods for outside entities & programs), and/or adult meals (e.g., meals for teachers, parents, etc.)?	Technical assistance was provided on collaboration between the business manager and director to accurately determine non-program expenses.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?	The SFA is not using the most recent non-discrimination statement. The most recent statements can be found in Download Forms in IowaCNP. All documents in Download Forms are dated so that SFAs can tell whether they have the latest version.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	Technical assistance was provided on on-site monitoring requirements. All sites must have lunch monitored, but only half of all sites must be monitored each year.
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 goals in the district's Wellness Policy must be assessed by building at least every three years. Those assessments must be shared with the public. Assessments have been conducted but not shared with the public. The SFA is waiting until a meeting with Instructional Coaches occurs and then will post assessments on the district's website.

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1100 - Smart Snacks	1101 What is the SFA's process for determining compliance with non-packaged or recipe food items (combination foods that do not have a label)?	All grains sold a la carte must be whole grain rich. Two items being sold a la carte were not whole grain rich. (Animal crackers and mini rice krispie bars). The SFA will use up open cases and return any unopened cases. Staff should check with the director to make sure that future purchases follow Smart Snack regulations.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	(1) Technical assistance was provided on working with staff on compiling Standard Operating Procedures. The SOPs could be divided between staff members to review and make suggestions and then final drafts could be reviewed by the entire group. (2) Food was stored directly on the floor of the walk-in freezer at the middle school. (3) When using sharing tables to collect and share food that students do not want, food that is temperature sensitive cannot be put back into coolers for a second use. The food can be thrown out or donated to another non-profit organization.

Site - Level Technical Assistance Central Middle School (0209)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students?	Breakfast signage was not posted at Central Middle School on the morning of observation. The director was notified and signage was posted the following morning.
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.	Technical assistance was provided on food production records, FPRs. FPRs must indicate adult and a la carte planned and actual servings. Resources were provided to the director and there was a discussion about changes that could be made to current FPRs. (Current FPRs are very complete otherwise and appear to be well-functioning.)
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Chef salads offered as an alternate entree at the middle school do not provide enough grain to meet the weekly minimum requirement of eight ounce equivalents. Two packages of crackers are served with the salad which equal one ounce equivalent per day. Menu plans from the director indicated that additional grain should have been offered. It is recommended that staff be trained that they must request permission to make any additions or subtractions from any recipe, menu, or component.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	During breakfast observation at the Middle School, the cashier was informed that one of the three items students must take in order to have a reimbursable meal is a half-cup of fruit/veg/juice. It is recommended that quick refreshers be provided on Offer vs Serve requirements. Training staff for both breakfast and lunch to look first for a half cup of fruit, vegetable, or juice is an easy way for staff to remember that requirement.

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Site - Level Technical Assistance JEFFERSON ELEMENTARY (0427)

Area	Question	Comments
1900 - Fresh Fruit and Vegetable Program (FFVP)		Teachers and food service staff are encouraged to use the "Pick a Better Snack" nutrition education materials to promote and educate students on fresh fruits and vegetables during Fresh fruits and Vegetables service times. There are a lot of fact sheets on various fruits and vegetables on the Pick a Better Snack webpage such as the one on apples emailed to the food service director. Does not have to be daily. Stephanie posted additional resources on the FFVP webpage on DE website. Go to the following link to find resources such as parent newsletters in English and Spanish. Other resources are coloring pages, educator and teacher lessons, marketing materials, and
1900 - Fresh Fruit and Vegetable Program (FFVP)	1905 Is the FFVP widely publicized within the school? If NO, explain.	Emailed two resources from Team Nutrition with Food Service Director. Encouraged these resources be shared with school principal and teachers at Jefferson Elementary to widely publicize the Fresh Fruit and Vegetable Program. One is Fruit and Veggie morning announcements. The other is fruits and vegetables promotion ideas. For both of these resources visit, Fresh Fruits and Vegetables Resources page on the Iowa Department of Education website.
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.	Fresh Fruit and Vegetables service was observed in two classrooms. In one classroom, proper sanitation practices were followed - students washed their hands, apples were placed on the napkin, and teacher wore gloves when handing the apples. In another classroom, these practices were not followed. The food service director emails the Fresh Fruit and Vegetables preparation and service Standard Operating Procedure to teachers at the beginning of the school year. It was suggested that the message of food safety be reinforced after the winter break.

Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE: The Food & Nutrition Services Administrator has benefit documents and all associated paperwork well organized. She is conscientious and works diligently to ensure compliance with regulations. 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. Five hundred and twenty-five applications were reviewed and all applications 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. Eligibility is kept confidential. 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 the cafeteria. 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. A copy of the district's public release was on file, documenting that it was submitted to local media. 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.</p>
<p>COMPETITIVE FOODS (SMART SNACKS/HKA): Students at the middle school may purchase a second entrée, a second milk, and/or several a la carte items. Documentation was available to show that most foods and beverages sold to students during the school day met Smart Snack and Healthy Kids Act standards, including food sold in the cafeteria, vending machines, school stores, and fundraisers. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.</p>

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FRESH FRUIT AND VEGETABLE: The Fresh Fruit and Vegetable Program (FFVP) was observed at Jefferson Elementary School. Alisha Eggers, Food Service Director did an good job offering a variety of both of fresh fruits and vegetables. The FFVP is operated on all operating days. The FFVP is offered outside the meal service time of the National School Lunch Program(NSLP) and School Breakfast Program (SBP). All fruits and vegetables served were allowable. The monthly time log (sent by Stephanie Dross on 10/23/2015) to track both operational hours was available for the review month (November 2017). A time study was completed to track Fresh Fruit and Vegetable (FFVP) administrative labor hours for Food Service Director and Food and Nutrition Manager. Proper sanitary practices are followed in preparation of the fresh fruits and vegetables. Teacher wear gloves when handling snacks. Leftover snacks are discarded. Cost documentation supported the November FFVP claims - produce served, operational and administrative labor hours, and small supplies. Documentation was well organized.

HACCP/FOOD SAFETY: The latest Health Inspection Report was posted in a publicly visible location. There were no critical areas noted on the report. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. Most kitchen and storage areas were orderly and clean. Food Service workers practiced good gloving procedures. Good food safety procedures were observed.

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 November were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. WinSNAP/WebSmart is used as the school's POS system. 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.

MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, does a superior job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will 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. Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. 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. A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption. The SFA provides a Fruit-Vegetable Bar at the middle school that encourages students to select a reimbursable meal. Standardized recipes are used for food production. Water was available as required. The staff training agenda covered many important topics and shows a commitment to ensure food program compliance. At least two types of milk are offered. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Food service staff was polite and respectful to students, other staff, and each other. The manager at Grant Elementary is patient with young students and makes sure each one gets the meal he or she wants. The Food Service Director completed the Menu Worksheets for the school selected for a targeted nutrition review for a specified week during the review period.

PROCUREMENT: The Food Service Director attended the State Agency's Regional Procurement Training in Iowa City. The written procurement plan for SY 17-18 is available. The local micro-purchase and small purchase thresholds were correctly identified. The procurement event page of the written procurement plan for school year 2017-2018 was completed including all expected procurement events, estimated value of each procurement event, and procurement method to be used. A review of invoices validated the School Food Authority (SFA) is compliant with micro-purchase threshold, costs of the item/service was reasonable. A review of invoice validated the items solicited were purchased. The formal procurement method is used for Prime Vendor, Milk, and Commercial Pizza. The SFA is a member of the Eastern Iowa Purchasing Group. Milk is procured cooperatively with metro area schools in the neighboring Linn county. Bread products are procured independently. Cost analysis is conducted at contract renewal or prior to issuing a new solicitation. The specifications for Prime Vendor allows for vendors to submit pricing for an equal product, thereby keeping the procurement process open and competitive. The Prime vendor contract included most required Federal terms and conditions. The Request For Proposal for Prime Vendor had evaluation criteria identified with price being the primary factor. The milk solicitation bottom line pricing correctly calculated (estimated usage and price per unit for each type of milk).The Food Service Director maintains sufficient records for all Procurement activities. The Food Service Director and her administrative staff monitor invoices to ensure contract terms and conditions are being met. Cost reimbursable contracts are monitored to ensure that discounts, credits and rebates are returned to the Child Nutrition in a timely manner. In SY 2016-2017, twenty six (26) percent above the allocated Planned Assistance Level (PAL) for USDA Foods was utilized, which is excellent.

PROFESSIONAL STANDARDS: Tracking was provided that documents that the director received the required 12 hours of annual training, managers received the required 10 hours of training, most other full-time staff have received at least 6 hours of training, and most other part-time staff have received at least 4 hours of annual training. The director holds regular training for staff, so there is no problem meeting minimum hours, and most staff receive more hours than the minimum required. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.

RESOURCE MANAGEMENT & RECORD KEEPING: Financial records that were reviewed, indicated appropriate and allowable expenditures. 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. The Non-Program Revenue, NPR, is sufficient to cover non-program revenue, so no increase in prices were required. The district does not charge indirect costs to the food service program. Money is not transferred out of the account to support other programs. The SFA very effectively utilizes its USDA entitlement for commodities. Reports are filed on time, and all records are maintained for at least three years plus the current year

SBP & SFSP OUTREACH: School Breakfast Program, SBP, outreach was sent out at the beginning of the year to inform families of the availability of the program. Reminders of the SBP were also sent out throughout the school year. Outreach included announcements, newsletters, the school website, posters, etc. Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer. The information was shared via websites, lunch menus, newsletters, phone calls, flyers, etc.

VERIFICATION: The correct number of applications were verified. All income sources were verified, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification. The SFA had at least one person attend verification training.

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WELLNESS POLICY: The district has a current wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The wellness policy is available to the public. Potential stakeholders are made aware of their ability to participate on the wellness committee.

Site - Level Commendations JEFFERSON ELEMENTARY (0427)

Description

Meal service at Jefferson was observed on January 11. The food service staff found out shortly before meal service that students were being sent home soon due to the weather. That meant that students were coming into the cafeteria out of their usual time slots and not in their usual order. It was a rather chaotic and confusing meal service, but the food service staff and other school staff handled it like pros. They got the students through quickly, and assured them that things were okay. Every student who wanted a hot lunch, received one.
