

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
North Mahaska Comm School District (47760000)
Dates: January 3-4 and 12, 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	Three applications were incorrectly processed. Two applications had income incorrectly entered during determination, but the errors did not change the household's eligibility status. One application was missing the required social security number.	The errors were discussed during the review, and the missing SSN number was obtained. No further response is required.	
200 - Verification	V-0200	(1) One of two applications that were verified was verified incorrectly. The household entered six people on the application, but only five names were on the application. Based on documented income, the household goes from free benefits to reduced benefits. (2) The Verification Report was completed incorrectly. Three DHS letters were entered as case numbers instead of DHS letters. Those three households were incorrectly included in the verification pool. (3) Counts of applications on file by October 1, indicate that only one application should have been verified instead of two applications. (4) Applications selected for verification were not confirmed prior to verification as indicated on page 103 of the Eligibility Manual. Also, the person indicated in off-site questions as the Confirming Official was also the Hearing Official. These cannot be the same person.	For your response, (1) Submit a copy of the letter of adverse action notice that is sent to the household. This was completed during the on-site review. (2) Revise the Verification Report on IowaCNP for both the household that went from free to reduced and the DHS letters on 3-2. (3) Indicate who will attend the Verification Webinar next fall. (4) Indicate who the Confirming Official will be in SY2019, and who will be responsible for ensuring that applications selected for verification will be confirmed.	
300 - Meal Counting and Claiming	V-0300	The SFAs November claim for the Elementary was incorrect due to an error in consolidating the elementary and Pre-K meal counts. The Pre-K paid meal counts were not included in the claim, so the paid meals were short by 326. Consolidating meals makes meal counting errors more common. In general, meal counts are not consolidated in Iowa. Meal counts are claimed by building site which makes errors less likely.	For your response, indicate whether the November claim will be revised or not. (When the error is an increase in the claim, the SFA can decide whether to revise the claim or not.) The SFA will begin to claim the Pre-K as a separate site beginning SY2019.	

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1000 - Local School Wellness Policy	V-1000	Wellness Policy goals must be assessed at least once every three years and the assessment must be made available to the public. An assessment of goals has not been completed or made available to the public.	For your response, submit a copy of the assessment of goals and indicate how and when the assessment will be made available to the public.	
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Site - Level Findings: North Mahaska Elementary School (0427)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	The accuracy of meal counts is extremely important. The method of counting meals at the Pre-K building is not an accurate method. Both lunch and breakfast is checked on a roster for any student whose parent has not called in to say the student will not attend. While this is a good method for determining how many meals to send over to the Pre-K building, it is not an accurate nor an acceptable method of counting meals for the claim. The method must be changed immediately. This error will be submitted separately and immediately for a response. The meal count must be taken at the time the meal is served and in the location where the meal is served. On the day of observation, 16 students were counted for meals but only 13 students received meals.	For your response, submit a detailed explanation of how accurate meal counts will be obtained from the Pre-K building. If the current roster form is to be used, add columns for separate point of service (POS) meal counts for both breakfast and lunch. For your plan, indicate whether staff in each room will take POS meal counts, or whether delivery staff will take meal counts. Since meals are plated instead of served family style, the student must have all elements of the meal, including milk, in order to count the meal as reimbursable. Note: An unannounced follow-up visit may occur within the next year to ensure that an accurate POS is in place.	
400 - Meal Components and Quantities - Lunch	V-0400	(1)Food Production Records, FPRs, indicated that vegetable quantity was short for twelve days for grades 9-12 and for seven days for grades K-6 in November. FPRs also indicated that only ½ cup of fruit was offered to grades K-6 for breakfast for all of November. After calculating the total amount of vegetable used, it was determined that the FPRs indicated the wrong serving sizes for the vegetables, so vegetable amounts were not actually short in November. However, fruit was short and has been short for the entire school year for breakfast for grades K-6. Breakfast FPRs were also not complete. (2) Several non-whole grain (WG) items were observed in storage, but the SFA does not have a whole grain waiver for any of the products. Sliced bread was not WG rich, Keebler crackers, and spaghetti. The director indicated that the bread company delivers non-whole grain rich bread when they are out. The other two items were incorrectly ordered for use. The director was told that in order to use non-whole grain items, she must obtain a waiver from the state office. (3) Pre-K students who are not co-mingled with older students are not following the CACFP meal pattern as required. Seven days in November, grain-based dessert items were served as the grain for breakfast. (4)OVS at breakfast was not correctly implemented. Meals that	For your response, (1 & 3) submit a breakfast menu for both Pre-K and grades K-6 that meets the appropriate meal patterns. Also submit one week of Food Production Records, FPRs, for breakfast for both Pre-K and grades K-6. Finally, submit one week of lunch FPRs that show sufficient quantities of vegetables for all grade groups. (2) Indicate how the problem with receiving the wrong bread from your vendor has been solved. Either refuse the bread and purchase it elsewhere—main vendor or local stores—or have the vendor return with the correct product. Also indicate whether the vendor is charging the same price for non-whole grain bread as the bid price for whole grain rich bread. If so, a refund should be requested. Also indicate what products you will replace the crackers and spaghetti with or indicate the date that a WG waiver was submitted to the state office. (4)Have line staff and cashiers view the Build a Healthy Breakfast webinar that is available on DE website and submit copies of the quiz. Also have them complete the activity “Is This Breakfast Reimbursable?” (5) Signage was shared at the time of the review and will be posted. No further response is required.	

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		included three items without one of those items being a ½ cupfruit or juice, were counted as reimbursable. (5) Required signage forbreakfast which indicates how many items each food credits for was not posted.	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	124 a. Certification and Benefit Issuance Review Method:	Technical assistance was provided on prioritizing eligibility statuses for households. A flowchart was provided.
200 - Verification	206 When a confirmation review was conducted,	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)
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 and bread 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. The SFA should include terms in the bid such as milk coolers and replacement products if the bid product is not available. (The SFA is frequently supplied with non-whole grain bread when the supplier is out.) (3) To monitor bids, prices should be spot-checked at least monthly. (4) When the decision to award a bid to the higher priced vendor is made, the SFA must maintain documentation of how that decision was reached. The decision must be based on documentable reasons.
700 - Resource Management		Technical assistance was provided on the district's Unpaid Meal Charge Policy. Beginning July 1, 2017, all schools were required to have a policy covering negative account balances for school meal programs. The district's policy

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		is not very specific and could lead to misunderstandings by households. Memos, Q and A, and a manual were provided.
700 - Resource Management		Technical assistance was provided on SY2017 usage of USDA Foods. Leaving entitlement dollars on the table costs the SFA money. The director can request that funds be moved from one area of the program to another in order to utilize the funds to the fullest extent possible.
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?	Food and supplies for other people or organizations should not be stored in the food service area or equipment. First, there is a sanitation issue. Are the people who are accessing the supplies trained in food safety, wearing hair nets, washing their hands, etc.? Second, if they are accessing the supplies when food service personnel are not present, how is the security/safety of the food protected and how is theft prevented? Third, if another group is regularly using the equipment as is currently being done, there should be compensation for the use. It is very highly recommended and encouraged that the practice of storing food for the concession stand cease.
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.	Technical assistance was provided on assessing wellness policy goals and sharing the assessments with the public. A prototype assessment form was shared.
1200 - Professional Standards	1214 a. After review of documentation, if the SFA hired any new directors on or after July 1, 2015 were hiring requirements met? If no new directors were hired mark NA and proceed to question 1216.	Technical assistance was provided on tracking Professional Standard's required training hours. When using a sign-in sheet as documentation, the sheet should include date, beginning and ending times, and location. There should also be an agenda or some other documentation of what topics were covered. Technical assistance was provided on Civil Rights training for nominal employees, such as associates who supervise the cafeteria during meals. A one-page CR training was provided to the director. The nominal staff should be provided a copy. This does not need to be tracked on the tracking form.
1200 - Professional Standards	1215 Verify the SFA's response to Q1203 on the Off-site Assessment Tool.	Technical assistance was provided on resources available for training staff. There are modules on Iowa Learning Online Professional Development as well as webcasts and webinars on Iowa DE website. The Institute for Child Nutrition offers a wide variety of training and other resources. The federal, USDA site that was shared is a clearing house for training available from all over the United States.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	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. Principles include identifying hazards, monitoring procedures, establishing corrective actions, verifying

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		<p>procedures, and record keeping. Part of the required written HACCP plan is a list of all menu items divided into the three process categories. Process 1, No Cook includes items such as fresh fruit and vegetables, canned fruit, and cold sandwiches. Process 2, Same Day Service includes the majority of menu items such as cooked vegetables, hot sandwiches, and other entree items. Process 3, Complex Food Preparation includes items such as leftovers and entree items that are prepared the day before and then reheated. There are posters in the HACCP Guidance manual beginning on page 20 that visually explain how to handle each process.</p>
<p>1600 - School Breakfast and SFSP Outreach</p>		<p>For information on summer, SFSP, locations in Iowa, go to complete information about promoting SFSP, go to One resource that could also be shared is the National Hunger Hotline. 1-866-3-Hungry or 1-877-8-Hambre. There is also information on the federal website with ideas for outreach brochures at. This information could be shared via websites, newsletters, phone calls, flyers, etc.</p> <p>SBP outreach can be sent out with registration materials and include menus, locations, and serving times. Students could be encouraged to create posters, the SFA could sponsor a trivia contest, and a daily or weekly reminder could be made on the announcements.</p>

Site - Level Technical Assistance North Mahaska Elementary School (0427)

Area	Question	Comments
<p>400 - Meal Components and Quantities - Breakfast</p>		<p>Offering choices can help increase participation and also increase the amount of food students eat. The SFA could offer a second cold breakfast choice on the elementary side by providing cereal and graham crackers or yogurt or cheese stick, etc. as an alternate entrée.</p>
<p>400 - Meal Components and Quantities - Lunch</p>	<p>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.</p>	<p>Labels and all crediting and nutrient information for products used as part of a reimbursable meal must be maintained by the SFA. That includes CN labels, Manufacturer's Formulation Statements, nutrition labels, and ingredient labels. The labels should come directly from the product and can be removed from the case, photographed, or photocopied. Whenever a new/updated product or a replacement product is received, the new label must be obtained. All labels for all reimbursable meals, including breakfast and lunch, must be maintained on file by the SFA. Most labels were from the vendor, some labels were missing, and some crediting information was missing.</p> <p>Technical assistance was provided on organizing labels. It is recommended that some system of organization be implemented. Some SFAs prefer to organize by day with all labels and recipes in one section for each day and by week. Other SFAs organize by components for lunch and components for breakfast by placing grains, meat/meat alternates, fruits, vegetables, and milk in separate sections. Organizing labels makes accessing the information much quicker and easier.</p>

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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 completing food production records and on various production record templates that are available. A production record checklist was emailed along with state FPR prototypes.
1400 - Food Safety	1402 Is a copy of the written food safety plan site specific and available at each school?	While the SFA has a district-wide Food Safety Plan, there are several improvements that should be made. First, the SOPs have not been tailored to what the SFA is actually doing. Two examples include Personal Hygiene SOP which states that employees will wear aprons and hairnets neither of which is practiced at the SFA. Second is that both the high temperature and chemical dishwasher SOPs are in the plan even though the SFA does not have a chemical dishwasher. It is recommended that the SOPs be tailored for this SFA. One way to accomplish this is to divide the SOPs between food service staff, have them review and make recommendations, and then convene as a group to discuss and determine what each final SOP should include. When unsure if actual practices are allowable, the director should ask for assistance from her Health Inspector.
1400 - Food Safety	1403 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	Technical assistance was provided requesting two health inspections annually. SFAs must request two inspections per year and document the request. The requests can be made at any time during the school year, but it is optimal to request them early in the year. (2) It is recommended that the health inspector be informed that the Pre-K building is a satellite site that has not been inspected, and that the site will be listed as a separate facility on IowaCNP next year.
1400 - Food Safety	1405 Was the SFA's written food safety plan implemented? If NO, explain.	It is recommended that small souffle cups be provided on the condiment table for students who return for additional condiments instead of returning with used trays. It is also recommended that additional condiment use be monitored so that students are not exceeding the sodium guidelines.
1400 - Food Safety	1406 Were the selected relevant temperature logs available for review? If YES to specify which date was selected. If NO explain.	Technical assistance was provided on temperature logs. Whenever temperatures are not within guidelines, the action taken should be noted on the logs. The dishwasher temperature during the final rinse should be logged daily and a temperature strip should be used at least weekly and taped to the log. All thermometers used to temp food should be checked/calibrated at least weekly, and the results should be logged. These practices help ensure that problems are quickly

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		<p>noted and that proper action was taken. It also helps protect the SFA in the case of a food borne illness.</p> <p>Food sent over to the Pre-K building is temped before leaving the kitchen, but it is not temped upon arrival or before serving at the Pre-K. The food should be temped at both locations and both temperatures should be logged.</p>
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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. Out of 188 applications reviewed, only three errors were found. Income was only converted to annual when there was more than one frequency of income, applications were signed by the household member and the SFA, and all applications were determined within ten days. 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. Signed waivers are obtained from applicants for school 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. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. The current state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school's website.</p>
<p>HACCP/FOOD SAFETY: The SFA has a district-wide written Food Safety plan. A copy of the written plan was available at the site reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. 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, as well as for food served. The kitchen and storage areas were orderly and clean. 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. Power School 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. The cashier seemed well trained. All students selected a reimbursable meal. A parent volunteer helped students in grades K-4 with condiments.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, does a good job of menu planning and offering choices. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. All lunches observed met at least the minimum daily requirements. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file for the majority of items. A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily choices of fruits and vegetables encourages student consumption. Water was available as required. Offer vs. Serve, OVS, was correctly implemented at lunch. 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. Signage for lunch was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheet(s) for each school selected for review for a specified week during the review period. Nutrient analysis was not required.</p>
<p>PROFESSIONAL STANDARDS: Tracking was provided that documents that the director received the required 12 hours of annual 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 documented.</p>
<p>RESOURCE MANAGEMENT & RECORD KEEPING: Financial records that were reviewed, indicated appropriate and allowable expenditures. 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. Non-Program Revenue, NPR, on IowaCNP financial report indicated that 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. Reports are filed on time, and all records are maintained for at least three years plus the current year</p>

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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. 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.

VERIFICATION: Applications 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.

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.