

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
New London Comm School District (46890000)
March 13-15, 2018

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Information about individual students receiving free and reduced benefits must be limited to a strict "need to know" for the operation of Child Nutrition Programs. There are eleven people plus the district's AEA who currently have access to the information. Only those people directly administering Child Nutrition programs may have access without written consent from the household. Further information and other exceptions are outlined in a technical assistance.	For your response, indicate the date that access was limited as required by law to only those administering CN programs. Submit a list of people who will still have access and their responsibilities in CN programs or why they need access. Also indicate who will be responsible for ensuring that access remains limited.	
200 - Verification	V-0200	(1) One application selected for verification was incorrectly verified. Income for application determination is always gross income without subtracting any pay deductions. The SFA did not use the total gross pay. The household will go from reduced to paid. (2) When denying or reducing meal benefits, the household must be offered the chance to appeal with a Hearing Official. That official must be someone other than the person who determined or confirmed the application and must be in a higher position than either of them. The SFA indicated that the confirming official was the hearing official.	The SFA sent a letter of Adverse Action to the household and provided a copy of the letter. The letter indicated that the Hearing Official has been changed to the correct person. No further response is required.	

Site - Level Findings: New London Jr-Sr High School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1100 - Smart Snacks in School	V-1100	Beverages sold in vending machines at the junior-senior high school do not meet Smart Snack regulations. Standards for beverages are divided by grades K-5, 6-8, and 9-12. When more than one grade group are in the same building with access to the vending machines, the items available must meet the lowest grades that	For your response, indicate the date the non-compliant beverages were removed from sale at the junior-senior high school. Submit labels for any beverages added to the vending machine to replace the ones removed. Indicate who will be responsible for ensuring that future beverages will meet regulations. An unannounced follow-up visit may be conducted	

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		have access. In this case, that is grades 6-8. The vending machine has water with added sweeteners and sports drinks. Neither of those items are allowable for grades 6-8.	next year to check on compliance. Resources are attached below.	
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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.	Technical assistance was provided on documenting Homeless students. The Homeless Liaison does not need to complete a benefit application. Acceptable documentation is a list of the students, the effective dates, and signature of the liaison. See page 40 of the Eligibility Manual.
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.	<p>The following technical assistance concerning confidentiality requirements for information from free and reduced benefit applications is from the "Eligibility Manual for School Meal Determining and Verifying Eligibility manual." For full text, refer to Section 5, pages 83-94 of the manual.</p> <p>The information provided by families on the free and reduced price application will be used only for determining eligibility for meal or milk benefits and verification of eligibility. LEAs planning to disclose children's eligibility status for purposes other than determining and verifying free and reduced price eligibility must inform households of this potential disclosure. In some cases, the LEA must obtain consent of a parent or guardian prior to the disclosure.</p> <p>Section 9(b)(6) of the NSLA, 42 U.S.C. 1758(b)(6) and regulations found at 7 CFR Part 245.6 explain the restrictions on the disclosure and use of information obtained from an application for free and reduced price meals, as well as the criminal penalties for improper release of information. While the law discusses applications specifically, the disclosure requirements also apply to information obtained through the direct certification process.</p> <p>Disclosure means revealing or using individual children's Program eligibility information obtained through the eligibility process for a purpose other than the purpose for which the information was obtained. Disclosure includes but is not limited to access, release, or transfer of personal data about children by means of print, tape, microfilm, microfiche, electronic communication, or any other means. It includes eligibility information obtained through the application or through direct certification.</p> <p>There are four items listed in the manual where all eligibility information can be shared without a signed waiver: (1) for Child Nutrition Programs, (2) for HAWK-i unless the parents opt out, (3) for the Comptroller General of</p>

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		the U.S., and (4) for law enforcement under certain circumstances. "Need to know" for these items are outlined on pages 87-88 of the manual.
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, and prices bid. The contract must be awarded to the lowest price. (If the SFA wants to determine award based on other criteria, formal procurement must be used via an RFP.) 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. 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. (5) For the SFA's formal procurement with EIPG, the SFA must maintain all documentation and materials related to the procurement including the RFP, contract, any amendments or addendums, prices, advertisement, etc. The SFA is responsible for having all documentation that it would have had the SFA conducted its own formal procurement.
700 - Resource Management		Technical assistance was provided on direct vs indirect costs for wages, salaries, and benefits. Only the wages, salaries, and benefits for food service workers are direct costs. Other employees such as secretaries and custodians must be paid out of the General Fund and then can be charged as part of Indirect Costs.
700 - Resource Management		Technical assistance was provided on Procurement. Resources for creating a Code of Conduct that includes language about accepting items of monetary value in exchange for purchasing, conflict of interest, checks and balances, and disciplinary actions should the code be violated. There is a template attached to the written procurement plan and a template from IASB was shared.
700 - Resource Management	711 Were indirect costs charged to the SFA's nonprofit school food service account?	Technical assistance on Indirect Costs
700 - Resource Management	711 Were indirect costs charged to the SFA's nonprofit school food service account?	Technical assistance was provided on Indirect Costs. Costs that were indicated on the off-site tool are actually being charged as direct costs. A link to the Indirect Cost manual and other resources was shared. The LEA was also informed that equipment repair must now be paid out of the General Fund. The district may then charge Indirect Costs to the

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		SFA. When using Indirect Costs, the unrestricted rate is used and all other federal programs in the District must also be charge for those costs.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?	Technical assistance was provided on putting the USDA and Iowa non-discrimination statements on the District's website. Currently the correct statements are linked to the home page while a Google doc on the Nutrition Services page is outdated. Since the statements only pertain to Child Nutrition programs, it is recommended that it be linked to the Nutrition Services page and the old statement removed.
1000 - Local School Wellness Policy	1006 How does the public know about the results of the most recent assessment on the implementation of the Local School Wellness Policy? Provide documentation to support the response (or appropriate web address(es)).	Technical assistance was provided on making the most recent assessment of Wellness Policy goals available to the public. The most common method is to post the policy on the District's website. It is recommended that the Wellness Policy and Assessment be posted together in the Nutritional Services section of the website. At the current time, the policy itself is difficult to locate.
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.	Post LWP assessment. Make LWP easier to find.
1200 - Professional Standards	1203 a. If a new School Nutrition Program Director has been hired, did they complete food safety training within 30 days of being hired?	The current Food Service Director, FSD, indicated she is considering retirement in the next two years. Technical assistance was provided on hiring requirements for districts with enrollment under 2,400 students. However, a change in requirements has been proposed. Once there is more information on the changes, the SFA will be notified.
1500 - Reporting and Recordkeeping	1501 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits? If NO, explain.	Technical assistance was provided on ensuring that records from Power School associated with Child Nutrition Programs must be maintained for three years plus the current year. Currently, Power School does not retain records past one school year. The SFA must determine how to save the records--print and file, electronic backup, etc.
1600 - School Breakfast and SFSP Outreach	1600 How did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	Breakfast outreach must be conducted at the beginning of each school year and throughout the year. Outreach at the beginning of the year must (at a minimum) indicate the locations and times of meal service and should be sent out at the same time as registration materials.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	TA on SBP and SFSP outreach

Site - Level Technical Assistance New London Jr-Sr High School (0172)

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast		Technical assistance was provided on increasing breakfast participation by secondary students. A Grab and Go breakfast could be provided in the commons area of the high school. A "second chance" breakfast could also be offered during the first and/or second period study hall. Grab and Go lunches are also a possibility for secondary students--especially free and

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		reduced students who are leaving campus and may not have the funds to purchase food. Participating in the Special Milk Program for Pre-K was also discussed.
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 on requesting two health inspections per year and documenting the request. It is recommended that the director request both inspections at the beginning of the year by e-mail or letter and keep documentation of the communication.

Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE: The official who determines benefit applications does an excellent job. Almost 200 applications were reviewed, and there were no application errors in either determining benefits or in entering benefits into Power School. All applications were complete with household signatures, dates, and social security numbers, and all applications were determined within the ten day limit. The current application form and guidelines were used, direct certification is downloaded twice a month as required, and the SFA does an excellent job of making notations about other students in the household. Rollover applications were removed if the household did not apply within thirty days of the school year. 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. Corrective action and technical assistance from the 2014-15 review were not repeated</p>
<p>CIVIL RIGHTS: The And Justice for All civil rights poster was posted in the cafeteria. 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. 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>COMPETITIVE FOODS (SMART SNACKS/HKA): Students in grades K-8 may only purchase milk a la carte. High school students may also purchase a selection of beverages and a second entrée at the end of lunch if there are extras. Second entrees are correctly documented on production records. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.</p>
<p>HACCP/FOOD SAFETY: The SFA has a district-wide written Food Safety plan that includes all required elements. The director and her staff went through all of the Standard Operating Procedures, SOPs, this school year to determine best practice and to make updates. The director emphasizes some items by making them red in color. A copy of the written plan was available, and SOPs have been implemented in the kitchen. It was evident that the HACCP plan is frequently updated and training is provided to staff. 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. 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 February were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. 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. Cashiers are trained, and daily edit checks are performed. All students selected a reimbursable meal.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, does a superior job planning menus that meet meal pattern requirements. The director has created a program that allows here to determine whether calories, sodium, etc., are within guidelines. Food production records were complete and highly accurate due to special efforts by the director. All meal pattern documentation was extremely well-organized. Standardized recipes, nutrition labels, ingredient labels and crediting labels were on file for all menu items reviewed and were well organized. 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 via a Fruit-Vegetable Bar encourages student consumption. 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. At least two types of milk are offered, and water was available as required. Offer vs. Serve, OVS, was correctly implemented. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Required signage was posted explaining what constitutes a reimbursable meal. The signage is superior, and is utilized by students to see not only the day's menu, but also the following day's menu. 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 Worksheets for a specified week during the review period.</p>
<p>PROCUREMENT: The off-site tool was completed, and board purchasing policy and vendor paid lists were submitted. The SFA has a written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The district is a member of a Group</p>

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Purchasing Organization. A signed agreement with the Group Purchasing Organization for SY 2017-2018 is on file. The signed agreement states that the school district agrees to procure food and non-food supplies, small wares, and chemicals through the Group's awarded Prime Vendor. The SFA had copies of the contract and bid prices. Last year's milk bid was also available for review.

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 correctly documented.

RESOURCE MANAGEMENT & RECORD KEEPING: 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, tool was completed, and 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 newspaper, radio, sending menus home, and the school website. 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 website, posters, flyers home, and the newspaper.

VERIFICATION: The correct number of applications were verified and 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 applications selected for verification were confirmed prior to verification.

WELLNESS POLICY: The district has a current wellness policy on file that was updated in the last month. 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. An assessment of policy goals was recently conducted. The district plans to provide the policy to households with a return form for those interested in serving on the committee.