

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
North Tama County Community School District (47850000)
Dates of Review: 4/23/18 – 4/26/18

Program Year: 2018
Month of Review: March
Lead Reviewer: Jean Easley
Org Representative(s):

Site - Level Findings: North Tama High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	4 "guest" students should not be entered as a Paid Student. These meals are not reimbursable and recommend charging adult price because they are not reimbursable.	For your response, state your understanding that visitor meals are not reimbursable.	
400 - Meal Components and Quantities - Lunch	V-0400	B/P (Legumes) were offered in insufficient quantity during focus week of 3/19. 1/8 cup creditable was offered on 3/21 (1/4 cup Black Bean & Corn salsa) and an insufficient amount on 3/23 (.075 cup was offered in chili on potato bar). Garbanzo beans were offered on the salad bar for Grades 4 - 12, however, because the salad bar is located after the POS, the vegetables offered here are not creditable. This is a repeat finding and fiscal action must be taken per USDA regulations for repeat vegetable subgroup findings. Additionally, day of observation was insufficient in offering the required 3/4 cup vegetable to K - 5 on the line; 1/2 cup broccoli + 1/2 cup romaine mix. (Romaine credits for 1/4 cup, but Romaine Mix would credit for less). Technical Assistance given again to change POS to after the salad bar to credit all vegetables offered. This will benefit nutritionally and economically to your program.	For your response, share your plan to change your point of service to be able to credit all vegetables offered daily. State your understanding a FPR will reflect this.	
400 - Meal Components and Quantities - Lunch	V-0400	Food Production Records are missing required information on some days during focus week. Refer to FPR Checklist: 1 - all menu items offered need to be listed. 2 - Total quantity to be prepared must always be included 3- Planned serving sizes for each grade level need to listed, including adult and a la carte.	For your response, submit one day's FPR for breakfast and lunch.	
1400 - Food Safety	V-1400	Milk is an item which requires time and temperature control and may not be offered on a Sharing Table for food safety per Iowa Food Code. This was corrected on site.	State your understanding of this and describe your plan to update HACCP plan to include a Standard Operating Procedure for sharing tables and food handling for employees.	

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Org - Level Findings

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700 - Resource Management	V-0700	INDIRECT COSTS: Instead of direct costs charged to the nutrition fund for cashier time, an "indirect cost" recovery should be considered instead. Districts are not required to capture indirect costs, however, it is an option. An approved rate for each school district is posted on the IDOE website.	State your understanding that nutrition cashier time cannot be charged as a direct cost.	
800 - Civil Rights	V-0800	NON DISCRIMINATION STATEMENT: 1 - Menus must contain abbreviated Non-Discrimination Statement "This institution is an equal opportunity provider." 2 - Include a link on website to include the complete Federal and State Non Discrimination Statement for school nutrition. 3 - Include Diet Modification Form Request on website. Change language to reflect the form must be completed by a "medical authority" that is authorized by state law to write medical prescriptions.	For your response, state that you have made the three changes as described.	
1000 - Local School Wellness Policy	V-1000	A WELLNESS POLICY ASSESSMENT or PROGRESS REPORT must be made available to the public. An assessment has not been completed; the rule requires an assessment be completed every 3 years, at a minimum. The Assessment could be posted with the Wellness Policy on the district website with an invitation extended to participate.	For your response, describe your plan and timeline to complete an assessment of the local wellness policy and your understanding of the requirement to review at least every 3 years and to make available to the public.	
1200 - Professional Standards	V-1200	PROFESSIONAL STANDARDS: Include target number of hours on the training tracker spreadsheet required for each employee. SFA's must have a mechanism to track training that includes: trainee name and title, key area (learning objectives), topic, participants, training time and completion date.	For your response, state your understanding of the expectation that a tracking mechanism must be used annually to track training of all those involved in school nutrition. In addition to FSD and staff, this includes Determining Official, Cashiers, Authorized Representative. Attach the spreadsheet you will use.	
1600 - School Breakfast and SFSP Outreach	V-1600	A requirement is to inform families about the availability and location of free meals for students via the Summer Food Service Program. Additionally, schools must send reminders regarding the availability of the SBP multiple times throughout the school year.	1 - Describe your plan for providing outreach for the Summer Food Service Program. 2 - Describe two additional ways you will promote school breakfast next year.	

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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency? If NO, explain.	ICAVES has been updated to include annual income. Next year, a "Web-Based I Caves" will be offered.
700 - Resource Management (2018)		Discussed the issue of nutrition-related repairs and preventative maintenance are now to be covered under general fund which could be captured under "indirect costs".
700 - Resource Management (2018)		USDA FOOD: Only 66% of Paid Assistance Level (PAL) has been utilized for this school year. Strive to use 100% annually. SY17 82.2% and SY16 89%. Remember to use this allocation, or lose it to another SFA.
700 - Resource Management (2018)		PROCUREMENT: 1 - Plan to review and update plan annually. 2 - Debarment Certification: maintain documentation on file of vendors are in good standing to do business with federal government. Or, a printout from sam.gov page. (Go to quick search - enter name of vendor) 3 - Continue to organize and track procurement events, divided into areas of – micro purchases, small purchases and formal using Micro and Small Purchase Log. 4- Bread and Milk "Bids" are a "Small Purchase" because of your local threshold. Use the language of "price quotations" instead of "bids" which suggest a "formal" procurement. 5 - Manage contract by regularly comparing invoice prices with bid or price quotation from bread and milk.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?	Reviewed the complete USDA Non Discrimination Statement required to post on all materials involved in School Nutrition.
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	PUBLIC RELEASE: maintain documentation verifying a public release was sent, to whom, what date and a copy of publication, if printed.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs? Provide a copy.	Complaints regarding school nutrition discrimination are to be directed to USDA. The process and the form is found here: http://www.fns.usda.gov/civil-rights . Recommended including a link on nutrition page to USDA Non Discrimination Statement where this is located.
1200 - Professional Standards	1219 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. i.e. entered into a tracking mechanism.	PROFESSIONAL STANDARDS: Training must be tracked annually for all involved in school nutrition program. SFA's must have a mechanism to track training to include: name and title, key area (learning objectives), topic, participants, training time and completion date. Include target number of hours on the training tracker spreadsheet required for each employee. Include plan for training and Tracking for: Authorized Representative = 4 hours annual training. Determining Official and Point of Service cashier = 4 hours annual training (if work 20 hours or less per week in Nutrition.)

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1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing in comments section.	HACCP: Food Service Director has a goal up updating HACCP Plan. Include a Standard Operating Procedure for Sharing Table and Self Service Bar. Sample resources provided. Encouraged FSD to attend Fall Boot Camp planned to be offered in Marshalltown in early October.
1500 - Reporting and Recordkeeping	1502 Did the SFA maintain sufficient records to document compliance with the paid lunch equity and revenue from nonprogram foods requirements? If NO, explain.	NON PROGRAM REVENUE: the Financial Report on IowaCNP which is populated using the Certified Annual Report provides the nonprogram revenue tool indicating whether non program revenue contributes adequately to Total Revenue. Please work with FSD in tracking and capturing non program food costs so this report can be as accurate as possible moving forward.

Site - Level Technical Assistance North Tama High School (0109)

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	322 a. Were there any days when the free, reduced price or paid meal counts exceeded the number of free, reduced price, or paid eligible students?	Breakfast participation percentage is very low. Breakfast outreach is required. Is there more you could do to ensure breakfast is available to all students? JH students do not eat lunch until 12:30 pm, is there an opportunity to offer a breakfast after the bell?
300 - Meal Counting and Claiming - Lunch	325 b. Were the counts by category correctly used in the Claim for Reimbursement?	4 "guest" students should not be entered as a Paid Student. These meals are not reimbursable and recommend charging adult price because they are not reimbursable.
400 - Meal Components and Quantities - Breakfast	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.	Refer to Food Production Checklist to improve required documentation daily. Guiding principle is to capture with a quantity planned, offered and served (leftover) all components of your daily meal. You do a great job on some days, other days pertinent information is missing such as: Romaine offered during focus week of review is not documented on FPR to verify it was offered.
400 - Meal Components and Quantities - Lunch		Continue collecting CN labels and Product Formulation Statements for all products served in cycle menu to correctly verify how all products credit in meal pattern. A Product Formulation Statement is an alternative for crediting information when you cannot get a CN label. This is not the specification sheet from your distributor.
400 - Meal Components and Quantities - Lunch		SALAD BAR: Encourage the language of "FRUIT AND VEGETABLE BAR" because non creditable items should not be offered here. Highly encourage also allowing your younger students (< grade 4) be allowed to participate with the self service bar. Studies demonstrate children eat what they select.
400 - Meal Components and Quantities - Lunch	406 If school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	Eggs were offered on self service salad bar on day of observation. Eggs are creditable for Meat/Meat Alternate, so not appropriate when you are already offering 2 M/MA for K - 8. Offer this type of item only for Grades 9 - 12 to ensure minimum of 2 M/MA is offered for this grade group.

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1400 - Food Safety	1409 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable? If yes, proceed to b, if no proceed to next question.	BUY AMERICAN requires SFAs to purchase domestically grown and processed foods to the maximum extent practicable. This supports the mission of Child Nutrition Programs, to serve children nutritious meals and support American agriculture. Maintain a "Buy American" Exception Log - if no alternative in US in sufficient quantity or cost is significantly higher than non-domestic product. WOW BUTTER is a Canadian product. Always ask: "is there another domestic source for this product?" Until recently, there was a domestic soy nut butter alternative available. Guidance given to add Wow Butter on your exception log and keep in mind you must consider domestic product as available.
Dietary Specifications Assessment Tool - Lunch	10 How often are meats such as hot dogs, luncheon meats (e.g. ham, turkey) and/or sausage offered on the service line and/or salad bar? (All varieties - including reduced and/or low sodium).	Ham Patty served on day of observation has no CN label or Product Formulation Statement to verify item is creditable. This item should be removed from menu. Product description states one serving provides 13 grams fat and 4.5 grams saturated fat per serving makes the item 75% fat. Just because an item is 2 oz does not mean it credits for 2 oz. Because you serve PreK - 12th grade and therefore need to meet a variety of meal pattern requirements, aim for offering entrees which credit for 2 M/MA and 2 Grain and documentation verifies this.

Org - Level Commendations

Description
APPLICATIONS: Benefit documents were very 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. 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 the same day or follow day of receiving. Rollover applications were removed if household did not apply in 30 days of school year. Access to benefit information is limited. Waivers are provided to applicants and indicate specific fees. The SFA has a back-up system for benefit issuance documents and system.
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. The SFA submitted the annual Public Release to local media. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination observed.
HACCP/FOOD SAFETY: The SFA has a district-wide written Food Safety plan. Food Service Director has a goal of updating the written plan to include all required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher. 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. Point of Service, POS, counts and filed claims appear accurate. There is a POS for all students, and the POS is orderly. No overt identification of students who receive benefits was observed. 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.
PROCUREMENT: A Procurement Plan has been developed which includes federal and local thresholds. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. The SFA is a member of AEA Group Purchasing Organization. Prime Vendor, Chemicals and Small Wares is a group purchase procurement. Cost Reimbursable contract is being monitored ensuring discounts, credits, rebates are returned to Nutrition fund. Bids include a Buy American Provision. The SFA ensures that no vendors have been debarred or suspended by USDA. Nutrition Director attended Procurement Training offered by the state agency.
PROFESSIONAL STANDARDS: Food Service Director attends face - to -face and webinar training offered by the state agency. Food Service Director implements a training plan for nutrition employees. It is planned that all staff will attend ServSafe training this summer. Documentation is on file verifying training for FSD, nutrition staff and Determining Official/Claims/Cashier.
SMART SNACKS/HKA: Documentation was available to show that all foods and beverages sold to students during the school day met Smart Snack and Healthy Kids Act standards including food sold in the cafeteria.

Site - Level Commendations North Tama High School (0109)

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Description
MEAL REQUIREMENTS & COMPONENTS: A variety of entrees, fruits, and vegetables are offered throughout the month for lunch. A beautiful vegetable self-service bar is available offering fresh peas, garbanzo beans, red peppers, mushrooms, onion, cabbage, tomato, broccoli, cauliflower, carrot, celery, raisins and dried cherries. Water was available as required. Offer vs. Serve, OVS, was correctly implemented to help minimize waste. 3 types of milk offered. Many low fat and low sodium food items observed in storage. A "Flavor Station" offers 3 low salt seasonings. Nutrition staff hustle so students have sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch.
NUTRITION DOCUMENTATION: Food Service Director has organized CN Labels, Product Formulation Statements and Standardized Recipes. She has a solid understanding of the meal pattern and the importance of knowing how menu items credit towards meal pattern. This is particularly challenging for a PreK - 12 school because meal pattern varies for Preschool, K - 5, 6-8 and 9-12. She continues to move forward in organizing menu information and is moving towards developing a cycle menu to save time and to ensure all menus meet meal pattern for all grade levels.
NUTRITION STAFF and ENVIRONMENT: are observed to be friendly, helpful and encouraging to student customers. Students are observed to have adequate time to eat.
PRESCHOOL MEAL PATTERN: A new preschool meal pattern was required to be implemented by 10/1/2017. FSD is aware of new preschool guidelines and has implemented the meal pattern this school year. It was explained that if preschoolers eat with other elementary students they may follow the NSLP meal pattern, but when preschool eat separately the expectation is to move forward with serving the new meal pattern which includes less sugar (check labels on yogurt, cereal and no grain based "desserts"). Webcasts and resources can be found at: https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition .
SIGNAGE: breakfast and lunch menus are communicated with excellent signage which shows components necessary for a reimbursable meal.