

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
North Polk Comm. School District (47790000)
February 27 – March 1, 2018

Program Year: 2018
Month of Review: January
Lead Reviewer: Shea Cook
Org Representative(s): Jeff Reeves

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One application which impacted three students was incorrectly determined as reduced when it should have been denied.	For your response please submit copies of the letter notifying the household of the reduction in benefits.	
800 - Civil Rights	V-0800	Program materials that are too small to include the full USDA non-discrimination statement must include the abbreviated statement, "This institution is an equal opportunity provider."	For your response please upload a copy of an edited menu that reflects the addition of the abbreviated USDA non-discrimination statement.	
1000 - Local School Wellness Policy	V-1000	The final rule of the Healthy, Hunger-Free Kids Act requires school wellness policies to include language that prohibits the marketing of foods and beverages that do not meet Smart Snack nutrition standards, language that includes standards for all foods and beverages provided but not sold to students during the school day (e.g. classroom parties, classroom snacks bought by parents, and foods given as incentives), and standards and nutrition guidelines for all foods and beverages sold to student on the school campus during the school day that are consistent with school meal nutrition standards and Smart Snack nutrition standards. Current district wellness policy does not address these areas.	For your response please provide a timeline for updating your wellness policy. It is the expectation that an updated wellness policy will be in place by the start of the 18/19 school year.	
1000 - Local School Wellness Policy	V-1000	Wellness policy committees should include the following stakeholders: parents, students, school health professionals, school administrators, a representative of the school board, a representative of the school food service department, and the general public. Current wellness policy committee does not include the representatives of the food service department, students, or school board members. At minimum documentation showing that all stakeholders have been invited to participate should be kept.	For your response please provide an updated list of the wellness policy committee members or documentations demonstrating that students, food service department representatives, and school board members have been invited to attend.	
1000 - Local	V-1000	At minimum school districts are required to	For your response please submit a timeline for	

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School Wellness Policy		conduct a triennial assessment of local wellness policy implementation. Documentation on file is insufficient to demonstrate that an assessment has been completed. In addition, the documentation that has been submitted indicated that an assessment was only conducted at the school which is the site of the targeted administrative review. Wellness policy is a district wide policy and the assessment should also be completed for all buildings within the district.	completing an assessment of the local wellness policy for each building in the district. It is the expectation that a wellness assessment and corresponding documentation will be on file and publically available by the start of the 18/19 school year. Please note: A letter stating that the wellness committee "reviewed and assessed the wellness policy goals" is insufficient for assessment.	
1000 - Local School Wellness Policy	V-1000	Under the final rule of the Healthy, Hunger-Free Kids Act school districts are required to make the results of triennial assessments available to the public.	For your response please describe your timeline for making wellness policy assessments available to the public, how it will be made available (website, etc.) and who will be responsible for completion. It is the expectation that the assessment will be available to the public by the start of the 18/19 school year.	
1100 - Smart Snacks	V-1100	Documentation demonstrating that all items available in school vending machines meet Smart Snack guidelines is required. Vending machines are not currently under the control of the school food service department, however, it is still the responsibility of the personnel overseeing the vending machines to provide documentation of Smart Snack compliance.	For your response please provide the name of the person within the district who will be responsible for completing and maintaining documentation of Smart Snack compliance for all items available in vending machines district wide. In addition, please upload documentation from three items currently offered in the vending machine that demonstrates the process has been started and the products are compliant. Compliance can be calculated at the Alliance for a Healthier Generation product calculator: https://www.healthiergeneration.org/productcalculator/	
1600 - School Breakfast and SFSP Outreach	V-1600	All schools that participate in the National School Lunch Program are required to conduct outreach for the Summer Food Service Program even if they do not participate in the program. Outreach was not conducted by the SFA.	For your response please provide your plan and timeline for conducting Summer Food Service Program outreach. Outreach materials can be found at the following website: http://bestpractices.nokidhungry.org/programs/summer-meals/promote-summer-meals#summer-meals-outreach-resource-toolkit Summer Food Service locator can be found at the following website: https://www.fns.usda.gov/summerfoodrocks	

Site - Level Findings: North Polk Central Elementary School (0412)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
500 - Offer versus Serve	V-0500	Signage explaining what constitutes a reimbursable meal, including explanation of the requirement of at least a 1/2 cup of fruit or vegetable, is required at all locations. There is no signage explaining the requirements for a reimbursable meal in the lunchroom.	For your response please indicate where you plan to post signage, who will be responsible for the posting, and your timeline for completion.	

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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance		LEA homeless official has been completing applications on behalf of homeless students. SA explained that completing applications is not necessary and simple documentation communicating a student's homeless status should be kept on file and is sufficient to extend benefits to homeless students.
700 - Resource Management		<p>Procurement:</p> <ul style="list-style-type: none"> •Technical assistance to review the written procurement plan annually prior to making decisions on school food service procurement for the upcoming school year. • Based on last year's records, the annual amount spent for milk is close to exceeding the district's local small purchase threshold of \$50,000. SFA should monitor closely and consider a formal bid for the next school year. •A public notification in a major circulating newspaper in the school district's service area is required when using either of the formal methods of procurement - Invitation for Bid (IFB) or Request for Proposal (RFP). A copy of the printed advertisement must be retained with the procurement documentation. •Required federal terms and conditions must be included when procurement is conducted using small purchase and formal methods of procurement. Please refer to the state-prototype templates posted on IA_CNP. •When procuring milk detailed specifications for all items to be procured must be included, the estimated annual usage for each item should be provided. To ensure the district selects a responsive vendor with the overall lowest price, the cost of each item on price quotation request or bid must be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template to calculate extended cost for milk was provided. A similar process should be used for bread products. •It is best practice to include the school calendar when requesting pricing from vendors to ensure deliveries are not made during holidays, snow days, etc. •In the milk solicitation, other things to consider when requesting price from vendors are: prices are for paper cartons or plastic bottles, coolers will be provided at no charge, HACCP plan to ensure clean crates and milk cartons, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should state

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		<p>whether a firm fixed price or a fixed price with economic adjustment (escalator clause) is requested.</p> <ul style="list-style-type: none"> •Allow vendors a minimum of four weeks from date vendor is contacted to the due date for milk and bread procurement. For any formal procurement, it is best practice to allow 8-12 weeks from the time the bid/proposal is issued to the due date of the bid/proposal. This is to allow the vendor adequate time to respond. •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. •The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification and be of an equal or lesser price. •Food service equipment repair and preventive maintenance will be an indirect cost to the school nutrition fund. •All price adjustment documentation (monthly milk escalator clause letters, updated prime vendor price lists) must be kept on file. •Copies of all requests for pricing should be kept on file with the responses.
700 - Resource Management		Although the district does have a negative balance policy in place, it does not explicitly state what meal accommodations will be made for students with a negative balance other than the statement "when a child or family account reaches a debt of \$10.00 or more, the child or children will be required to bring a sack lunch." SA advised FSD that a revision of the policy with language specific to when and what age groups of children will/will not be provided a meal and what kind of meal will be provided based on account balance be added to ensure that practices are followed consistently.
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	USDA non-discrimination statement should be included on the webpage for the nutrition department.
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.	Currently FSD tracks training via a series of sign in sheets. SA recommends FSD use one tracking tool to easily keep track of how many hours of professional standards each employee has completed. Tracking tools can be found at the following website: https://www.educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition .
1200 - Professional Standards	1221 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	The hearing official is not an employee of the food service department and should complete, at minimum, civil rights training.

Site - Level Technical Assistance North Polk Central Elementary School (0412)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	In order to count towards a reimbursable meal, if a student does not have a diet modification form signed by a medical professional the only allowable substitutes for milk are those that are nutritionally equivalent to cow's milk.

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		A list of permissible products was provided to FSD.
800 - Civil Rights	811 Did meal service observations on the day of review indicate that program benefits were made available to all children without discrimination? If NO, explain.	<p>During meal observation at Central Elementary school staff supervising the lunchroom were observed telling some students that they were not allowed to eat a dessert item until they had eaten all of the other items on their tray. There is no such requirement in the National School Lunch Program. Student choice is encouraged as a way to increase program participation and develop healthy eating habits. Civil Rights guidance also states that all participants must have equal access to all menu items and all participants must be treated in the same manner.</p> <p>Additionally, the SA observed that after being reprimanded for opening and eating two spoonfuls of the dessert item one student stopped eating completely. Two bites of food is not enough nutrition to provide students with the calories and nutrients they need to learn.</p> <p>Upon questioning it was disclosed that this has been an ongoing problem. Homemade, whole grain rich desserts made by the FSD in the school's bakery have also been taken away from students. School Nutrition staff adhere to strict dietary guidelines and whole grain rich grain based desserts are compliant within the guidelines of the program. There is no logical reason to deny students access or regulate in what order school meals are consumed.</p>
1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	Food safety inspection was posted in the kitchen and not visible to the public. SA advised FSD that inspections must be posted in a publically visible location, inspection was moved while on site, and no further action is required.
1400 - Food Safety	1409 a. Did any review of products indicate violations of the Buy American provision in 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.	Three produce items were found to violate the Buy American requirement. Grapes from Chile and cherry tomatoes and cucumbers from Mexico were found in the walk in cooler. SA advised SFA that if non-domestic produce is used there should be sufficient documentation in place to demonstrate that domestic options were either unavailable or cost prohibitive. If there is no justification non-domestic produce should be declined at the time of delivery.

Org - Level Commendations

Description
<p>CERTIFICATION AND BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were very well organized. • The 30 days of eligibility status is provided to all families who were eligible for benefits in the previous school year. • The approved letter of notification of eligibility is sent to all families who apply for benefits including those families who were denied benefits. • Applications are processed and benefits are administered within 10 operating days of the application being received. • Direct certification lists are downloaded in a timely manner and kept on file. All students in the household are extended benefits. • Income applications are complete with parent signatures, income information, names of all family members and social security numbers. • Denied applications were determined accurately. • The correct income guidelines were used and the conversion rates were used properly.</p>
<p>CIVIL RIGHTS: • The correct public release was sent to a local media outlet and published. • The SFA works closely with the school nurses, students and families to ensure that all students have their special dietary needs met. Diet modification forms are completed and on file for students with special dietary needs. SFA has a gluten free menu available. • All staff with responsibilities in the school nutrition program received civil rights training. Documentation is on file. • The "And Justice For All" poster is on display in all cafeterias. • The racial ethnic form was completed and shows that students were not discriminated against when applying for free or reduce price meals. • The SFA follows the USDA's complaint procedure as needed.</p>

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COMPETITIVE FOODS: • Nutrition calculator printouts are on file for all a la carte foods and beverages sold. • All competitive foods sold during the on-site review meet the Smart Snack requirements.
FOOD SAFETY: The temperatures for hot foods are monitored and recorded on the food production records. • Temperatures are monitored and recorded for the refrigerators, freezers and milk coolers. The temperatures for the dishwasher are also monitored and recorded. • The food safety inspection report is on display and no violations were found. • The food service director requested a 2nd inspection as required. • The SFA's HACCP plan is available at each site. • The food service director, head cooks at each site and many food service staff are ServSafe certified. • Good food safety practices were observed while SA was on-site. • Foods are stored properly.
MEAL COUNTING AND CLAIMING: • The point of service line for breakfast and lunch is organized and orderly which allows staff to ensure all students receive a reimbursable meal. • All students at the selected sites had a reimbursable meal at the breakfast and lunch as observed. • The edit check reports matched the claim. • The day of review meal counts were reasonable with the review period counts.
MEAL PATTERN AND NUTRITION QUALITY: • The menu offers a daily salad bar and hot vegetable options to provide many options to students. • The menu offers a variety of vegetables, fruits and entrees. • The breakfast menu provided during the review period met the daily and weekly meal pattern requirements for all grade groups. • The lunch menu at Central Elementary met the daily and weekly meal pattern requirements for all menu components including all of the vegetable subgroups. • Food production records, CN labels, and standardized recipes were on file for all meals served during the review period. • The SFA purchases many low or reduced fat, low sodium products. • The SFA offers 3 different and approved types of milk to students. • The food service director completed the menu certification worksheets. • Foods found in storage met the Buy American provision. • Free, potable water is available for students during their meal times.
ON-SITE MONITORING: • On-site monitoring forms have been completed for all sites in the district for lunch. • On-site monitoring forms have been completed for 50% of the breakfast sites.
PROCUREMENT: The SFA conducts contract management as staff ensures orders received are what was delivered and that prices match what was written on the bid. • Micro purchases were conducted accurately as funds were spent evenly throughout the community. • Small purchases were made according to the SFA's local purchasing thresholds. • The SFA completed the off-site procurement questionnaire and the food service director attended the regional procurement training. • The SFA has a procurement plan that includes a signature page, debarment certification statement, code of conduct and purchasing methods that will be used based on local purchasing thresholds. • The SFA purchases main supplies through a group purchasing organization which helps keep prices down and spreads the responsibility for bidding among more people.
PROFESSIONAL STANDARDS: Training hours are tracked for all staff with school nutrition responsibilities. • Civil rights training was provided to all staff with school nutrition program responsibilities. • Documentation is on file for all training received. • Full and part time school nutrition employees have received the required number of training hours for the school year.
RESOURCE MANAGEMENT: The non-program food revenue adequately covers the cost of the non-program foods. • The SFA requested and was granted a PLE waiver for the 2017-2018 school year and the correct adult lunch price is charged. • The SFA has a negative balance policy to address negative student lunch accounts. • Expenses made during the review period were allowable. • Revenues received went directly into the school food service account and there are checks and balances to ensure the process is followed. • Records are kept for 3 years plus the current year. • The SFA effectively utilizes its USDA entitlement for commodities.
SCHOOL BREAKFAST PROGRAM OUTREACH: • Families are informed of the school breakfast program through the district's website, social media and school announcements.
VERIFICATION: • The verification report and process were completed on time. • The correct information was collected from parents and eligibility status was determined correctly. • Families were notified of verification selection and the verification results with a letter that contained the correct information including information on their ability to appeal if they disagree with the results. • The applications selected for verification were confirmed and signed to show that the original eligibility status was determined correctly.

Site - Level Commendations North Polk Central Elementary School (0412)

Description
Food Safety: A copy of the written food safety plan was available on site. • The latest Health Inspection Report was posted. • Temperature logs are maintained for all coolers-including milk coolers, freezers, refrigerators and for the dishwasher. • Food temperatures are recorded on the daily food production record. • Good food safety procedures were observed. • Opened food products were labeled and dated. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Kitchen lead is ServSafe certified.
Meal Components and Quantities: All meal components were available at the beginning of meal service on the day of observation and throughout meal service. • All meals observed met at least the minimum daily requirements. • The menus met weekly and daily meal pattern requirements for the grade groups. • CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • At least two types of milk are offered.
Meal Counting and Claiming: The Point of Service is at the end of the line. Older students punch their unique number into a key pad and younger students give the cashier an ID card to scan. • Meal counts during the on-site review were reasonable when compared to the review month counts. • Meal count totals for the month of January were accurate and complete. • Point of Service counts and filed claims appear accurate. • Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. • Cashiers are trained and appeared aware of what constitutes a reimbursable meal. • Edit checks are performed.
Offer vs. Serve: Offer vs. Serve is being implemented properly. • All students observed selected 1/2 cup of fruit and/or vegetable. • Cafeteria staff have been trained on offer vs. serve.

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Water: Free potable water is available to all students for lunch.