

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Odebolt-Arthur Comm School District (48600000)
SNP - Review ID: 4557

Program Year: 2018
Month of Review: March
Lead Reviewer: Brenda Windmuller
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	SFA failed to extend free benefits to one student who is a member of the same household as a student on the Direct Certification list. The student was originally determined reduced based on an application, the member of the household was on the March 15, 2018 DC list.	SFA will state their procedure to ensure all members of a household receive the benefits determined by the DC list. Corrected during On-site review.	
300 - Meal Counting and Claiming	V-0300	The SFA must ensure accuracy in monthly claims. The SFA under-claimed 17 reduced students and over-claimed 17 paid students on the March 2018 claim as discovered when comparing JMC reports to the March claim.	SFA will adjust the March claim to reflect the accurate count and attach documentation to show that the adjustment was made.	
1000 - Local School Wellness Policy	V-1000	WELLNESS ASSESSMENT: The SFA is required to make the Wellness Policy and Assessment available to the public.	Submit a timeline and plan on when and how the SFA will make the Local School Wellness Assessment available to the public and/or to the families it serves. Provide a web address if applicable.	

Site - Level Findings: Odebolt-Arthur Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

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Area	Question	Comments
100 - Certification and Benefit Issuance	140 Did the SFA update benefit issuance documents accurately and in a timely manner upon receipt of Direct Certification updates? If NO, explain. Record errors on the SFA-1.	One application was approved as reduced, but benefits were not updated when a member of the same household was identified on the Direct Cert list. TA was provided to update benefits.
300 - Meal Counting and Claiming	310 At the site level, how are the total daily meal counts by category submitted to the SFA for consolidation?	An error was found when comparing JMC records (SFA counts) to the review month claim. TA was given to use care when entering claims to ensure accuracy. An extra 17 students were claimed as paid students, all 17 should have been claimed as reduced. SFA modified their claim during the AR.
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>Must have signed debarment certifications kept on file.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Agreements valued at \$10,000 or more should have an exit clause.</p> <p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p> <p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none"> <input type="checkbox"/> All price adjustments throughout the year <input type="checkbox"/> All invoices <input type="checkbox"/> All contracts and agreements <input type="checkbox"/> All bids solicited

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		<ul style="list-style-type: none"><input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)<input type="checkbox"/> Documentation of why you selected a specific vendor<input type="checkbox"/> Copies of bid solicitation <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$3500 (or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.<input type="checkbox"/> Purchases should be distributed around community, not just one store. <p>Small Purchases- Purchases that are under \$150,000 (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none"><input type="checkbox"/> Include all terms and conditions<input type="checkbox"/> Include terms: Buy American and Equal Opportunity<input type="checkbox"/> Attain Signed Debarment Statements<input type="checkbox"/> Awarded on lowest price (unless written documentation to justify)<input type="checkbox"/> Maintain documentation <p>Formal Purchase- Purchases equal to and exceeding \$150,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <ul style="list-style-type: none"><input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised.<input type="checkbox"/> Include all requirements of a small purchase<input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.
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		<input type="checkbox"/> Everything must be in writing.
800 - Civil Rights		SPECIALTY DIETS: SFA was provided with the Diet Modification Request Form to be used to gather required information for students needing diet modifications. We discussed using this form in conjunction with the form already produced by the school nurse if they choose, but to have the same information included on their format. Discussed specific requirements for students unable to consume cow's milk and provided list of pre-approved products. Told Nurse that the substitution must have the same nutrient content as cow's milk.
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)).	WELLNESS POLICY: Reminded SFA that the Wellness Policy and the Assessment must be reviewed once every 3 years at a minimum. Both of these documents must be made available to the public. The Policy is currently posted on the district's web site and distributed through the newsletter. The Assessment has not been made public. Information on smart snacks was provided to the School Nurse.
Resource Mgt Comprehensive Review	5 If so, what process did the SFA use to calculate its compliance with the revenue from nonprogram food requirements in 7 CFR 210.14(f)?	SA advised SFA to review prices for second entrees and a la carte items annually. Find the average cost of entrees for one week, be sure that you are charging a minimum of the cost. SFA completed the Non-program Revenue Tool during AR.

Site - Level Technical Assistance Odebolt-Arthur Elementary School (0409)

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	317 a. Based on meal observation, does the meal counting system as implemented prevent overt identification of students receiving free and reduced price benefits?	Exchange: All students are required to stop at the cashier/POS operator and give something in exchange for their meal. This can be entering an ID number, present a ticket, swipe an ID badge, give their name or any number of other methods. SFA started training students to provide their name at the Point of Sale during AR.
400 - Meal Components and Quantities - Breakfast	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	Standardized Recipes: Technical assistance was given to use standardized recipes for any menu items which combine two or more ingredients. The item in question was a turkey sandwich served on March 7, 2018. This is necessary for consistency and to know how much of each ingredient is prepared for each student and how it contributes to the meal pattern.

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600 - Dietary Specifications and Nutrient Analysis		The SA and the FSD discussed the possibilities of allowing students to take 2 ketchups with their meals. The SA reviewed the FSD's daily calorie, sodium, and fat calculations for menus. The day of review's menu proved to be maxed out on daily sodium allowances for the elementary while the 6-8th grade level could afford a second ketchup packet. The question of allowing peanut butter at breakfast was raised. The peanut butter is allowed as long as the menu meets daily calorie, sodium, and fat requirements as prescribed by the USDA. The peanut butter would need to be included in that calculation. The FSD does an excellent job of monitoring these levels, but may want to consider offering the peanut butter as an alternate breakfast on occasion to satisfy the customer demand.
1500 - Reporting and Recordkeeping	1503 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits? If NO, describe reason.	REPORTING AND RECORD KEEPING: Technical assistance was given, all program records must be retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits. Temperature logs are to be kept for 6 month.

Org - Level Commendations

Description
BREAKFAST & SUMMER PROMOTION (1600): The SFA does an excellent job of promoting breakfast with posters, free breakfast promotion and reminders in the district's newsletter. Menus are posted in each cafeteria as well as the website. Summer Food Service Program outreach for the SFSP program is shared via websites, lunch menus, and newsletters.
Certification and Benefit Issuance: The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are 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 within ten days. Income was only converted to annual when there was more than one frequency of income. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Waivers are provided to applicants and indicate specific fees.
CIVIL RIGHTS (800): The And Justice for All civil rights poster was posted in the cafeteria and the serving line. Annual civil rights training was provided to food service staff and documented. 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.
COMPETITIVE FOODS (1100): Competitive foods and beverages sold to students during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) meet Smart Snack guidelines as outlined by the Smart Snacks Guidelines.
LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years (6/12/2017.) The policy has nutrition education, physical activity and other wellness goals included. An assessment has been completed. A wellness committee is in place to set goals and help assess the completion of the goals. The committee is made up of students, faculty, staff, and community members. The committee meets annually and minutes are kept. Wellness goals include: Using a heart monitor during PE for students to track, participation in Healthy Schools Grant, Creating a Healthy Snacks list for teachers and families, and participating in Jump Rope for Heart each year.
MEAL PATTERN: All students observed on the on-site visit had a reimbursable meal, the menu was complete with all food groups represented and served in their proper quantity. Water was available to all students during meal times. Menus for the month of review contained all required components.

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PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events, and specifications were well-written and comprehensive. 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 ensures that no vendors have been debarred or suspended by USDA. SFA has a completed signature page and the FSD attended Regional Procurement training in September 2017.

PROFESSIONAL STANDARDS (1200): The SFA followed regulations for the district's size category when hiring a new director. Tracking was provided that documents that the director received the required 12 hours of annual training, managers received the required 10 hours of training, and all other staff have received at least 4 hours of annual training. (Or state that there is a plan, and they are on-track to complete hours by the end of the year.) There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.

RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed, indicated appropriate and allowable expenditures. The Paid Lunch Equity (PLE) too was completed and prices were increased as indicated by the PLE tool. Reports are filed on time, and all records are maintained for at least three years plus the current year. The Negative Balance Policy was well written and in place. The SFA utilized 94% of USDA commodities dollars budgeted to them in 2016/2017.

VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. The verification process was completed on time. One representative from the SFA completed Verification training.

Site - Level Commendations Odebolt-Arthur Elementary School (0409)

Description
<p>HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes the 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, and dishwasher. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Food Service workers wore proper hair restraints and practiced good gloving procedures. The kitchen was very clean and showed pride in work space. The FSD and the Site Supervisor are both ServSafe Certified.</p>
<p>The Site supervisor at the Odebolt-Arthur school stepped into the position mid-year and has done a great job working with the FSD to ensure all regulations are being followed. Copies of production records and temperatures were well organized and easy to find. A HACCP manual was available as were all CN labels. The breakfast cashier maintains a menu board which features the daily menu for both breakfast and lunch for the current day and the following day, allowing students time to decide what items they will select or if they want to bring a cold lunch the next day. The staff works together to accomplish all daily tasks and to help support one another.</p>