

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Pella Christian High School (51668302)
April 3-5, 2018

Program Year: 2018
Month of Review: March
Lead Reviewer: Shea Cook
Org Representative(s): Bonnie Van Wyngarden

Org - Level Findings

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|--------------------|--|--|-----------------------------------|
| 100 - Certification and Benefit Issuance | V-0100 | <p>One household with two students was determined as reduced by application. One student from that household was directly certified as free on 12/15/17. At that time the status of all students in the household should have been changed to free.</p> <p>Another student was listed as directly certified when they did not appear in e-lookup. An individual with the same name, but different DOB was listed in e-lookup, likely causing the error.</p> | For your response please submit a copy of the notification letter for increase in benefits to the household who became directly certified. Additionally, please also submit a copy of the letter notifying the household incorrectly given free status of the reduction in benefits. | |
| 200 - Verification | V-0200 | All applications chosen for verification must be confirmed by the confirming official prior to sending a letter of notification of verification. The application chose for verification does not demonstrate that a confirmation review took place. | For your response please identify your confirming official and state your intention for conducting a confirmation review during verification for the 18/19 school year. SA highly encourages FSD to watch the verification training webinar in the fall as this is a repeat finding. | |
| 700 - Resource Management | V-0700 | The financial report on IowaCNP has not been completed and no formal review of end of year expenses has been done. | For your response please identify who will be responsible for completing the financial report on IowaCNP. | |
| 800 - Civil Rights | V-0800 | <p>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." Current menus do not include that statement.</p> <p>In addition, the full USDA non-discrimination statement should be included on all program materials. Materials titled "Food Service Information" found under the 17-18 registration tab on the school's website do not include the USDA non-discrimination statement.</p> | For your response please submit a copy of an updated menu that reflects the abbreviated civil rights statement. Additionally, please describe your plan for including the full statement on the 18-19 registration materials and who will be responsible for making sure the statement is included on program materials. | |
| 1000 - Local School Wellness | V-1000 | Under the final rule of the Healthy, Hunger-Free | For your response please outline your timeline for the creation of a wellness committee, who will be invited to | |

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Pella Christian High School (51668302)
April 3-5, 2018

| | | | | |
|---|---------|---|--|--|
| Policy | | <p>Kids at minimum schools must invite a number of stakeholders from the general public and school community to be a part of the wellness policy process. A wellness committee made up of parents, students, representatives of the school nutrition program, physical education teachers, school health professionals, administrators, and board members should be formed to update or modify the wellness policy as appropriate.</p> <p>Once formed, the wellness committee should update the policy to include language that references Smart Snack standards for foods sold or available to students during the school day. The policy also needs to be updated to reflect the requirement of a triennial assessment of the local wellness policy goals. There is no documentation to demonstrate that an assessment has been completed and made available to the public.</p> | <p>participate, and when you plan to meet.</p> <p>Additionally, please outline your timeline for the committee, once assembled, to update current policy and assess your progress towards meeting the goals of the wellness policy. Please indicate where the assessment will be posted for public access once completed. It is the expectation that an updated wellness policy and assessment of that policy will be completed in the 18/19 school year and made available to the public.</p> | |
| 1200 - Professional Standards | V-1200 | There are two school employees (hearing and confirming officials) who do not work in the nutrition program, but have responsibilities in the program. Those officials have not completed the required civil rights training. | Please describe your plan for making sure that all school personnel who have duties in the nutrition program complete civil rights training and how you will document that training. | |
| 1600 - School Breakfast and SFSP Outreach | V-1600 | All schools that accept money for the national school lunch program are required to perform summer outreach even if they are not a participating site. | For your response please outline your plan for conducting summer outreach at the end of the school year. | |
| Resource Mgt Comprehensive Review | V-RMCRF | Nonprogram foods are defined as any food sold during the school day that is not part of a reimbursable meal to a student. Provision 206 of the Healthy Hunger Free Kids Act requires that nonprogram foods raise revenue sufficient to cover the costs of the food. Neither the nonprogram revenue tool nor the financial report on IowaCNP have been completed and compliance cannot be measured. | <p>For your response please complete and attach the nonprogram revenue tool.</p> <p>If the tool says that you are out of compliance please discuss your plan for evaluating and increasing nonprogram revenue in order to come into compliance.</p> | |

Site - Level Findings: Pella Christian High School (8302)

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|-------------------------------|-------------|--|---|----------------------------|
| 1100 - Smart Snacks in School | V-1100 | Two of the three sports drinks in the vending machine are not compliant with Smart Snack guidelines. | For your response please indicate your plan for removing the non-compliant items. In addition, please identify who will be in charge of monitoring and keeping records of compliance for items offered in vending machines. | |

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Pella Christian High School (51668302)
April 3-5, 2018

Org - Level Technical Assistance

| Area | Question | Comments |
|--|---|---|
| 100 - Certification and Benefit Issuance | 133 Are the Direct Certification lists retained on file by the SFA? If NO, explain. | SA advised FSD to print off e-lookup matches for each student found on e-lookup. If family has already completed an application, attach match to application. |
| 700 - Resource Management | | <p>Technical Assistance for Procurement was given in the following areas:</p> <p>Micro Purchase</p> <ul style="list-style-type: none"> · SA gave clarification on spreading the wealth for micro purchases. Clarification was also given on documenting reasons for not spreading the wealth (e.g. significant difference in price between vendors, distance to travel to another vendor). <p>Small Purchase</p> <ul style="list-style-type: none"> · Guidance was given on writing more specific product specifications in price request documents including but not limited to size, nutritional information, delivery expectations, etc. · SFA was discouraged from requesting specific product numbers in a price request as product numbers are specific to vendors and may exclude some companies from submitting a bid. · SFA was advised that vendors should be given a minimum of 4 weeks to respond to a request for pricing. SA encouraged SFA to exercise best practice of at least 6 weeks response time. · A number of required statements were absent from the price request documents including Buy American, debarment statement, termination for cause and convenience, equal opportunity, small business, etc. · SFA should include estimated annual usage in request for pricing in order to get best pricing. SA shared electronic resource developed for evaluating bottom line pricing based on estimated annual usage. <p>Formal Purchase</p> <ul style="list-style-type: none"> · SFA does exercise contract management by price checking invoices. SFA was encouraged to continue price checks and to include a variety of food and non-food items from the bid in those checks. |
| 800 - Civil Rights | 805 How are students with special dietary needs accommodated? | FSD works closely with families to accommodate special dietary needs, however, the FSD does not require families to complete diet modification forms. SA advised FSD that in order to deviate from the meal pattern a diet modification form signed by a medical professional must be on file in order for the meal to count for reimbursement. In addition, SA advised FSD that |

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Pella Christian High School (51668302)
April 3-5, 2018**

| | | |
|-----------------------------------|---|---|
| | | diet modification forms also serve to limit the liability of the SFA. |
| 1200 - Professional Standards | 1218 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable. | Two of the six part time employees have not completed the required four hours of professional standards training. SA reminded FSD that hours must be completed by the end of the school year and advised FSD that going forward training in critical areas like food safety and civil rights should be completed at the beginning of the school year to make sure that all employees are following proper practices and procedures. |
| 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. | Although most of the professional standards training is complete, the training, including the Civil Rights training, was completed just before the date of the on-site visit. SA advised FSD that Civil Rights training should be completed at the beginning of the year to assure compliance. Other training, like food safety training, should also be completed at the beginning of the school year due to its importance. a |
| Resource Mgt Comprehensive Review | 1 Did the SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency? | SA discussed indirect cost rate guidance and allowable and unallowable direct costs. SA explained that non-public schools are allowed to use a 10% rate and that going forward some expenses currently paid for as a direct cost to the nutrition program (utilities, postage, fire inspections, maintenance and repair, etc.) must be charged as indirect costs. SA advised administration to look for continued guidance from school finance. |

Site - Level Technical Assistance Pella Christian High School (8302)

| 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? | SA discussed allowable and unallowable milk substitutes with the FSD. Documentation of special diets that specifically list a type of milk that is not nutritionally equivalent to cow's milk must be in place in order for the meal to be eligible to claim for reimbursement. Currently one student takes an unallowable type of milk. In this circumstance medical professionals are working on identifying exact allergens and once that is done documentation will be obtained. |
| 1400 - Food Safety | 1406 Were the selected relevant temperature logs available for review? If YES to specify which date was selected. If NO explain. | SA could not find an internal thermometer for the milk cooler. SA advised FSD to replace thermometer in milk cooler. |
| 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. | Grapes from Chile were observed in the walk in cooler. SA advised FSD that non-domestic products must be logged and justification must be given for non-domestic produce to be allowed. |
| Dietary Specifications Assessment Tool - Lunch | 24 Students are offered salt: | SA observed salt shakers at the condiment station. Salt is not allowed and FSD was advised to remove them and did so immediately. |

Org - Level Commendations

| Description |
|--|
| CERTIFICATION AND BENEFIT ISSUANCE: 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. • E-lookup is used in a timely manner to identify directly certified students. All students in the household are extended benefits. • Income applications are complete with parent signatures, income information, |

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Pella Christian High School (51668302)
April 3-5, 2018

| |
|---|
| 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. |
| 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. • 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. |
| FOOD SAFETY: Temperatures are monitored and recorded for the refrigerators and freezers. • The temperatures for the dishwasher are also monitored and recorded. • The food safety inspection report is on display in a public location. • The food service director requested a 2nd inspection as required. • The SFA's HACCP plan is available at each site. • The food service director is ServSafe certified. • Good food safety practices were observed while SA was on-site. • Foods are stored properly. |
| MEAL PATTERN AND NUTRITION QUALITY: • The menu offers a daily salad bar to provide many options to students. • The menu offers a variety of vegetables, fruits and entrees. • Signage is made available informing students of how the menu constitutes a reimbursable meal. • The lunch menu 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. |
| PROCUREMENT: • The SFA has a written Procurement Plan that includes federal and local thresholds, identifies the estimated value and procurement method for each anticipated procurement event. • The Procurement Plan identifies the names and title of the individual(s) responsible for the selection, award, and administration of procurement contracts. • The SFA adopted the state-prototype written Code of Conduct policy. • When using the micro-purchase method, each transaction with the vendor was below the local micro-purchase threshold of \$3,500. The purchase prices were reasonable. • The invoices from vendors were well-organized. The invoices had a date, vendor name and address, and items purchased were identifiable. • The district used the small purchase method to obtain price quotations for milk. • Two vendors were contacted for milk price quotations. • The district is a member of a Group Purchasing Organization. • A signed agreement with the Group Purchasing Organization for SY 2017-2018 is on file. • The district has maintained a file for all procurement-related information including the compact discs with RFPs for Prime Vendor, ware wash, and small wares and vendor responses received since joining the GPO. • The food service did an excellent job utilizing USDA Foods Planned Assistance Level (PAL). Last SY, more than the allocated PAL was used - 131 percent. |
| PROFESSIONAL STANDARDS: • Training hours are tracked for all staff nutrition staff. • Civil rights training was provided to all school nutrition program staff. • Documentation is on file for all training received. • Full and the majority of part time school nutrition employees have received the required number of training hours for the school year. |
| RESOURCE MANAGEMENT: The SFA charges the correct paid student lunch price according to the required PLE tool and the correct adult lunch price. • The SFA has a negative balance policy to address negative student lunch accounts and notified families through email and through a mailed letter. • Expenses made during the review period were allowable. • Revenues received went directly into the school food service account. • Records are kept for 3 years plus the current year. |
| SCHOOL WELLNESS POLICY: The school has a wellness policy and it is available to the public on the school website. |
| 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. |

Site - Level Commendations Pella Christian High School (8302)

| Description |
|---|
| Meal Counting and Claiming: The Point of Service is at the end of the line and students punch their unique number into a key pad. • Meal counts during the on-site review were reasonable when compared to the review month counts. • Meal count totals for the month of March 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. • 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. • There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at breakfast and lunch. |
| Water: Free potable water is available to all students at lunch. |