

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**REGINA CATHOLIC EDUC CNT (31418000)**  
**October 31-November 2, 2017**

**Program Year:** 2018  
**Month of Review:** October  
**Lead Reviewer:** Cheryl Benson  
**Org Representative(s):** Alan Opheim

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Annual income is based on the previous year's tax return statement and can only be used when a member of the household is self-employed or when income is so sporadic that determining a regular income frequency is not possible. One application indicated annual income for both adults. The household also submitted their 2016 tax return which indicated regular taxable wages instead of self-employment. The benefit application indicates which lines of the tax return to use for self-employment. In this instance, the SFA should have approved the application on face value, but at the same time, a letter of adverse action should have been sent asking for further information of income and/or proof of self-employment within a specific time period. If no response, then the household goes to paid status.	For your response, obtain current income information from the household and submit the corrected front page of the application or submit the correct tax documentation that indicates the household is self-employed. If documentation changes the household from free to either reduced or over income limits, also submit a copy of the letter of adverse action. Also, indicate the date the issue was resolved.	
200 - Verification	V-0200	The application selected for verification was incorrectly verified. The household submitted several paycheck stubs for documentation. Averaging the pay indicates the household should have been changed from free to reduced during verification, but they were verified as free.	For your response, submit a copy of the letter of adverse action notifying the household of the change in benefits and providing ten days for appeal. The letter of adverse action was sent during the on-site review. No further action is required.	
700 - Resource Management	V-0700	Only allowable costs may be charged to the Child Nutrition account. In general, structural repairs are not an allowable cost unless prior approval is acquired. For example, plumbing installed solely for a piece of kitchen equipment may be an allowable cost while replacing general plumbing in the kitchen is not an allowable cost. Walsh Door - The charge to install a loading dock door was made to the school nutrition. This	For your response, submit documentation to show that the amount of \$225 has been transferred from the general funds to the school nutrition account.	

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		amount is not an allowable cost and therefore should have been covered by the school's general fund.		
700 - Resource Management	V-0700	Net cash resources for Regina's child nutrition account is well over the allowable three months' average that is allowable. Child Nutrition Programs must maintain a non-profit status.	For your response, submit a plan, including timeline, to spend down the balance of the CN account.	
1400 - Food Safety	V-1400	During the last review in the 2014-15 school year, it was noted that SOPs had not been updated since 2007, and the SFA indicated they would be updated over the summer of 2015. However the update did not occur and SOPs are still from 2007. SFAs must also provide annual HACCP training which was not conducted this year.	For your response, submit a detailed plan for updating SOPs and the overall HACCP plan and minutes or results from first meeting. For training, involve all staff in the update. Divide current SOPs among staff and have them determine whether the procedure and corrective action on the SOPs is what is being done. If not, the SOP needs altered. Also have staff review SOP prototypes that are available on the ISU website provided, select new SOPs that should be added to Regina's plan, and review those SOPs for compliance with Regina SFA practices.	

**Site - Level Findings: Regina High School (8104)**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
400 - Meal Components and Quantities - Lunch	V-0400	(1) Documentation was not available to determine whether Hy-Vee pizza that is offered on Mondays is reimbursable or not. Documentation was requested by the director, but it has not been received. SFAs cannot serve meals without documentation that the meals meet minimum component requirements. (2) Documentation for grain contribution was also missing for the glazed doughnut offered at breakfast.	For your response, (1) submit Formulation Statements for Hy-Vee pizza to determine whether the pizza was reimbursable. If the pizzas did not meet meal pattern requirements and/or documentation is insufficient to determine whether the pizzas met meal pattern requirements, then the meals will be added to the overclaim. There were 148 paid meals, 4 reduced meals, and 4 free meals. (2) Submit documentation for grain contribution of the glazed doughnut.	
400 - Meal Components and Quantities - Lunch	V-0400	The Healthy Hunger Free Kids Act, HHFKA, requires the use of standardized recipes for any food item that is altered in any way. Standardized recipes must have the Name of the Recipe, the Number of Servings, Ingredients, and Directions for Preparation, Serving Size, Total Yield, Component Contribution, and Critical Control Points. It is helpful if the recipe also has serving utensils to use and serving suggestions. Standardized recipes are not being utilized for most prepared items.	For your response, submit a copy of a standardized recipe for Beef Nachos and a timeline for converting current recipes into standardized recipes. Finally, complete the Standardized Recipes tutorial on Iowa Learning Online Professional Development and submit a copy of the certificate of completion. (Create account, Iowa School Meal Program Tutorials at log into <a href="https://ilopd.iowa.gov/">https://ilopd.iowa.gov/</a> ) Also see attached manual.	

**Org - Level Technical Assistance**

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100 - Certification and Benefit Issuance	107 a. When and how are households notified of students' certified eligibility?	Whenever households are denied benefits (page 62 or Eligibility Manual) or when benefits are reduced (a household goes from free to either reduced or denied, or a household goes from reduced to denied) the household must be informed in writing. The written notification must give the household ten days to appeal, inform them of how to appeal, state contact information for the Hearing Official, inform the household of the cost of the meals, let the household know they can reapply at any time their situation changes, and include both the USDA and Iowa non-discrimination statements.
700 - Resource Management		Technical assistance was provided on using part of the SFA's commodity entitlement dollars on DoD fresh fruits and vegetables. This could help increase use of the entitlement from 81% for SY2017 to 100%.
700 - Resource Management		<p><b>PROCUREMENT:</b></p> <p>Local Purchasing Policy - The school purchasing policy small purchase threshold was revised in October 2017 to raise it from \$1,000 to \$5,000. Purchasing policy states any purchase of goods or services exceeding \$5,000 shall be on a "competitive bid basis." Per business manager, this means price quotations are obtained from two - three vendors. The school policy does not have a requirement for formal purchase methods - Request for Proposals (RFP) and Invitation for Bids (IFB). TA provided. Any purchases of goods and services where estimated aggregate amount of purchase exceeds \$150,000 (federal small purchase threshold), formal procurement methods will be used. Emailed Diocese of Dubuque Child Nutrition Program Purchasing Policy.</p> <p>School Food Service Written Procurement Plan - The food service director will revise the written procurement plan local and school food service purchase thresholds to reflect the change in the school written purchasing policy.</p> <p>Equipment Repairs - One equipment repair and two preventive service maintenance - hood cleaning and replacing filters in walk-in refrigerator were identified on the vendor paid list. Per new guidance issued by IDOE school finance - equipment repair cannot be charged as a direct expense. At this time, Bureau of Nutrition and Health Services is checking with School Finance to be certain if preventive maintenance can be charged as a direct cost to school meal programs.</p> <p>Micro-purchases:</p> <p>Locally-sourced produce - The food service director should spread the wealth and procure locally sourced foods from multiple producers. In School Year (SY) 2016-2017, the same vendor was used for corn. In SY 2017-2018, different vendor(s) should be used.</p> <p>Office supplies - When purchasing office supplies or for printing services, spread the wealth and use multiple office supply stores.</p> <p>Small Purchases:</p> <p>Computer Purchase for POS - A computer was purchased for the Point-of-Service by the school technology department. Per business manager, the</p>

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		<p>technology individual obtains verbal quotes from vendors at the beginning of the school year. All computer equipment is then purchased from the same vendor for the school and church for the year. Verbal price quotes were obtained. No documentation is on file. TA provided to document price quotations, vendors contacted, vendor individual who provided price quotes, dates when quotes were obtained. Recommended use 3 Bids and a Buy template available in Download Forms on IA_CNP.</p> <p>Fire Extinguishers - Fire extinguishers were replaced through-out the school. No competitive procurement was conducted. To be an allowable expense from school nutrition funds, competitive procurement must be conducted. TA provided.</p> <p>Bread and Bread Products - In SY 2016-2017, the food service director asked for pricing for bread and bread products from two vendors. Prior to making an award, competitor pricing was shared with one vendor who requested this information. TA provided that this is not following good procurement principles. Integrity was not maintained and did not allow for free and open competition. The award was not made to any one vendor - bread and bread products were purchased from both vendors through the school year.</p> <p>Milk - No competitive procurement was conducted for milk. TA provided. In SY 2018-2019. a small purchase method procurement will be used.</p> <p>Franchise Pizza purchase - In SY 2016-2017, three varieties of pizzas were purchased from Dominos. For SY 2017-2018, the food service director is purchasing the same varieties from Pizza Hut. No competitive procurement was conducted. Only Pizza Hut was contacted to provide pricing. The food service director understood that by purchasing pizzas from a different franchise each year she is "spreading the wealth." TA provided. For SY 2018-2019 and forward, the food service director will conduct a small purchase procurement for pizza. The 3 Bids and a Buy document will be used. Documentation will include accurate specifications, general and specific requirements, and include required federal terms and conditions. Refer to Instructions to Complete a Small Purchase procurement available in download forms on IA-CNP.</p> <p>Pepsi-Cola - The business manager is not sure if the contract was signed by the school or booster club. He is not sure if the contract rolled-over year-to-year or it expired a while ago. He will check. TA provided. If last contract expired, a competitive procurement must be conducted.</p> <p>Prime Vendor - The school is a member of the Iowa City Rural Food Service Purchasing Group (ICRFSPG) for Prime Vendor services. The group issued a RFP for Prime Vendor for SY 2017-2018. The food service director has not been managing the contract by ensuring vendor is delivering the goods ordered, providing credits, if applicable, or if rebates or discounts are passed on to the school. Invoice prices are not checked against bid prices. Items that are not on the bid list have been ordered. These items are special order items and school has paid a high price for them. TA provided that it is the responsibility of the school food service to monitor cost reimbursable contracts to ensure contract terms and conditions are met and prices on invoices are net of all discounts, rebates, and credits.</p>
700 - Resource Management	704 Did the SFA complete a process to ensure its compliance with the net cash resources limitation to a level at or below three months' average expenses?	Technical assistance was provided on lowering the net cash reserve to under three months' operating expenses. Some options include: 1-

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		Applying for an exemption from increasing prices as indicated on the PLE tool. 2-Look to see if their are menu improvements that can be made such as an expanded variety of fruits and vegetables, a fruit/vegetable bar, and/or more fresh fruits and fresh vegetables. 3-Make sure all staff vacancies are filled and that staff is paid a competitive wage. 4-Look at current equipment and assess whether any equipment needs repaired or whether another piece of equipment (such as a combi-oven or flash freezer) are warranted.
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (i.e., cafeteria staff, F/R application approval staff) and their supervisors?	Personnel who complete tasks for CN Programs, even if not paid from CN funds must have annual civil rights training. That would include staff who determine applications for benefits, file claims, act as confirming official, etc. For non-program staff who only perform peripheral duties, a one-page training was provided.
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.	Technical assistance was provided on updating the district's wellness policy to reflect changes in meal pattern regulations. Information was also provided on including and encouraging participation of all required stakeholders.
1200 - Professional Standards	1218 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	Technical assistance was provided on Professional Standards. The State Agency allows training to be averaged over a two year period. The two years must be clearly indicated. Training resources were emailed to the director, and a book with 10-minute staff training plans was provided on-site.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	A complete HACCP plan includes comprehensive Standard Operating Procedures, SOPs, at each site; a Process List of menu items; critical control points indicated on recipes; temperature logs with corrective action indicated; annual training; and a plan to periodically review and revise HACCP. HACCP Principles include identifying hazards, monitoring procedures, establishing corrective actions, verifying procedures, and record keeping.
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?	Whether the district participates in the Summer Food Service Program, SFSP or not, outreach to households at the end of the school year is required since children may travel to other towns during the summer. For information on summer, SFSP, locations in Iowa, go to complete information about promoting SFSP, go to the summer food section of IowaCNP. Another resource that could also be shared is the National Hunger Hotline 1-866-3-Hungry or 1-877-8-Hambre. There is also information on the federal website with ideas for outreach brochures at <a href="#">USDA's website</a> This information could be shared via websites, newsletters, phone calls, flyers, etc.

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300 - Meal Counting and Claiming - Breakfast	321 a. Are total meal counts, by category, for the review period reasonable compared to meal counts for the day of review?	Technical assistance was provided on increasing reimbursable meals at breakfast. A grain and fruit or juice could be bundled in a cardboard boat to make it easier for students to grab and go. Milk could be placed closer to breakfast items to encourage students to add milk to their selections. Cashiers could keep applesauce cups or other fruit/juice to hand to students to complete a reimbursable meal.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students?	Technical assistance was provided on signage. Signage must indicate what the five components are and that three of the five components are required for a reimbursable meal, and one of the components must be a ½ cup fruit or vegetable. Signage must also indicate which menu item fulfills which component. The kitchen manager added component signage during the on-site review and a sign was provided.
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?	(1) The consultant, director, and kitchen manager discussed various program improvement options. One option is to either change the current salad bar to a reimbursable meal by adding grain choices and portioning meat/meat alternate choices instead of only offering it a la carte. The salad bar could also be eliminated and box salads be offered instead. A salad bar requires a lot of work-hours to produce and the bar currently only provides meals for 5-10 staff members per day and maybe 1-2 students. The return for the investment is not worth it in its current state.  (2) Technical assistance was also provided on encouraging reimbursable lunch meals for students who cannot purchase a la carte. This usually occurs when the student does not have the required 1/2 cup fruit or vegetable. Keeping something on the cashier stand, such as raisins, that can be added to the tray to create a reimbursable meal is a good plan.
400 - Meal Components and Quantities - Lunch	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.	Technical assistance was provided on including milk usage on Food Production Records and separating out peanut butter and cream cheese for bagels at breakfast. FPRs must also indicate the number of planned a la carte servings which are missing from the current records. It is important to accurately report those servings in order to demonstrate compliance with Smart Snack regulations.
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 changes to the health inspection practices in Iowa. In the past, two inspections of prep sites and one inspection of satellite sites was conducted free of charge. DIA changed to one inspection per year of prep sites and one inspection every 18-24 months for satellite sites. SFAs must still request two inspections per year and document the request.
1400 - Food Safety	1406 Were the selected relevant temperature logs available for review? If YES to specify which date was selected. If NO explain.	Technical assistance was provided on using thermal strips to check dishwasher temperatures. The strips should used at least once a week,

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		and after running through the machine, they should be taped to the temperature log as documentation. Technical assistance was also provided on documenting thermometer calibration. Thermometers should be checked at least weekly and the results logged.
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**Org - Level Commendations**

Description
<p><b>APPLICATIONS/BENEFIT ISSUANCE:</b> Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were 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. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.</p>
<p><b>CIVIL RIGHTS:</b> 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. Ethnic/racial information is collected and the form was correctly completed. No discrimination was observed. SFA on-site monitoring was completed for lunch even though it is not required for a one-building district. 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><b>COMPETITIVE FOODS (SMART SNACKS/HKA):</b> Students may purchase a second entrée and/or a second milk at meal services plus a large variety of a la carte items including chips, cookies, cereal, etc. Documentation was available to show that most foods and beverages sold to students during the school day met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte. The SFA charges competitive prices for a la carte items.</p>
<p><b>HACCP/FOOD SAFETY:</b> The SFA has a written Food Safety plan that includes all required elements. A copy of the written plan was available at the site reviewed. 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. Food Service workers wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.</p>
<p><b>MEAL COUNTING &amp; CLAIMING:</b> Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of October were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. Total Access is used as the school's POS system. There was a POS for all students regardless of grade level, and the POS was organized and orderly. Each student has a card that is scanned or they have the card on their phone to scan. 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 well trained and did an excellent job of quickly recognizing reimbursable meals.</p>
<p><b>MEAL REQUIREMENTS &amp; COMPONENTS:</b> The Food Service Director, FSD, does an excellent job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat. 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. Most menu items had CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meal on file. 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 encourages student consumption. Water was available as required. Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one or two of the five components. At least two types of milk are offered. Many low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Food service staff and students interact in a respectful manner. The Food Service Director completed the Menu Worksheets for breakfast and lunch for a specified week during the review period. Nutrient analysis was not required.</p>
<p><b>PROCUREMENT:</b> There is a written procurement plan and code of conduct. The local policy for disciplinary actions for violations of the code has been identified on the written code of conduct. Food Service Director attended the Regional Procurement Training workshop in Iowa City.</p>
<p><b>PROFESSIONAL STANDARDS:</b> Tracking was provided that documents that the director received the required 12 hours of annual training, manager received the required 10 hours of training, and all other staff are on track to receive either 6 or 4 hours of training by the end of the school year. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.</p>
<p><b>RESOURCE MANAGEMENT &amp; RECORD KEEPING:</b> The Resource Management section of the Off-Site Assessment tool was completed in a timely manner. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. There were no unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate financial</p>

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account for the nonprofit school food service. 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 the percentage of NPR revenue is sufficient. Money is not transferred out of the account to support other programs. 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 about Iowa City area SFSP meals was provided.

VERIFICATION: The SFA was only required to verify one application which was 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 application selected for verification were confirmed prior to verification. The SFA had at least one person attend training.

WELLNESS POLICY: The district has a current wellness policy on file. 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 and the most recent assessment of the policy are available to the public.