

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Remsen-Union Comm School District (54860000)
On-Site Review Dates: April 17-20, 2018

Program Year: 2018
Month of Review: March
Lead Reviewer: Deann Murphy
Org Representative(s): Clint Leonard

Org - Level Findings

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|--|---|----------------------------|
| 100 - Certification and Benefit Issuance | V-0100 | One application did not have a parent's social security number listed resulting in a 2.35% error rate for the district. | The application error was corrected on-site. No further corrective action is required at this time. | |
| 1000 - Local School Wellness Policy | V-1000 | The local wellness policy has not been made accessible to the public as required. The SFA has not yet completed an assessment of policy goals or made their assessment available to the public. | The SFA will state when they plan to complete the assessment of the local wellness policy goals for Remsen-Union CSD. They will also state how both the most recent local wellness policy and goal's assessment will be made available to the public. If the assessment has been completed, please attach it to your corrective action response. If you have already posted the policy and goal assessment, please state where they can be found. | |
| 1200 - Professional Standards | V-1200 | The acting FSD has not had adequate Food Safety training and no one working on-site is Serve Safe certified. Also, none of the staff involved with the Child Nutrition Program have received adequate Professional Standards training. | 1). The SFA will state the date when the FSD will take the Serve Safe training course. 2). The SFA will state how they intend to ensure that all staff involved in the Child Nutrition Program (FSD, FT/PT kitchen staff, Determining Official, Confirming Official, 2 POS operators) will have met their training requirement hours by June 30, 2018. | |
| Resource Mgt Comprehensive Review | V-RMCRF | The SFA has a net cash resource balance that exceeds the 3 month expense maximum allowed and there is no plan in place as to how to spend that down. | The SFA will submit their plan outlining how and when they intend to spend down their net cash resource balance to at or below 3 month's worth of expenses. | |

Site - Level Findings: Remsen-Union High School (0109)

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|---|---|----------------------------|
| 400 - Meal Components and Quantities - Breakfast | V-0400 | Inadequate grains were served at breakfast for the review week and on the day of review since both the long john served on the day of review and the French toast sticks served during the review week are not whole grain rich and, therefore, not creditable. Foods containing 2 or more ingredients at breakfast do not have | The SFA will submit a 5 day week of breakfast menus that are compliant with the meal pattern. All grains served must be whole-grain rich and all foods containing 2 or more foods put together must have a standardized recipe. Please submit the monthly menu for the week selected, the completed food production records showing what was actually served, appropriate | |

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| | | standardized recipes showing component contributions. | labels showing component contributions (CN/PFS/ingredient labels) and applicable standardized recipes. | |
| 400 - Meal Components and Quantities - Lunch | V-0400 | The review week lunch menus show that an inadequate amount of dark green vegetables were planned into the menu. Upon an expanded check of the monthly menu, it appears that this is a systemic problem. Also, not all grains served were whole grain rich and the SFA does not have an exemption on file. | Please submit a 5 day week of menus that meet all meal pattern requirements. Your response should include the posted monthly menu of the week submitted, completed food production records, and all supporting documentation showing component compliance, i.e. CN/PFS statements, ingredient listings, standardized recipes, etc. Please make sure the monthly menu has the shortened non-discrimination statement listed on it and that all grains served are whole-grain rich. | |
| 1100 - Smart Snacks in School | V-1100 | The SFA offers all foods from the reimbursable meal to be sold as a la carte, including desserts. There is no documentation showing that they are compliant with smart snacks requirements. | Please submit documentation showing that all desserts sold a la carte during the review month, i.e. smoothie, strawberry shortcake, cinnamon roll, apple crisp, pumpkin bar, coffee cake, and banana bar are compliant with Smart Snack regulations. If you decide not to sell these items a la carte, please state that instead. | |

Org - Level Technical Assistance

| Area | Question | Comments |
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| 100 - Certification and Benefit Issuance | 130 Is household notification of denied benefits consistent with FNS requirements? If NO, explain. | The SFA must provide written notification to all denied applications. Also, the determining official should fill in the "Received by" date on each application to ensure that applications are determined within the required 10 operating days. |
| 200 - Verification | 208 a. Did the SFA attempt to directly verify selected applications? | Recommend that the Verifying Official check E-Lookup for all verified applications after a confirmation review has been done, but before a letter has been sent to the household asking for their income information. If the SFA finds the students name on E-Lookup, verification is complete and the application has been verified. If no name is found, continue with the verification process as directed in the Eligibility Manual. |
| 700 - Resource Management | | <ul style="list-style-type: none"> • PROCUREMENT: • The district is using the state-prototype Code of Conduct policy. The local policy for disciplinary actions for violations of the code was identified incorrectly on the written code of conduct. The SFA will need to specify what disciplinary actions will be taken if the Code is violated. |

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| | | <ul style="list-style-type: none">• Include all anticipated purchases for SY 2017-2018 on the Written Procurement Plan.• Required federal terms and conditions must be included when procurement is conducted using small purchase methods of procurement. Please refer to the state-prototype templates posted on IowaCNP.• When using the micro-purchase method, purchases must be equitably distributed among vendors to "spread the wealth."• When procuring milk and bread, along with specifications for all items to be procured, 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 is included on the small purchase template on IowaCNP. 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, vacation 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 |
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| | | <p>individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should state 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, bread and prime vendor procurement. This is to allow the vendor adequate time to respond.• The vendors should provide bid pricing or price quotes to the SFA as well as any price updates throughout the year. The food service director should spot check invoices to ensure products delivered match the order and specifications of the product solicited. Price on the invoice should match bid pricing. Items not in the bid specifications must be procured using the appropriate procurement methods. Any substitutions need to be approved prior to delivery and prices on subbed items need to be the same or better than the product requested with the same or better quality. Reimbursements for travel do not need to be included in procurement as these are an allowed expense. Please see the micropurchase log on IowaCNP to document purchases to ensure child nutrition dollars are equitably spent. Also, if the store receipt does not itemize purchases, the SFA should note all purchases on the micropurchase log. <p>Small purchase procurement requires the SFA send out their specification document to a variety of vendors (recommend 3) in order to get the best price. Even if the school procures other items that are not foodservice related, if procuring products using federal dollars, all procurement regulations apply. The responsive and responsible vendor who provides the lowest pricing should receive the bid unless the SFA has</p> |
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| | | documentation showing otherwise. |
| 800 - Civil Rights | 809 Review program materials, do appropriate Program materials use the non-discrimination statement? | The Shortened non-discrimination statement needs to be on all posted menus, i.e. "This Institution is an Equal Opportunity Provider." |
| 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. | The most recent wellness policy needs to be made available to the public - it can either be posted on the school website or in the handbook, etc. An assessment needs to be done of the policy goals, preferably by the local wellness committee, at minimum of every 3 years. Best practice is to assess goals for each building. Since this district whole-grade shares with another school district, separate assessments are needed for each school. The assessment also needs to be made public. A template of an assessment form was provided to the Superintendent. |
| 1200 - Professional Standards | 1216 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool. | None of the staff who work with the child nutrition program have received adequate Professional Standards training so far. The FSD needs 12 hours, kitchen staff working over 20 hours weekly need 6 hours, all other kitchen staff (PT under 20 hours weekly and regular subs) and non-kitchen staff (Determining official, confirming official, 2 secretaries that operate the POS) need 4 hours annually. Professional Standards hours need to be obtained by June 30, 2018. At least part of these training hours need to include Civil Rights training annually. The State Agency provided Professional Standards written information and e-mailed the SFA links to various trainings available. Recommend sending the acting FSD to summer short courses this summer for training. Also, the Iowa Training Tracker was sent to the FSD to properly track all SFA staff involved in the Child Nutrition Programs. |
| 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. | Recommend adding the SOP for Cleaning up Bodily Fluids to your HACCP manual. |
| 1600 - School Breakfast and SFSP Outreach | 1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements? If NO, explain. | Breakfast should be promoted to households at least 2 times annually. Promotion should include a statement encouraging students to eat breakfast, menu, times available, price. Recommend promoting it at each semester, during National School Breakfast Week, PT conferences, etc. and/or placing a breakfast promotion on the school website. Also, a summer meals flier was sent to the SFA to provide to households before the end of the school year. This should be sent out annually each spring so that families know where they can access free meals during the summer months. |
| Resource Mgt Comprehensive Review | 6 Review the year-end Statement of Revenues and Expenses from the SFA's nonprofit school food service account. Were general expenses reasonable, necessary, and allocable? | Equipment repair, fire inspections, etc. need to be paid for from the General fund and recouped through the indirect cost rate. See instructions in the School Business Alert June/Nov 2017 for more information. |
| Resource Mgt Comprehensive Review | 9 Did all recorded expenses represent an activity or function recognized as reasonable, necessary, allocable and otherwise compliant with the provisions of 2 CFR 200 Subpart E? | Discussed with SFA staff that only foods compliant with the meal pattern should be purchased using child nutrition funds. Non-whole grain rich items were purchased which are not compliant. Internal controls should be implemented so that invoices are cross-checked for appropriate expenditures prior to payment. |

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Site - Level Technical Assistance Remsen-Union High School (0109)

| Area | Question | Comments |
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| 300 - Meal Counting and Claiming - Lunch | 321 a. Are total meal counts, by category, for the review period reasonable compared to meal counts for the day of review? | Discussed with the Business Manager and School Secretaries that when students leave the district, JMC takes them out of the system which changes meal count totals. The SFA should work with JMC to ensure accurate meal counts even if students have left the district. |
| 400 - Meal Components and Quantities - Breakfast | 402 Are the minimum daily quantity requirements met for the age/grade group being offered? | Labels from the Review week show that not all grains served are whole-grain rich, and therefore, not creditable. The FSD needs to specify to vendors that she needs whole grain rich grains and then update labels with the new products showing this. Breakfast products that are made up of more than one ingredient need a standardized recipe, i.e. Egg/Cheese/Biscuit, Biscuits and Gravy, showing how they credit. Check Iowa Gold Star Recipes, Healthier Kansas Recipes or USDA recipes, or write your own standardized recipe. Recipe information e-mailed to the FSD. Recommend all pre-dished fruit served at meals be a full 1/2 cup serving. Students must take 1/2 cup fruit at breakfast to make a reimbursable meal and must be allowed to take up to 1 cup fruit without an extra charge. |
| 400 - Meal Components and Quantities - Lunch | 410 a. Do planned menu quantities meet meal pattern requirements for the review period? | Discussed with the FSD the need for all grains to be whole grain rich unless they have a written exemption from the State Agency. Non-whole grain rich grains were found in storage, including tortillas, noodles, Rice Krispies and the Apple Crip recipe. Also, all subgroups need to meet minimum requirements. Current menus are lacking adequate dark green vegetables which appears to be a systemic problem based on the entire review month. |
| 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. | Agricultural products need to meet the Buy American provision. If a vendor sends the SFA a non-domestic product, the SFA should either return it to the vendor or enter the date, name of product and reason for keeping the product in an exception log. |

Org - Level Commendations

| Description |
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| Benefit documents were organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred to the POS system, and denied applications were correctly determined. All applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Households were notified that their 30 day carryover was about to expire. 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. Eligibility is kept confidential. |
| No fiscal action taken with this review so no claim adjustments should be needed. |
| The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The applications selected for verification were confirmed prior to verification. |
| The district has a current wellness policy on file. There are goals to promote student health, nutrition promotion and education and physical activity. The district's SIAC committee serves as it's wellness committee and they meet at least annually. |

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The Resource Management section of the Off-Site Assessment tool was completed on time. March receipts that were reviewed indicated appropriate and allowable expenditures. The Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool. The SFA effectively utilizes its USDA entitlement for commodities. In SY2016-17, the SFA used 116% of their Planned Assistance Level (PAL) dollars. Reports are filed on time, and all records are maintained for at least three years plus the current year.

The SFA has a 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. The SFA also has a written Code of Conduct which includes conflicts of interest, accepting items of monetary value, and checks and balances.

The SFA has documentation showing that competitive foods sold in the vending machine are compliant.

Site - Level Commendations Remsen-Union High School (0109)

| Description |
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| Planned menus provide a variety of foods that students enjoy as well as many fresh fruits and vegetables. Labeling information was well organized. Students seemed to have adequate time to eat their meals. Offer vs. Serve was done correctly. Water is available as required. Calorie, sodium and saturated fat levels seem to be within limits for menus served. |
| The And Justice for All civil rights poster was posted near the kitchen. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided to most staff involved in the Child Nutrition Program. Ethnic/racial information is collected and the form is completed. No discrimination was observed. SFA on-site monitoring was completed to ensure that the school is meeting program requirements. |
| The SFA has a district-wide written Food Safety plan that includes most 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. |