

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
River Valley Comm School District (19750000)
On-site Review Dates: January 9-11, 2018

Program Year: 2018
Month of Review: December
Lead Reviewer: Deann Murphy
Org Representative(s): Kathy Fick

Org - Level Findings

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|---|---|----------------------------|
| 100 - Certification and Benefit Issuance | V-0100 | Application errors were noted on 3 applications involving 6 students. This made a 3.9% error rate for the district. | All application errors were corrected on-site. No further action needs to be taken for this. | |
| 200 - Verification | V-0200 | The number of applications verified exceeded the number of applications that needed to be verified. This was also a problem on the last review. Also, no follow-up was documented by the SFA for households that did not respond to the verification request. TA was given on-site. | 1). Please explain the process you will use to correctly determine the number of applications to be verified next year. 2). The SFA will also explain the process they will use to follow-up with households that do not respond to the verification request before the SFA changes the households benefit level to paid. | |
| 300 - Meal Counting and Claiming | V-0300 | Per conversation with the FSD and Elementary Manager, field trip meals do not meet the required meal pattern. Currently, the SFA provides students with a "Serve Only" sack lunch containing a sandwich, 1/2 cup vegetable, 1/2 cup fruit, and an option of milk or juice. Since this meal is not provided using OVS, all 5 components in their full minimum quantities must be served. | The SFA will state what they plan to provide students in sack lunches that meets the meal pattern requirements. Please show how these items credit by providing appropriate CN labels or PFS statements. | |
| 1200 - Professional Standards | V-1200 | There are 9 identified staff outside of the nutrition staff that have duties related to the operation of the School Lunch Program that have not had adequate Professional Standards training. Staff who's school lunch duties do not exceed 20 hours weekly need a minimum of 4 hours annually. Civil Rights training is needed for everyone involved in program operations. | Please state your plan as to how these non-nutrition staff will meet their required 4 hours training prior to June 30, 2018. | |

Site - Level Findings: River Valley Elementary (0418)

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|---|---|----------------------------|
| 400 - Meal Components and Quantities - Breakfast | V-0400 | During the on-site review, the elementary kitchen staff reported that students can take any or all of the choices offered at breakfast. Today, those choices included cold cereal, NutriGrain bars, | 1). The SFA will state how they plan to ensure that students take a reimbursable meal that fits within their calorie limits. 2). Provide an example of a day's signage that they plan to post to educate students and | |

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| | <p>French toast sticks, Oatmeal, granola, peanut butter, yogurt, cheese sticks as well as fruit, juice and milk. Some students took multiple items that would put them over their calorie allowance for K-5 grade. No signage was present to help students and staff know what they had to take to make a reimbursable meal or how individual food items credited. Also, even though there is a staff member at the end of the fruit/yogurt/cheese bar at breakfast, students can easily slip through and not take their required 1/2 cup fruit to make a reimbursable meal. The POS is located at the beginning of the meal line.</p> | <p>staff on how items credit.</p> | |
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Org - Level Technical Assistance

| Area | Question | Comments |
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| 100 - Certification and Benefit Issuance | 126 Are the correct conversion factors used when processing applications that indicate more than one income frequency? If NO, explain. | Discussed with the Determining Official to use the appropriate column in ICAVES when a single income frequency is given - only use the Annual column if annual income information is given or if multiple incomes are given. Discussed the need to complete the Received By date so that they can ensure applications are determined within 10 operating days. Also, while it is nice to have a confirming official review all applications, it is not required based on the low error rate. If a confirming official does review all applications, they need to make sure to act as a new pair of eyes and confirm that the application is fully complete and all math is correct. Please make sure all household members are listed on the application. For example if 4 students + father is listed on application and mother fills it out, please make sure the mother's name is also listed as a household member on the application. Recommend notifying households found on the July direct Certification list early enough that they understand they do not need to complete an income application. This should create less paperwork for the district. |
| 200 - Verification | 200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report). | Instructions given to the verifying official on how to correctly determine the number of applications that need to be verified using ICACES. The SFA must use the Verification Report numbers from last year as well as the number of applications from this year to determine how many to verify. |
| 200 - Verification | 208 a. Did the SFA attempt to directly verify selected applications? | Once the applications are chosen for verification, the SFA should use E-lookup to see if any of the students are listed on direct certification before sending out any letters to households. If student names are found on e-lookup, the verification process for that application is complete. |
| 200 - Verification | 210 Did the SFA meet the follow-up requirements if the household failed to respond to the request for verification? If NO, explain | The verifying official needs to follow-up at least once if a household does not respond to the SFAs request for income documentation. Follow-up can be either in writing or verbally/phone call and it needs to be documented by the SFA. |
| 300 - Meal Counting and Claiming | 305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable): | Visiting students not part of the district should pay the non-subsidized adult price for meals. |

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| | | <p>Foods left on share tables may be donated to a non-profit organization, an after-school snack program, a back-pack program, the school nurse, etc., but may not be re-sold as part of the school lunch/breakfast program. Check with your local sanitarian for guidelines on perishable foods left on the share table.</p> |
| 300 - Meal Counting and Claiming | 308 Have alternate points of service been approved by the SA? | <p>Pre-K students are served in their room as an alternate POS. TA given to provide a roster to the Pre-K staff to mark off student names as each one gets their meal. Do not complete POS based on attendance.</p> |
| 700 - Resource Management | | <p>PROCUREMENT: Technical assistance provided to include all anticipated purchases for SY 2017-2018 on the Written Procurement Plan including micro-purchases. The school district may need to use a formal method of procurement either Invitation for Bid (IFB) or Request for Proposal (RFP) when procuring milk and dairy products. Based on last year's records, the annual amount spent for milk and dairy products comes very close to the district's local small purchase threshold of \$25,000. If the school district would prefer to continue using the small purchase (3 Bids and a Buy) method for procuring milk, the superintendent and the school board should consider raising the local small purchase threshold. A public notification in a major circulating newspaper in the school district's service area is required when using either 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 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 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 whether a firm fixed price or a fixed price with economic adjustment (escalator clause) is requested. 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, 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.</p> |

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| | | The food service director should spot check invoices from the Prime Vendor to ensure products delivered match the order and the 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. 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. Food service equipment repair and preventive maintenance should be an indirect cost to the school nutrition fund. |
| 1100 - Smart Snacks | 1100 What are the SFA's food sale policies? List all types of food/beverage sales to include the selling of non-food items in combination with food items. | Since the MS/HS houses 6-12 graders, all Smart Snacks must meet guidelines for MS students. Currently the vending machine contains flavored water which is not allowed for MS. |
| 1400 - Food Safety | 1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing. | Since your Pre-K program students eat in their classroom, there should be an SOP on file in the HACCP manual and available to them that discusses food safety procedures in the classroom. Also, based on Iowa Code requirements, sites that participate in family style dining must contact the Department of Inspections to obtain a waiver. Please notify the local health department that the Pre-school serves family style and follow their directions. |
| 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. | The USDA requires SFAs to promote breakfast at least 2 times annually. Promotion should include encouragement to eat breakfast, menus, times available, price. |

Site - Level Technical Assistance River Valley Elementary (0418)

| Area | Question | Comments |
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| 400 - Meal Components and Quantities - Breakfast | 404 a. Is there signage explaining what constitutes a reimbursable breakfast to students? | Breakfast signage e-mailed to the FSD to use at both sites in the district. Signage showing how each food is credited as an item is required and helps students and staff know what they must take to make a reimbursable meal. |
| 900 - SFA On Site Monitoring | 901 a. Was the on-site review of the lunch counting and claiming procedure completed prior to February 1? | Since this is a 2 site school district, the SFA on-site monitoring form is required to each site prior to Feb. 1. Currently the elementary site is complete - need to complete the MS/HS site form. |

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 in a timely manner to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. 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. Eligibility is kept confidential. |
| District staff work well together to make the School Meals Program run as smoothly as possible. |
| Fiscal action for this review will be under the USDA disregard level so no claim adjustments will be needed. The missing breakfast meals found from December have been recouped for the SFA on a revised claim completed by the State Agency. |

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| <p>The And Justice for All posters were hung in a public place in both sites. Civil Rights training was provided to all foodservice staff and some non-foodservice staff. Ethnic/racial information is collected and the summary form has been completed. No discrimination was observed. The non-discrimination statement was found on all household notification forms as well as the posted menu. The Public Release was sent to the local newspaper as required.</p> |
| <p>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 education, physical activity and other school based wellness activities. The latest assessment of the policy was available and both the policy and the assessment are located on the district website. The wellness committee meets at least annually and keeps meeting minutes. The committee is made up of a wide array of stakeholders.</p> |
| <p>The Foodservice Director does a good job with menu planning. She is working hard to obtain and organize all the necessary standardized recipes and labels required to show nutrients and components provided to meet the meal pattern. Food production records are available for all meals served. The fruit/veggie bar offers a nice selection of fresh produce when it is in season. Water is available as required. Many low fat/low sodium foods were found in the storeroom. Signage was posted for lunch as to what students have to take to make a reimbursable meal. Offer vs. Serve was done correctly. Staff was polite and helpful to students and guests.</p> |
| <p>The Resource Management section of the Off-Site Assessment tool was completed on time. December 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 tool. The SFA effectively utilizes its USDA entitlement for commodities, using 113% of their allotted entitlement dollars last year. Reports are filed on time, and all records are maintained for at least three years plus the current year.</p> |
| <p>The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods. It 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, disciplinary actions, and checks and balances. The SFA ensures that no vendors have been debarred or suspended by USDA. The Buy American provision seems to be followed based on the foods found in the storeroom and freezer.</p> |
| <p>The SFA has a district-wide written Food Safety plan that includes most required elements. It was recently updated by the FSD and a copy is located in both site kitchens.</p> |
| <p>The Summer foodservice program is promoted well. The SFA hosts a summer feeding program in conjunction with their summer school program.</p> |

Site - Level Commendations River Valley Elementary (0418)

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| <p>All meals observed during the review were reimbursable with a few prompts from staff to take a fruit or vegetable.</p> |
| <p>The latest Health Inspection Report was posted publicly. 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 labeled. Food Service workers wore proper hair restraints and practiced good gloving procedures.</p> |