

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Sac and Fox Tribe of the Mississippi in Iowa (60988602)**  
**Date of Review: 5/6/2018 – 5/9/2018**

**Program Year:** 2018  
**Month of Review:** March  
**Lead Reviewer:** Jean Easley  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	<b>BENEFIT ISSUANCE ERRORS:</b> 17 student applications eligible for free or reduced meals via application were incorrectly listed as PAID on the benefit issuance list for review month. A number of applications were incomplete, many of which could have been "directly certified" had Determining Official had access to "E Look Up" to directly certify students (eliminating need for application). Corrections were made during site review.	Determining Official will obtain access to the Portal and E Look Up system. Describe your planned procedure for ensuring that the proper benefit will be transferred to the Point of Service.	
200 - Verification	V-0200	<b>VERIFICATION ERRORS:</b> Verification process was completed late. SFA Verification began 12/1/17. The requirement is to begin 10/1/17 and be completed by 11/15/17. Both applications selected for Verification were PAID students on Benefit Issuance list. Applications on file showed one should have been FREE and one should have been REDUCED. Additionally, one verification was not determined correctly. Paystubs verified showed household was over income and should have been PAID. Remember to use gross income.	For your response, 1 - state your understanding Verification begins October 1st. 2 - State your commitment to participating with 3 important annual webinars: Eligibility and Direct Certification, Verification and Verification Collection Report webinars in August and September. Refer to Bureau of Nutrition annual calendar.	
700 - Resource Management (2018)	V-0700	<b>RESOURCE MANAGEMENT:</b> There are unanswered Resource Mgt questions as there is no Business Manager currently employed at school. The following questions were asked of Authorized Representative (Superintendent): 1 - What is the process for the Tribe paying for student meal accounts. 2 - A Financial Report in IowaCNP has not been completed as required for Non Public Schools. Annual report due September 15.	1 - Describe and provide documentation showing the process and how the Tribe pays student meal accounts. 2 - State your understanding and commitment that a Financial Report for SY17-18 will be completed for Non Public Schools is due annually in IowaCNP by September 15.	

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800 - Civil Rights	V-0800	<b>USDA NON DISCRIMINATION STATEMENT:</b> must be included on nutrition program materials including the menu, website and written documents provided to households. The abbreviated statement is acceptable on the menu. A link could be provided on the Nutrition Webpage which includes the process for making a complaint to USDA. <b>Ethnic Racial Form</b> has not been completed.	For your response, describe your plan to include the abbreviated statement on menu, include a link on the nutrition webpage and to complete and maintain in your files an Ethnic Racial Form annually.	
1100 - Smart Snacks	V-1100	<b>VENDING MACHINE</b> is not compliant with Smart Snack standards. (Otherwise the machine needs to be completely turned off from Midnight until 30 minutes after dismissal of school day.) This is a repeat finding. Beverages sold must meet Smart Snack Beverage Standards for the youngest students having access. For elementary this includes: Water, carbonated or plan, 8 oz Non Fat milk and 8 oz 100% Juice.	For your response, describe your plan for the Vending Machine.	
1200 - Professional Standards	V-1200	All involved in the Child Nutrition Program must have documentation of training: Authorized Representative and Consultant: 4 hours annually Teachers who assist at the fruit and vegetable bar at PreK - 3 Cashiers who assist at 4 - 12 side must be trained to do their job (Civil Rights, Meal Pattern, & Offer versus Serve is appropriate training for teachers). (Civil Rights, Resource Management, Procurement or Leadership) may be appropriate for Authorized Rep and Consultant.	For your response, describe the plan for training next year for: Authorized Representative, Consultant, Cashiers and Teachers at Fruit and Vegetable Bar.	

Site - Level Findings: Meskwaki Settlement School (8602)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	BREAKFAST ERRORS: Meals observed on day of review counted for reimbursement did not contain all required components. PreK - 3 participates in SERVE option which means all trays must include all components offered in complete serving size, regardless of student preference. 25 meals were not reimbursable. Highly recommend participating in Offer vs Serve district-wide. 19 meals with only 1/2 cup fruit, 3 without milk, 1 without cereal, 1 with no fruit, but 2 milk). 2 Meals on the OvS line were not incomplete with cereal only. Additionally: Corn Pops and Frosted Flakes are not WG rich.	During the site review, it was decided to move forward with the Offer versus Serve option district wide for Breakfast and Lunch. Change your application in IowaCNP to reflect Offer versus Service district-wide. Describe your plan to address the cereal discovered to be not WG rich.	

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400 - Meal Components and Quantities - Breakfast	V-0400	Breakfast Signage is not available. Technical Assistance explained this is a helpful tool for the cashiers who rotate at POS for the 4 - 12 line.	Breakfast Signage (and Lunch Signage for Secondary Side) was corrected during site review. No further action is necessary. State your understanding of this requirement.
400 - Meal Components and Quantities - Lunch	V-0400	FOOD PRODUCTION RECORDS are incomplete: You must include both <b>Planned</b> and <b>Actual</b> number of servings per grade group and adults. Enter after meal service. Note: your FPR actual served do not match the daily Edit Check report for the focus week of the review. Always include the <i>total</i> quantity to be prepared for all planned portions for each menu item in <i>measurable</i> amounts such as #10 can, pounds, or each.	Practice making the suggested improvements with FPR and attach completed FPR for Breakfast, Lunch, Fruit and Vegetable Bar for the same Cycle Menu Week (Pork Rib on Bun on Monday). Attach May Edit Check Report.
1400 - Food Safety	V-1400	HACCP PLAN and SOPs: Temperature documentation is missing. This is a repeat finding. Written HACCP Plan is fairly comprehensive; however, it has not been updated since 2017. Include a SOP or Standard Operating Procedure for the Self Service Fruit and Vegetable Bar.	For your response, describe your plan to 1 - implement temperature documentation and submit one week of examples. 2 - describe your plan to review HACCP and update SOP. 3 - address the issue of boxes on floor in freezer. State your intention to attend a 2 hour regional HACCP Boot Camp to be offered in Marshalltown in October.

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance		INDEPENDENT REVIEW OF APPLICATIONS: when error rate is 8% or greater you will be required to do an independent review of applications next school year. All applications must be reviewed by Confirming Official and dated. Patti Harding will contact you next school year.
100 - Certification and Benefit Issuance	101 Who is the determining official for certifying household applications (Names and/or position titles)?	APPLICATION posted on your website is from SY14. The application is updated annually and must include the current school year. (or remove from website). Next year, there will be an Adobe Pro Fillable Application which may be helpful for you.
200 - Verification	208 a. Did the SFA attempt to directly verify selected applications?	Prior to beginning Verification, double check student names in E Look Up. This is considered to be "directly verifying" applications.
700 - Resource Management (2018)		Authorized Representative is an employee of the SFA who is the point of contact for the Department of Education (DE). Their responsibility is to act on information or guidance provided by the DE or to distribute to appropriate staff member to act, respond, or implement; has signature authority related to matters of the Child Nutrition Program and is the primary contact for: program agreements; audit findings; three month operating balance; second view of application; and memos and updates. As this person is essential to the Child Nutrition Program, they are required to have a minimum of 4 hours of training annually.

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700 - Resource Management (2018)		FINANCIAL REPORT is a required to be submitted annually by non-public schools in the IowaCNP by 9/15. When a Business Manager is hired and in place, please contact Patti Harding for assistance. <a href="mailto:Patti.harding@iowa.gov">Patti.harding@iowa.gov</a> .
700 - Resource Management (2018)		PROCUREMENT: A Procurement Plan for school nutrition has been developed. Plan to review and update plan annually. 1. Debarment Certification Tab: Documentation is to be available to show SFA confirmed vendors are in good standing to do business with federal government. You must have a Debarment form on file for each vendor. Or, a printout from sam.gov page. (Go to quick search - enter name of vendor) 2. Continue efforts to organize and track documentation of procurement events, divided into areas of – micro purchases, small purchases and formal. 3. Milk "Bids" may be a Small Purchase instead of Formal as the amount is under the local threshold. Solicitation documents should use the language of "price quotations" if this is the case. 4. Buy American: this provision requires SFAs to purchase domestically grown and processed foods to the maximum extent practicable. Tribal Preference: SFA local procurement policy is to consider Sac & Fox and Native American vendors, products and services.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	The SFA must collect racial/ethnic data on an annual basis. Provided Form to Determining Official to complete and maintain with records during application and E Look up at beginning of school year.
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.	TRAINING TRACKER: An annual "tracker" or mechanism to track annual training is required and will help organize annual training for the SFA. Authorized Representative must be tracked. Consultant should be tracked if continuing to work with Nutrition. Document training was provided to Cashiers and Teachers who ensure a reimbursable meal at Fruit and Veggie Bar.
1400 - Food Safety		HACCP PLAN: Include additional Standard Operating Procedures (SOPs) such as the self-service fruit and vegetable bar. Sample SOPs can be found on the ISU Extension and Outreach site: <a href="https://www.extension.iastate.edu/foodsafety/haccpschool-foodservice">https://www.extension.iastate.edu/foodsafety/haccpschool-foodservice</a> . Recommend attending HACCP Boot Camp in Marshalltown in October 2018.

**Site - Level Technical Assistance Meskwaki Settlement School (8602)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	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.	FOOD PRODUCTION RECORDS for Breakfast must include total quantity prepared in measureable amounts and leftover amounts for each item offered. <i>Recording leftover amounts documents that students had access to all required components and sub-groups.</i>

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400 - Meal Components and Quantities - Lunch		NUTRITION DOCUMENTATION: Continue collecting CN labels and Product Formulation Statements for all products served in cycle menu to correctly verify how all products credit in meal pattern. A Product Formulation Statement is an alternative for crediting information when you cannot get a CN label. This is not the specification sheet from your distributor. Use Exhibit A Grain Chart for crediting bread and grain items w/o documentation.
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? If SFA/school is offering 1% flavored milk, check that approved waiver from State Agency is on file.	DIET MODIFICATION FORM is required to maintain by nutrition department for documentation for reimbursable meal.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	OFFER vs SERVE is recommended to limit waste and may be a better way to ensure all breakfast meals served are reimbursable.
1300 - Water	1300 Is free potable water available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)?	WATER must be available to all students at breakfast and lunch. A water fountain is convenient on Grade 4 - 12 side of cafeteria. Cups are available for teachers to provide water on PreK - 3 side, but they located below counter. How can you better communicate water availability?
Dietary Specifications Assessment Tool - Lunch	1 Are specifications considered when purchasing menu items and condiments to limit the following?	BACON BITS are high sodium, are not creditable, and offer no nutritional value. Recommend discontinuing for child nutrition program.

**Org - Level Commendations**

Description
MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. Point of Service, POS, counts and filed claims appear accurate. There is a POS for all students. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. Cashiers are trained, and daily edit checks are performed.
PROFESSIONAL STANDARDS: Food Service Director implements a training plan for nutrition employees. Documented training range from individuals completing self-directed short lessons to webinars to in-person training. Three individuals are ServSafe certified. Please begin to use a training spreadsheet to documents and tracks training annually.
USDA FOODS: Nutrition Director uses 100% of the allotted Planned Assistance Level (PAL) for USDA Food. (115% was utilized in SY17)
WELLNESS POLICY: The district has a 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. Potential stakeholders are made aware of their ability to participate on the wellness committee.

**Site - Level Commendations Meskwaki Settlement School (8602)**

Description
FOOD SAFETY: There is a written HACCP Plan with a comprehensive list of Standard Operating Procedures. Food safe food handling practices were observed.
NUTRITION STAFF and ENVIRONMENT: cafeteria appears to be welcoming place for students to enjoy school meals. Students are observed to have adequate time to eat. Staff are observed to be helpful and encouraging to student customers.

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**NUTRITION:** A cycle menu and standardized recipes are used. A fresh fruit and vegetable self-service bar is offered daily. FSD has a posted diagram for self-service demonstrating commitment in offering all vegetable subgroups daily. Day of observation there was: Spinach, Romaine, Peppers, Carrots, Tomato, Celery, Beets, Black Beans, Cucumber, Cauliflower, Fresh Pineapple, Kiwi. Vegetable subgroups on documented on FPR. Planned Serving Sizes for all menu items are adjusted for Grade Groups for PreK - 12 school.

**PRESCHOOL MEAL PATTERN:** A new preschool meal pattern was required to be implemented by 10/1/2017. Preschool classrooms are considered "co-mingled" with Kindergarten so it is acceptable to follow the National School Lunch Meal pattern at this time. If Preschool eats separately, it will be expected to move forward with serving the new meal pattern which includes less sugar (check labels on yogurt, cereal and no grain based "desserts"). Webcasts and resources can be found at: <https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition>.