

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Springville Comm School District (61380000)
Dates of Review: April 2-5, 2018

Program Year: 2018
Month of Review: February
Lead Reviewer: Deb Linderblood
Org Representative(s): Stacey Matus

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Four students were determined to be free and should have been reduced. These students were on the direct certification list as "Other Reduced" and the Determining Official put them into the system as "Other Free." One student was receiving free meals and had never turned in an application and was not on the direct certification lists so should have been denied after the 30 day carryover.	All application errors were corrected while the State Agency was on-site. No further action is required.	
100 - Certification and Benefit Issuance	V-0100	The SFA's notification of denied benefits does not describe why the household was denied, does not have the current USDA nondiscrimination statement and does not have the current Iowa nondiscrimination statement.	Work with Total K-12 or revise on your own the notification letter that goes to denied households or state that you will use the State Agency prototype notification letter for denied households.	
200 - Verification	V-0200	The application selected for verification was for an individual who is self-employed. The 1040 form was submitted however the lines needed to verify the income were cut off so that they could not be seen. TA provided on using the 1040 and the supplemental worksheet for determining a self-employed workers monthly income.	By the time the State Agency found that the verification was not completed accurately the household was found on the direct certification list as "Other Free" so the household will maintain their free status. No further action required for this finding.	
700 - Resource Management	V-0700	The SFA's Negative Account Policy does not state that students who qualify for free meals shall never be denied a reimbursable meal.	Revise and attach your Negative Account Policy to state that students who qualify for free meals shall never be denied a reimbursable meal.	
800 - Civil Rights	V-0800	The Confirming Official has not had Civil Rights training in school year 2017-2018.	Have the Confirming Official obtain Civil Rights training. Attach a sign-in sheet with the title of the course, date and time and her signature signifying that she completed the training.	
800 - Civil Rights	V-0800	The SFA's monthly menu does not have the current USDA short version of the non discrimination statement which is "This institution is an equal opportunity provider."	Revise and attach a copy of the May monthly menu showing that it has the proper short version of the USDA nondiscrimination statement.	
1000 - Local	V-1000	There are currently no students or Board	State your plan and a timeline for 1.) inviting students	

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School Wellness Policy		Members participating on the Wellness Committee. The Wellness policy has not been reviewed/ revised since 2014. Also, the SFA has not completed a triennial Assessment describing the school's progress in meeting the wellness policy goals.	and school board members to participate on the Wellness Committee 2.) when and who will review/revise the Wellness Policy 3.) completing a triennial assessment of the implementation of the local wellness policy. 4.) how you will make the results of the assessment available to the public.	
1200 - Professional Standards	V-1200	The Food Service Director has not been tracking training completed by those employees with duties in the nutrition department or those with duties related to the program. TA provided on where to find training tracker tools. Provided a hard copy of the Iowa Individual Training Tracker tool.	Complete and attach a training tracker tool for the Food Service Director, five nutrition staff and the confirming official.	
Resource Mgt Comprehensive Review	V-RMCRF	The SFA did not include all of the non-program food revenue or non-program food costs in the figures that are on the IowaCNP Financial report. The report currently shows that the SFA did not bring in adequate revenue from non-program foods. TA was provided that for non-program revenue the SFA needs to include a la carte sales, adult breakfast and lunch sales, 2nd entrée sales and milks sold a la carte. For their non-program food costs the SFA needs to include the cost of a la carte purchases, adult breakfast and lunch food cost and the cost of a la carte milks.	Calculate all of your non-program food costs and non-program revenue from school year 2016-2017. Complete and attach the USDA non-program revenue tool with the correct numbers entered. If the tool shows that additional non-program revenue is needed, state how you will bring in additional non-program revenue.	

Site - Level Findings: Springville Secondary School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	Students are going past the cashier without stating their unique id number and without any exchange between the cashier and the student. The primary cashier has their numbers memorized so she enters them by memory into the POS system. When a substitute cashier is used they do not know the student's id numbers and need the students to tell them their numbers. TA provided that each student needs to stop at the POS, tell the cashier their id number, allow the cashier to check their tray to be sure they have a reimbursable meal and then there needs to be some sort of exchange between the cashier and each student. Also, for grades K-3rd, teachers are completing a roster in their classroom of who will be eating lunch and who will have a milk. These sheets are then given to the cashier who enters the students into the POS. TA provided that meal counts must be taken at the point of service.	State how you will educate students and cashier(s) that each student must stop at the POS and state their unique id number to the cashier, that the cashier needs to check the tray to be sure the student has a reimbursable meal and that there is some sort of exchange between the student and the cashier. Also state how you will begin to get a point of service meal count for grades K-3rd.	
400 - Meal Components and Quantities -	V-0400	The SFA is offering Uncrustables at lunch for the 6-8th graders and 9-12th graders that only contribute 1 oz. eq. of grain and 1 oz. eq. of	State the product you will use to replace the uncrustables. State the meal contribution of the product you will use to replace the uncrustable.	

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Lunch		meat. This does not meet the weekly requirements for the 6-8th graders or the daily or weekly requirements for the 9-12th graders thus the SFA was short on grains and meat during the week of review. TA provided that each entrée offering must meet the daily and weekly meal pattern requirements. Discussed that the SFA may want to replace the uncrustables with a sandwich made with 2 oz. of cheese on 2 slices of 1 oz. eq. bread.		
1100 - Smart Snacks in School	V-1100	The bagel with cream cheese and the bagel with peanut butter does not meet Smart Snacks regulations.	State your intentions to stop selling a bagel with cream cheese and a bagel with peanut butter a la carte.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance		TA provided that the direct certification list now has two new columns (other free and other reduced). Discussed that this is the first time reduced price students have been directly certified. If a student is found under other reduced, however they are free by application there should not be a reduction in benefit status so they should remain free via an application.
100 - Certification and Benefit Issuance	110 Does the SFA use the direct certification notification letter provided by the State agency?	TA provided that if the SFA uses notification letters generated from their POS system then the letters must be submitted to the State Agency each year for approval. Discussed that an Approval Request Form is to be submitted along with the SFA's direct certification (free and reduced version), free/reduced and denied letters.
100 - Certification and Benefit Issuance	136 Did the SFA update the benefit issuance document(s) accurately and in a timely manner, including those students that are new, transferred, or withdrawn? If NO, explain. Record errors on the SFA-1.	TA provided that the SFA can use the date on the direct certification list that is the date the match was made or they can use the date they download the direct certification list. Emphasized that the method used must be done so consistently from month to month.
200 - Verification	202 Who serves as the confirming official? (Name and/or position title or software used is acceptable)	TA provided that since the Food Service Director is the Determining Official another person must be the confirming official.
200 - Verification	206 When a confirmation review was conducted,	TA provided that a confirmation review must be conducted prior to sending the letter to the household informing them that they were selected for verification. The individual who confirms the eligibility status should sign at the bottom of the application for free and reduced price meals.
200 - Verification	208 a. Did the SFA attempt to directly verify selected applications?	TA provided that the SFA should attempt to directly verify the students who are selected for verification by trying to locate them on IowaCNP. If the student(s) are found then they are directly verified and the SFA does not need to send the household the letter informing them that they were selected for verification.
700 - Resource Management		The school food service written procurement plan should be shared with the Superintendent. The procurement event page on the written procurement plan should be revised to reflect the upcoming school year's procurement events, correct procurement methods, contract award type.

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		<p>and solicitation evaluation method used. It is recommended that the procurement event page of the written procurement plan be reviewed annually (about February). It is best practice to keep a separate procurement event page for each school year. This practice will help ensure that the correct procurement method is identified based on the estimated value of a particular purchase. TA provided on how to complete the procurement plan as well as the off-site procurement questions. The written code of conduct did not identify the specific board policies that make a reference to disciplinary action. No board approved policies that reference disciplinary action were identified so a progressive disciplinary sample was provided to the SFA to insert into the Code of Conduct. Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a Buy) method of procurement. Please refer to the state-prototype template posted on IA_CNP.</p> <p>When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." A micro-purchase log can be found on IA_CNP.</p> <p>When procuring milk and bread, along with specifications (descriptions) 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 (bottom line), the cost of each item on price quotation request should 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 that calculates extended cost for milk was provided.</p> <p>For milk, other things to consider when requesting price from vendors are: is pricing requested for paper cartons or plastic bottles, coolers to be provided at no charge, Hazard Analysis Critical Control Plan (HACCP) plan to ensure clean crates and milk cartons are delivered, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should inform vendors whether a firm, fixed price or a fixed price with economic adjustment (escalator clause) is requested.</p> <p>For bread, provide vendors with a package count/package weight/weight per serving for each bread product. Review current school year bread product purchases to include any regularly purchased items when requesting price quotes. Unless exemption has been granted, bread made with enriched flour should be removed from price quotation letter. Bread products should be 100 percent whole grain or whole grain-rich (50 percent whole grain).</p> <p>The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and the description of the product solicited by GPO. Prices on the invoice should match bid pricing or be lower unless SFA was given advance written notification per solicitation of any price increase. Food items procured by the SFA not on the GPO solicitation must be procured using 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.</p>
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?	TA provided that the current USDA nondiscrimination statement must be on all NSLP and SBP materials and the SFA's nutrition web page. Provided a copy of the current statement and e-mailed a copy to the Food

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		Service Director.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging discrimination within FNS School Meal Programs? If procedures are written, provide a copy.	TA provided on where to find the USDA procedures for receiving and processing complaints alleging discrimination in the nutrition programs.
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?	TA provided that the State Agency has outreach materials available via a link on the Bureau's web page, such as flyers, bookmarks, etc. Showed the Food Service Director how to get to this link: https://www.educateiowa.gov/pk-12/nutrition-programs-0

Site - Level Technical Assistance Springville Secondary School (0172)

Area	Question	Comments
1400 - Food Safety	1402 Is a copy of the written food safety plan site specific and available at each school?	TA provided that the Food Service Director needs to date each Standard Operating Procedure (SOP) with the date of implementation and initial. Discussed that the SOPs should be reviewed/ revised on a yearly basis. Upon review/revision the SOP should be dated and initialed.

Org - Level Commendations

Description
Certification and Benefit Issuance: The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the Point Of Sale system, and denied applications were correctly determined. All applications were signed and dated by the household member and the SFA, were complete with SSN's, and all applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Waivers are provided to applicants. The SFA has a back-up system for benefit issuance documents and system. The Determining Official listened to the Application Approval and Direct Certification webinar.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria, services are offered for Limited English Proficient households, annual civil rights training was provided for food service staff and documented as well as the Superintendent and Business Manager. The SFA submitted the annual Public Release to the local media. Students with special dietary needs are correctly accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed.
Fiscal Action: Fiscal action appears to be below the USDA allowed disregard for this review so no claim adjustments for February seem to be needed.
Food Safety: The SFA has a Food Safety plan that includes all required elements. The kitchen and storage areas were orderly and clean. Temperature logs are maintained for all coolers-including milk coolers, freezers, and refrigerators. Food temperatures are documented on the food production record. Dishwasher temperatures are also taken and documented. Good food safety procedures were observed. Food Service workers wore proper hair restraints and practiced good gloving procedures. Michele McCoy and Lisa Stejstal are ServSafe certified.
Local Meal Charge Policy; The SFA developed and approved a meal charge policy on July 19, 2017. The policy was e-mailed to all households, is in the daily Oriole newsletter and was in registration packets. Staff were informed of the policy.
Meal Components and Quantities: The Food Service Director does a god job of menu planning. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. The menu met the daily meal pattern requirements for each K-5 and 6-8 grade groups. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. A variety of entrees and grains are offered throughout the month for breakfast and lunch. At lunch a vegetable bar is offered and a variety of fruits are available for students to select. At least two types of milk are offered. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Total K-12 is used as the school's POS system. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records were on file for all meals claimed for reimbursement for the review period. Cashiers are trained and appeared aware of what constitutes a reimbursable meal. Daily edit checks are performed.

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Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of February 19-23, 2018 for breakfast and lunch. The worksheets showed that at breakfast all meal components were offered and at lunch the vegetable sub-groups were all offered. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the school is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, controlling the portion sizes of condiments, offering some reduced-fat salad dressings, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats. A nutrient analysis was not required.

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.

Procurement: The Food Service Director and Business Manager attended the regional Procurement Training in Iowa City. The SFA has a comprehensive written Procurement Plan that includes federal thresholds (the SFA does not have local thresholds), procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA is a part of the Eastern Iowa purchasing group and has a signed agreement.

Professional Standards: The newly hired Food Service Director meets the hiring standards. All nutrition staff have started to obtain the required training for school year 2017-2018 and there are plans for them to obtain the rest of the required training prior to the end of the school year.

Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.

Resource Management: All expenditures that were reviewed appeared allowable. There were no unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate financial account for the nonprofit school food service and net cash resources do not exceed three operating months. The Paid Lunch Equity, PLE, tool was completed and prices were increased as required. No indirect costs are charged the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for USDA Foods. In school year 2016-2017 the SFA used 100% of their allotted PAL dollars. The SFA participates in the DoD program

School Breakfast and Summer Food Service Program Outreach: School Breakfast Program, SBP, outreach included information regarding the school breakfast program being listed on the school website, the program being discussed at school orientation and the breakfast menu being posted on the school's website daily as well as listed in the Daily Oriole. Summer Food Service, SFSP, outreach was completed by hanging SFSP posters in the cafeteria. Posters were in English and in Spanish.

Smart Snacks: Students are able to purchase foods via a la carte sales. Exempt leftover NSLP entrees are only sold the same day or the day after they are initially offered. Beverages sold meet the standards for the various age groups of students. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.

Verification: The correct number of applications were verified and were correctly selected from error prone applications. The process was completed on time. The SFA had at least one person attend training via the Verification webinar and the Verification Reporting webinar. The verification report was completed accurately and on time.

Water: Free potable water is available to all students for lunch and for breakfast via a water fountain that is close to the cafeteria.

Wellness Policy: The SFA's wellness policy was reviewed and revised on June 18, 2014. The public is made aware of the SFA's wellness policy via the district's website. The following individuals are involved in reviewing and updating the Local Wellness Policy: Physical Education Teacher, Maintenance Director, Business Manager, Secondary Principal, School Nurse, Food Service Director and Community Members. Potential stake holders are made aware of their ability to participate in the Wellness Committee. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.