

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Francis Catholic School - Marshalltown (41048103)
Review Dates: November 6-8, 2017

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming	V-0300	The SFA has not had internal controls to ensure the meal counts do not exceed enrollment or the attendance adjusted enrollment.	Complete and attach the edit check report for October. State your intentions to complete this report on a monthly basis. TA provided on how to complete the report and how to analyze the numbers once the report is completed.	
800 - Civil Rights	V-0800	The SFA does not have a procedure for receiving and processing complaints alleging discrimination within the FNS School Meal Program.	Develop and attach a procedure for receiving and processing complaints alleging discrimination within the FNS School Meal Program.	
800 - Civil Rights	V-0800	The SFA has not been getting Diet Modification Forms for students who need dietary modifications.	State the date you will or have sent the Diet Modification Form to households who have a student who needs a dietary modification. State who will receive the signed form and state your intentions that a copy of the completed form will be provided to the Food Service Director so that she can assure the child's diet is modified accordingly. TA was provided that a parent can complete the bottom portion of the form if they would like the soy milk listed that will be served in place of fluid milk and this does not require a medical professional's signature. Also state your intention to make the Diet Modification Form available to households each school year.	
1200 - Professional Standards	V-1200	The Food Service Director has only completed 1.5 hours of training so far in school year 2017-2018.	State the training that the Food Service Director will complete by the end of 2017-2018 school year including the number of hours each training will provide. TA provided that it would be good for the Food Service Director to complete some of the Iowa School Meals Web-based Tutorials, such as Food Buying Guide, Food Production Records, Meal Pattern, etc.	
1400 - Food Safety	V-1400	TA provided that the SFA is missing some standard operating procedures that they should have in their food safety plan, such as Controlling	Develop and attach a standard operating procedure for Controlling Time and Temperature During Preparation and Disinfecting Body Fluid Spills that will become part	

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		<p>Time and Temperature During Preparation and Disinfecting Body Fluid Spills. Consultant provided sample policies. Also, the SFA's standard operating procedures do not have documentation that they have been reviewed and revised. In addition, numerous unauthorized individuals come into the kitchen preparation area.</p>	<p>of your food safety plan. Also, state your intentions to review and revise your food safety plan and that you will document the date they have been reviewed and revised. Also decide which individuals are to have authorized access to the preparation area of the kitchen. Develop a policy which states that only authorized individuals are to be in the preparation area of the kitchen. Attach a copy of the completed policy.</p>	
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Site - Level Findings: St Francis Catholic School (8103)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	<p>The SFA's production records need the component contribution, adult serving size, adult planned serving size, leftovers and number of milks served recorded. Also the planned meal counts and the actual meal counts should be recorded in the upper right hand corner of the page. Also worked with in-coming Authorized Representative, who also runs the POS, that at the end of meal service she should give the Food Service Director the meal count totals for students and adults so that she can enter this number onto her Production Record.</p>	<p>Complete and attach one week's worth of production records that were completed after the on-site review. As the SFA has decided to change from being a serve site to using offer vs. serve TA was provided that the planned servings should reflect that not all students will take all food items. TA also provided on how to complete the production record.</p>	
400 - Meal Components and Quantities - Lunch	V-0400	<p>The Food Service Director has improved on planning menus that meet the meal pattern requirements. On the week of menus used to complete the menu certification worksheets all of the meal components and vegetable sub-groups were offered. The menus were short on grain (only provided 7 oz. eq. for the week).</p>	<p>TA provided that on her paper menu templates the Food Service Director needs to add up the weekly amounts as well as the daily amounts and compare what she has planned for the day and the week to the meal pattern requirements. Reviewed how to use the Food Buying Guide and the Bread Grain Chart. For your response, state your intention to send the Food Service Director to the State Agency's Healthy Meals Workshop in the summer of 2018.</p>	
1400 - Food Safety	V-1400	<p>The SFA has not had a food inspection since 04/29/16 and has not requested an inspection.</p>	<p>TA provided that the SFA must request two food safety inspections each school year. For your response, state your intentions to request two food safety inspections per school year and that you will maintain documentation that you requested two inspections.</p>	
1400 - Food Safety	V-1400	<p>The SFA does not document dish machine temperatures.</p>	<p>Begin to record dish machine temperatures. Attach documentation showing temperatures were taken for one week. The State Agency provided a dish machine temperature recording form that the SFA can use or they can develop their own form.</p>	
1500 - Reporting and Recordkeeping	V-1500	<p>The Food Service Director threw out the majority of her past paperwork this past summer (temperature logs, production records, menus, etc.)</p>	<p>State your intentions to keep all records pertaining to the Child Nutrition Program for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits.</p>	

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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	124 a. Certification and Benefit Issuance Review Method:	TA provided that an updated Eligibility Manual is released by USDA on a yearly basis. Consultant e-mailed a copy of this school year's manual to the SFA.
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.	TA provided that on ICAVES the SFA should only use the annual tab if the household has reported income in more than one frequency. If households report income in one frequency the tab that matches that frequency should be used (ex. if reports weekly income then the weekly tab should be used).
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	TA provided on the use of ICAVES for determining how many applications are to be verified. Walked through which numbers are to be entered into the tool and that a report can then be printed. The State Agency consultant assisted the SFA with completing their verification report on IowaCNP.
200 - Verification	208 a. Did the SFA attempt to directly verify selected applications?	TA provided that if the SFA does not have any error prone application(s) and they randomly select an application with a case number they should attempt to put this household into ELookup. If one of the students are located, this household is considered to be directly verified and a letter of selection does not need to be sent to the household. On the Verification Report this application would be reported in line 5-7 and 5-6 would not be check marked.
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	TA provided that if a household does not respond to the verification request, the SFA is required to make one follow-up attempt. Showed the SFA the space on the free and reduced price application for them to sign and date when they make a follow-up attempt.
200 - Verification	211 If applicable, did the SFA's notice of adverse action contain all required information, including notification of appeal rights? If NO, explain.	TA provided that the SFA needs to be sure to print both pages of the verification notification letter as the letter they sent in school year 2017-2018 did not contain the USDA or Iowa nondiscrimination statement. TA also provided that the SFA must give the household 10 calendar days to appeal and then within 10 operating days following the appeal period, they must change the student's eligibility status.
700 - Resource Management		TA provided that the SFA needs to be sure to obtain a copy of the CBC manual which has the US Foods awarded contract, bid prices and other required documents. Consultant contacted the West Des Moines Food Service Director to remind her to send St. Francis Catholic School a copy and also encouraged the SFA to contact US Foods for a copy. TA was also provided that once the SFA receives the contract the SFA needs to monitor the contract. Per the Food Service Director a representative from US Foods has only been in once and per the contract they are to come at a minimum twice a month. The Food Service Director stated she needs assistance with the on-line ordering system so US Foods should be contacted and a request made that they follow the terms of the contract. TA provided that when using micro-purchasing the SFA needs to log these purchases. Provided the State Agency prototype micro-purchasing log. TA also provided that if a vendor decides not to respond to a request to bid, the SFA should attempt to get a Vendor Statement of No Bid from them. TA also provided that the SFA needs to obtain a signed debarment

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		statement from the vendors that they utilize. Provided SFA with the 3 bids and a buy form and explained that they should include detailed specifications and terms such as "Buy American" on this form. In school year 2016-2017 the SFA only used 62% of their allotted PAL dollars for USDA foods. TA provided that financially it is important to try to use 100% of their allotted dollars. The Food Service Director stated that the US Foods delivery is being made prior to her arriving at work so she is unable to check in her order. TA provided that someone needs to assure that the items delivered are the items that were ordered, that all foods delivered meet the "Buy American" requirement, etc. Before the consultant left the Head Cook/Manager had arranged with US Foods to come at 7:30 and she arrives to work at 7:00 a.m. Ta also provided that the Nutrition account cannot pay for coffee for staff consumption.
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 shortened version of the USDA nondiscrimination statement on the SFA's website needs to be changed to read: "This institution is an equal opportunity provider."
800 - Civil Rights	801 Does the School Food Authority have a Public Release?	TA provided that if the SFA has the public school include them in their public release that they need documentation that this occurred. Authorized Representative stated that she would just send the State Agency prototype Public Release to the local newspaper and keep documentation of doing this.
800 - Civil Rights	805 How are students with special dietary needs accommodated?	TA provided that the SFA must offer a milk substitute that is nutritionally equivalent to cow's milk to students who cannot drink regular milk. Provided the Food Service Director with a list of milk substitutes that are approved for use.
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?	TA provided that there is an updated Civil Rights power point presentation and an interactive game on IowaCNP under download forms.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	TA provided that since the SFA has only one site, they are not required to complete the on-site monitoring form for lunch (they do not claim breakfast). If they find the tool useful, they are encouraged to use it for their own use. TA provide that the State Agency has revised the form and they may find it useful to complete.
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	TA provided that students should be included as members of the Wellness Committee. Encouraged the SFA to invite their older students to participate (5th and 6th graders).
1100 - Smart Snacks	1103 Who is responsible for tracking Smart Snacks compliance at the:	TA provided that if the SFA was to begin selling a la carte items to students, that these food item's nutrition information would need to be entered into the Smart Snack calculator to determine if they were compliant with the Smart Snack's regulations.
1200 - Professional Standards	1218 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	TA provided that part-time food service workers need to have 4 hours of training per school year.
1200 - Professional Standards	1220 a. Are there any employees that were hired in the time between completion of the Off-site and On-site Assessment Tools?	TA provided that the individual who was recently hired would need to have Civil Rights training and since she was hired prior to January 1 she will need to have 4 hours of training before the end of school year 2017-2018.
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 SFA needs to inform families about the availability and location of Summer Food Service Programs. Showed the SFA where to find promotional materials (flyers, bookmarks, etc.) on the Department of Education website.

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Site - Level Technical Assistance St Francis Catholic School (8103)

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	TA provided on the advantages of using Offer vs. Serve. SFA is concerned with the amount of food waste they have so offer vs. serve could help with this issue. Provided the Offer vs. Serve manual to the SFA for them to have additional information. On the State Agency's second day at the site, the SFA started to use Offer vs. Serve. Provided assistance on what each student needed to take prior to meal service and also during meal service. The SFA's site application was revised to reflect that they are now using Offer vs. Serve. Also recommended that the SFA consider placing a bowl of fresh fruit at the Point of Sale table so that if a student gets to the POS and does not have 1/2 cup of fruit or vegetable they can grab a piece of fruit.
1400 - Food Safety	1406 Were the selected relevant temperature logs available for review? If YES to specify which date was selected. If NO explain.	TA provided that temperature logs need to be kept on file for 6 months.

Org - Level Commendations

Description
Certification and Benefit Issuance: Benefit documents, as well as all paperwork, were very well organized. There were no benefit issuance errors. The current application form and guidelines were used by the SFA. Elookup is used and students located are downloaded to cart so that the SFA can print documentation of these students being directly certified. Benefits are accurately and frequently transferred to the POS system, and the one denied application was correctly determined. 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. A second person confirms that the applications were approved correctly. 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. The SFA has a back-up system for benefit issuance documents and system.
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 to staff involved in the National School Lunch Program and is documented. The Ethnic/racial information is collected and the form is completed. No discrimination was observed.
Fiscal Action: Very little fiscal action was associated with this review and it will not exceed the \$600 disregard.
Food Safety: The SFA has a written Food Safety plan. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk cooler, freezer and refrigerator. Food temperatures are taken and documented for foods served. Thermometer calibration is done. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. One nutrition employee is ServSafe Certified.
Meal Counting and Claiming: Students enter their unique number into a key pad to record that they were served a meal. 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 counts and filed claims appear accurate. Power School 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.
Nutritional Quality of School Meals: The Authorized Representative and Food Service Director completed the USDA menu worksheets for the week of October 9-13, 2017 for lunch. The worksheets showed that the menu had all meal components and vegetable sub-groups. The Authorized Representative and Food Service Director also completed the Dietary Specifications Assessment tool 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, controlling the portion sizes of condiments, offering some reduced-fat, low-fat and fat-free 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.
Procurement: The Principal attended the State Agency's Regional Procurement Training in Marshalltown. The SFA has a written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, and the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA also has a School Nutrition Code of Conduct. The Prime vendor contract includes all of the required Federal terms and conditions. The Prime Vendor Request For Proposal had the Buy American provision. The Request For Proposal had evaluation criteria with price as the primary factor. Members of the Central Buying Consortium meet regularly to monitor contracts as a group. The Principal has a copy of the Prime vendor contract as of

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11/14/17 and has been monitoring invoice prices against the bid prices.
Professional Standards: The Authorized Representative has completed 5.5 hours of training in School year 2017-2018 of the required 12 hours. She plans to participate each month in the State Agency's "What's New in School Nutrition" webinars. The individual training to become the Authorized Representative has completed 6.5 hours of training. Nutrition staff have started to obtain their required training for school year 2017-2018.
Reporting and Record Keeping: Reports are filed on time.
Resource Management: 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 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 has completed the Financial Report on IowaCNP.
Verification: The correct number of applications were verified and were 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 was confirmed prior to verification. The SFA had two individuals attend training. The verification report was completed accurately and on time.
Wellness Policy: The SFA's wellness policy was reviewed and revised on April 13, 2017. The public is made aware of the SFA's wellness policy and assessments via the web site. The following individuals are involved in reviewing and updating the Local Wellness Policy: parents, PE teacher, Administrator, lunch employee and other teachers. Potential stake holders are made aware of thier ability to participate in the Wellness Committee. The SFA completed an assessment of their wellness policy. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.

Site - Level Commendations St Francis Catholic School (8103)

Description
Meal Components and Quantities: The Head Cook 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. All meals observed met at least the minimum daily requirements. 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, fruits, and vegetables are offered throughout the month for lunch—including many fresh fruits and vegetables. 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 lunch.
Smart Snacks: Students are able to purchase second milks which are allowable under the Smart Snacks regulations. Leftover NSLP entrees are not sold.
Water: Free potable water is available to all students for lunch on a cart that is in the cafeteria. A volunteer assisted students with obtaining water.