

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Mary\Catherine-Remsen (54868001)
On-Site Review Dates: February 26-28, 2018

Program Year: 2018
Month of Review: January
Lead Reviewer: Deann Murphy
Org Representative(s): LeAnn Wiederholt

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Five student errors were noted on the applications on file resulting in a 19.23% error rate for the SFA.	Errors were fixed on-site. The SFA will state in writing that they agree to do a second full review of all applications in SY2018-19.	
800 - Civil Rights	V-0800	Civil Rights training was not completed with all staff involved in the Child Nutrition Program.	The SFA will show documentation that Civil Rights training has been conducted with all 8 staff involved in the Child Nutrition Program or state the specific date that they intend to complete the training.	
1000 - Local School Wellness Policy	V-1000	The SFA does not have a wellness committee made up of the needed stakeholders that meets regularly. The wellness policy that is posted on the school's website is outdated. An assessment of the wellness policy goals has not been completed or made public.	The SFA will 1). show documentation that they have invited all the required stakeholders to a local wellness policy committee meeting and show the date that the meeting will be held. Required stakeholders include School administration/board member, PE teacher, Food service representative, student, parent, community member and school health professional (if applicable) at minimum. 2). State when the policy will be assessed (Progress Report completed) and how it will be made available to the public. If this has already been done, please attach the completed assessment.	
1200 - Professional Standards	V-1200	The new FSD hired this year has not had prior food safety training which is required.	The SFA will state how and when the FSD will obtain the required food safety training prior to June 30, 2018.	
1200 - Professional Standards	V-1200	The SFA is not tracking the Professional Standards training being done by Child Nutrition Staff. None of the staff have completed their required training for SY2017-18.	1). The SFA will complete the training tracker form sent to them with all training done to date. They will submit the completed tracker to the State Agency. 2). The SFA will also describe their plan as to how they intend to have all 8 staff meet their training needs prior to June 30, 2018.	

Site - Level Findings: St Marys High School (8103)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities -	V-0400	Numerous errors were noted in the review week menu, including inadequate fruit provided on Monday, inadequate vegetables provided on	The SFA will repeat the same menu that was used for the review week showing that all components are provided in their proper quantities for all age groups.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Mary\Catherine-Remsen (54868001)
On-Site Review Dates: February 26-28, 2018

Lunch		Friday, inadequate meat/meat alternates provided on some days during the week, inadequate grains provided to the 9-12 graders during the week, inadequate starchy vegetables provided to the K-8 graders and inadequate "other" vegetables provided during the week. Food production records do not reflect all the vegetables served on the Garden Bar and the SFA does not collect and keep on file food labels for all products served as required. The SFA uses cycle menus so these errors are systemic.	The SFA will submit applicable standardized recipes and CN/PFS statements supporting component contributions. The SFA will ensure that all vegetable subgroups are met for all age groups and that food production records are complete with all foods served on the menu each day.	
1100 - Smart Snacks in School	V-1100	The SFA sells seconds of the foods available on the reimbursable meal line. There is no documentation showing that all these foods are compliant. Entrees sold the same day are exempt from documentation. The SFA has a vending machine in the cafeteria that contains beverages that are not compliant for the lowest grades. The SFA has a snack cart that contains Original Rice Krispie Bars that are not compliant with Smart Snacks.	The SFA will 1). state how they intend to become compliant with Smart Snacks with their vending machine and snack cart and who will be responsible to ensure continued compliance and 2). Submit documentation showing side items of cinnamon rolls, peach crisp and tea rolls are compliant with Smart Snacks and able to be sold to students during the school day.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	120 How and when are the following changes made to the point of service and benefit issuance document:	According to 7 CFR 245.6(c)(2), an individual student's eligibility from the previous school year (before July 1) carries over for up to 30 operating days into the new school year, or until a new eligibility determination is made, whichever comes first. The 30 operating days begins on the first operating day of school. The SFA needs to allow free/reduced benefits to remain in place for the full 30 operating days of school unless a new application has been filed.
100 - Certification and Benefit Issuance	127 Is household notification of eligibility consistent with the responses provided on the Off-Site Assessment Tool? If NO, explain.	Discussed with the determining official the need to fill in the "Received by" date on the applications when they are received by the school. All applications must be determined within 10 operating days. Both the determining and confirming official need to check to make sure all required information is included on income applications before processing them, i.e. a Social Security number, an adult signature, income, and that the names of individuals in the household match the number given by the family. If the SFA wishes to use their own form for household notifications, the form needs to be submitted to and approved annually by Deb Linderblood at the State Agency. The SFA can also use the State Agency prototype found in Download Forms for household notification.
100 - Certification and Benefit Issuance	131 Were all direct certifications (SNAP, TANF, FDIPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified? If NO, explain. Record errors on the Certification and Benefit Issuance Error Worksheet, SFA-1.	Four student names were found on e-lookup that were not getting free benefits. The SFA was strongly encouraged to sign up for and use e-lookup for all new and returning students in order to provide free benefits without completing an application.

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Mary\Catherine-Remsen (54868001)
On-Site Review Dates: February 26-28, 2018**

200 - Verification	205 a. Did the SFA complete verification?	The confirming official needs to be a separate person from the hearing official. The confirming official should determine if the application is complete and that the original determination is correct before sending a letter to the household for verification. The SFA should fill in all the blanks in the verification letter prototype so the household knows how they can contact the SFA if needed and when documentation is due. Any follow-up attempt with a household needs to be documented by the SFA. Verification needs to be completed no later than November 15 each year.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable):	Field trip meals for Elementary are "Serve Only" where students are not given choices, therefore, all 5 components must be provided in their minimum quantities including 3/4 cup vegetables. Student workers should not be given a free meal in exchange for work in the kitchen.
700 - Resource Management		<p>PROCUREMENT:</p> <ul style="list-style-type: none"> · The district is using the state-prototype Code of Conduct policy. The local policy for disciplinary actions for violations of the code was not identified on the written code of conduct. Enter policy # and title in the blank line on the state-prototype or, if no such local policy exists, write in how the SFA intends to deal with disciplinary violations. · Be sure to include all anticipated purchases for SY 2018-2019 on the Written Procurement Plan including micro-purchases and small purchases. · 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 template posted on IA_CNP. · When using the micro-purchase method, purchases must be equitably distributed among vendors to "spread the wealth." If the SFA is unable to do this based on a limited number of vendors in the area, a statement needs to be on file annually stating why you were not able to equitably purchase from a variety of vendors. · 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 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

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Mary\Catherine-Remsen (54868001)
On-Site Review Dates: February 26-28, 2018

		<p>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.</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 and bread procurement. This is to allow the vendor adequate time to respond. · 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. · Food service equipment repair, preventive maintenance, rent, utilities, etc. should be indirect costs to the school nutrition fund. <p>Enriched, non-whole grain rich, egg noodles and macaroni were found in the storeroom. The SFA does not have a waiver to allow them to serve these foods. Child nutrition funds should not be used to purchase foods that are non-complaint with the meal pattern. Foods purchased for another program but listed on a child nutrition program invoice should be clearly marked that they will be paid for from another source.</p>
800 - Civil Rights	801 Does the School Food Authority have a Public Release?	The USDA requires that the SFA submits the public release annually before school starts to the local newspaper so households are aware of benefit levels. The newspaper does not need to publish it, but if they do they cannot alter it in any way. Keep documentation showing that it was sent.
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?	Civil Rights training must occur annually with all staff involved in the Child Nutrition Program. Training needs to be documented with a sign in sheet which includes topics covered, time in-time out and participant signatures. Keep this on file for 3 years + current year. Civil rights training can be done as a group using either the PowerPoint Presentation or the Jeopardy game on IowaCNP Download Forms. If individual training occurs, have participants complete the Civil Rights quiz and keep this on file as documentation.
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	The shortened non-discrimination statement must be on all child nutrition forms including the posted menu. The shortened statement is, "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 local wellness policy needs to be dated as to when it was approved/reviewed by the school board and posted on the school website in place of the outdated policy found there. A template of the goals assessment was provided to the SFA. This needs to be completed at least every 3 years and made available to the public. Discussed required stakeholders that need to be a part of the local wellness committee.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Mary\Catherine-Remsen (54868001)
On-Site Review Dates: February 26-28, 2018

		Meeting minutes should be kept when the committee meets.
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.	A training tracker form was e-mailed to the lunch coordinator to keep track of all 8 child nutrition program staff's Professional Standards training. The FSD needs 12 hours, PT kitchen staff need 4 hours, non-nutrition staff need 4 hours prior to June 30 annually. Training must include Civil Rights annually. All training needs to be pertinent to the needs of the program and the job that is being done.
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 Summer Meet Up flier was e-mailed to the SFA in both English and Spanish to send to households in the spring newsletter, place on the school website, etc. Households should be notified annually each spring before school is over about summer feeding sites across the state.
Resource Mgt Comprehensive Review	1 Did the SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency?	The church charges the school rent for use of the cafeteria which is considered an indirect cost. The general (school) fund needs to pay for this. The school can then line-item transfer money from the lunch fund to recoup this cost. The school lunch program can pay up to 10% of their direct cost base to cover all indirect costs, including rent. The direct cost base consists of the sum of foodservice staff salaries, benefits, supplies and foodservice travel costs. Costs and transfers should be clearly shown in the foodservice account bookkeeping.

Site - Level Technical Assistance St Marys High School (8103)

Area	Question	Comments
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?	When comparing January meal count totals with the submitted claim, it was found that the SFA overclaimed 391 paid meals. The State Agency revised the January claim and fixed the error on-site.
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?	Almond milk is not an acceptable milk substitute for cows milk. The SFA either needs to provide an acceptable substitute from the list provided OR have the medical provider complete the Diet Modification form requesting almond milk.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Numerous meal planning resources were e-mailed to the FSD to help with meal pattern requirements, menu planning and food production record completion.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	One student stated she did not want baked beans on her tray and the server gave them to her anyway. The student already had the required components on her tray. Students must be able to refuse any part of the meal with Offer vs. Serve as long as they have 3 components on their tray with one component being 1/2 cup fruit or vegetable.
1100 - Smart Snacks in School	1105. a. Review 10% of the food and beverages sold during the review month. Do foods and beverages sold to students during the school day (defined as 12am on a day of instruction to 30 minutes after the end of the official school day), including a la carte foods and beverages sold during meal services, meet Smart Snack standards? (Includes food items sold during non-exempt fundraisers) If NO, explain.	The Alliance for a Healthier Generation calculator was sent to the SFA to allow them to have documentation showing that foods sold as sides at lunch are compliant with Smart Snacks rules. Original Rice Krispie treats are being sold on the snack cart which are not complaint and, therefore, not allowed to be sold during the school day. Also, Smart Snacks only allows water and 8 oz. 100% juice as beverages sold in the vending machine since all students have access to it during the school day.
1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	The most recent food safety inspection report needs to be posted in the cafeteria. The FSD should go through the HACCP manual to update the Standard Operating Procedures and remove those that no longer apply.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Mary\Catherine-Remsen (54868001)
On-Site Review Dates: February 26-28, 2018

		Also, recommend using the HACCP/Food Safety manual for staff training annually. Have staff sign in with date, time in-time out and topics covered in order to receive Professional Standards credit for trainings.
1400 - Food Safety	1409 a. Did any review of products indicate violations of the Buy American provision in 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.	Broccoli and tomatoes from Mexico and tuna from both Thailand and Philippines were found in storage. Discussed with the lunch coordinator and FSD to check all deliveries to ensure agriculture products come from the USA. Exceptions to this should either be returned to the vendor or noted in an exception log if justification can be made for accepting the foods, i.e. based on price, availability, etc. Future vendor solicitations need to include the Buy American clause requiring vendors to provide the SFA with domestic products.
Dietary Specifications Assessment Tool - Lunch	24 Students are offered salt:	It is very difficult to meet the sodium restriction requirements when offering students a salt shaker. Based on planned reductions in sodium levels in the program, strongly recommend not providing a salt shaker to students. You may offer any non-sodium seasonings instead.

Org - Level Commendations

Description
Benefit documents were organized. The current application form and guidelines were used. Denied applications were correctly determined. Households that had not submitted an application and that had qualified for F/R benefits last year were notified before ending their benefit status. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential.
Ethnic/racial information is collected and the form is completed. No discrimination was observed.
The correct number of applications were verified and correctly selected randomly. All income sources were verified accurately and benefits were changed appropriately.
The Resource Management section of the Off-Site Assessment tool was completed on time. The Paid Lunch Equity, PLE, tool was completed and prices were set as indicated by the PLE tool. The SFA effectively utilizes its USDA entitlement for commodities and takes advantage of DoD for fresh fruits and vegetables. Reports are filed on time, and records are maintained for at least three years plus the current year.
The SFA followed regulations for the district's size category when hiring a new director.
The SFA has a negative balance policy which is required. This is communicated to households and staff through the student handbook.
The SFA has a written Food Safety plan that includes the required elements. Temperature logs are maintained for all coolers - including milk cooler, freezer, food served and dishwasher. The kitchen and storage areas were orderly and clean.

Site - Level Commendations St Marys High School (8103)

Description
The SFA has a garden bar for all students 3 days each week which offers a wide range of fresh fruits and vegetables for students and staff to choose from. This seems to be a very popular addition to the hot meal.
Water was available as required. Food service staff and teachers worked well with the students to ensure they each had a reimbursable meal. Food Production records were available for all meals served during the review week.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Mary\Catherine-Remsen (54868001)
On-Site Review Dates: February 26-28, 2018