

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
United Comm School District (65610000)
Review Dates: February 26, 27, 28 and March 1, 2018

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Three applications did not have a social security number written onto the application.	The SFA is to obtain the social security numbers for the three applications. The social security numbers were obtained while the State Agency was on-site. No further action is needed.	
700 - Resource Management	V-0700	The SFA does not have a nutrition code of conduct with progressive disciplinary action.	Develop and attach a nutrition code of conduct policy with progressive disciplinary action or have a separate policy for disciplinary action and refer to this policy. If the disciplinary action policy is a separate policy, attach it as well.	
700 - Resource Management	V-0700	The SFA does not have debarment statements from Anderson Erickson Dairy and Rotellas Bakery.	Obtain and attach debarment statements for Anderson Erickson Dairy and Rotellas Bakery.	
800 - Civil Rights	V-0800	The SFA's website has an outdated Iowa nondiscrimination statement. Provided the current version. The SFA also needs to change the short version of the USDA nondiscrimination statement on their menus to read "This institution is an equal opportunity provider."	Put the current version of the Iowa nondiscrimination statement on your district's web site. State the date that this was completed below. Also, attach a copy of your April menu showing that you have added the correct short version of the USDA nondiscrimination statement.	
800 - Civil Rights	V-0800	The Authorized Representative/Claim Preparer/Confirming Official/Verifying Official has not had civil rights training.	Complete civil training and attach a sign-in sheet showing that the training was completed by the Authorized Representative/Claim Preparer/Confirming Official/Verifying Official. This was corrected while the State Agency was on-site. No further action is required.	
1000 - Local School Wellness Policy	V-1000	The SFA has not completed a triennial assessment of their wellness policy.	State your plan and a timeline for completing an assessment of your local wellness policy.	
1400 - Food Safety	V-1400	The SFA's Food Safety Plan has numerous versions of Standard Operating Procedures (SOP) in one notebook. SOPs have not been reviewed/revised and there is no documentation of the last time they may have been reviewed/revised. TA provided that the Head	Create and attach a table of contents listing the SOPs you will have in your Food Safety Plan. State your intentions to make these SOPs match your actual practices. Also state your intentions to review/revis each SOP on a yearly basis in order to keep them up to date.	

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		Cook should try to attend the Summer Short Course on HACCP which is June 20, 2018. TA provided on where to find sample SOPs.	
Resource Mgt Comprehensive Review	V-RMCRF	The SFA currently has more than 3 month operating balance in the nutrition account.	State your plan for how you will get the nutrition account so that it does not exceed three-month operating balance.

Site - Level Findings: United South Elementary Grade 2-6 (0418)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	There is no signage explaining what constitutes a reimbursable breakfast to students. TA provided on where to find editable breakfast signage on the Bureau's web site. Discussed that if the SFA uses offer vs. serve that students as well as the individual who checks breakfast trays to be sure they have a reimbursable meal must know how many items each food is to be counted as.	Develop and attach one week's worth of breakfast signage.	
500 - Offer versus Serve	V-0500	The SFA's application has that at breakfast they use offer vs. serve for grades Pre K through 6th grade however students were not being allowed to select what they wanted. The Head Cook stated that she uses serve for all students at breakfast. Ten students did not take a milk with their meal. At lunch Pre K through 1st are serve and three students did not take milk.	For the breakfast meal, state below if you will continue to use serve and if so that the Head Cook will be sure that all students take a milk and the date you changed your application packet to reflect that you are using serve or state that you will change to using offer vs. serve as this is what your application packet states. For the lunch meal, for the Pre-K through first grade, state if you will continue to use serve with this age groups and if so that the cashier will be sure that all students take a milk or state that you plan to use offer vs. serve with this age groups and then state the date you changed your application packet to reflect that you will begin to use offer vs. serve with the Pre-K through first grade.	
500 - Offer versus Serve	V-0500	Cafeteria staff have not been trained on offer vs. serve in school year 2017-2018. E-mailed the Food Service Director the Offer vs. Serve Guidance manual.	Provide training on offer vs. serve for servers and cashiers. Attach a sign-in sheet showing signatures of those who were trained.	

Org - Level Technical Assistance

Area	Question	Comments
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 when the SFA is using ICAVES if only one frequency of income is provided then the corresponding tab on ICAVES should be used. If the household reports an annual income or income is provided in more than one frequency then the annual tab should be used.
100 - Certification and Benefit Issuance	131 Were all direct certifications (SNAP, TANF, FDPIR, 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.	TA provided that if a household submits an application with a case number written on it or submits a "Free Lunch Letter," the SFA should attempt to find these students on ELookup and if found these students would then be

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		directly certified.
300 - Meal Counting and Claiming	303 How often are cashiers and substitute cashiers trained on the meal counting and claiming system (including the backup system)?	TA provided that cashiers and substitute cashiers should be trained yearly on meal counting and claiming and offer vs. serve.
700 - Resource Management		<p>Reviewing invoices from the Prime Vendor, there were three items found on invoices that were not on the bid however the price increase was found on a weekly price e-mail. Nine other items had an invoice price that matched the price on the original bid response. Discussed that the food service director should spot check invoices to ensure products delivered match the order and the specifications of the product solicited. Price on the invoice should match bid pricing or pricing provided on weekly updates. TA provided that 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. The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification at equal or lesser price. TA provided that the SFA must spread the wealth when using micro-purchase method. Showed the Head Cook the micro-purchasing log to use to track that they are spreading the wealth. TA was also provided on how to complete the 3 bids and a buy document that is on IowaCNP under download forms. Discussed that the SFA should include the No Vendor Response form when they send the 3 bids and a buy form to vendors soliciting quotes.</p>
700 - Resource Management		Made a visit to SFA prior to their on-site AR. TA provided on completing their Procurement Plan for SY2017-2018. Assisted SFA in locating their local purchasing thresholds and then determining if their local threshold or the Federal were more restrictive. Worked with SFA on completing the Procurement Plan and registering for a Regional Procurement Training on 10/23/17.
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 how to find the USDA procedures for receiving and processing complaints alleging discrimination in the school meal programs.
800 - Civil Rights	805 How are students with special dietary needs accommodated?	TA provided that the SFA must offer students who cannot drink cow's milk a substitute that is nutritionally comparable to cow's milk. Provided the SFA with a list of approved milk substitutes. If the household provides a

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		milk substitute and it is not nutritionally equivalent to cow's milk, for the students who are serve (not offer vs. serve) this meal could not be claimed for reimbursement.
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	TA provided that the SFA should invite students to participate in their Wellness Committee.
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 on where to go on the Bureau Web site to locate outreach materials that can be used to let students know where to find Summer Food Service Programs.

Site - Level Technical Assistance United South Elementary Grade 2-6 (0418)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	406 If school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	Visit was made to school prior to on-site review. Provided TA that for their pre-school students, the SFA must be using the CACFP meal pattern as they are not co-mingled with the other grades at lunch. Provided a copy of the meal pattern, Handy Guide to Creditable Foods, Bread/Grain chart. Discussed that the pre-K meals could be one column on the SFA's production records showing that they were served the appropriate food items and amounts.
1400 - Food Safety	1407 Were on-site (or Off-site, if observed) storage violations observed? If YES, explain.	TA provided that the SFA needs to have a way to have all food products in the freezer six inches off of the floor.
1500 - Reporting and Recordkeeping	1503 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits? If NO, describe reason.	The Head Cook has records since she was hired 2 years ago and a few records from before she was hired. TA provided that records must be maintained for 3 years plus the current year.

Org - Level Commendations

Description
Certification and Benefit Issuance: Benefit documents were very well organized. 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 POS system, and denied applications were correctly determined. All applications were correctly determined, signed and dated by the household member and the SFA, and all applications were determined within ten days. 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. Waivers are provided to applicants. The three individuals who are involved in approving applications participated in the Application Approval and Direct Certification webinar. The SFA has a back-up system for benefit issuance documents.
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 all staff involved in the nutrition program and is documented. The SFA submitted the annual Public Release to the local media. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The correct federal non-discrimination statement is provided on all material describing the program including letters and the school's website.
Fiscal Action: Fiscal action appears to be below the USD allowed disregard for this review so no claim adjustments for January seem to be needed.
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 the milk coolers, freezer, refrigerator and the dishwasher. Food temperatures are documented on the daily Food Production Record. Digital thermometers are used. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Food Service workers practiced good gloving procedures.
Local Meal Charge Policy; The SFA developed and approved a meal charge policy on July 13, 2017. The policy was e-mailed to all households and staff were informed of the policy. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.

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<p>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. The menus met weekly and daily meal pattern requirements for each age/grade group. 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. A vegetable bar is offered for grades 2-6th. 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.</p>
<p>Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Power School is used as the school's POS system. There is one POS for all students and the POS was organized and orderly. 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. Daily edit checks are performed.</p>
<p>Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of January 22 - 26, 2018 for breakfast and lunch. The worksheets showed that all meal components and vegetable sub-groups were 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, 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.</p>
<p>Offer vs. Serve: Offer vs. Serve is being implemented properly. All students observed selected 1/2 cup of fruit and/or vegetable. There is signage at lunch explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable.</p>
<p>Procurement: The Food Service Director attended the Regional Procurement Training in Des Moines. The SFA has a comprehensive written Procurement Plan that includes federal and 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 part of the AEA purchasing group and has a signed agreement for food, small wares and chemicals. A signed agreement with the Group Purchasing Organization for SY 2017-2018 is on file. The signed agreement states that the school district agrees to procure food (excluding bread and milk) and non-food supplies through the Group's awarded Prime Vendor.</p>
<p>Professional Standards: The Food Service Director has completed 13 hours of professional training in school year 2017-2018 of the required 12 hours. The Head Cook and Full time food service worker have completed 21 hours of training as they attended New Manager's Orientation and the Healthy Meals Workshop. The Authorized Representative has completed 4 hours of the required 4 hours of training.</p>
<p>Reporting and Record Keeping: Reports are filed on time, and the Head Cook is aware that records need to be kept for 3 years plus the current year.</p>
<p>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. 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 effectively utilizes its USDA entitlement for USDA Foods. In school year 2016-2017 the SFA spent 95% of their PAL dollars. The SFA receives USDA foods and participates in DOD.</p>
<p>School Breakfast and Summer Food Service Program Outreach: School Breakfast Program information is sent home in registration packets with students, is on the website, in Parent/Student handbooks, on monthly menus, on the daily menu board, & at the Preschool & Kindergarten Parent informational meetings in the spring. Summer Food Service Program Outreach included a poster being displayed.</p>
<p>Smart Snacks: Students are able to purchase milk via a la carte sales. Exempt leftover NSLP entrees are only sold the same day they are initially offered.</p>
<p>Verification: The correct number of applications were verified and were randomly selected from all applications as the SFA used the Alternate One selection process. 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 at least one person attend training. The verification report was completed accurately and on time.</p>
<p>Water: Free potable water is available to all students for lunch and for breakfast.</p>
<p>Wellness Policy: The SFA's wellness policy was reviewed and revised on August 10, 2017. The public is made aware of the SFA's wellness policy via the school's web site. A Blackboard message was put out to all parents, an email was sent to all staff and all board members, and an invite was posted on the United Community website to invite individuals to participate on the wellness committee. The following individuals are currently involved in reviewing and updating the Local Wellness Policy: Principal/Superintendent, parents, physical education teacher, school health professional, school food service and school board member. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.</p>