

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Westwood Comm School District (69920000)**  
**On-site Review Dates: November 28-30, 2017**

**Program Year:** 2018  
**Month of Review:** October  
**Lead Reviewer:** Deann Murphy  
**Org Representative(s):** Kerry Lamoureux

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	The SFA did not conduct a confirmation review on their verified applications before sending the households notice. One household was properly denied benefits after their income was verified. The SFA told the family verbally that they were denied instead of giving them written notice as required. The SFA did not remove this family from their POS until the State Agency caught the mistake during the on-site review.	The Verification official and the Confirming official will complete the tutorial on Verification and submit to the State Agency a copy of their Certificate of Completion. The tutorial can be found at <a href="http://ilopd.iowa.gov">http://ilopd.iowa.gov</a> .	
1200 - Professional Standards	V-1200	The SFA is not tracking staff members professional standards training as required.	The SFA will 1.) Complete a tracking form with all staff involved in the Child Nutrition Program, i.e. 6 nutrition staff and 6 non-nutrition staff and submit a copy of the completed form to the State Agency. 2). State who will be responsible annually to ensure that professional standards training is met.	
Resource Mgt Comprehensive Review	V-RMCRF	The SFA has an excess net cash balance in their nonprofit school foodservice account that has not been approved by the State Agency.	The SFA will submit their plan to the State Agency on how and when they intend to spend down their net cash resources to below 3 month operating expenses. Please be specific.	
Resource Mgt Comprehensive Review	V-RMCRF	The SFAs non-program food revenue tool shows that the SFA does not generate adequate non-program food revenue to cover their non-program food costs.	The SFA will state their plan on how they intend to generate adequate revenue from their non-program food sales to cover their non-program food costs and how that will show in their bookkeeping.	

**Site - Level Findings: Westwood High School (0109)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The SFA serves 2 entrée choices for students in grades 3-12. During the review week, the hot meal option only served 1/4 cup fruit on Wednesday and 1/2 cup on Friday. On Monday, only 1 oz M/MA and 1.75 oz grain was offered to the HS students. Food Production Records do not clearly show that all the vegetable subgroups	The SFA will provide the State Agency 1 week of January menus that show that all components are met in their minimum quantity for K-5, 6-8 and 9-12 grades for both the hot meal and the salad bar entrée. They will also submit completed FPRs for the same week showing that all vegetable subgroups were represented for both entrée options. Please provide	

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		were represented during the week, especially legumes. On the Salad Bar option, inadequate grains are offered to students. Food production records for the salad bar do not show that all the subgroups are represented during the week, especially starchy vegetables.	supporting recipes and CN/PFS labels as needed to show necessary documentation.	
1100 - Smart Snacks in School	V-1100	The SFA is selling G-2 and PowerAid in the MS. These are not allowed for this age group per Smart Snack rules. Also, the Jr. class sells candy bars that do not meet Smart Snacks rules during the school day as a fundraiser.	1.) The SFA will state how they intend to become Smart Snacks compliant with foods and beverages sold during the school day, i.e. midnight until 30 minutes after the last school bell. 2.) Please state who will be responsible to ensure Smart Snacks rules are met in the District.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	105 How long does the application's approval take from the date the SFA receives the application from the household?	The date many of the applications are processed is more than the 10 days allowed by USDA. The SFA needs to ensure that all applications are processed within 10 operating days and households are notified of their benefits within that time frame.
100 - Certification and Benefit Issuance	107 a. When and how are households notified of students' certified eligibility?	The household notification letter generated from JMC needs to be approved annually by Deb Linderblood before it can be used.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable):	Discussed with the SFA staff the need to follow their meal charges policy with all families equitably. Also, we discussed the need to charge visiting students who are not part of the district as well as second meals the same as an adult since these students are not receiving federal/state subsidy money to off-set their meal price.  Since sack lunches for field trips are not OVS, all 5 components in their minimum quantities must be provided to students to be able to claim them for reimbursement. The POS count during a field trip needs to be taken at the point of meal service - not in the kitchen.
300 - Meal Counting and Claiming	308 Have alternate points of service been approved by the SA?	Recommend the SFA use 2 sites instead of 1 on their application and for claiming purposes since they have 2 cashiers in 2 parts of the building. The JMC reports currently must be consolidated by the Business Manager which increases the risk of errors. This change would take place in June/July 2018 during the application process.
700 - Resource Management		Much TA given on Procurement including tips to help accurately complete the written procurement plan, the differences between micropurchases and small purchases and what documents need to go out with the small purchase solicitation document. Also discussed how the local purchase policy may impact some of the small purchase bids in the future.
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?	Recommend the district either hold the Civil Rights training for all necessary staff as a group and have a sign in sheet for those who attend with date, time-in, time-out and topics covered. If the SFA wants to

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		continue to have staff complete this individually, have each individual complete the Civil Rights quiz and keep that on file.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	Since the SFA does have 2 cashiers and 2 serving areas, recommend completing the SFA on-site monitoring form NSLP260 annually. This is not a required form in a single site building, but in this case would be best practice.
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 final rule for the Local Wellness Policy requires a variety of stakeholders be invited to wellness committee meetings including a student. The district is encouraged to make the policy template personal to their district and take out things that they are not planning to implement. The assessment of the wellness policy goals needs to be made public, i.e. school website, newsletter, etc.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	An email was sent to the FSD with a link for an SOP for Cleaning up Bodily Fluids to add to her HACCP manual. Recommend using the manual for staff training annually.
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.	Guidance given to the FSD to promote breakfast in the district at least 2 times annually, i.e. each semester, PT conferences, School Breakfast week, etc. Promotion should encourage students to eat breakfast - not just menu and price.  A summer flier was e-mailed to the FSD and to the Authorized Rep to promote the summer feeding program. This should be made public, i.e. put on the district website, added to a spring newsletter, etc. in order to let households know how they can access free summer feeding.

**Site - Level Technical Assistance Westwood High School (0109)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	There are some students in the district who are lactose intolerant and bring their own milk from home. The SFA must offer a complete meal with all 5 components. Recommend the SFA visits with parents to see if the SFA can provide the milk substitute for these students. The substitute must meet the nutritional guidelines of the program.
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students?	A Breakfast signage template was sent to the FSD by e-mail today to post in both cafeterias telling students how breakfast items credit and what choices they can make for a reimbursable breakfast. Currently signage in the MS/HS states students must take 1 cup fruit at breakfast, which, under OVS, is not true. The OVS manual was also sent to the FSD for reference and staff training.
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	The supervision from staff for the salad bar was intermittent and the staff have not had adequate training on reimbursable meals which increases the potential for students to leave the salad bar line without a reimbursable meal. Trained staff need to be in place at the salad bar to supervise students in order to count this as a reimbursable meal.
400 - Meal Components and Quantities - Lunch	405 If the school has elected to serve meals using the Family Style Method, is the school implementing method as specified in FNS Instruction 783-9?	Memos SP98-09 and CACFP05-2017 were given to staff discussing proper serving methods for pre-K children using family style dining. Staff should allow children to serve themselves as much as possible and then encourage them to take adequate portions of each food as directed in the memos.

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400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The FSD was e-mailed resources to help her with meal planning and FPR completion, including forms and webinars, to ensure that all components are represented in their minimum quantities.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Students are not required to take 1 cup fruit at breakfast. The menu planner must plan 1 cup fruit into the menu and offer it to the students to take, but they only need to take 1/2 cup fruit per OVS rules. Juice cups should contain a full 4 ounces juice at breakfast.
600 - Dietary Specifications and Nutrient Analysis	605 Based on the Nutrient Analysis, did the school meet the Dietary Specifications (Calories, Saturated Fat, Sodium, and Trans Fat) for the appropriate age/grade group being served?	The FSD needs to re-evaluate the salad bar options in the Elementary and MS to ensure calorie limits are not exceeded. For example, students could potentially take up to 5 oz M/MA which could easily put them over their calorie limits. Also, recommend re-evaluating giving 2 slices toast and 2 eggs to elementary students as this may easily provide excess calories at breakfast. Calories may be slightly low for HS at lunch. Discussed with the FSD ways to increase calorie levels for HS only.

**Org - Level Commendations**

Description
A la carte food offerings have been run through the Smart Snacks calculator and are compliant to be sold to students during the school day.
Any fiscal action for this review will be minimal and below the USDA disregard level so no claim adjustments will be needed.
Students in grades 3-12 have an option of a hot meal or a salad bar. All grades have an option of a mini veggie bar at the end of the hot lunch line. The FSD has CN labels on file. She uses standardized recipes and has food production records for all days of the review period for both the hot meal and the salad bar. Free water is provided to all students as required. The elementary grades have recess before lunch which the FSD feels has helped increase food intake. Many low sodium, low fat items are being used on the menu. The cafeterias are well supervised. The foodservice staff was polite and helpful to each other and their customers. Signage is posted in the cafeteria as to what makes a reimbursable lunch. 4 different types of milk are offered to all students each day. OVS was done correctly at lunch.
The And Justice for All civil rights poster was posted. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided to staff. Ethnic/racial information is collected and the summary form was completed. No discrimination was observed.
The current application form and guidelines were used, direct certification is downloaded twice a month as required and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were correctly determined, applications were complete with SSN's and case numbers. 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 and indicate specific fees. Eligibility is kept confidential.
The District feels like they have significantly reduced the number of negative balances they have by e-mailing and calling parents on a regular basis. Many of their current negative balances are uncollectable.
The district has a current wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student and staff health, nutrition promotion and education, and physical activity. The latest assessment of the policy was complete. The district has a wellness committee that meets periodically and they keep meeting minutes.
The Resource Management section of the Off-Site Assessment tool was completed on time. October receipts that were reviewed indicated appropriate and allowable expenditures. The Paid Lunch Equity, PLE, tool was completed and prices were increased 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. Last year the FSD used 153% of the USDA Foods entitled to the district. Reports are filed on time, and all 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. Staff is on target to complete all their required training this year. The FSD needs 12 hours, Nutrition staff working over 20 hours weekly need 6 hours, part time nutrition staff and non-nutrition staff that help with part of the program need 4 hours annually.
The SFA has a district-wide written Food Safety plan that includes most required elements. The latest Health Inspection Report was posted. Temperature logs are maintained for refrigerators, freezers, and food served. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures.
The SFA has a written Procurement Plan on file 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 also has a written Code of Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks

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and balances. Last year the SFA did receive bid quotes from at least 2 vendors for bread. They spread the wealth for their micropurchases between 2 stores.

**Site - Level Commendations Westwood High School (0109)**

Description
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Meal counts during the on-site review were reasonable when compared to the (October) review month counts. Meal count totals for the month of October appeared accurate and complete. There was a point of service, POS, at the beginning of the line. Foodservice staff were responsible to ensure each student took a reimbursable meal.
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