

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Akron Westfield Comm School District (00630000)**  
**On-site Review Dates: December 4-6, 2018**

**Program Year:** 2019  
**Month of Review:** October  
**Lead Reviewer:** Deann Murphy  
**Org Representative(s):** Kristin Blake

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Two students should have been given free benefits due to extended eligibility. The SFA incorrectly used the household income application to determine reduced benefits.	The eligibility errors were fixed on-site. No further changes needed.	

**Site - Level Findings: Akron Westfield Senior High School (0172)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA does not have breakfast signage showing students and staff how breakfast items credit to make a reimbursable meal. Staff was unsure of Offer vs. Serve rules at breakfast which requires students to take 3 items rather than 3 components.	1. The Foodservice staff will watch the webcast "Build a Healthy School Breakfast" and complete the facilitator guide and resources located at <a href="https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts">https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts</a> . The SFA will submit to the State Agency documentation showing that this was completed. 2. The SFA will also submit an example of a day's breakfast signage they use to show students how food items credit.	
400 - Meal Components and Quantities - Lunch	V-0400	The SFA does not have standardized recipes for all menu items that combine at least 2 foods together.	The SFA will submit to the State Agency a standardized recipe for a Ham and Cheese Sandwich, a Turkey and Cheese Sandwich, and a Turkey Wrap.	
600 - Dietary Specifications and Nutrient Analysis	V-0600	Many days a week, breakfast menus offer students 3-4 grains, with a total of 12-14.5 oz eq. grains offered weekly. Since this is a DK-12 school, students are only allowed to have 450-500 calories at breakfast on average daily for a reimbursable meal. Excess grains offered at breakfast easily exceeds calorie level requirements.	The SFA will submit one week of breakfast menus showing that they are compliant with meal pattern requirements of at least 9-10 grains offered weekly and within calorie limits of 450-500 calories on average daily.	
1100 - Smart Snacks in School	V-1100	The hot cocoa and healthy French Vanilla latte mixes that are currently sold in the coffee bar during the school day are not compliant with	Coffee bar beverages of plain coffee, tea, 100% juice, fat-free or 1% milk can be sold at the coffee bar during the school day without documentation. For your	

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		Smart Snacks standards.	response, please submit to the State Agency a list of all beverages being sold at the coffee bar during the school day. If any beverages sold come from pre-packaged mixes or have additions to the above list, please also submit a Smart Snacks calculator printout and corresponding Nutrition Facts label from the package showing that they are complaint.	
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**Org - Level Technical Assistance**

Area	Question	Comments
200 - Verification	214 If a student's eligibility changed due to verification,	The SFA must give 10 days for the household to appeal when student eligibility benefits are lowered. The SFA then has up to 10 operating days to lower the benefit in the POS after the 10 calendar day appeal period.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	When making student sack lunches as reimbursable meals, the SFA must include all 5 components in their minimum quantities for the age group they are feeding.
700 - Resource Management		Much TA was given to the SFA staff on procurement, including updating their current Procurement plan, how to proceed with the procurement process each spring, and when/how to properly use each procurement method. Any staff member, whether foodservice staff or administrative staff, who procure using Federal Child Nutrition dollars, must follow all federal procurement regulations. Discussed the need to link the disciplinary policy to the Code of Conduct that the SFA has on file. It is best practice for the SFA to complete the Signature page annually with those involved in the procurement process and allow the School Board to view both the Procurement Plan and the Code of Conduct for better transparency. The SFA only used 93% of their USDA Foods entitlement money in SY2017-18. The goal is to spend at least 95% of their entitlement each year. The FSD was encouraged to contact the State Agency USDA Foods consultant to sign up for the DOD program in order to spend more of their entitlement on fresh fruits/vegetables used on the Veggie Bar. Sign up ends in February.
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	If staff do self training for Civil Rights, they should complete the Civil Rights quiz and keep it on file for accountability.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	Please use the updated IowaCNP Download Form NSLP260 to complete an on-site review for breakfast and general areas before Feb. 1.
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?	The SFA does not have an active Wellness Committee made up of various stakeholders, i.e. Board, Administration, Foodservice, PE Teacher, Parent, Student, Community member, school nurse. The current policy states that this committee will ensure compliance of the wellness policy and will complete a progress report yearly. The current progress report should be dated. Recommend the committee meet at least annually, if not twice annually, in order to set goals and then evaluate goals each year to better

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		promote wellness in the district.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Since the SFA is claiming one student lunch daily at the Akron Children's Center, the SFA should assist the Center in putting together a HACCP manual that includes basic, pertinent Standard Operating Procedures.
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?	The SFA is required to help promote the summer feeding program offered across the state. Currently a notice is placed in the August newsletter when the program is almost over. Recommend putting the notice in the May newsletter and/or on their website so families know where they can access free meals over the summer months. Also discussed putting breakfast promotion information on the website or in the school newsletter at least twice annually to encourage families to participate in the school breakfast program.
RMCR - Nonprofit School Food Srvc Acct	11 If Yes, was the equipment included on an approved State agency equipment list or did the SFA otherwise secure prior approval from the State agency before purchasing the equipment (per FNS Policy Memo SP 31-2014)?	As per USDA policy SP31-2014, the SFA needs State Agency approval prior to purchasing equipment over their local equipment threshold or over \$5,000, whichever is less, until a state agency approved equipment list is completed and distributed.

**Site - Level Technical Assistance Akron Westfield Senior High School (0172)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable <b>breakfast</b> to students for all applicable grade groups?	Discussed with staff the breakfast Offer Vs. Serve (OVS) rules that use items instead of components. E-mailed the FSD a copy of the Offer vs. Serve manual and a signage template showing students what they need to take to make a reimbursable meal.
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?	The SFA needs to serve a full 8 oz. serving of milk substitute to students who require this. Recommend serving it in a 10 oz. cup or buying individual 8 oz. cartons.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	At the HS level, when one component is split between 2 different food items, please ensure that students either take both food items to make a full component or that students have 3 other full components in order to make a reimbursable meal.
600 - Dietary Specifications and Nutrient Analysis	603 Were any areas identified during the Off-site review requiring technical assistance or corrective action prior to the beginning of the On-site portion of the review?	The alternate lunch entrees offered during the review week include processed lunch meat sandwiches or hot dogs which are all high sodium foods. If a child took the alternate entrée daily, this could easily put them over their allowed sodium limit. Encouraged the FSD to look for lower sodium entrees as alternates.

**Org - Level Commendations**

Description
All staff involved in the Nutrition Program are on track or have met their required Professional Standards training hours for this year. The SFA has developed it's own tracking form that meets requirements and there is an appointed staff person in charge of ensuring that all training is completed each year.
Benefit documents, as well as all paperwork, were well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately

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transferred in a timely manner to the POS system, and denied applications were correctly determined. Applications were complete with SSN's, parent signatures, and case numbers, 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. Waivers are provided to applicants and indicate specific fees. Eligibility is kept confidential.
Fiscal Action for this review will be less than the USDA \$600 disregard level so no further claim adjustments will be needed.
Resource Management documents were completed and on file in a timely manner. April receipts reviewed showed appropriate and allowable costs. The District had a positive cash balance as of January 31, 2018 so they did not need to raise their student lunch prices this year. Staff keep all foodservice documentation for a minimum of 3 years + the current year.
The And Justice for All civil rights poster was posted in the cafeteria. 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 all staff involved in the Nutrition program. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. Ethnic/racial information is collected and the summary form was completed. No discrimination was observed. SFA on-site monitoring was completed at lunch to ensure that all sites are meeting program requirements. The shortened non-discrimination statement is on the posted menu. The SFA uses the State Agency notification prototype forms which includes the full non-discrimination statement.
The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, 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 verification training.
The District does have a Local Wellness Policy on file that has been reviewed within the last 3 years as required. They have completed an assessment of their policy goals and both the policy and the assessment are available on the school website.
The SFA does have a SY2018-19 Procurement Plan and Code of Conduct on file as required. The FSD and staff member attended the regional training offered by the State Agency this fall to learn more about the Procurement process.

**Site - Level Commendations Akron Westfield Senior High School (0172)**

Description
Lunch menus are well planned and meet all the minimum component requirements. The SFA has CN labels and Nutrition Facts documentation on file to support required components and quantities. The Food Service Director (FSD) periodically calculates calorie, sodium and saturated fat content and adjusts the menu as needed to meet these requirements. Students have 2 entrée choices daily, plus a fruit/veggie bar that is popular. All students took a reimbursable meal during on-site meal observation. Water is available to students at both breakfast and lunch as required and the SFA has cups available for students who want to drink water. Many low sodium canned vegetables and low sugar canned fruits were in the storeroom. Lunch signage was posted so students know what they must take to make a reimbursable meal along with the monthly menu. Food Production Records for the hot meal and the veggie bar were complete and on file for all days a meal was served. Students seemed to have adequate time to eat.
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 end of the line as approved in the application. Students pick up and scan their cards all in the lunch line so cards are not easily lost or stolen. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. The school has a meal charge policy that is communicated to households and staff.
Smart Snacks documentation is on file for most foods sold in vending and a la carte. Students can purchase second entrees and milk if they have the money. Non-program food revenue does cover the cost of non-program foods.
The SFA has a district-wide written Food Safety plan that includes the required elements. Kitchen staff were trained on the Standard Operating Procedures (SOPs) at the beginning of the school year. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk cooler, food served, and dishwasher. The freezer has an alarm system that notifies the FSD if temperatures are not within an acceptable range. The kitchen and storage areas were orderly and clean.