

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Ballard Community School District (04720000)**  
**Dates of Review: 2/11/2019 – 2/13/2019**

**Program Year:** 2019  
**Month of Review:** January  
**Lead Reviewer:** Jean Easley  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The SFA had a letter on file from a building principal who requested free meal benefits on behalf of a student. No application was on file. Page 35 of manual states "Local school officials may complete an application for a child known to be eligible for meal benefits if the household fails to apply." "...the school official must complete an application on behalf of the child based on the best household size and income information known to the official. The source of the information must be noted on the application." "This option is intended for limited use in individual situations..." Every possible avenue for obtaining a household application should be exhausted before a school official completes an application on behalf of a student.	For your response, submit your revised process to effectively pursue the household to complete an application prior to a school official completing an application on behalf of a student such as checking Direct Certification, Homeless Liaison, etc.	
200 - Verification	V-0200	<ol style="list-style-type: none"> <li>1. Applications selected for verification was not "confirmed".</li> <li>2. Letter of Adverse Action included incorrect dates.</li> <li>3. Income submitted should have resulted in changing eligibility from Free to Paid, not Reduced.</li> </ol>	For your response, state 1) who will be responsible for verification and completing verification training offered annually by the State Agency. 2) state your understanding that applications selected for verification must first be reviewed for accuracy and signed/dated by confirming official 3) a letter of adverse action was written and sent during the review. Confirm date eligibility was changed to "Paid" in the point of service.	

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Ballard Community School District (04720000)**  
**Dates of Review: 2/11/2019 – 2/13/2019**

700 - Resource Management	V-0700	The number of lunch meals billed to the SFA by the FSMC did not match the monthly claim submitted by the SFA. It was determined that the FSMC was using the incorrect report (summary report) to generate meal totals for billing, instead of the correct report (edit check) which did match the claim.	For your response please submit documentation reflecting that the SFA has been credited by the FSMC for the overcharge in meals from August 2018 through January 2019.	
900 - SFA On Site Monitoring	V-0900	On-Site Monitoring Forms were not completed by February 1st as required. This is a repeat finding.	State your understanding of this annual requirement is to be completed by February 1st and documentation maintained. Complete and submit On-Site Monitoring Forms for four sites. Note a minimum of 50% of breakfast sites are to be completed.	
1000 - Local School Wellness Policy	V-1000	An assessment of the local wellness policy has not been completed. Policy and Assessment, including progress toward meeting the goals of the policy, are to be made available to the public. Resources can be found at: <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-wellness">https://educateiowa.gov/pk-12/nutrition-programs/school-wellness</a> .	For your response, 1) describe who will be designated to provide leadership for the local wellness policy and how stakeholders will be made aware of an opportunity to participate 2) what date will the committee plan to meet and describe the timeline to have the assessment completed 3) Describe how both the policy and assessment will be made available to the community. (The Wellness Policy can be posted immediately.)	
1600 - School Breakfast and SFSP Outreach	V-1600	SFA must provide outreach about breakfast and inform families about the availability and location of free meals for students via the Summer Food Service Program.	Describe your plan to promote breakfast and free summer meals. Who will take charge of these two annual requirements?	
RMCR - Revenue From Nonprogram Foods	V-RMCR	According to the financial report SFA completed in IowaCNP, the percentage of revenue received for nonprogram food sales (24%) does not equal or exceed the percentage of money spent on nonprogram food (15%).	For your response, complete and submit a Non Program Revenue Tool. If completed tool continues to show non-compliance, describe your plan to improve compliance.	

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Ballard Community School District (04720000)**  
**Dates of Review: 2/11/2019 – 2/13/2019**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	On day of lunch review, 4 trays counted as a reimbursable meal were short meeting the 1/2 cup fruit and vegetable requirement. Technical Assistance provided on-site. One tray contained 3 slices of apple, one tray contained 3 mini carrots, one tray contained approximately 1/4 cup canned fruit, and one tray had 1/2 cup salad which credits for only 1/4 cup.	Clementines placed at both point-of-service lines corrected this issue during the site review. Clementines were offered to students with meals containing less than 1/2 cup fruit or vegetable. Describe your plan to continue to provide cashier training for recognizing a reimbursable meal, particularly that 1/2 cup romaine credits for only 1/4 cup vegetable.	
1400 - Food Safety	V-1400	Food is to always be stored 6 inches off the floor. Some boxes of food were observed on the floor of the freezer instead of on pallets.	Describe your plan for correcting the food storage violation.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance		APPLICATIONS: must include date received by SFA in order to confirm eligibility is given within the required 10 days.
700 - Resource Management		LOCAL MEAL CHARGE POLICY: reminder the policy must be provided to households annually by email or hard copy mail. Maintain documentation how it was communicated.
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	There are inaccuracies in the monthly billing invoice provided by the FSMC to the SFA. Although the inaccurate information was not used to generate the bill total, the errors made the worksheet difficult to understand for purposed of reconciliation. The errors included the following: 1) 'Program Breakfasts-LSI Staff' did not use the breakfast conversion factor of .66. 2) Zero meal equivalents were noted for 'Student Alternate Meals-Reimbursable' when there were meals counted. 3) The 3.5325 meal conversion factor was used for 'District Staff Lunches' when there should be no conversion for staff lunch per J. III. e. in the contract.

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Ballard Community School District (04720000)**  
**Dates of Review: 2/11/2019 – 2/13/2019**

800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	DIET MODIFICATION FORM: Food Allergy information is posted on district web page; however no diet modification form or any guidance for parents for whom to contact. This was corrected on site; the form is now posted on website.
1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	PROFESSIONAL STANDARDS: Office staff with nutrition responsibilities are to maintain training documentation; additionally a mechanism should track training hours. Reminder - Determining Official is required to have documented training maintained on file.

**Site - Level Technical Assistance Ballard Middle School (0209)**

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	319 Electronic Systems Only	POS OVERRIDES: district students from other schools are allowed to eat breakfast at MS site because it is a bus stop location. Cashier must "override" these transactions because POS will not allow transaction. Cashier manually writes down student name, account, meal choices; items or meals are then entered later by logging into student account and added manually. Technical Assistance given to 1) follow up with POS provider to fix POS to allow transactions to occur at POS; 2) if not possible, a notation should be made in student account details to include location and time of breakfast transaction.
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?	VEGETABLES: reminder for training staff that 1/2 cup leafy green vegetable such as romaine lettuce credits only for 1/4 cup.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	SMART SNACKS: Maintain all copies of calculator printouts for all items sold as a la carte. Recommend maintaining a smart snack binder for a convenient way to review and update products.

**Org - Level Commendations**

Description
BENEFIT ISSUANCE: eligibility applications were found to be well-organized. Direct Certification lists were maintained as required. Eligibility is kept confidential.
CIVIL RIGHTS: annual training is provided, civil rights poster is displayed, menu and nutrition-related program materials include the non-discrimination statement, and no discrimination observed.

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Ballard Community School District (04720000)**  
**Dates of Review: 2/11/2019 – 2/13/2019**

**FSMC:** The SFA and FSMC have a current Fixed-Price contract in place. As required, the SFA retains signature authority over Programs, retains control of the nonprofit school food service account, and files the monthly claim. Twice a year, the SFA conducts on-site visits to monitor operations for compliance with regulations. The sale of all meals and competitive foods accrue to the food service account. The Advisory Committee meets at least twice a year and the notes from the meetings indicate an active involvement in menu planning by students. USDA Foods usage from last year was reconciled. The SFA had food prices, labor costs, etc. to use for reconciling charges from their Cost Reimbursable contract. The SFA has someone named as the Program Director, and he has had required food safety training.

**HACCP:** District HACCP is complete and well-written with program information, Standard Operating Procedures (SOP), documentation forms, temperature references, physical hazard and foodborne illness procedures. HACCP plan show evidence of annual training to staff and review of SOPs.

**PROFESSIONAL STANDARDS:** Training is documented. School nutrition staff are included on a training tracker and maintained by FSD.

**WELLNESS POLICY:** a local wellness policy is on file including goals for nutrition, physical activity, nutrition promotion.

**RESOURCE MANAGEMENT:** All expenditures reviewed appeared allowable. The SFA effectively utilizes its USDA entitlement for USDA Foods. No fiscal action as result of this review.

**Site - Level Commendations Ballard Middle School (0209)**

<b>Description</b>
<b>BUY AMERICAN:</b> documentation for exception to Buy American is maintained on the receiving log.
<b>ENVIRONMENT:</b> Students are observed to have adequate time to eat. Nutrition staff and cashiers are encouraging to students - cashiers move at a fast pace yet are able to kindly suggest to students to take a clementine when less than 1/2 cup fruit or vegetable was taken. Excellent signage showing the various menu items and how to build a reimbursable meal.
<b>FOOD SAFETY:</b> Food Service Director and Head Cook are ServSafe certified. Proper food handling practices observed and temperature of foods documented.
<b>MEAL COUNTING and CLAIMING:</b> Meal counts during the on-site review were reasonable when compared to the review month counts. Point of Service (POS) counts and filed claims appear accurate. Daily and monthly edit checks are performed.
<b>MENU PLANNING and NUTRITION:</b> an 8 week cycle menu is utilized. Several entrees choices are offered daily. A self-service "Fruit & Veggie Bar" is offered daily allowing students to select as many fruits and vegetables as they would like to eat. Meal pattern meets requirements and all vegetable subgroups are offered as required. Overall, students were observed to eat what they selected.
<b>SMART SNACKS:</b> a la carte food and beverages offered to middle school students meet smart snack standards.