

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Lutheran School (06098000)
Dates of Review: December 5 – 7, 2018

Program Year: 2019
Month of Review: October
Lead Reviewer: Deb Linderblood
Org Representative(s): Frank Parris

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	The SFA did not accurately complete their Verification Collection Report. FIP and "Other Free" students were not counted separately from Food Assistance students and the SFA counted applications with case numbers but did not have any of these. TA provided on how to accurately complete the Verification Collection Report. The report was corrected while the State Agency was on-site.	State your intentions to participate in the Verification Reporting webinar or to listen to the recorded version next fall.	
700 - Resource Management	V-0700	The SFA currently does not have a Meal Charge Policy. TA provided on where on the DE web site to find a sample Meal Charge Policy and guidance. TA also provided that the policy must be distributed to all households once a year and also be shared with staff.	Complete and attach your Meal Charge Policy.	
800 - Civil Rights	V-0800	The Staff person who fills in for the individual who normally checks students off of a roster as they come through the serving line has not had Civil Rights training.	Provide Civil Rights training for the individual who fills in for the staff person who normally checks students off of the roster as they come through the serving line. Attach a sign-in sheet showing the title of the class, date, time and signature that training was completed.	
1000 - Local School Wellness Policy	V-1000	The SFA has not completed an assessment of the implementation of the local school wellness policy and thus has also not made the assessment available to the public. TA provided that the SFA must assess their local wellness policy triennially to assess the school's progress towards meeting the goals written in the Local Wellness Policy. TA also provided that the assessments must be made available to the public. Wellness policy resources were provided and TA was provided on where to find the assessment form on the DE web page.	State by when you will complete an assessment of your local wellness policy and a timeframe for when you will make the assessment available to the public. State how you will make the assessment available to the public.	
1600 - School	V-1600	The SFA is currently not informing eligible	State how you will inform eligible families about the	

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Bureau of Nutrition and Health Services
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Breakfast and SFSP Outreach		families about the availability and location of free meals for students via the Summer Food Service Program. TA provided that even though the SFA does not have a Summer Food Service Program they are still required to do outreach letting families know where they can find sites. TA provided that resources are available on IowaCNP in download forms.	availability and location of free meals for students via the Summer Food Service Program.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	It was determined that the values entered into the Financial Report for nonprogram revenue and nonprogram food costs were not correct. The State Agency assisted the Food Service Director with revising the report. It was then found that the SFA is not bringing in sufficient non-program revenue in comparison to its nonprogram food cost.	State below how you will bring in additional non-program revenue.	

Site - Level Findings: Central Lutheran School (8204)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	The SFA has not been doing an edit check report and their POS system does not have an edit check report. Thus, they have not been assessing if their counts exceed the number of attendance adjusted eligible students. TA provided on how to complete the edit check report and where to find the form on IowaCNP in download forms.	Complete and attach a completed edit check report for the month of November.	
400 - Meal Components and Quantities - Lunch	V-0400	Nineteen students did not have a full 3/4th cup of vegetable on their tray during meal service and the school is a serve school. The students were served 1/2 cup of green beans, 2 pepper strips and 1/2 of a radish. TA provided that the SFA needs to be sure every student is served a full 3/4th cup of vegetable and that the SFA should measure the amount or use the Food Buying Guide to be sure they have the required amount.	State your plan for how you will assure that every student is served 3/4th cup of vegetables.	
400 - Meal Components and Quantities - Lunch	V-0400	The SFA is serving cashew milk for their milk substitute which only has 1 gram of protein per 8 oz. serving. TA provided that the milk substitute must be nutritionally equivalent to cow's milk. TA provided that Martin Brother's carries Kikkoman Pearl which is shelf stable and comes in an 8.25 oz. individual carton. Provided a list of milk substitutes that are nutritionally equivalent to cow's milk.	State the milk substitute you will begin to serve that is nutritionally equivalent to cow's milk.	
400 - Meal Components and Quantities - Lunch	V-0400	The week selected to use to complete the menu certification worksheets only had 1/2 of a banana for fruit on one day (1/2 banana = 1/4 cup of fruit) so the SFA was short on their quantity of fruit. TA provided that the SFA needs to use the Food	Attach a standardized recipe for Chicken Tacos. State your intentions to serve a whole banana when bananas are the only fruit served on a given day. Attach the chili recipe you will use showing that the recipe contributes 1/2 cup of legumes.	

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Lutheran School (06098000)
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		Buying Guide to determine the amount of fruits and vegetables to serve to meet the quantity requirements. Showed the Food Service Director how to access the Food Buying Guide and how to locate foods in the guide. Also, the SFA did not have a recipe for the Chicken Taco. Not having standardized recipes was a repeat finding. Also upon review of the weekly vegetable sub-groups offered for the week of December 3rd (week of on-site review) it was found that legumes were offered in the chili so reviewed the chili recipe and found that it does not contribute 1/2 cup of legumes. TA provided that the recipe needs to contribute 1/2 cup of legumes if no other legume is offered that week. Consultant found a Healthier Kansas chili recipe that contributes 1/2 cup of legumes and provided it to the SFA and encouraged that they use this recipe.		
1100 - Smart Snacks in School	V-1100	There is a vending machine that is on and available as of 3:45 and school ends at 3:30. The vending machine contains beverages that do not meet the Smart Snacks guidelines for beverages for grades K-8th. TA provided that the vending machine would need to be turned off until 4:00 p.m. so that it is not operational from midnight until 30 minutes after the end of the school day. Elementary schools may sell up to 8 ounce portions of allowable milk and 100% juice and water (carbonate or uncarbonated). TA provided to the Food Service Director on allowable beverages for grades K-8 during the day.	Submit a plan that describes how the SFA will ensure that the vending machine is either not available for use during the school day (midnight until 30 minutes after the end of the school day) or will only contain beverages that meet the Smart Snacks guidelines.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency?	TA provided that when processing applications using ICAVES the annual or more than one frequency radio button should only be used if a household reports an annual income or reports income in more than one frequency. Encouraged the Food Service Director to use the new Web-based ICAVES in the future. Provided instructions on how to get to the Web-based ICAVES.
100 - Certification and Benefit Issuance	130 Is household notification of denied benefits consistent with FNS requirements?	TA provided that on the State Agency prototype notification letter the SFA needs to insert the name, phone number and address of the hearing official, the school name and address at the top of the page, the date by when a household may request a hearing and the date the eligibility status is effective.
200 - Verification	208 When a confirmation review was conducted:	TA provided that once application(s) are selected for verification, each

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Lutheran School (06098000)
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		application needs to be confirmed to be sure it was initially determined correctly. The Confirming Official should sign the bottom of the application once it has been confirmed and date.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	TA provided that when the SFA selects application(s) for verification and if the application has a case number written on it, the SFA should try to find the students on ELookup. If found, the household is directly verified and a letter of selection does not need to be sent to the household.
200 - Verification	212 Did the SFA meet the follow-up requirements if the household failed to respond to the request for verification?	TA provided that if a household does not respond to the verification request the SFA is required to make at a minimum one follow-up attempt. Upon making this attempt, the SFA should sign and date the bottom of the application in the appropriate section.
700 - Resource Management		<ul style="list-style-type: none"> · The procurement event page on the written procurement plan should be revised to reflect the upcoming school year's procurement events, correct procurement methods and contract award type. It is recommended that the procurement event page of the written procurement plan be reviewed annually (about February). It is best practice to keep a separate procurement event page for each school year. This practice will help ensure that the correct procurement method is identified based on the estimated value of a particular purchase. On the plan the SFA should identify if they will award based on line item or bottom line for any purchasing event using small or formal purchasing method. Worked with the Food Service Director to correct this school year's procurement event page. · TA also provided that the SFA needs to have debarment statements from vendors when using small or formal procurement methods. * The written code of conduct did not identify the specific board policies or contract language that make a reference to disciplinary action. Write in the policy numbers and titles or make reference to employee contracts on the school food service code of conduct that would apply to officers and employees who violate procurement procedures. · Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a Buy) and formal methods of procurement. Please refer to the state-prototype templates posted on IA_CNP. · When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." A log should be kept of micro-purchases. Provided a log template.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Central Lutheran School (06098000)
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		<ul style="list-style-type: none">· When procuring milk and bread, along with specifications (descriptions) 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 (bottom line), the cost of each item on price quotation request should 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).· For milk, other things to consider when requesting price from vendors are: is pricing requested for paper cartons or plastic bottles, coolers to be provided at no charge, Hazard Analysis Critical Control Plan (HACCP) plan to ensure clean crates and milk cartons are delivered, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws and/or date stamped on milk cartons. The district should inform vendors whether a firm, fixed price or a fixed price with economic adjustment (escalator clause) is requested.· The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and the description of the product solicited by GPO. Prices on the invoice should match bid pricing or be lower unless SFA was given advance written notification per solicitation of any price increase. Food items procured by the SFA not on the GPO solicitation must be procured using 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. <p>*TA provided that rebates and credits should be tracked. Provided the Food Service Director with tracking forms.</p> <p>*The SFA's Hot Lunch Purchasing Policy currently states that Competitive proposals are required for purchases costing more than \$5,000. Recommended that the SFA consider raising this dollar amount. TA provided that the Federal threshold for formal purchasing is now \$250,000.</p>
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Iowa Department of Education
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State Review Summary Report
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800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	TA provided on where to find the web-site to use if the SFA received a complaint alleging discrimination in the Child Nutrition Program. Web site is: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .
1200 - Professional Standards	1211 Review an employee list for the day of the review and verify that the SFA's information from the Off-site matches the current (day of review) employee list.	TA provided that each SFA must designate someone to be the Director of Nutrition Services. This individual needs to have 12 hours of professional training per year. TA also provided that if the Director would leave there are hiring standards that need to be followed when replacing this individual.
RMCR - Indirect Costs	1 Did the SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency?	TA provided that if the Nutrition account is going to be charged for utilities it must be done so using an indirect cost rate. This can be up to 10% and is applied to labor, supplies and nutrition travel cost. Shared with the Principal that there is an indirect cost manual for non-public schools on the DE web site. https://educateiowa.gov/documents/indirect-cost-rates/2013/03/indirect-cost-guidance-nonpublic-and-rcci .

Site - Level Technical Assistance Central Lutheran School (8204)

Area	Question	Comments
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	TA provided on some of the benefits of using Offer vs. Serve as the SFA is currently a serve school. Reviewed with the Food Service Director that with Offer students must select 3 components with one component being 1/2 cup of fruit or vegetable. Discussed that there is often less food waste when schools use Offer.
Dietary Specifications Assessment Tool - Lunch	12 Grain-based desserts such as doughnuts, pastries, cakes, and cookies are limited to 2 oz. eq. per week or less for LUNCH. If grain-based desserts are not offered, then select the "N/A" dropdown response.	TA provided that since the school is a serve site if a grain based dessert contributes to the grains in a meal, then each student must be served the grain-based dessert.

Org - Level Commendations

Description
Certification and Benefit Issuance: The current application for free and reduced price meals/milk and income guidelines were used, ELookup is used to determine if students are directly certified, benefits are accurately transferred to the Point Of Service (POS) system, and the one denied application was correctly determined. The one application on file was correctly determined, signed and dated by the household member and the SFA, was complete with a Social Security Number and was determined within ten days. Rollover applications were removed if the household did not apply within thirty days of the school year or were not found on ELookup. Access to benefit information is correctly limited. Eligibility is kept confidential. 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, applications translated in Spanish are offered for Limited English Proficient households, annual civil rights training was provided for food service staff and documented. The SFA submitted the annual Public Release to the local media (Star Press out of Belle Plaine). 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 state and federal non-discrimination statements are provided on all material describing the program including letters and the monthly menus.
Fiscal Action: No fiscal action required.
Food Safety: The SFA has a written Food Safety plan that includes all required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including the milk cooler, freezers and refrigerators. Food temperatures are documented. Dishwasher temperatures are taken and documented and digital thermometers are used. The kitchen and storage areas were orderly and clean. Food Service workers practiced good gloving procedures. The Food Service Director is ServeSafe Certified.

Iowa Department of Education
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State Review Summary Report
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Procurement: The Food Service Director attended the Regional Procurement Training in Williamsburg. The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, have listed procurement events and procurement methods for each event. The SFA is part of the AEA purchasing group. The signed agreement with AEA Purchasing states that the school district agrees to procure food (excluding bread and milk) and non-food supplies through the Group's awarded Prime Vendor as well as vendors awarded the ware wash and small ware contracts. In school year 2017-2018 the SFA utilized 96.6% of their allotted PAL dollars. This school year, the SFA has used all of their allotted direct distribution allotment.
Professional Standards: The Food Service Director has completed 12 hours of Professional Training so far in school year 2018-2019. All nutrition staff have met required training for Professional Standards in school year 2019. Organized annual Training Spreadsheets are maintained showing at a glance which staff have been trained and meet required annual hours.
Reporting and Record Keeping: Reports are filed on time and all records are maintained for at least three years plus the current year.
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 and net cash resources do not exceed three operating months. The Paid Lunch Equity (PLE) tool was completed and prices were increased as required. No indirect costs are currently charged to the food service program. Money is not transferred out of the account to support other programs.
Verification: The correct number of applications were verified. The process was completed on time.
Wellness Policy: The SFA's wellness policy was reviewed and revised on October 19, 2018. The public is made aware of the SFA's wellness policy via it being published in the Parent/Student Handbook and it is posted outside the office in the entry way of the school. The following individuals are involved in reviewing and updating the LWP: parents, administrator, school board members, teachers and a student on the student council. Potential stake holders are made aware of thier ability to participate in the Wellness Committee. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.

Site - Level Commendations Central Lutheran School (8204)

Description
Meal Components and Quantities: The Food Service Director does a god job of menu planning. All meal components were available at the beginning of meal service on the day of observation and throughout meal service. The menus met daily meal pattern requirements for the Kindergarten through 8th grade. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements 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. Menus included some homemade entrees and standardized recipes are used for food production. 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.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of October were accurate and complete. Point of Service (POS) counts and filed claims appear accurate. Fast Direct is used as the school's POS system. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records (FPRs) were on file for all meals claimed for reimbursement for the review period.
Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of October 1 - 5, 2018 for lunch. The worksheets showed that all meal components were served. The Food Service Director also completed the Dietary Specifications Assessment tool for 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 recipes, controlling the portion sizes of condiments, offering some reduced-fat, low-fat and fat-free salad dressings, using fresh or 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. Numerous posters are displayed promoting good nutrition.
Smart Snacks: Students are only able to purchase milk and second entrees via a la carte sales. Exempt leftover National School Lunch Program entrees are only sold the same day.
Water: Free potable water is available to all students for lunch.