

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Davis County Comm School District (16190000)
SNP - Review ID: 4853

Program Year: 2019, Review January 7-9, 2019
Month of Review: November
Lead Reviewer: Cheryl Benson
Org Representative(s): Davis Co CSD

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	<p>(1) A sample of 315 applications were reviewed and the following errors were determined. The income on one application was impossible to determine; it is either \$700 or \$800 every two weeks. At 700, the household is reduced, while at 800 dollars the household would have been denied. One household was correctly determined as reduced but entered into the system as free. One application was missing the social security number. Part of the income on one application was not included when benefits were determined. The household should have been determined as denied instead of reduced. One student receiving benefits as a homeless student did not have any documentation from the Homeless Liaison and should have remained paid until documentation was received.</p> <p>(2) There were also two errors in determining income on applications that were verified. A household that was changed after verification from free to reduced should have been determined as paid. Income documentation from the second verified application is unclear whether it is received once or twice.</p>	<p>The household confirmed the amount was \$700. In the future if income is not clear, the household should be contacted before determination of benefits. The social security number was obtained. The homeless student is no longer in the district. The household entered incorrectly into the POS as free instead of reduced has been contacted and changed to reduced. For your response, submit a copy of the letter of adverse action to the household where income was missed and letters of adverse action for both verified applications. Also go into the Verification Report and revise the report. (If the report cannot be revised, contact your consultant.)</p>	
RMCR - Revenue From Nonprogram Foods	V-RMCR	<p>Each year, SFAs must calculate the percentage of nonprogram food costs and the percentage of nonprogram revenue. The percentage of revenue must be equal to or greater than the percentage of food costs. The SFA's financial report indicates that more revenue is needed.</p>	<p>For your response, recalculate the nonprogram food costs and revenues using the provided Non-Program Revenue Tool and submit a copy. If the tool still indicates that revenues are insufficient, also submit a plan to increase revenue and/or decrease food costs for nonprogram sales.</p>	

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Site - Level Findings: Davis County Community High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Two entree options for lunch do not include sufficient grain. Students in grades 9-12 must be offered at least two ounce equivalents of grain per day in every entree choice. The yogurt parfait only offers one grain, and the chef salad only offers 1-3/4 grain. (2) All items that are altered or prepared in any way must have a Standardized Recipe. There are no recipes for the daily Chef Salad, Yogurt Parfait, Sub Sandwich, and Wrap Sandwich. (3) In order to credit meat/grain items either a CN Label or a Manufacturer's Statement must be obtained. Without one or the other, meat items cannot be credited while grain items must use the Bread/Grain chart. Product Formulation Statements (PFS) must be obtained for pizza from Pizza Hut and quick breads offered at breakfast. Other labels should be checked.	For your response, (1) Indicate how grains will be increased on the parfait and the chef salad so that the two ounce minimum is met. It is recommended that menus be entered into the attached form below to ensure compliance. (2) Submit standardized recipes for the chef salad, parfait, sub sandwich, and wrap sandwich by attaching below. (3) Submit PFS for pizzas from Pizza Hut and quick breads offered at breakfast by attaching below. (If no PFS for the bread, it will credit as one grain.)	
500 - Offer versus Serve	V-0500	Offer vs Serve, OVS, is a way to provide students some choice in their meals and to decrease waste. For lunch, students must select at least a half-cup of fruit or vegetable and two other components. For breakfast, students must select at least a half-cup of fruit or vegetable and two other food items. OVS was implemented incorrectly at both breakfast and lunch. It was evident that students were not accustomed to taking the half-cup of fruit or vegetable. Sometimes they were not required to take any fruit or vegetable while other times, they were required to take more than the half-cup.	Several resources for OVS training were provided. For your response, indicate what resources were used to train high school cashiers, when the training was completed, and how you will ensure that only reimbursable meals are claimed in the future.	
1400 - Food Safety	V-1400	As indicated in the HACCP guidance manual, SFAs are required to have a food safety (HACCP) plan "...for every school food preparation and service site." The plan should be specific to each site and the equipment and preparation activities of each site. The SFAs only written plan is in the food service office instead of at the three prep and serving areas.	For your response, submit a timeline for creating and distributing HACCP plans to all three sites.	
Infant and Pre-K Meal Pattern Checklist - Lunch	V-IMPCL	(1) Pre-K students who are not co-mingled during meal service must follow the CACFP meal pattern. Even though Davis County Pre-K students eat in their classrooms and are not co-mingled, the SFA was using NSLP and SBP meal pattern. (2) Meal counts must be taken at the location and time the meal is served. Lunch meal counts at the Pre-K are taken at breakfast. (3)	For your response, (1) Submit one month of breakfast and lunch menus that meet the CACFP meal pattern. Include serving sizes and meat/grain crediting amounts. Also submit labels for the cereal and yogurt that will be offered to Pre-K students. Attach documents below. (2) Indicate how lunch will be counted at the time of meal service instead of in the	

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		Food and refrigerator/freezer temperatures should be recorded daily and retained. (4) There must be an And Justice for All poster at each serving site.	morning. (3) and (4) These errors were discussed and will be corrected. No further response required.	
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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?	(1) When determining applications, the income should only be converted to annual if there is more than one frequency of income. If all income on the application is one frequency (for example monthly) then the determination must be made on that one frequency. Converting all income to annual may result in an incorrect determination of benefits. (2) The person who originally determines benefits should sign the Determining Official space instead of the Confirming Official space. Be sure that all applications are signed and dated by both the household and the Determining Official.
200 - Verification	208 When a confirmation review was conducted:	Once applications are selected for verification, but prior to any other verification activity, the application must be re-determined by someone other than the Determining Official to ensure that the original determination was correct. This person is called the Confirming Official. (See page 103 of the Eligibility Manual.) The Confirmation Review was not conducted. (2) The SFA should also consider checking to see if the households are directly certified which is considered Direct Verification. (3) The Hearing Official must be someone other than either the Determining or Confirming Officials and must be in a higher position.
200 - Verification	213 If applicable, did the SFA's notice of adverse action contain all required information, including notification of appeal rights?	Technical assistance was provided on including the entire USDA non-discrimination statement as well as the Iowa non-discrimination statement on all letters, pamphlets, website, etc.--anywhere Child Nutrition information is present. The director was also informed that the Hearing Official on letters of adverse action was incorrect.
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?	<p>PROCUREMENT: The school food service small purchase threshold was not correctly identified in the written procurement plan. The correct small purchase threshold should be \$55,000. Following the increase in the federal micro-purchase threshold (July 1, 2018) from \$3,500 to \$10,000, the school food service micro-purchase threshold should change to \$5,000.</p> <p>Technical assistance was provided on completing the written procurement plan, for example, for a micro-purchase it is not necessary to select "fixed price" for contract award type. In a non-competitive procurement, school food service will pay the ticketed price.</p> <p>Guidance was provided last school year from School Finances at the Iowa Department of Education that certain expenditures such as equipment repairs and maintenance are an indirect cost to school food service and not a direct cost. Other expenses that were charged directly to school nutrition funds that should be indirect costs are: radio advertisement of school lunch/breakfast menus, pest control, replacement parts for school</p>

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		<p>food service equipment. The district can contact School Finance at the Department of Education related to indirect cost questions.</p> <p>Technical assistance was provided that software updates to the Point of Service (POS) are allowable as a sole source purchase. State agency approval is required for other sole source purchases (which are rare for school food service). Purchases using the micro-purchase threshold (no competitive procurement required) should be kept to a minimum. It is recommended the district use the small purchase method (3 Bids and a Buy) for the procurement of small wares. An inventory of small wares can be conducted at the beginning and mid-way through the school year to allow purchases to be grouped together.</p> <p>The micro-purchase method was used to purchase pizza from a local franchise. No competitive procurement was conducted. Purchases were not equitably spread among qualified vendors which is requirement of micro-purchase method. In the past, the district has tried to solicit price quotations from the local gas station that do sell pizza, however, the business has not responded. Going forward, the small purchase method should be used for fresh commercial pizza purchases. The district is encouraged to meet with the local gas station management to determine barriers that prevent the business to submit a response to the district's solicitation.</p> <p>School food service entered into an agreement with a Food Service and Vending Options business for the purchase of beverages to be sold in vending machines and a la carte at the high school. A representative of the company visited the district with a catalog of "high school approved beverage offerings" and convinced them to sign an agreement with the company. The agreement would automatically renew annually until terminated without cause by either party upon thirty days prior written notice. The district did not conduct a competitive procurement. School nutrition funds are used for payment. If school nutrition funds will be used to pay for the beverage purchase, in SY 2019 - 2020, the agreement should not be renewed. A competitive procurement using the small purchase (3 Bids and a Buy) method should be conducted.</p> <p>Milk and bread solicitations were reviewed to assess compliance with small purchase method. Last year, the amount spent on the procurement of milk exceeded the school food service small purchase threshold of \$55,000. We, therefore, recommend that the school food service request board approval to raise the district small purchase threshold. This would allow milk to be procured by soliciting price quotations. Otherwise the formal method of procurement should be used which requires public notification in a widely circulating newspaper.</p> <p>Required federal terms and conditions must be included in solicitations. Refer to the small purchase (3 Bids and a Buy) and RFP and IFB templates available in download forms on IA_CNP.</p> <p>Include the full Buy American statement on all solicitations. Refer to bureau templates.</p> <p>A review of invoices from Prime Vendor showed that one of the USDA</p>
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		<p>Foods -Diverted Food item was charged the correct USDA Food Value, however, the processing fee charged was twice as much as should be charged. School food service director should follow-up with the distributor to obtain credit. The food service director should also review past invoices to check if other USDA Foods are charged as procured. This other buying group district should also review their invoices.</p> <p>For the current SY, the drawn down on some Diverted Food items is low. Please contact DE USDA Foods Consultant on best options to maximize use of USDA Foods PAL allotment.</p>
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	<p>There are two separate groups to consider when accommodating special diets. The first group is where the diet can be accommodated within the meal pattern--for example, providing a creditable soy milk instead of cow's milk, or serving the student grapes instead of strawberries. For this group, the SFA does not have to require a Special Diet form, but the SFA can require one; that is a local decision. Either way, the SFA cannot wait for the completed form before accommodating the diet request; it must be accommodated as soon as possible. The second group is where the diet cannot be accommodated within the meal pattern--for example, a gluten-free diet. For this second group, the SFA cannot accommodate the diet until a Special Diet form has been provided. Special Diet forms do not have to be resubmitted unless there has been a change. However, the SFA should check in with the household annually to determine whether there have been any changes.</p>
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?	<p>The SFA used a video from another state to provide Civil Rights training for staff. When other states' presentations are used, the SFA must be sure to include the additional Iowa protected classes.</p>
1000 - Local School Wellness Policy	1006 How does the public know about the results of the most recent assessment on the implementation of the Local School Wellness Policy?	<p>SFAs are required to share the assessment of wellness policy goals with the public. The assessments have not been shared with the public. The SFA agreed to post the results on the district's website as soon as possible.</p>
1200 - Professional Standards	1208 Is the SFA tracking training hours on an annual basis?	<p>The SFAs tool to track training needs additional information: year or years included on each tracker, hours needed by each employee, whether the employee is a director, manager, or other, and whether the employee is part-time (less than 20 hours/week) or full-time. It was also unclear whether all of the employees on the tracker were food service staff or outside staff performing food service duties. The Iowa tracking tool was shared with the director, and the SFA plans to find out who is and isn't paid out of Child Nutrition funds. Those not paid out of CN funds do not have required training, but the SFA should still provide training as necessary for their duties. (2) It is recommended that regular training be scheduled throughout the school year.</p>
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	<p>Food safety is one of the most important areas of oversight for directors. One way to keep the HACCP plan up to date, provide training for staff, and promote buy-in from staff is to review the food safety plan and all Standard Operating Procedures (SOP) as a group. SOPs can be divided among staff, reviewed for accuracy, additions, and corrections, and then discussed.</p>
RMCR - Revenue From Nonprogram Foods	9 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	<p>Technical assistance was provided on calculating non-program revenue. The financial review instructions from download forms was shared, and methods of calculating costs and revenue were discussed.</p>

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Site - Level Technical Assistance Davis County Community High School (0109)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	317 a. Based on meal observation, does the meal counting system as implemented prevent overt identification of students receiving free and reduced price benefits?	Identification of students receiving free or reduced meals must be kept confidential. On the SFA's Point of Service, POS, system, the computer displays a meal cost for paying students but displays zero meal cost for free students. The SFA must either remove the cost of the meal from all accounts or add the cost of the meal to all accounts.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	(1) While the SFA has beautiful lighted signs for lunch, neither the sign at the high school nor the elementary was being used. Signage is required that indicates each component and the food(s) for that component. (2) The sign used at breakfast does not indicate the number of items that each breakfast item credits and did not indicate that students must take a 1/2 cup of fruit. A prototype sign was provided.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Food Production Records, FPRs, must include the actual number served by grade group and adults, indicate specific foods such as apples and oranges, specify leftover amounts of all foods. A FPR checklist was provided as well as examples of FPRs.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Standardized Recipes are required by USDA regulation for any food that is prepared/altered. Resources were provided to assist in standardizing recipes. It is recommended that the SFA start with a standardized recipe and then adjust it for local use. Standardized recipes must include the recipe name, number of servings, serving size, total yield, meal pattern contribution, ingredients, directions, and critical control points.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Technical assistance was provided on labels which must be from the product itself or the manufacturer and not from the vendor. Information on Product Formulation Statements was also provided. It is recommended that labels and crediting information be collected in a notebook in some form of organization such as meat/ma, grain, fruit, vegetable and separated by lunch and breakfast.
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	(1) The And Justice for All poster displays information for participants on how to file a discrimination claim. The poster at the high school is behind the serving line and therefore the pertinent information cannot be read by participants. (2) On printed menus, the one-line statement (This Institution is an equal opportunity provider) must be included.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	Two beverage vending machines in the high school cafeteria contain unallowable beverages. The school must ensure that those machines remain locked from midnight the night before until a half hour after the end of the school day.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The latest health inspection report is posted behind the serving line. Inspection reports must be posted where participants can read them.

Org - Level Commendations

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Description
<p>APPLICATIONS/BENEFIT ISSUANCE: 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 transferred to the POS system in a timely manner, and denied applications were correctly determined. A correct and current benefit issuance list was available. Households who declined benefits were correctly documented. Over 300 applications were reviewed and only three errors were determined, Access to benefit information is correctly limited. Free meals are extended to all members in the household. The SFA has a back-up system for benefit issuance documents and system.</p>
<p>BREAKFAST: The district has greatly improved breakfast participation. The meal is presented in a Grab and Go format. Students have a variety of both hot and cold entrée items to choose from.</p>
<p>CIVIL RIGHTS: Annual civil rights training was provided food service staff and documented. A copy of the district's public release was on file, documenting that it was submitted to local media. 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 form has been completed and filed. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements.</p>
<p>COMPETITIVE FOODS (SMART SNACKS/HKA): Students may purchase a second entrée, select a la carte options, and vending machine items. Second entrees are correctly documented on production records. Documentation was available to show that all foods and beverages sold to students during the school day met Smart Snack and Healthy Kids Act standards, including food sold in the cafeteria and vending machines. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte along with ingredient and nutrient labels.</p>
<p>HACCP/FOOD SAFETY: The SFA has a district-wide written Food Safety plan that includes all required elements. The latest Health Inspection Report was posted, and two inspections have been requested for each serving site. There were no critical areas noted on the report. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.</p>
<p>MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of November were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. There was a POS for all students at lunch, and the POS was organized and orderly. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: The SFA offers multiple entrée options at the high school. Besides three hot entrée choices, students could also select from six cold entrée options. All meal components were available at the beginning of service and throughout meal service on the days of observation. A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables plus a variety of entrees offered throughout the month, encourages student participation and consumption. Water was available as required, and at least two types of milk were offered. Many low fat and low sodium food items were observed in storage. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheets for the high school.</p>
<p>PRE-K MEAL SERVICE: Meal service was observed at Head Start. The staff worked very well with the students, there was ample supervision, tables were sanitized prior to meal service, and all required food in at least minimum amounts required was on the table at the start of the meal.</p>
<p>PROCUREMENT: The Food Service Director and Food Service Secretary attended the Regional Procurement Training in Harmony. The district is a member of the Southeast IA Buying Group consisting of five (5) school districts in Southeast IA for the purpose of procurement of foods, supplies, warehousing, and distributing of prime vendor services. This partnership will allow the food service director (new to the position) to develop the knowledge and the skills to conduct competitive procurement that meets requirements. The food service procurement plan (procurement events and Code of Conduct) for SY 2018-2019 was completed. The district school food service director and director of support services attend Bureau training and implement needed improvements in program operations including procurement. Milk and bread solicitation included written specifications identifying the minimum requirements of the items being procured. Last SY, the food service did an outstanding job of utilizing the Planned Assistance Level (PAL) of USDA Foods at 123.3 percent. The food service director has developed a tracking sheet to track rebates. Rebate forms are completed by the distributor sales individual and food service is responsible for mailing the rebates to the manufacturer.</p>
<p>PROFESSIONAL STANDARDS: Tracking was provided that documents that the director received the required 12 hours of annual training, managers have received the required 10 hours of training, and most other full-time and part-time staff have received training. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was documented.</p>
<p>RESOURCE MANAGEMENT & RECORD KEEPING: Financial records that were reviewed, indicated appropriate and allowable expenditures. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. 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 District had a positive balance in January 2018 and elected to not increase paid lunch prices. The district does not charge indirect costs to the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for commodities. Reports are filed on time, and all records are maintained for at least three years plus the current year</p>
<p>SBP & SFSP OUTREACH: School Breakfast Program, SBP, outreach was sent out at the beginning of the year to inform families of the availability of the program including times and locations. Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer. The information was shared via flyers, separate SFSP Facebook page, websites, lunch menus, media, etc.</p>
<p>VERIFICATION: The correct number of applications were verified. All income sources were verified with at least one month's income, and the process was completed on time. The SFA had at least one person attend verification training.</p>
<p>WELLNESS POLICY: The district has a current wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The wellness policy is available to the public. Potential stakeholders are made aware of their ability to participate on the wellness committee.</p>

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