

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Ft Madison Comm School District (23220000)
SNP - Review ID: 5050

Program Year: February 5-7, and February 21, 2019
Month of Review: December
Lead Reviewer: Cheryl Benson
Org Representative(s): Ft. Madison CSD

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	(1) Three applications were incorrectly determined due to income that was not included in the determination. (2) One application indicated a monthly income which would have denied the household benefits. (3) When a household submits a DHS letter for benefits, the letter must be signed and dated by the SFA so that the date the student became eligible for benefits can be determined. (4) SFAs have ten days to determine benefits once an application has been accepted by the district. In order to determine the actual date the district accepted the application, it should be date-stamped.	(1) The three incorrectly determined households were mailed letters of adverse action during the on-site review, copies are attached below, no further action is required. (2) The household was contacted and the income was annual instead of monthly so benefits do not change. No further action is required.(3 and 4) The director has agreed to sign and date the DHS letters and to instruct building personnel to date stamp applications when they are accepted. No further response is required.	
700 - Resource Management	V-0700	(1) SFAs are expected to effectively use their USDA Food's entitlement dollars. While that has been done in the past, the usage of Diverted Foods is behind schedule. Two-thirds of the year is over, but only 53% of DF funds have been utilized. (2) While reviewing vendor invoices, it was discovered that the vendor for bread and other grains has been providing a different product from the one that was bid at a significantly higher price. The original sub bun #6055 was bid at \$4.10/package, but the SFA is receiving #6584 for \$5.99/package. After a quick calculation, it appears that 149 packages have been purchased at an overcharge of \$281.61	For your response, (1) Indicate your plan to utilize all or most of the remaining Diverted Foods entitlement. (2) Contact the vendor and indicate the results; whether there was a reason for the change that is acceptable within the terms of the contract or whether a refund was provided.	

Site - Level Findings: Fort Madison High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Students in grades 9-12 must be offered at least 2 ounce equivalents of meat/meat alternate and 2 ounce equivalents of grain per day, 1 cup of fruit, 1 cup of vegetable, one cup of fruit and one cup	For your response, correct the Menu Certification Worksheet from the week of December 17-21. Submit recipes for the Chili, Pulled Pork, Pizza Burger, and Mac/Cheese and labels for Cheese Breadstick	

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Ft Madison Comm School District (23220000)
SNP - Review ID: 5050**

	<p>of milk. Within the one cup of vegetable per day, students must be offered 1/2 cup of starchy, 1/2 cup of dried beans/legumes, 1/2 cup of dark green, 1-1/4 cups of red/orange, and 3/4 cup of 'other' vegetables each week. For the week in December selected for review, the menus were short 1/4 cup vegetable one day and 1/2 ounce equivalent of grain one day. For the week, there was no dried beans/legumes and red/orange vegetable was short 1/8 cup. There were other days in the month when there were shortages. Note: A repeat of these violations may result in fiscal action at the next Administrative Review.</p>	<p>and Pork. Indicate actual serving sizes for all entrees, grains, fruits, and vegetable. Also watch a webinar titled "Menu Planning Resources-March 2016," and indicate when you watched the training. (The webinar can be found by going to the DE website, clicking on A to Z Index, the letter "L" and then Learning Tools-Schools. The webinar is under the sub-heading Menu Planning and Recipes.</p>	
--	--	--	--

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	111 What is the SFA's procedure for extending free school meal eligibility to all children who are members of a household in which one person in that household is receiving SNAP, TANF, or FDPIR benefits?	Every student receiving free or reduced meal benefits must have documentation of how the determination was made. When siblings or other students are living in a household with a student who is directly certified, those other students/siblings must be indicated in some way. A separate list can be maintained or the names can be manually added to the direct certification list next to the student's name who is on the list.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Technical assistance was provided on counting meals for field trips. All meals must be counted at the time and location where they are served, so staff on the field trip should check off students as they receive their meals.
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>Formal Procurement:(1) Reviewing invoices from the Prime Vendor, there was one item found on invoices that were not on the bid, and one other item had an invoice price that did not match the price on the original bid response or the monthly price list. The food service director should spot check invoices to ensure products delivered match the order and the specifications of the product solicited. Price on the invoice should match bid pricing. Items not in the bid specifications must be procured using the appropriate procurement methods. The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification at equal or lesser price. (2) Rebates, credits, and discounts must be tracked to ensure they are received. The SFA's off-site procurement tool indicated that these are not tracked and none were received. (3) The SFA is responsible for all areas of procurement whether bidding independently or procuring with group purchasing organization. The director must maintain all records including the RFP, all addendums and amendments, advertising, responses to the RFP, prices, etc. The SFA must also ensure that the terms and conditions of the contract are met. Oversight of contracts is a key responsibility of the SFA.</p> <p>Small Purchase Procurement: The director did an excellent job of creating bid documents for bread and dairy. She included many terms and conditions that help ensure the SFA gets the products and service it wants. Some improvements could</p>

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Ft Madison Comm School District (23220000)
SNP - Review ID: 5050**

		<p>be included: (1) Better specifications for products. The bread bid indicated that products should be at least 51% whole grain, but the form sent to vendors to fill in prices indicated 100% whole grain. The lower bid was rejected because they bid 51% whole grain products. Specifications should give a range of sizes for grain items, such as a bun between 56 grams and 62 grams. Refer to Choice Plus for specifications for many foods. The book can be found on the DE website, A-Z Index, Procurement, School Nutrition. (2) The Buy American provision on both the bread and dairy bids needs updated to include new language. There are also other terms that must be included depending on the value of the contract. For example, both bids were missing language for termination for cause which is required over \$10,000, and both were missing documentation that the vendors were not debarred from doing business with the federal government. Additional terms could be added such as indicating that the temperature of coolers must maintain between “x” and “y” degrees. The Three Bids and a Buy prototype in download forms can be used for small purchase as it contains language for terms and provisions. (3) Both bids were over the district’s small purchase threshold and should have been formally procured instead of using the small purchase method. (Note--The district is in the process of increasing the small purchase threshold for CNP purchases.) (4) The lowest price was not accepted for dairy either. The reason was that the bids were close. However, there is no provision for accepting a higher bid simply because it is ‘close’ to the other bid. When using small purchase, the lowest bid must be accepted.</p> <p>Micro Purchase: There are three main requirements when using micro purchase—the price must be under the threshold, the prices must be reasonable, and the purchases must be spread around between all eligible vendors. Normally the main use of micro purchase is for ‘emergency’ or last minute purchases, and it is not intended for on-going purchases from the same vendor. Two micro purchases from last year were reviewed, Cintas Corporation and Central Restaurant. While more money was spent with Central for kitchen supplies than with other vendors, there was an attempt to spread the purchases between vendors. However, the purchases from Cintas were not spread around with any other vendor, and it appears they have an on-going contract. In order to continue using Cintas this year, the SFA needs to use Small Purchase. (The director indicated that this is procured via another department. It is the responsibility of the SFA to ensure the procurement is conducted in accordance with federal regulations. If it is not, then the items cannot be paid out of the nutrition account.)</p> <p>A Buy American provision exception log must be maintained for all non-American commodities that are purchased. The SFA had a log for permanent non-American commodities such as pineapple and mandarin oranges but did not have one for items in storage such as cherry tomatoes and grapes. A log must be kept that indicates the date, the product, country and reason for the exception. Either the item is not produced in sufficient quantities in the US or the price is significantly higher.</p>
800 - Civil Rights	810 Review program materials.	Be sure that printed menus include the one-line non-discrimination statement, "This institution is an equal opportunity provider."
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?	Assessment of goals should be done for each building and then shared with the public. Outreach to stakeholders-students, parents, general public, PE teachers, food service staff, school health professionals, Board

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Ft Madison Comm School District (23220000)
SNP - Review ID: 5050

		members, and Administration should be conducted via newsletters, announcements, website, etc.
1100 - Smart Snacks	1103 Who is responsible for tracking Smart Snacks compliance at the:	It is recommend that the district implement a plan with a central person to approve all food sales during the school day to ensure they meet Smart Snack regulations. A prototype was provided.
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	There is an Iowa Professional Standards tracking spreadsheet that could be used to track staff training and might be more comprehensive and easier to use than the local form currently used. The Iowa tool was emailed to the director.
2100 - Special Provision Options		Technical assistance was provided on the possibility of using Community Eligibility Provision, CEP, for the elementary buildings. There is guidance on the DE website including a calculator. The SFA must submit their ISP (identified student percentage) in April and based on that number and a percentage calculation, the SFA would be reimbursed for free and paid reimbursement. All students in those buildings eat free, but the percentage of free students must be made up with non-federal funds. The district cannot use the free and reduced benefit application or any Child Nutrition resources to get information for other programs such as Title I. CEP is a great program for buildings where the ISP is high enough to make it practicable.
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	Technical assistance was provided on completing the Non-Program Revenue tool.

Site - Level Technical Assistance Fort Madison High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch		Increasing participation for school meals, especially for middle and high school students, can be a challenge. Students are used to many food choices at restaurants, convenience and grocery stores, and even at home sometimes. The more choices in entrees, fruits, and vegetables that the SFA can offer, the more likely a student will be eat school meals. While it makes the meal more complex for food service staff, there are some simple ways to give students some choices. Fruits and/or vegetables can be pre-cupped and placed in rows on sheet pans, fresh fruit can be put out daily, dried fruit can be offered as an option as well as juice. A daily choice of a salad and a cold sandwich can be done fairly easily. Some schools make their own version of a lunchable by placing a reimbursable meal in a plastic clamshell (example-crackers, dinner roll or muffin, yogurt, cheese stick, fruit and then student can also take the vegetables offered with the regular entrée and milk). Elementary students can be offered a Cereal Meal (cereal, another grain, cheese stick, 4 ounce yogurt and then all the regular fruit/veg/milk) Contact Team Nutrition staff in Des Moines for ideas and look at the Smarter Lunchroom Movement.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	Technical assistance on signage at the beginning of the service line to indicate what food item fulfills each component. Signage was missing at breakfast. Information and resources were provided.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Technical assistance was provided on meeting meal pattern requirements. There is an entire webpage at www.educateiowa.gov dedicated to menu planning and recipes. Go to A to Z index, click on "M"

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Ft Madison Comm School District (23220000)
SNP - Review ID: 5050

		and then on Menu Planning and Recipes. There are also webinars and other training resources at the same website under Learning Tools-Schools and at www.theicn.org .
800 - Civil Rights	811 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	The And Justice for All poster is intended to provide participants with information on how to make a civil rights complaint. In order for the poster to be useful, it must be where the participants can read the phone numbers and addresses.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	Be sure to keep nutrition and ingredient labels for all Smart Snack items along with the nutrition calculator print outs. Also ensure that fundraisers where food is sold to students during the day meet requirements.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Be sure to maintain temperature logs for all areas. Thermometers should be calibrated at least once a week and logged. The dishwasher should be temped and logged daily and the temperature test sticks kept with the log. Temperature logs should have a column for Corrective Action and any time a temperature is not within acceptable limits, the action taken should be logged. All of these actions help ensure that temping is completed and offer protection for the SFA in case there is a food born illness outbreak.

Org - Level Commendations

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 accurately and frequently transferred to the POS system, and denied applications were correctly determined. A correct and current benefit issuance list was available. Over 400 applications were reviewed and only four errors were determined. Applications were signed and dated by both a household member and the SFA, applications were complete with SSN's and case numbers, and all applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Waivers are provided to applicants that indicate specific fees and were signed and dated by the household. The SFA has a back-up system for benefit issuance documents and system.</p>
<p>CIVIL RIGHTS: The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. 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. The current state and federal non-discrimination statements are provided on most materials describing the program including letters, pamphlets, and the school's website.</p>
<p>COMPETITIVE FOODS (SMART SNACKS/HKA): Students may purchase a second entrée, some a la carte options, and/or a second milk at lunch. 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, vending machines, and fundraisers. 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. A copy of the written plan was available at the site reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. The latest Health Inspection Report was posted in a publicly visible location, 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, and dishwasher. 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 December were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. There was a POS for all students, and the POS was organized and orderly. Students are not overtly identified as free, reduced, or paid during the meal counting process or during meal observation. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. Cashiers are trained, and all students observed selected a reimbursable meal.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, has created menus that meet the meal pattern for reimbursable meals. 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.</p>

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Ft Madison Comm School District (23220000)
SNP - Review ID: 5050

Water was available as required, and at least two types of milk were offered. Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one or two of the five components. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Recess is scheduled before lunch service. Signage was posted explaining what constitutes a reimbursable meal. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheets for the school selected for review for a specified week during the review period. Nutrient analysis was not required.

PROCUREMENT: The off-site procurement tool was completed, and board purchasing policy and vendor paid lists were submitted. The SFA has a comprehensive written Procurement Plan 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, and specifications were well-written and comprehensive. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. The district is a member of a Group Purchasing Organization. A signed agreement with the Group Purchasing Organization for SY 2018-2019 is on file.

RESOURCE MANAGEMENT & RECORD KEEPING: Financial records that were reviewed, indicated appropriate and allowable expenditures. 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 indicated by the PLE tool. The district does not charge indirect costs to the food service program. Money is not transferred out of the account to support other programs. . Reports are filed on time, and all records are maintained for at least three years plus the current year

VERIFICATION: The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was completed on time. The applications selected for verification were confirmed prior to verification to ensure the original determination was correct. The SFA had at least one person attend verification training.

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 on the district's website.