

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
HAMBURG CSD (27720000)
SNP - Review ID: 5109

Program Year: 2019
Month of Review: September
Lead Reviewer: Brenda Windmuller
Org Representative(s): Vicki Hansen

Org - Level Findings

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|---|---|----------------------------|
| 100 - Certification and Benefit Issuance | V-0100 | Two applications reviewed were missing a social security number (or checking the box to indicate no social security number). The application should be considered incomplete and not processed without this information. | The SFA contacted the household during the On-site visit and was able to complete the application. No further action required. | |
| 700 - Resource Management | V-0700 | Procurement regulation requires SFAs to have a code of conduct policy which addresses disciplinary action to be taken against an employee who acts unethically. The Board policy (705.2 and 704.4) included as a reference to the Code of conduct does not define disciplinary actions to be taken. | The SFA will find and submit existing policy addressing disciplinary action to be taken against an employee who violates the Code of Conduct OR Submit a draft of a policy to be presented to the school board if such a policy is not already in existences. | |
| 700 - Resource Management | V-0700 | The minimum adult meal price for 2018/2019 is \$3.65. SFA was only charging \$3.60. | The SFA has corrected the adult meal price in the POS during the on-site review. No further action required at this time. | |

Site - Level Findings: MARNIE SIMONS ELEMENTARY (0418)

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|--|--|----------------------------|
| 400 - Meal Components and Quantities - Breakfast | V-0400 | One student was allowed to go through the line with only 2 items on their tray at breakfast. (Juice and French toast sticks only.) The student was not stopped at the POS and was allowed to complete the transaction. | SFA will 1. Post signage to better explain to students what they must take for a reimbursable meal. 2. SFA will have the breakfast POS operator watch the "Building a Healthy Breakfast" webcast found at: https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts and submit the date completed. 3. SFA will complete and submit an on-site monitoring of breakfast dated after October 19, 2018. | |
| 1700 - Afterschool Snack | V-1700 | The SFA has not completed production records. The SFA has not completed the on-site monitoring as required in the first 4 weeks. | The SFA will submit the After School Snack Program production records for October 22-November 2 and will submit the completed on-site monitoring form for the Afterschool Snack Program. | |

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| Infant and Pre-K Meal Pattern Checklist - Breakfast | V-IMPCB | Pre-school students (age 2-5) were allowed to drink flavored milk. | SFA will provide the procedure to be used in the future to ensure that pre-school students do not take flavored milk. | |
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Org - Level Technical Assistance

| Area | Question | Comments |
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| 300 - Meal Counting and Claiming | | <p>The SFA inquired about serving meals Family Style to all students. This is an option and information was sent to the SFA. The SFA must consider the following before proceeding:</p> <ul style="list-style-type: none"> -SFA personnel would need to monitor all students and ensure each student takes the minimum requirements for a reimbursable meal. All of these staff members would need to take 4 hours of annual training to include OvS, and Civil Rights. -Likelihood of increased food waste. Each table would need to have bowls with enough of each food item for each student to take the recommended portion. With OvS, students may take smaller portions and pass on items all together. All leftovers would need to be discarded as they were not in a restricted area or kept under temperature controls. - Additional food safety measures may need to be put in place. The SFA would need to consult with their local Health Inspector. - Current lunch blocks of 20-25 minutes may or may not be sufficient for this type of service. |
| 700 - Resource Management | | <p>Procurement: Need to maintain documentation from all vendors solicited. Keep records of what they returned and their price quotes. Document which vendor was selected and why. If a vendor elects not to bid, write "no response" on a copy of the letter sent to them or have them return a "No Response" Letter (template on Download forms).</p> <p>Product specifications on bid solicitations should include all detail to include flavors, packaging, low-fat, and any other product requirements. SFA should also include inclusion of milk cooler or other equipment if applicable.</p> <p>Only product included on the bid are allowed to be purchased. Outside purchase will require a separate bid or addendum to the original agreement.</p> <p>Solicitations for small and formal purchases must include the Buy American Clause. If these contracts are for \$10,000 or greater, you must also include the Termination for Cause and Convenience clause. Debarment statements must be collected from all small and formal vendors.</p> <p>SFA should keep all procurement records together for a minimum period of</p> |

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| | | <p>3 years plus the current year. This documentation should include:</p> <ul style="list-style-type: none">• All price adjustments throughout the year• All invoices• All contracts and agreements• All bids solicited• Documentation that a vendor did not reply to bid (if applicable)• Documentation of why you selected a specific vendor (Selection Rubrics)• Copies of bid solicitation• Debarment statements• CD provided by the AEA (if applicable) <p>SFA should have someone monitoring the prices charged on the invoices to see if they match the contract prices.</p> <p>Meyer Laboratories is recorded as a Micro-purchase and appears accurate as no bids were solicited, however, with a Micro-purchase, the SFA is required to spread the wealth, meaning you a. must start rotating purchasing these items with another company or b. complete a competitive bid for these items and change it to a small purchase method.</p> <p>SA provided templates and documents for procurement with an overview of procurement regulations. SA also reminded SFA that all of the most up to date templates may be found on IowaCNP Download forms.</p> <p>SA assisted SFA in correcting errors on the Procurement Plan.</p> <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$10,000 (or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none">▪ Track micro purchases, what purchased when and dollar amount.▪ Purchases should be distributed around community, not just one store. <p>Small Purchases- Purchases that are under \$250,000 (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> |
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| | | <ul style="list-style-type: none"> ▪ Include all terms and conditions ▪ Include terms: Buy American and Equal Opportunity ▪ Include Termination for Cause and Convenience if \$10,000 or more ▪ Attain Signed Debarment Statements ▪ Awarded on lowest price (unless written documentation to justify) ▪ Maintain documentation <p>Formal Purchase- Purchases equal to and exceeding \$250,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <ul style="list-style-type: none"> ▪ Notice of accepting all types of formal purchase must be advertised. ▪ Include all requirements of a small purchase ▪ If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. ▪ Everything must be in writing. |
| 700 - Resource Management | 707 Did your SFA receive a transfer of non-Federal funds into the food service account to reduce or eliminate the need to raise paid lunch prices? | <p>The SFA's School Lunch account currently has a loan from the General fund. The Business Official is working on a payment plan. SA and Business Official discussed ways of getting the finances under control. Ideas include:</p> <ul style="list-style-type: none"> -Provide a budget to the FSD -FSD should do inventory regularly, monthly is advised -FSD should calculate average food cost (annually is required, monthly or weekly will help to monitor costs) -Cycle menus will help by reducing waste, more accurate forecasting of production levels, cross utilization of ingredients, and ability to menu foods with lower food cost -Consider raising lunch prices. Current paid student lunch is \$2.45 while the USDA's target price is \$2.86 -Research if Community Eligibility Provision (CEP) is an option |
| 700 - Resource Management | 711 If the SFA charged for adult meals, were the meal prices sufficient to cover the overall cost of the meals in compliance with FNS Instruction 782-5, Rev. 1? | <p>Adult meal prices must comply with minimum requirements set by the USDA. The minimum for 2018/2019 is \$3.65, SFA was charging \$3.60. SFA corrected this on the first day of the on-site review. Further discussed that this price should apply to all visitors, regardless of the age as these are meals which do not receive any subsidies.</p> |

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| Area | Question | Comments |
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| 400 - Meal Components and Quantities - Lunch | 402 Are the minimum daily quantity requirements met for the age/grade group being offered? | <p>SFA should include packages sizes (weight or quantity) on production records when using a package as a unit of measure. (ie: refried beans- 1 bag = 26.25 oz) Package sizes can vary, thus changing serving sizes.</p> <p>The SFA should consider utilizing cycle menus to aid in menu planning. This will help with consistency in meeting the meal pattern requirements. Cycle menus can also help reduce food waste.</p> |
| 400 - Meal Components and Quantities - Lunch | 410 a. Do planned menu quantities meet meal pattern requirements for the review period? | <p>The FSD should review menus every week to ensure that they meet the meal pattern. September 12, 2018, an insufficient quantity of meat/meat alternative was planned with the menu. While refried beans were planned for the day and completed the m/ma requirement, the beans were intended to be counted as a vegetable.</p> <p>SFA should be aware that changing brands of product may change the meal pattern contribution.</p> <p>Staff should verify food items meet the serving size required, ie: orange sizes vary, 1/2 of a 113 count orange does not equal 1/2 cup, a single tri-tater equals 1/4 cup.</p> <p>Students choose salad bar as their entire meal must select 3 components in their minimum quantity required. This will require monitoring very closely. POS operator did a good job, but based on the number of students going through the salad bar at one time, the SFA may consider training and using the "Iron Chef" students who are already tasked with monitoring the cleanliness and fullness of the salad bar to help ensure students take what they need. SFA may also consider adding additional components to the salad bar like a dinner roll or fruit to assist students in having enough to choose from.</p> |
| 500 - Offer versus Serve | 500 Is Offer vs. Serve being implemented properly by the reviewed school? | <p>The SFA had some confusion regarding the number of items students are required to take for a reimbursable meal. SA clarified items/components at breakfast. (Lunch service requires students select 3 components, at breakfast it is 3 items for OvS)</p> <p>Additional training in the area of Offer vs Serve would benefit all staff and students. Additional posters and signage will assist students in recognizing what they need to select for a reimbursable meal. Posters and links to additional resources were provided to the SFA by the SA.</p> |
| 600 - Dietary Specifications and Nutrient Analysis | | <p>Non-creditable foods were purchased on two separate occasions as micro purchases. Items like candy and Oreos should not be purchased using NSLP funds. These items were used as rewards for student helpers completing tasks like wiping down tables after lunch.</p> |
| 1400 - Food Safety | 1408 Were the selected relevant temperature logs available for review? | <p>Missing temperature logs for milk cooler. The SFA has not been recording the temperature of the milk cooler, SA advised them to start immediately. All temperature logs must be kept for a minimum of 6 months.</p> <p>SA advised SFA to restrict access to the kitchen to authorized personnel only. The proximity and the openness of the kitchen increases opportunity for food contamination and pilferage.</p> |

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| | | All foods removed from the original container should be labeled and dated. Freezer items like chicken nuggets removed from the original box should additionally have the tracking label in case of recalls or a foodborne illness outbreak. |
| 1700 - Afterschool Snack | 1700 Were any areas identified requiring technical assistance or corrective action? | Afterschool Snack Program- Production Records are not being completed for the Afterschool Snack Program. The On-site monitoring has not been completed for 2018/2019 in the first 4 weeks of the Afterschool Snack Program. |
| Infant and Pre-K Meal Pattern Checklist - Breakfast | 11 Was the appropriate milk type served? | Children ages 2-5 may not have flavored milk unless they are eating with older children who have access to flavored milk. Students were observed drinking chocolate and strawberry milk at lunch and breakfast. These meals were served a separate time and in a separate location as the older children. SA communicated this regulation to the FSD and the Administrative Assistant. SFA should develop a system of milk distribution to ensure pre-school students do not take flavored milk. |

Org - Level Commendations

| Description |
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| ACCESS AND REIMBURSEMENT (100): Benefit documents, as well as all paperwork, were well organized. The current application form was used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS, and denied applications were correctly handled. |
| BREAKFAST & SUMMER PROMOTION (1600): The SFA does an excellent job of promoting breakfast and the SFSP to the students and families in their community. |
| CIVIL RIGHTS (800): The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided to food service staff and documented. 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 is completed. 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 (or abbreviated version) are included on program materials. |
| LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years. The policy has nutrition education, physical activity and other wellness goals included. An assessment has been completed and is available to the public. A wellness committee is in place to set goals and help assess the completion of the goals. The SIAC committee is included in this process. The SFA has many programs in place which promote healthy minds and healthy bodies of children in the district. Items of note: student and community maker spaces, Farm to school (including school farm) and Iron Chef class. |
| 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 September appeared accurate and complete. |
| On-site Monitoring (900): The on-site monitoring forms were completed for NSLP and SBP. |
| PROCUREMENT: 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. Representatives of the district attended Regional Procurement training in 2017 and 2018. |
| PROFESSIONAL STANDARDS (1200): The SFA followed regulations for the district's size category when hiring a new director. Tracking was provided that documents that all staff are on pace to complete the required hours of training. The director will receive the required 12 hours of annual training, Full time staff 6 hours of training, and all other staff will receive at least 4 hours of annual training. There is a plan in place to complete the hours by June 30, 2018. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented. Training included Civil Rights training for all staff. |
| RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed, indicated appropriate and allowable expenditures. Reports are filed on time, and all records are maintained for at least three years plus the current year. SFA spent 102% of USDS Foods Money in 2016/2017 and 100.3% 2017/2018. Errors fell below the \$600 disregard, so no claim adjustments will be required at this time. |

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VERIFICATION (200): 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 verification report was completed accurately and on time.

Site - Level Commendations MARNIE SIMONS ELEMENTARY (0418)

Description

AFTERSCHOOL SNACK PROGRAM: SFA does a good job of offering a variety of snacks which appeal to the students. Snacks include 2 of the 4 components. Staff administering the program are well organized and do a great job of counting and documentation. A variety of enrichment activities accompany this program like doing chores in the farm school, homework club, and guest speakers such as the local County Extension and Outreach Specialists who present on different topics and lead workshops.

HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for most coolers-including freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered. The FSD is ServSafe Certified.

MEAL PATTERN: All students observed on the on-site visit had a reimbursable lunch, the menu was complete with all food groups represented and served in their proper quantity. Water was available to all students during meal times. Menus for the month of review contained all required components.

MEAL PLANNING AND PRODUCTION: The Food Service Director does a good job of planning menus to include a variety of entrees, fruits and vegetables. The FSD has a good idea of what her students like and creates menus that appeal to them but challenges them to try new things. The salad bar is a feature that gives the students even more choices two days a week. The FSD maintains good production records.