

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Holy Trinity School-DSM (17378119)
Dates of Review: January 29 – 31, 2019

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

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One error with benefit issuance; directly certified students given free status instead of reduced (other reduced).	For your response, send a "letter of adverse action" giving household the required 10 calendar days to appeal before changing benefits to reduced. Upload your letter sent to the household and confirm eligibility has been changed on date as indicated in letter.	
200 - Verification	V-0200	The application selected for verification was not pulled from "error-prone" applications and the application was not "confirmed" as required.	For your response, state your understanding that applications pulled for verification must come from error-prone applications and before the verification process begins, the application is to be "confirmed" or reviewed for accuracy, signed and dated.	
RMCR - Indirect Costs	V-RMCR	The Nutrition Program was charged for Utilities (Electricity, Gas, Water) and Trash Removal by using a direct cost rate process. Technical Assistance reviewed USDA guidance to use an indirect cost method instead. The indirect cost rate would be then used to pay for utilities per USDA guidance. Appendix D: Typical Costs and their classification as Direct or Indirect provided.	For your response, describe your plan for SY2018-2019 to set up an Indirect Cost Allocation, or your intention to pay all costs from the general fund and not charge the nutrition fund.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	According to the financial report SFA completed in IowaCNP, the percentage of revenue received for nonprogram food sales does not equal or exceed the percentage of money spent on nonprogram food.	For your response, either complete a non-program revenue tool proving compliance; and/or describe two strategies you will implement in improving nonprogram revenue percentage.	

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400 - Meal Components and Quantities - Breakfast	V-0400	Mini Long John served during focus week in December was planned to credit for 1 grain; however, according to the Grain Chart, it credits for only .5 grain.	For your response, state your plan to secure documentation from manufacturer, or Exhibit A Grain Chart to credit grain items for menu planning decisions.	
400 - Meal Components and Quantities - Lunch	V-0400	Production records evaluated from the review period are incomplete for portion sizes to confirm minimum meal pattern requirements are met for all grade groups being served.	For your response, make changes to FPR and attach a breakfast and lunch production record completed from week of the on-site review.	
Infant and Pre-K Meal Pattern Checklist - Lunch	V-IMPCL	Preschool students are not offered a choice of milk as required for the NSLP meal pattern. Preschool students may be served the CACFP meal pattern or the NSLP meal pattern when "co-mingled". Co-mingled means to be served the same time as other students receiving the NSLP meal pattern. SFA may not offer a combination of meal patterns.	For your response, please confirm if you will continue to follow the NSLP Meal Pattern or follow the Preschool/CACFP Meal Pattern. Describe the choice of milk to be offered to preschool students and the date this will begin.	

Org - Level Technical Assistance

Area	Question	Comments
300 - Meal Counting and Claiming	310 At the site level, how are the total daily meal counts by category submitted to the SFA for consolidation?	Discrepancy between December Claim/Edit Check Report and December Benefit Issuance showing 43F, 5R compared to Edit Check/Claim showing 41F 7R. After investigation during the review, it was learned the Edit Check meal counts are correct; however eligible student number is not correct. Director to contact point of service provider to request service to ensure benefit issuance report matches edit check.

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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?	COMPLAINTS: Civil Rights complaints regarding school nutrition are to be directed to USDA. The process and the form is found here: http://www.fns.usda.gov/civil-rights
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	DIET MODIFICATION FORM: There is an updated Diet Modification Request Form to use moving forward located in Download Forms in IowaCNP. Consider how families have access to making these requests as it is not posted on the school website.
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?	WELLNESS POLICY: The rule requires schools to make the wellness policy and most recent assessment available to the public. It was decided during the review to post the wellness policy and assessment on the website.

Site - Level Technical Assistance Holy Trinity School (8119)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	323 a. Were there any days when the free, reduced price, or paid <i>lunch</i> counts exceeded the number of attendance adjusted eligible students?	EDIT CHECK REPORT: include an attendance factor to the monthly edit check report to help prevent over claims.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	FOOD SAFETY INSPECTION: USDA requires two health inspections annually, so the SFA responsibility is to request a second inspection annually. Maintain documentation proving a request was made.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	THERMOMETERS: are to be calibrated regularly. Written information provided on thermometer calibration. Check to see if your digital thermometers can be calibrated and begin documentation of thermometer calibration as stated in your local HACCP plan. Include Corrective Action column on all temperature documentation.
1400 - Food Safety	1411 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	BUY AMERICAN EXCEPTION LOG: SFA is to keep a log reporting any nondomestic agriculture products purchased with CN dollars. The Exemption Log should state date, product accepted and reason why they accepted it, i.e. domestic product was not available or significantly higher priced than the non-domestic product.

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Org - Level Commendations

Description
A Wellness Policy and Evaluation is in place; written goals for Nutrition Education and Promotion, Physical Activity and School Based Activities to Promote Wellness.
A written procurement plan for school nutrition has been developed. A Procurement Code of Conduct from the Diocese of Des Moines includes conflicts of interest and disciplinary actions. Director attended a regional training on Procurement. Plan to review and update plan annually and continue efforts to organize documentation of procurement events, including a log of annual micro and small purchases made for school nutrition program.
Civil Rights poster is displayed. Annual training is provided to staff as required. Written materials include the USDA Non Discrimination Statement. No discrimination observed.
Free and Reduced Meal applications are completed correctly; the current application is used, direct certification is utilized by using the E Look Up system; and denied applications were correctly determined. Applications are maintained with ICAVES and a copy of letter sent to household. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents and system.
FSD does an excellent job with menu planning. Menu meets meal pattern requirements, offers variety; including many fresh fruits and vegetables, hummus offered as a dip to carrots regularly. Condiments controlled. Excellent documentation is maintained for meal pattern crediting and solid understanding by all nutrition staff. Thoughtful decisions are made with student nutrition, health and acceptability of menu in mind.
No fiscal action as result of this administrative review.
Nutrition Program is self-supporting. Director completed the Financial Report in IowaCNP as required. A meal charge policy is in place and communicated in student/parent handbook.

Site - Level Commendations Holy Trinity School (8119)

Description
A Food Safety Plan is in place and has been updated. Director and staff are maintain ServSafe Certification.
All meals observed during the day of the review met reimbursable requirements.
Nutrition environment is positive. A sample tray is displayed showing the menu for the day. Offer versus Serve allows students to decline items they would otherwise waste. Excellent signage for breakfast and lunch communicates how to build a meal. Nutrition program is well-marketed with a menus posted in a variety of locations. Nutrition staff are helpful and knowledgeable of meal pattern. Students are observed to have enough time to eat.
Smart Snacks – A process is in place for students in grades 2 - 8 may purchase a la carte items after they've eaten lunch. There is a Closed vs Open sign. Nicely organized and marketed to students separate from the a la carte line. Documentation is in place. All items are compliant. Smart Snacks are offered to parents to purchase for classroom parties.
Special Diets are accommodated and documentation is maintained.
Water is offered at breakfast and lunch as required.