

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Lone Tree Comm School District (38160000)
SNP - Review ID: 5063

Program Year: March 26-28, 2019
Month of Review: February
Lead Reviewer: Cheryl Benson
Org Representative(s): Lone Tree CSD

Site - Level Findings: Lone Tree Junior-Senior High School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	In order to ensure accurate meal counting and claiming, all meals must be counted at the Point of Service (POS), which means at the location of meal service and at the time the meal is served. Pre-K students lunch meal counts are taken in the morning instead of at the POS.	For your response, indicate how meals will be counted at the location and time of service and when this plan was implemented. (See technical assistance for options.)	
400 - Meal Components and Quantities - Lunch	V-0400	The lunch meal pattern overlaps for grades K-5 and 6-8 but it does not overlap with grades 9-12. When grades 9-12 are offered the same menu and serving sizes as other grades, then the meal pattern is not compliant.	For your response, indicate the changes that will be implemented so that there is sufficient differentiation between grades 9-12 and other grade groups. (See technical assistance for suggestions.)	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
RMCR - Revenue From Nonprogram Foods	V-RMCR	SFAs must calculate non-program revenue (NPR) compliance annually. In Iowa, this is calculated in the financial report on IowaCNP which comes from the Certified Annual Report, IowaCNP, and calculations. The percentage of revenue from non-program foods must be equal to or greater than the percentage of non-program food costs. According to IowaCNP, the revenue is not sufficient.	For your response, complete the non-program revenue tool that was provided and submit a copy. If the tool still indicates that revenues are not sufficient, also submit a plan to increase revenue from non-program sales, and/or decrease non-program food costs. (Technical assistance was provided and is included in this review.)	

Org - Level Technical Assistance

Area	Question	Comments
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?	All resources of Child Nutrition Programs must be protected from theft and tampering. When the cafeteria is not in use, either the doors to the

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		cafeteria need to be locked, or the doors to the kitchen and to milk coolers in the cafeteria must be locked.
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 GUIDANCE: Buy American--SFAs must keep a Buy American Exception Log. There is a template available in download forms. There are two general reasons that are acceptable for not buying American commodities: First-an American commodity is not available, such as pineapple and mandarin oranges. Second-the price of the American commodity is significantly higher. This frequently happens during the winter for a lot of produce.</p> <p>MICRO PURCHASE--This SFAs micro-purchase threshold is \$10,000. Any purchase under that amount can be micro. There are three main requirements. First, the purchase is under the threshold, second, the price is reasonable, and third, purchases of the item or types of items are spread around to various vendors. This type of purchase is generally best for emergency runs to the store. It is recommended that the Micro Purchase Log be used. The SFA must also maintain detailed receipts of the purchase so that reasonableness of prices can be determined.</p> <p>SMALL PURCHASE--This SFAs small-purchase threshold is \$50,000. Any purchase under that amount can be small purchase. (Note-from zero dollars to \$10,000 either Micro or Small Purchase may be used.) For small purchase, documentation of what is being procured, prices offered, vendors contacted, responses, terms, conditions, etc. must be maintained. For that reason, it is recommended that the 3 Bids and a Buy template be used. Small purchase is determined on the lowest price only.</p> <p>FORMAL PROCUREMENT--For this SFA, any procurement event of \$50,000 or more must be formal. (Note: Formal Procurement is the only method that can be used for any dollar amount.) Formal uses an IFB or an RFP. Everything must be in writing. Specifications must be well-written. The solicitation must be advertised. All appropriate terms and conditions must be included. The SFA must give vendors time to respond; preferably at least six weeks. IFBs must be publicly opened at a designated time and location. RFPs can only be accepted up to a designated time and location. For RFPs, rebates and discounts must be tracked. All criteria that will be used to evaluate responses to formal proposals and bids must be included in the solicitation and price must be worth the most points.</p> <p>REBATES, DISCOUNTS, CREDITS--to ensure that the SFA is receiving all due rebates, discounts, and credits, it is recommended that the form in IowaCNP be used and then filed annually with other financial documents.</p> <p>BOTTOM LINE--for a true bottom line bid on items such as bread or milk, it is recommended that the projected usage of each bid item be multiplied out by the proposed price and then added together to get a true comparison of the cost. There is a spreadsheet for this purpose in download forms.</p> <p>TERMS AND CONDITIONS--there are many required terms for procurement. All food solicitations must include the Buy American provision. All solicitations must determine that a vendor has not been debarred from doing business with the federal government. There are other terms that must be included depending on the dollar value of the solicitation. These terms are in the templates in download forms for 3 Bids and a Buy, and for the formal IFB and RFP templates. For conditions, the SFA should consider what it expects/wants and what it doesn't want and incorporate those into the solicitation. For example, milk crate sanitation,</p>

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		locking milk coolers, maintaining temperatures, delivery times and days, etc., are all examples of conditions. CONTRACT MAINTENANCE--prices on invoices should be spot checked against bid prices to ensure compliance. The SFA should ensure that contract terms and conditions are met, and document when they are not and the action taken.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Technical assistance was provided on Special Diets since the requirements have changed. Any household that indicates a medical issue with a food item must be accommodated. If the accommodation can be made within the meal pattern requirements, then the SFA cannot wait for a medical statement but must implement the accommodation as soon as possible. (For example, a student cannot have regular cow's milk but can have a nutritionally equal replacement soy milk or lactose-free milk.) If however the accommodation cannot be made within the meal pattern requirements, then the SFA must wait for a medical statement that is signed by a medical professional who can prescribe medicine. (For example, a student cannot have cow's milk or an equal supplement but must have juice or rice milk.) Diet forms do not have to be replaced each year, but the households should be contacted to see if there are any changes. Also, the SFA is not required to accommodate lifestyle preferences or religious restrictions, but you are encouraged to do so when possible. Finally, when accommodating special diets, the menu does not have to match the regular menu. For example, if you have a student on a gluten-free diet, and pizza is on the menu, the SFA does not have to provide gluten-free pizza.
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	The latest review of the Local Wellness Policy, LWP, was obtained during the on-site review. Resources and information on LWP review was provided at the beginning of the review. There are a couple updates that need to be made to the Competitive Food section, and there are a couple stakeholders that need to be invited to participate on the committee.
1200 - Professional Standards	1207 a. Has the State Agency allowed the SFA flexibility to complete annual training requirements over a 2-year period?	(1) Iowa allows SFAs to track training over a two year period if they want to do that. Since staff at this school have several extra hours this year due to taking ServSafe, the director may want to consider averaging this year and next year together. If so, clearly indicate on tracking forms the two year period. (2) All SFAs should have a single tracking tool for all food service staff. While the SFA is small enough that using individual tracking sheets is acceptable, it is still recommended that a central tracker be used. The Iowa spreadsheet tracker was provided.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Each SFA should regularly update their food safety plan known as HACCP. Training should also be provided to staff annually or more often if needed. One way to complete both of these tasks as well as provide required training hours for staff is to have them participate in updating Standard Operating Procedures, SOP. The current SOPs could be divided between staff members for them to review and make recommendations. The Iowa State extension website where SOP templates are available could also be reviewed by staff to see if there are new SOPs or additional SOPs that should be added to the HACCP plan. The staff could then bring their suggestions to the whole group for discussion, revision, and possibly addition.

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RMCR - Revenue From Nonprogram Foods	10 If the SFA found that its revenue ratio was less than its food cost ratio, did the SFA take additional steps to sufficiently increase its nonprogram food prices, add sufficient funds to its nonprofit food service account, and/or take other actions to adequately resolve the problem?	(1) Technical assistance was provided on calculating Non-program Revenue. The SFA can choose to do a sampling of NP costs, or track NP costs the entire year, or calculate Program costs and subtract from the total in order to get non-program. Memos were shared, and a one-page resource was included in a folder that was given to the director. (2) The SFA should be very careful about passing food purchases for other groups through the CN account as that will skew non-program calculations. If this happens, the business manager should be sure to back them out of food totals on the CAR. (3) It is recommended that a la carte prices and milk prices be increased since the current charges are very low compared to other schools. (4) Offering additional a la carte items was discussed, and finding a way to sell them through the POS system or maybe putting a vending machine in the cafeteria that is stocked by food service.
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Site - Level Technical Assistance Lone Tree Junior-Senior High School (0172)

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?	It is very important to get an accurate count of meals. The cashier does an excellent job of getting the students' pin# and entering it into the POS. However, on the day of observation, there were multiple times when the student stated their pin# so quietly or so quickly and then walked away and the cashier had to call them back or look up their number. Please regularly remind students to stop at the cashier, state their pin# clearly and loudly, and wait for her to acknowledge them before moving on to their seats.
300 - Meal Counting and Claiming - Lunch	318 At the selected school(s), does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	Currently in the Pre-K classroom, the names and pin# of students who want lunch are sent to the cafeteria in the morning. It is okay to continue that practice, but a count must also be taken at the meal itself by staff who are present. It is recommended that teachers in the room be given a roster of students in their room and next to each name indicate students who received a reimbursable meal. The roster from the classroom is the count that must be used to claim meals.
400 - Meal Components and Quantities - Lunch	406 If the school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	Technical assistance was provided on ways to differentiate the meal pattern for different grade groups. Increase the serving size of the entrée for grades 9-12 or decrease the serving size for lower grades. Giving 9-12 an additional chicken nugget or a larger portion of chili or spaghetti would be examples. Provide additional grains for grades 9-12. For example, a cookie, Sun Chips, or roll. (On the day of observation, all students were given a bag of potato chips which does not credit for anything other than calories, fat, and sodium. This could have been provided to only 9-12.) Menus do not have to be different every day, but they should be different enough to span the calorie difference between grade groups.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	Smart Snack regulations do not allow students in grades K-5 to have beverages that have any added sugars or non-nutritive sweeteners. At the time of the review, grades 6-8 were being sold G2 Sports Drink. The director indicated that she would stop selling them to those grades immediately. Other beverages could be sold instead such as plain water or juice. A product such as Switch was suggested.

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1300 - Water	1300 Is free potable water available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)?	Water must be available in the cafeteria, or immediately adjacent to the cafeteria, at both lunch and breakfast. A water carboy and cups were provided at lunch but were not available at breakfast. The director stated she would correct that error immediately.
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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 150 applications were reviewed and all reviewed applications were correctly determined, 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.</p>
<p>BREAKFAST: The district has good breakfast participation. Grab and Go breakfast is provided for grades 6-12 in an upstairs hallway which increases participation. Signage was posted explaining what constitutes a reimbursable meal. Offer vs. Serve, OVS, was correctly implemented. Students have a variety of meal components to select at breakfast as well as a daily choice of a hot or cold breakfast.</p>
<p>CIVIL RIGHTS: The And Justice for All civil rights poster was posted in the cafeteria in a location where participants can read information on the poster. 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. The current state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school's website.</p>
<p>GENERAL: Materials for the review were readily accessible and staff were eager to assist with the review however they could. Staff work well together and everyone seems to know what is expected. There are areas where it is obvious that extra effort has been expended, such as the photos of food on the line for younger students.</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, 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 February were accurate and complete. Point of Service, POS, counts and filed claims appear accurate. There was a POS for all students, and the cashier did a good job of ensuring students gave their pin number and that each one had a reimbursable meal. 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. All students observed selected a reimbursable meal.</p>
<p>MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, has created cycle 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. Documentation such as food production records, labels, inventory, standardized recipes, and purchase receipts indicated that meals contained the required components and quantities. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included multiple daily offerings of fresh fruits and vegetables. The SFA provides a Fruit-Vegetable Bar to students in grades 6-12 that encourages students to select a reimbursable meal. Water was available at lunch as required, and at least two types of milk were offered. Offer vs. Serve, OVS, was correctly implemented. Many low fat and low sodium food items were observed in storage. Students had sufficient time to eat after receiving meals. The SFA has exceptional signage explaining what constitutes a reimbursable meal. There are photos of each food item on the serving line and a poster outside the door where students enter the lunchroom. There is sufficient time between lunch periods that the cafeteria is cleaned and restored so that each group gets the same clean cafeteria and fully stocked food items. There was more than enough time for students to eat during each lunch period. The Food Service Director completed the Menu Worksheets for grades K-12 for a specified week during the review period.</p>
<p>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. 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.</p>

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PROFESSIONAL STANDARDS: Tracking was provided that documents that the director has received more than the required 12 hours of annual training, other full-time staff have received at least 6 hours of training, and other part-time staff have received at least 4 hours of annual training. Required Civil Rights and HACCP training was provided.

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 District had a positive balance in January 2018 but still 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 very 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

SBP & SFSP OUTREACH: School Breakfast Program, SBP, outreach was sent out at the beginning of the year in the handbook to inform families of the availability of the program including times and locations. Reminders of the SBP were also sent out throughout the school year. Outreach included announcements, flyers, and social media. 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 websites, flyers sent home, and social media.

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 application selected for verification was confirmed prior to verification to ensure the original determination was correct.

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, the latest review of the wellness policy, and the most recent assessment of policy goals are available to the public. Potential stakeholders are made aware of their ability to participate on the wellness committee.