

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Solon Comm School District (60930000)
SNP - Review ID: 5055

Program Year: April 16-17, 2019
Month of Review: February
Lead Reviewer: Cheryl Benson
Org Representative(s): Solon CSD

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	Each goal in the district's Local Wellness Policy, LWP, must be assessed at each building level at least once every three years, and the results of the assessments must be shared with the public. Goals have not been assessed or shared with the public.	For your response, indicate when the LWP Committee will meet to assess the policy's goals and include when and how the assessments will be shared with the public.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The Child Nutrition (CN) account must be maintained as a non-profit account which means the balance must be less than three months' operating expenses unless the SFA has state agency permission to exceed three months. At the end of SY2018, the SFA had more than seven month's operating expenses.	For your response, submit a plan to spend down the excess balance in the CN account. (See technical assistance for suggestions.)	

Site - Level Findings: Solon Senior High (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

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?	When determining income applications for benefits, income is only converted to an annual amount when there is more than one frequency of income on the application. When all income is the same frequency, then the application must be determined on that one frequency.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	Technical assistance on Direct Verification. When conducting Verification, the official can search on Elook-up to determine if any of the students on application(s) selected for verification are directly certified. If so, then

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		Verification is complete and the SFA does not need to continue the process for that household. See pages 109-112 in the Eligibility Manual.
700 - Resource Management		Beginning in SY2017, SFAs were required to have an Unpaid Meal Balance policy and to communicate the policy in writing to households at the beginning of each year. The SFA sent the policy electronically but did not make any attempt to communicate it in writing. Options were discussed, and at the very least, the SFA must make paper copies available at any beginning of the year events such as registration and open house.
700 - Resource Management		Technical assistance was provided both in writing and in person on calculating non-program revenue and how the CAR is used to complete the financial report on IowaCNP. The document in download forms that gives formulas and code numbers for the report was shared. Indirect Cost calculation was also discussed.
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:</p> <p>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 \$30,000*. *It is recommended that the district increase the small-purchase threshold for Child Nutrition Programs so that the stricter requirements for federal procurement do not apply where there isn't any advantage to using formal procurement. 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. When allowing additional years to bread bids, the increase allowed should be tied to some rate, such as CPI for Food Eaten Away from Home.</p> <p>FORMAL PROCUREMENT--For this SFA, any procurement event of \$30,000* 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</p>

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		<p>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. Please be aware that SFAs that use Group Purchasing Organizations are responsible for maintaining everything associated with the bid and contract--RFP, advertisement, amendments, price lists, updates, etc.</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, locking milk coolers, maintaining temperatures, delivery times and days, etc., are all examples of conditions.</p> <p>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.</p>
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	<p>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</p>

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		must have juice or rice milk.) do not have to get new forms each year. Don't have to accommodate religious or personal preferences.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	Technical assistance was provided on completing the Ethnic/Racial form. Each line on the form must add up to the number in the first (totals) column. Then the totals in each column on the Ethnic portion must equal the totals in each column of the Racial column. The purpose is to ensure that minority households are not being denied benefits in unusual numbers.
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?	Technical assistance on the district's Local Wellness Policy, LWP. The district is encouraged to add Smart Snacks to the policy's language. A folder with several LWP resources was provided including a template for assessing LWP goals.
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.
RMCR - Nonprofit School Food Srvc Acct	3 Did the SFA's net cash resources exceed its 3 month average monthly expenses?	Some things to consider in order to spend down excess funds in the non-profit CN account: increasing the quality of food purchased, purchasing new equipment, increasing wages and/or benefits, sending the director to Mississippi for training at the Institute for Child Nutrition, other training for staff, pay for reduced breakfast, reduced lunch, and/or paid breakfasts (referred to as Universal Breakfast). Several ideas were discussed—grab and go containers, printer, lunch trays, and additional staff for additional things such as a coffee shop or grab and go kiosk for lunch and/or breakfast.
RMCR - Nonprofit School Food Srvc Acct	4 If Yes, did the SFA develop a spend down plan approved by the State agency?	Technical assistance was provided on developing a plan to spend down account balance.

Site - Level Technical Assistance Solon Senior High (0172)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Obtaining and maintaining labels for food products can be challenging, but maintaining documentation is important. Information on CN labels, Manufacturer Statements, and food production record requirements was provided.

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400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Technical assistance was provided on Food Production Records, FPR. Production records must indicate the planned number of servings for each food item divided by grade groups and adults/a la carte. (For the high school, that would be two groups; grades 9-12 and adults/a la carte.) The director has other forms that may indicate that information but will work on ensuring it is available. Also the quantity prepared must be in a measurable amount. When preparing fruits, vegetables, etc., quantities should usually be in pounds or #10 cans.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Technical assistance was provided during breakfast observation on what constitutes a reimbursable breakfast. Occasional observation by the director is recommended to ensure OVS is correctly implemented, and/or additional training especially at the high school where there are so many choices and combinations.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	It is important for food safety that temperature logs be maintained. The SFA had all required temperature logs except thermometer calibration. The error was corrected during the on-site review.

Org - Level Commendations

Description
<p>APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were collected and ready for review. 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. Approximately 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. 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 SFA provides a wide variety of choices for breakfast. On the day of observation, there were two hot meal choices, PBJs, Yogurt Parfaits, Bagels, Muffins, Cereal, and crackers and bars. There were also multiple choices of fresh fruit, juice, and dried fruit. Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted.</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. 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 and/or a second milk at lunch as well as a variety of a la carte items on the serving line and in vending machines. 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. The documentation is divided by type in a notebook, and each section has an index which makes locating information easier.</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. 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 March 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. 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. Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation</p>

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such as food production records, was available. 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 many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables plus a variety of entrees offered throughout the month, encourages student consumption. The SFA provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal. Water was available as required, and at least two types of milk were offered. Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. 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 building 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 main vendor bid included the Buy American Provision and other required terms and terminology. The SFA ensures that no vendors have been debarred or suspended by USDA. The SFA's policy on purchasing local follows regulations for unprocessed food. The district is a member of a Group Purchasing Organization.

PROFESSIONAL STANDARDS: A central tracking form was provided that documents that the director received the required 12 hours of annual training, managers have received all but one hour of required training, and other full-time staff have received at least 6 hours of training. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.

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. The District had a positive balance in January 2018 and elected to not increase paid lunch prices. The Non-Program Revenue, NPR, tool on IowaCNP financial report indicated that sufficient revenue is generated from nonprogram sales, no increase in prices were required. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for commodities.

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. Reminders of the SBP were also sent out throughout the school year. 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, lunch flyers, etc.

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 is in the process of reviewing changes to the policy. 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 on the district's website and therefore available to the public. Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.