

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Wapello Comm School District (67590000)**  
**SNP - Review ID: 5052**

**Program Year:** 2019  
**Month of Review:** October  
**Lead Reviewer:** Cheryl Benson  
**Org Representative(s):** Kathy Begey

**Site - Level Findings: Wapello Senior High School (0109)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	<p>Food production records, FPRs, were missing the following required information:            Actual number of students who ate divided into 6-8 and 9-12 grade groups, and adults who ate.            Planned servings and serving sizes for adults and for a la carte.            All food offered as part of a reimbursable meal, including dried cranberries, cereal bars, pop tarts, etc.            Food specifications must be indicated, such as what fruit was offered at breakfast.            FPRs should indicate more differentiation in menu items or serving sizes between grades 6-8 and 9-12.            This is a repeat violation from the 2015-16 review.</p>	<p>For your response, submit one week of lunch and one week of breakfast food production records from the jr-sr high school along with that week's menus. Also watch the eleven minute webcast titled Food Production Records. After viewing the webinar, download the first page of the Facilitator Guide and Resources. Using one day of the submitted lunch FPRs, answer the eight questions, indicate which day was used for the questions, and submit a copy.</p>	
500 - Offer versus Serve	V-0500	<p>Offer vs Serve, OVS, was not correctly implemented at lunch or breakfast. Students at both meals were made to take additional items when they did not need to in order to have a reimbursable meal. Lunch OVS--the student must have at least a half-cup of fruit/vegetable plus two other components. (Components are--fruit, vegetable, meat, grain, milk.) Students who had pizza (bread and meat components) and fruit were handed a bag of dried cranberries in order to have "3 things." Breakfast OVS--the student must have at least a half-cup of fruit/vegetable plus two other items. Students who had fruit/juice plus two waffles were told to take additional food.</p>	<p>For your response, have all cashiers watch the two webcasts titled "Build a Healthy Lunch" and "Build a Healthy Breakfast." Have them answer the quiz questions in both facilitator guides and resources. Submit quiz responses with the date and time the webinar was viewed and signatures of the cashiers. It is recommended that the nutrition director spot check compliance with offer vs serve.</p>	
1100 - Smart Snacks in School	V-1100	<p>All food sold to students from midnight the night before until a half hour after the end of the school day must meet Smart Snack requirements regardless of whether it is vending machines, school stores, coffee bars, or fundraisers. All</p>	<p>For your response, (1) submit labels and calculator print-outs that show only beverages allowed for grades 6-8 are available in the vending machine. Indicate the date the machine was brought into compliance. (2) Indicate the date the coffee bar ceased operation. If</p>	

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		<p>food sold must have print-outs from the Alliance for a Healthier Generation calculator along with nutrition and ingredient labels to document compliance. The school has several non-compliance issues. Vending-a vending machine outside of the cafeteria; Coffee Bar--behind the cafeteria; Fundraiser--held at Valentine's Day with lollipops. There was discussion about salads sold by the Family &amp; Consumer Science classes, but the LEA indicated they are sold only to adults. Information on Smart Snack regulations was provided. Smart Snack violations were reported in the 2015-16 review.</p>	<p>the coffee bar has been changed to sell allowable items, submit labels and calculator print-outs. (3) Indicate who will be responsible for approving future fundraisers for compliance with Smart Snacks.</p>	
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**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	<p>At least every three years, the Local Wellness Policy, LWP, must go through a process to assess each individual goal in the policy. The results of that assessment must be made available to the public. There are also some updates that should be made to the policy, and the district should ensure that all indicated stakeholders are invited to the committee and encouraged to participate. (In the last review, there was no student on the committee and no one single person designated in the policy as overall responsible for compliance. Those two issues are still not in compliance.)</p>	<p>For your response, submit a timeline for the committee to meet to assess goals and to update the Wellness Policy. Include when you expect the process to be completed and how the results will be shared with the public. Also indicate who will be responsible for overall compliance and how stakeholders will be invited to participate on the committee.</p>	
1200 - Professional Standards	V-1200	<p>There was some confusion on combining years for training hours. Iowa allows the SFA to combine two years as long as the years are indicated on the tracking form, and there is some training annually. Training must be allowable and applicable to the position. After deducting SFSP, summer training, and some other unallowable training, there are five employees who need additional training by the end of SY2019. The names and hours have been attached below.</p>	<p>For your response, indicate the plan to complete training hours for all food service staff by the end of the May 2019.</p>	
RMCR - Revenue From Nonprogram Foods	V-RMCR	<p>At the end of each year, the SFA must determine whether the percentage of revenue from non-program food sold is equal to or greater than the percentage of money spent on non-program food. The determination has not been made for 2017-2018. (The amounts indicated on IowaCNP financial report are not accurate.) This is a repeat violation from the 2015-16 review.</p>	<p>For your response, complete the Non-Program Revenue tool and attach a copy. If the tool indicates that revenue is insufficient, also indicate your plan to either increase revenue or decrease costs of non-program foods.</p>	

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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	141 Does the SFA account for benefits that have been extended to students living in a household that is receiving SNAP, TANF, or FDIPIR benefits?	Every student receiving free and reduced benefits must have some documentation to show how they are eligible for benefits. Keeping the Eligibility Extension list is an excellent way to document other students in a household where one student is on the direct certification list. The list needs to be updated frequently so that it is comprehensive. The SFA may also choose to indicate other students in the household directly on the direct certification lists.
200 - Verification	209 Based on the review of verified applications:	When using Standard Verification, applications must first be selected from error prone. If the SFA did not have any non-response verifications the year before, they can choose to do Alternate Verification where the applications do not have to be error prone. There is a place on the IowaCNP Organization Application to indicate which method of verification you are using, and there is also a place to indicate the method on the verification report.
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?	(1) Technical assistance was provided on Procurement. When the purchase event was under \$3500 last year (\$5000 this year and beyond) the SFA could use Micro Purchase or Small Purchase. Micro Purchase is when no price quotes are obtained; the items are simply purchased. In that case, the price must be reasonable, and purchases must be spread as evenly as possible among all eligible vendors. For any purchase under \$25,000, the SFA can use Small Purchase where price quotes are obtained and the correct terms and conditions are included. It is highly recommended that the 3 Bids & a Buy form in download forms be used so that you ensure all terms are included. Buy American information, Debarment, and termination for clause are common terms to use. Formal Procurement can be used no matter what the dollar amount, but it must be used for purchase events over \$25,000. The IFB or RFP must be advertised, the solicitation must be in writing, and there are many other requirements. It is recommended that the school consider increasing the small purchase threshold for child nutrition programs. (2) When using bottom line solicitation for milk and bread, it is best to multiply the proposed prices by the quantity of each item being bid, add all together to get a true bottom line price. (3) SFAs must maintain a Buy American Exception Log. Any time a non-domestic food items is delivered, the SFA must log the date, product name, country of origin, and why an exception is being made. Two exceptions are recognized--one, the product is not made in sufficient quantities in America, and two, the price is significantly higher. If the price is higher, also document the price of domestic vs foreign. (4) Prices should be spot-checked against bid prices on a regular basis to ensure bid integrity. (5) Even though the SFA is part of a buying group for prime vendor supplies, the SFA is still responsible for all areas of procurement. Being part of a group does not excuse the SFA from any responsibility. (6) Rebates, discounts, and credits must be tracked to ensure that credit is received. There is a form in download forms that can be used.
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?	Technical assistance was provided on allowable costs to Child Nutrition non-profit account. Any item used in the calculation of the Indirect Cost Rate cannot be directly charged. Some of these items include: equipment

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		repair, office supplies and postage, on-line collection fees, pest control, fire suppression recharging/exam, gas, electricity, custodial services, trash removal, etc. These items must be paid out of the General Fund. They can be charged to Child Nutrition Programs via Indirect Costs. However, the LEA must charge any other federal program those costs also.
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	Keep documentation that the public release was sent to media, whether that is a fax receipt, email, or letter.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	There is a more updated Special Diet form available in download forms than the one currently used by the SFA. (Be sure to check dates in download forms to make sure you have the newest form available.) When a diet request made for medical reasons can be accommodated within the meal pattern requirements, the SFA must accommodate as soon as possible, and cannot wait for the form to be returned. On the other hand, if the request cannot be accommodated within the meal pattern requirements, then the form must be on file, signed by a medical professional who can prescribe medicine. It is the SFAs choice whether or not to accommodate special diet requests made for personal preference or religious beliefs. The forms do not have to be resubmitted every year, but someone should follow up with the household each year to see if there are any changes. If there are changes, then a new form may be necessary.
1200 - Professional Standards	1211 Review an employee list for the day of the review and verify that the SFA's information from the Off-site matches the current (day of review) employee list.	Technical assistance was provided on what constitutes allowable training. The training should be information that will be applied to the staff person's job. General school staff meetings do not credit, and blood borne pathogen training would only credit for a few food service employees. Also, training for SFSP, summer foods, does not credit for school programs since they are entirely separate programs from different funding. In order to complete annual required training, it is recommended that regular training time be set aside, possibly on early-out days once a month or every other month. Staff can discuss problems, how to improve the program, menu ideas, food safety, etc. Be sure to keep documentation of the meetings including signatures, agenda, time spent, and date.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Standard Operating Procedures, SOPs, are an important part of a food safety plan. SOPs should include the date they were implemented and dates they are revised. The SFA is expected to conduct annual training on food safety and to regularly revise the plan. One way to do that is to have staff join in reviewing and updating SOPs and look at SOP templates to determine whether any additional SOPs are needed.
1500 - Reporting and Recordkeeping	1501 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	The SFA uses PowerSchool for its POS. Since this system does not save documents for three years plus the current year, the SFA must back up or print and save all documents.
RMCR - Revenue From Nonprogram Foods	9 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	Technical assistance was provided on calculating non-program revenue. Information on how the financial report calculates the entries along with other resources were shared. For calculating with the tool for corrective action this year, the SFA can determine an average lunch and breakfast cost multiplied by reimbursable meals last year and then subtract from total expenses. The remaining amount is non-program costs. The same can be done for revenue. Calculate total revenue for free, reduced, and paid meals from last year and subtract from total revenue.

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400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable <b>lunch</b> to students for all applicable grade groups?	Signage is required for both breakfast and lunch. Besides the lunch signage posted for lunch, there also needs to be a sign that indicates which food items fulfill which components. For example, a burger is the meat/meat alternate component. Signage for breakfast must indicate how many items each food offered credits for. For example, the waffles served during the review credit for 2 grains. The SFA could consider the waffles one item or two items. Signage and links to signage were provided.
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?	There are many ways to differentiate menus between grades 6-8 and 9-12. The older students can be offered larger portions or the younger students smaller portions, as long as the meal pattern is followed. For example, older students could be offered an additional chicken nugget, a larger portion of spaghetti, peanut butter or hummus with celery, chips with a sandwich, or the occasional cookie.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	Smart Snack regulations control food that is sold to students during the school day, from midnight the night before until a half hour after the end of the day. The only allowable beverages for grades K-8 are plain water, carbonated plain water, skim and 1% milk, and 100% juice plain or carbonated. Grades 9-12 can have some beverages with additional sweeteners, diet soda, and caffeinated beverages. Food snack items must meet certain calorie, sodium, sugar, and fat limits. All grains must be at least 50% whole grain. All food items must be either a meat, dairy, grain, fruit, or vegetable. The district's Wellness Policy also spells out these requirements for food sold on campus.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Technical assistance was provided on temperature logs. The SFA should log thermometer calibration results, and keep test strips for the dishwasher.

**Org - Level Commendations**

Description
APPLICATIONS/BENEFIT ISSUANCE: Benefit documents, as well as all paperwork, were 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. Almost 200 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.
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. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated. 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.
COMPETITIVE FOODS (SMART SNACKS/HKA): Students may purchase a second entrée and/or a second milk at lunch as well as a small selection of snack items. Documentation was available to show that all foods and beverages sold to students during lunch and breakfast met Smart Snack and Healthy Kids Act standards.
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. Temperature logs are maintained for milk coolers, freezers, and food served. Food Service workers wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.

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**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 October 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. TA: Monitoring lunch every year, breakfast every other year.

**MEAL REQUIREMENTS & COMPONENTS:** 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 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. Water was available as required, and at least two types of milk were offered. Students had sufficient of time to eat after receiving meals. Recess is scheduled before lunch service. Food service staff was polite and respectful to students, other staff, and each other.

**PROCUREMENT:** The off-site procurement tool was completed, and board purchasing policy and vendor paid lists were submitted. The SFA has a written Procurement Plan and a written Code of 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. Bread and milk bids were also available for review.

**PROFESSIONAL STANDARDS:** Training hours are tracked and documentation of training is maintained.

**RESOURCE MANAGEMENT & RECORD KEEPING:** 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. The SFA 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 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.

**VERIFICATION:** The correct number of applications were verified, all income sources were verified, and the process was completed on time. The applications selected for verification were 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, were available.