

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Washington Comm School District (67680000)
SNP - Review ID: 5054

Program Year: February 19-21, 2019
Month of Review: January
Lead Reviewer: Cheryl Benson
Org Representative(s): Washington CSD

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The following benefit issuance errors were documented: The 9/17/18 direct certification list was not download so one student was on paid status instead of reduced, and another student was on reduced status instead of free. One application indicated \$3400 a year but was determined on \$34,000 a year and goes from reduced to free. The SFA downloaded the SY2018 July direct certification list instead of the SY2019 July list which caused multiple households to go from free to paid. One application was missing the SSN.	All errors were corrected before the review was posted. No further corrective action is required.	
1200 - Professional Standards	V-1200	Training was not being tracked on a single tracking tool for all food service staff as required. The SFA must maintain a comprehensive list of staff, date of hire, position (director, manager, or other), and whether the employee is full time (20 hours or more per week) or part time. Then training hours and documentation of the training maintained in one location. Individual staff may want to track their own hours and keep documentation of training in which case, the SFA can keep copies of the documentation.	The Iowa Tracking Tool was provided. Please submit a completed copy. If any staff have not completed the required hours of training, indicate the SFA's plan to provide training. The tracking tool was provided before the review was posted, and food service staff have scheduled ServSafe training to complete their hours. No further response is required.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	(1) Each year, SFAs must assess compliance with revenue from nonprogram foods sold by the SFA. The percentage of revenue received for nonprogram foods must be equal to or greater than the percentage of funds spent on nonprogram foods. While the IowaCNP financial report indicates the SFA is receiving sufficient funds, the dollar amounts do not seem reasonable. The report indicates that only \$1450.00 is spent on nonprogram food. Since that includes all adult meals, second entrees, milk	(1) For your response, submit a completed copy of the USDA Nonprogram Revenue Tool. If the tool indicates that there is not sufficient revenue then also indicate the SFA's plan to either increase revenue and/or decrease food costs for nonprogram sales. (2) The completed procurement plan is attached below.	

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		sales, and a la carte, the amount appears very low. (2) The director did not submit a written Procurement Plan prior to review. She was able to locate a partially completed plan which she completed during the on-site review.	
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Site - Level Findings: Washington High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	<p>st(1) Each separate meal choice offered to students must meet the meal pattern. For grades 9-12, at least 2 ounce equivalents of meat/meat alternate and 2 ounce equivalents of grain must be offered with each meal choice as well as 1 cup fruit, 1 cup vegetable (including required vegetable sub-groups in at least minimum requirements), and 1 cup fluid milk. The daily salad entrée offered to students does not provide 2 ounce equivalents of grain, does not offer fruit, and does not provide most of the vegetable sub-groups since students are not allowed to select anything other than the salad and milk.</p> <p>(2) In grades 9-12, since the minimum amounts for meat/ma and grain is 2 ounce equivalents, any student who selects less than 2 ounces does not have that component on his or her tray. Under Offer vs Serve, a student must select a minimum of three components one of which must be at least a half-cup of fruit or vegetable. Uncrustable PBJs are offered as an alternate entrée. Each sandwich has 1 meat/ma and 1 grain, but students can take two. If a student does not take both sandwiches, then he or she must have the other three components-- 1/2 cup of either fruit or vegetable, and 1 cup of either fruit or vegetable, and 1 cup milk. Eight students on the day of observation did not have a reimbursable meal due to taking only one PBJ. The meals will be added to the overclaim calculation.</p> <p>3) Students must be offered at least one cup of fluid milk for both breakfast and lunch. One student who gets lactose-free milk was served the milk in an 8-ounce cup. Since that cup could not be filled to the top, the student did not receive sufficient milk.</p> <p>(4) Any food where the crediting amount cannot be determined (such as pizza and chicken nuggets) must have either a CN label or a Manufacturer's Formulation Statement, MFS. Pizza ordered from Pizza Ranch does not have either of those documents, so crediting of meat/ma and grain could not be determined.</p>	<p>For your response:</p> <p>(1) Indicate how the salad entree will provide sufficient grain, fruit, and vegetable sub-groups.</p> <p>(2) Indicate how Uncrustable meals will be changed to ensure the meals are reimbursable. Either training will be provided to POS staff or students at the high school will be required to take both sandwiches.</p> <p>(3) The milk issue was resolved on-site. A larger cup will be used.</p> <p>(4) Submit copies of formulation statements for pizzas from Pizza Ranch.</p> <p>(5) Submit copies of one week of FPRs from the high school for lunch.</p>	

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		<p>5) Food Production Records, FPR, must include comprehensive information. A checklist and examples were provided. FPRs at the high school were missing adult/a la carte serving sizes and planned number of servings. Without that information, seconds on entrees cannot be sold. The FPRs were also missing condiments, the daily salad entrée, and separation of milk types.</p> <p>Note: A repeat of this error on the next review will result in fiscal action.</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 or reduced benefits must have some documentation on file indicating how the determination was made. For other children in the household of a directly certified student, those other children should be written onto the DC list or kept as a separate list that shows the connection.
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	The September 17 direct certification download was missed. One of the households selected for verification was on that list and would not have been selected had the list been downloaded. However, the SFA did correctly use Elookup to directly verify.
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>Formal Procurement:(1) Reviewing invoices from the Prime Vendor (AEA Purchasing via Martin Bros.), there were many items found on invoices that were not on the market basket. Items not on the market basket must be properly procured. All prices checked from three months of invoices matched bid prices. The food service director should spot check invoices to ensure products delivered match the order and the specifications of the product solicited. Price on the invoice should match bid pricing. methods. The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification at equal or lesser price. (2) Rebates, credits, and discounts must be tracked to ensure they are received. There is a tracking tool available in download forms of IowaCNP. (3) The SFA is responsible for all areas of procurement whether bidding independently or procuring with group purchasing organization. The director must maintain all records including the RFP, all addendums and amendments, advertising, responses to the RFP, prices, etc. The SFA must also ensure that the terms and conditions of the contract are met. Oversight of contracts is a key responsibility of the SFA. A second Formal Bid that was reviewed was the bread bid. One product is being regularly purchased that was not included on the bid. The director used the state agency prototype document which included required terms and conditions, and the bid was advertised.</p> <p>Some improvements to the bid were discussed. There could be better specifications for products, such as whole grain between 50% and 100% instead of asking for only 100%. The vendor awarded actually bid 51% whole grain</p>

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		<p>products which did not match what was requested in the RFP and should have been rejected. Specifications should give a range of sizes for grain items, such as a bun between 56 grams and 62 grams. The expected usage should also be included. Based on the previous year, quantities that may be purchased should be indicated. Refer to Choice Plus for specifications for many foods. The book can be found on the DE website, A-Z Index, Procurement, School Nutrition.</p> <p>Small Purchase: The SFA did not have any small purchase procurement last year. Since bread and milk bids are well below the SFA's threshold, a small purchase could be conducted for those two vendors. There is a small purchase prototype in download forms titled Three Bids and a Buy. This is a much simpler form of procurement, so it is okay to continue with the Formal method.</p> <p>Micro Purchase: There are three main requirements when using micro purchase—the price must be under the threshold, the prices must be reasonable, and the purchases must be spread around between all eligible vendors. Normally the main use of micro purchase is for 'emergency' or last minute purchases, and it is not intended for on-going purchases from the same vendor. Two micro purchases from last year were reviewed, Leets Refrigeration and Pizza Ranch. Leets was repair of equipment. There were nine times that Leets was used without any attempt to use a different vendor. (See more about this in another technical assistance entry.) The Pizza Ranch micro purchase was allowable and correctly conducted.</p> <p>The director is encouraged to attend Procurement Training during Summer Short Courses, and to explore the procurement documents in download forms. The director indicated that the SFA participates in all three AEA Purchasing programs, however the signed addendum did not indicate participation in Rapids smallwares.</p>
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>Technical assistance was provided on allowable expenditures from the CN account. Equipment repair, office expenses, fire equipment recharging and inspection, pest control, utilities, janitorial services, wages/benefits for staff who are not food service employees, etc., are not allowable as direct expenses from the CN account. Those expenses must be paid from the General Fund and can only be recouped via Indirect Costs since those expenses are included in the calculation of the Indirect Cost Rate. If the LEA has questions, they can refer them to the Finance Department at the DE.</p>
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	<p>When providing special diets for students with food allergies or food disabilities, there is no requirement that they be fed the same menu items as the regular diets. When using gluten-free food items such as chicken strips or corn dogs, the gluten-free items must have crediting information in the form of a CN label or a Manufacturer's Formulation Statement.</p>
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	<p>Due to weather-related school cancellations, the director has not completed the lunch monitoring for two sites. She has indicated that they will be finished by the end of February.</p>
1000 - Local School Wellness Policy		<p>There are some changes and updates that need to be made to the Local Wellness Policy, LWP. The policy refers to the SMI review for nutrition in school meals. The SMI review no longer exists since it has been rolled into the Administrative Review. The LWP also indicates that all sites will</p>

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		participate in SFSP and FFVP which is not correct. Outreach needs to be conducted for general public participation on the LWP committee, and that group should be added to the list of stakeholders in policy language. Finally, an assessment of LWP goals has been conducted, but the results have not been shared with the public as required.
1200 - Professional Standards	1208 Is the SFA tracking training hours on an annual basis?	The Iowa Tracking tool for professional standard's training was shared with the director and instructions on completing the tool, so that training is correctly tracked by the SFA.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	Since food safety is very important for all food service staff, annual training is required and regular review and revision of the HACCP plan are required. In order to comply with these requirements and to also provide training hours for staff, it is recommended that SOPs be divided among staff for review, revision, and suggestions. The staff could also look at SOPs on the Extension website to see if any of them are applicable and should be added to the SFA's food safety plan.
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 completing the Non-Program Revenue Tool. A one-page instruction sheet was included in a folder of resources, the financial report instructions and source form was provided, and oral instructions were given. The business manager and director should work together on the tool and also on ensuring that the financial report is more accurate next year so that the separate tool does not need to be completed.

Site - Level Technical Assistance Washington High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	Signage was not posted at breakfast. However the sign was observed in the kitchen during lunch observation, so it was probably forgotten. Please be sure that signage is posted daily. For breakfast, the signage must indicate how many items each food offered credits for. For example, if a bagel is large enough to credit for two items, then the menu should indicate two items.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	Technical assistance was provided on completing Food Production Records, FPR. An FPR checklist was provided that indicates required items in bold print, copies of completed FPRs with required items highlighted was also shared. The SFA had reorganized the Iowa FPR form which is allowable, but in doing so, the adult/a la carte column had been eliminated. A revised FPR was sent to the director. It is also recommended that when completing the FPRs, meat and grain items be put in as pounds, ounces, or each while fruits and vegetables be put in by cups, portions of cups, or each.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Technical assistance was provided on ensuring that alternate entrée choices meet meal pattern requirements. Entrée salads could offer more grain via breadsticks, rolls, tortilla shell bowls, etc. The students could be allowed to also take food from the fruit and vegetable bar so that they have access to fruit and all of the vegetable sub-groups. PBJs could be bagged together so that students take both and/or signage could indicate that two are required. The cashier could keep some extra PBJs at the POS to hand to students who only take one sandwich.

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		It is also recommended that fruit on the fruit/vegetable bar be limited. Allowing unlimited fruit will almost surely put calories over allowable limits. The same is true for condiments. Condiments are required to be limited in some way. While the SFA uses condiment packets, the number of packets are not limited and several students were observed taking 6-10 packets of catsup. This practice will almost surely put sodium over limits and also reduces the amount of sodium that could be used in other food items for all student.s
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	Food safety is extremely important. The last thing any school wants is a food borne illness outbreak. You must ensure that all temperature are taken daily, including temperature logs for walk-ins, dishwasher (with temp strips), and thermometer calibration. The director should also ensure that the actual temperature are being recorded. When temperature logs show the same two or three temperature every day of the month, it calls into question whether they are accurately recorded. The director should also ensure that there are internal thermometers in all refrigeration and freezer units since the external thermometers may be inaccurate.
1400 - Food Safety	1409 Were on-site (or Off-site, if observed) storage violations observed?	Cases of food were observed stored on floor. All food in storage must be at least six inches off of the floor. The director indicated that this was a delivery issue, and pallets to place the food off of the floor were observed. It is recommended that the vendor be notified of the error and request the cases be placed correctly. Each time the vendor does not comply, take documenting photos and notify the vendor.

Org - Level Commendations

Description
APPLICATIONS/BENEFIT ISSUANCE: The current application form and guidelines were used, and benefits are accurately and frequently transferred to the POS system. A correct and current benefit issuance list was available. Almost 400 applications were reviewed and all reviewed applications were signed and dated by both a household member and the SFA, all but one application was 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. The SFA has a back-up system for benefit issuance documents and system.
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. 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.
COMPETITIVE FOODS (SMART SNACKS/HKA): Students may purchase a second entrée, milk, and a selection of a la carte items. The food service department is active in comprehensive oversight of food sold on campus. 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, vending machines, and fundraisers. 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.
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. The kitchen and storage areas were clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Good food safety procedures were observed.
MEAL REQUIREMENTS & COMPONENTS: All meal components were available at the beginning of service and throughout meal service on the day of observation. Documentation such as food production records, labels, inventory, standardized recipes, and purchase receipts indicated that meals contained the required components and quantities. Most CN labels, 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

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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. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. Signage was posted at lunch explaining what constitutes a reimbursable meal. Food service staff was polite and respectful to students, other staff, and each other. The Food Service Director completed the Menu Worksheets for each school selected for review for a specified week during the review period.

PROCUREMENT: The off-site procurement tool was completed, and board purchasing policy and vendor paid lists were submitted. IFBs and RFPs are advertised. All bids include a Buy American Provision and other required terms and terminology. The SFA ensures that no vendors have been debarred or suspended by USDA. 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. The signed agreement states that the school district agrees to procure food (excluding bread and milk) and chemicals through the Group's awarded Prime Vendor and EMS. The SFA had copies of the contract and bid prices. Bread and milk bids were also available for review.

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 and 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.

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 newspaper, radio, school website, flyers sent home with students at the end of previous school year, flyers sent to surrounding schools to hand out to students at the end of previous school year, posted flyers in each school building, local YMCA and public library.

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.