

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**West Hancock Community School District (08190000)**  
**Dates of Review: 11/27/2018 – 11/29/2018**

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

**Org - Level Findings**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
100 - Certification and Benefit Issuance	V-0100	Households who were denied benefits were not notified in writing. Households must be notified in writing because it must include the reason for denial, the right to appeal the decision, how to appeal and the right to re-apply at any time. Maintain documentation.	For your response, please submit a copy of notification letter of denied benefits that you will use. Indicate who will be responsible for notifying households and for maintaining documentation of notification.	
1000 - Local School Wellness Policy	V-1000	WELLNESS POLICY: A review of local wellness policy goals has not been completed to be made available to the public. At least every three years, the goals of the local wellness policy must be assessed and the assessment provided to the school community.	For your response, please indicate: 1) when the assessment of goals will be completed (a date), 2) who will be involved in the process (names or titles), 3) where the assessment will be posted or how it will be provided to the community.	
1200 - Professional Standards	V-1200	Determining Official, Confirming Official and Authorized Representative will need 4 hours documented training annually to be included on tracker. Confirming Official has completed documentation of training, however, is not included on tracker.	Submit your revised tracker ensuring all those working in any aspect of school nutrition will document appropriate training on the tracker, including Authorized Representative, Determining Official/Confirming Official. Who will maintain the tracker annually? State your understanding Norovirus and Blood Borne Pathogens are counted as "additional" training and not to be counted towards annual hours. Staff training onsite including HACCP training is counted towards training.	
1600 - School Breakfast and SFSP Outreach	V-1600	OUTREACH: SFA must inform eligible families about the availability and location of free meals for students via the Summer Food Service Program and School Breakfast throughout the school year.	For your response, 1 - Describe how you will provide reminders about availability of School Breakfast Program throughout the year. 2 - Describe how you will inform eligible families about availability and location of free meals for students via Summer Food Service Program.	

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**West Hancock Community School District (08190000)**  
**Dates of Review: 11/27/2018 – 11/29/2018**

**Site - Level Findings: Britt Elementary School (0409)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
600 - Dietary Specifications and Nutrient Analysis	V-0600	DIETARY SPECIFICATIONS: 1- Libby's canned chili contains trans fat which is not allowed. 2 – WIP IT topping does not specify trans fats. Hydrogenated Palm Kernel Oil is second ingredient following sugar, so recommend replacing this product. 3 – Kellogg's Fruit Loop Cereal served 11/28 for breakfast is not Whole Grain rich. 4- Two brands of pasta, containing "Durum Wheat" are not whole grain rich. 5- Chef Mate Gravy used for Biscuits and Gravy does not credit for M/MA as listed in FPRs.	For your response, describe your plan of action for addressing each of the five dietary specification concerns. Trans Fat is a second finding. How will you ensure products will not be delivered which include trans fat?	
1400 - Food Safety	V-1400	1 - Person in charge at Britt elementary does not have current certification for Food Handling Protection Manager, such as ServSafe. One "Person in Charge" must have certification at each site. 2 - Written HACCP plan does not match all practices observed, including hair restraints, description that all staff will have food handler certification, Temperature Forms used should match plan and include a place for Corrective Action and Thermometer Calibration should be documented per HACCP.	For your response, 1 - state the date planned for ServSafe training and testing. What is the plan for ensuring one individual at each site location has a Food Handling Protection Manager certification? 2 - Update HACCP plan and/or practices and describe and submit these changes. Describe how HACCP plan will be used for annual training.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	129 Is household notification of eligibility consistent with the responses provided on the Off-Site Assessment Tool?	<b>NOTIFICATION LETTER:</b> SFAs not using State Agency prototype letter for notification of direct certification must have their letter approved by state office. The letter being used was not approved. Email to Deb.Linderblood@iowa.gov during summer prior to school year.
200 - Verification	202 Who serves as the confirming official? (Name and/or position title or software used is acceptable)	<b>CONFIRMING OFFICIAL:</b> The Confirming Official listed as same person as Determining Official. The Confirming Official cannot be same as Determining Official. The Confirming Official signs/dates applications "confirming review" prior to Verification. Definition of

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**West Hancock Community School District (08190000)**  
**Dates of Review: 11/27/2018 – 11/29/2018**

		titles were reviewed during review. Note: The Hearing Official is generally a position of higher authority.
700 - Resource Management		Discussed the issue of nutrition-related repairs are now to be covered by the general fund and may be recovered by the "indirect cost" method. .
700 - Resource Management		<b>PROCUREMENT:</b> A Procurement Plan for school nutrition has been developed. Plan to review and update plan annually. 1. Debarment Certification Tab: Documentation is to be available to show SFA confirmed vendors are in good standing to do business with federal government. You must have a Debarment form on file for each vendor. 2. Continue efforts to organize and track documentation of procurement events, divided into areas of – micro purchases, small purchases and formal. 3. Refer to Small Purchase Template to include terms and conditions when preparing solicitation letter for Break and Milk. Small Purchase solicitation documents should use the language of "price quotations" instead of "bid". 4. BUY AMERICAN EXCEPTION LOG: SFA is to keep a log reporting any nondomestic agriculture products purchased with CN dollars. The Exemption Log should state date, product accepted and reason why they accepted it, i.e. domestic product was not available or significantly higher priced than the non-domestic product.
700 - Resource Management		<b>LOCAL MEAL CHARGE POLICY:</b> The SFA has information about school lunch accounts in student handbook. If this is your process for sharing policy with households, give a proper title to this section <b>Meal Charge Policy</b> instead of Hot Lunch Fund. Policy must include the statement that "students who qualify for free meals shall never be denied a reimbursable meal."
800 - Civil Rights		<b>PUBLIC RELEASE:</b> SFAs are required to send to local media. The newspaper is not required to publish it, however, SFA must confirm it was sent. Please maintain copy of what was sent with a date. NSLP176 under Download Forms in IowaCNP contains the public release annually.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	<b>USDA Civil Rights:</b> Specific to school nutrition civil rights complaints - here is the process to be used:  <a href="https://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer">https://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer</a>

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**West Hancock Community School District (08190000)**  
**Dates of Review: 11/27/2018 – 11/29/2018**

800 - Civil Rights	810 Review program materials.	<b>USDA NON DISCRIMINATION STATEMENT:</b> For USDA Nutrition Programs - the National School Lunch and Breakfast Programs you must use the USDA Non Discrimination Statement. The full statement must be included on all documents, websites and documents referencing nutrition programs. Menus may contain the abbreviated statement "This institution is an equal opportunity provider." (Your menu states "We are an opportunity employer.")
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	<b>PROFESSIONAL STANDARDS:</b> an alternate training tracker is shared which may be helpful tracking and counting required hours while documenting required KEY areas. Be sure to count webinars such as Eligibility, ServSafe classes, Nutrition staff meetings held onsite.
1600 - School Breakfast and SFSP Outreach	1600 Did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	<b>WEBPAGE</b> 1 - Include the breakfast menu 2 - link to complete Non Discrimination Statement 3 - Meal Prices, Meal Charge Policy, Diet Modification Form, Contact information 4 - Wellness Policy and Assessment.

**Site - Level Technical Assistance Britt Elementary School (0409)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	407 a. Has the school offered the planned menu for the day of review?	<b>BREAKFAST MENU</b> is posted at the school site location. Additionally, the Breakfast Cycle Menu is posted. However, there is no Breakfast Menu posted on the school website for parents.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation.	<b>FOOD PRODUCTION RECORDS:</b> 1 - Include Planned Servings for each Grade Group, as well as actual served. 2 - Specify Fruit served, not just "fruit". 3 - Total Quantity Prepared must be in MEASURABLE amounts. Example: Avoid using term "bag". Specify # of pounds or volume. Refer to FPR Checklist.

Description
<p><b>CERTIFICATION and BENEFIT ISSUANCE:</b> Benefit documents, as well as all paperwork, were very well organized. The current application for free and reduced price meals was used, direct certification is downloaded twice a month as required, benefits are accurately updated in Point Of Service (POS) system, and denied applications were correctly determined. All applications reviewed were correctly determined, signed and dated by the household member and SFA; complete with SSNs and determined within required ten days. Rollover applications were removed if the household did not apply within thirty days of new school year. Access to benefit information is limited; Eligibility is kept confidential. SFA has a back-up system for benefit issuance documents and system.</p>
<p><b>CIVIL RIGHTS:</b> Civil rights poster was posted in the cafeteria. Annual civil rights training was provided food service staff and documented. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed.</p>

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**West Hancock Community School District (08190000)**  
**Dates of Review: 11/27/2018 – 11/29/2018**

<p>MEAL COUNTING and CLAIMS: 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. JMC is used as the school POS system. There is 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 claiming process or during meal observation.</p>
<p>No fiscal action as result of this review.</p>
<p>PROCUREMENT: a 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. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions. The SFA ensures that no vendors have been debarred or suspended by USDA. The SFA is part of the AEA purchasing group and has a signed agreement for (food, smallwares and chemicals). FSD attended regional training.</p>
<p>RESOURCE MANAGEMENT: All expenditures reviewed appeared allowable. SFA has a separate financial account for nonprofit school food service and net cash resources do not exceed three operating months. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for USDA Foods.</p>
<p>SMART SNACKS: Documentation was available to show vending items met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website was used to document items sold a la carte. (Note: SFA is responsible for compliance, not vendor.)</p>
<p>VERIFICATION: The correct number of applications were verified and were correctly selected from error prone applications. The verification report was completed accurately and on time.</p>

**Site - Level Commendations Britt Elementary School (0409)**

Description
<p>FOOD SAFETY: SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at site reviewed. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Dishwasher temperatures taken and documented and thermometers are calibrated. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. No storage violations observed.</p>
<p>MEAL COMPONENTS: Food Service Director does a good job of menu planning. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. All meals observed met at least the minimum daily requirements. Menus meet weekly and daily meal pattern requirements for each age/grade group. Documentation of CN labels, PFS and Standardized Recipes are maintained on file. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch—including many fresh fruits and vegetables. At least two types of milk are offered. Students had sufficient of time to eat after receiving meals. Signage is posted explaining what constitutes a reimbursable meal at both breakfast and lunch.</p>
<p>NUTRITION STAFF and ENVIRONMENT: are observed to be friendly, helpful and encouraging to student customers. Offer versus Serve is handled properly. Staff have a good understanding of a reimbursable meal. Students are observed to have adequate time to eat.</p>