

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Clay Central-Everyly Comm School District (12180000)
On-Site Review Dates: December 3-6, 2019

Program Year: 2020
Month of Review: October
Lead Reviewer: Deann Murphy
Org Representative(s): Diane White

Org - Level Findings

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|--------------------|---|---|-----------------------------------|
| 100 - Certification and Benefit Issuance | V-0100 | The SFA had 9 benefit issuance errors resulting in a 16.36% error rate. | All errors were fixed on-site during the review. Based on the high error rate, the SFA will be required to complete an Independent Review of Applications for SY20-21. Please refer to page 51 the Eligibility manual for details on this process. Please state your agreement for two staff to review all applications received in SY20-21. | |
| 200 - Verification | V-0200 | The application chosen for verification was not reviewed by the confirming official prior to sending a letter to the household as required. | Both the determining official and the confirming official will watch the webinar called Preparing to do Verification Fall 2019 found at https://educateiowa.gov/pk-12/nutrition-programs/school-nutrition/income-eligibility-and-verification and submit to the State Agency the signed/dated Professional Standards Certificates showing they each watched it. | |
| 1000 - Local School Wellness Policy | V-1000 | There is no active wellness committee in the district that has input into the wellness policy or assessment. | The SFA will state when they intend to have an active wellness committee in place. | |
| 1200 - Professional Standards | V-1200 | Adequate and job specific training is essential in order for staff to know and understand their duties as they relate to the Child Nutrition Programs. The kitchen manager/head cook needs 10 hours training annually. Prior to Oct. 2019, she was the FSD and needed 12 hours training. There is 1 part time kitchen staff, 2 cashiers, a determining official and a confirming official who need 4 hours training annually. Training hours were not met last year and has not been met yet this year. | To satisfy this finding, the SFA will submit documentation (certificates, sign-in sheets, etc.) showing that the kitchen manager has received at least 10 hours Professional Standards training, the part time kitchen staff, the cashiers, both the determining and the confirming officials have received at least 4 hours Professional Standards training. All training needs to be specific to the duties they perform with the National School Lunch/Breakfast program. | |
| 1200 - Professional Standards | V-1200 | The SFA is required to track their training hours for each employee. This is being done for the head cook/kitchen manager, PT cook, and 2 cashiers, but the determining official, confirming official and FSD are not listed on the tracking | Please submit an updated tracker showing everyone involved in the Child Nutrition Program, i.e. FSD, kitchen manager, PT kitchen staff, determining official, confirming official and 2 cashiers. List all training they have completed to date. | |

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| | | form. | |
| RMCR - Revenue From Nonprogram Foods | V-RMCR | Based on the SY18-19 non-program food revenue tool, non-program food costs exceeded non-program food revenue. | The SFA will state what actions they will take to ensure that future non-program food revenue exceed non-program food costs. |

Site - Level Findings: Clay Central-Everyly Elementary At Royal (0409)

| Area | Findings ID | Finding Description | Required Corrective Action | Corrective Action Response |
|--|-------------|---|---|----------------------------|
| 400 - Meal Components and Quantities - Lunch | V-0400 | The SFA is serving 2% lactose free milk and other milk substitutes to some students which do not meet meal pattern requirements without documentation from a medical provider. There is no medical documentation on file for these substitutions. | The SFA will state how they intend to comply with the meal pattern when diet modifications are required for a student, specifically when it comes to milk substitutions. | |
| 400 - Meal Components and Quantities - Lunch | V-0400 | During the review week, the planned menu only contained 7.75 oz. eq. grains. A minimum of 8 oz. eq. grains per week is required to be offered to K-8 graders. | The SFA will submit 1 week of completed Food Production Records and the actual labels for all the grain foods served showing that at least 8 oz. eq. grains were offered to students that week. | |

Org - Level Technical Assistance

| Area | Question | Comments |
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| 100 - Certification and Benefit Issuance | 107 a. When and how are households notified of students' certified eligibility? | The SFA uses JMC's eligibility letter without State Agency approval. The letter needs to be approved annually unless the SFA uses the State Agency household notification letter template. Send all approval requests along with Download Form ELIG010 to Deb.Linderblood@iowa.gov . |
| 100 - Certification and Benefit Issuance | 126 a. Certification and Benefit Issuance Review Method: | Discussed with the Determining official what needs to be on an application in order to approve it, how to use ICAVES to determine income levels, how to ensure the SFAs software has accurate and up to date income eligibility levels, and how to properly fill out the administration portion of the application. Recommend the Determining Official has annual training on Direct Certification and Benefit Issuance so that mistakes can be minimized. Also, sent the Determining Official a copy of the most recent Eligibility Manual for her reference. |
| 100 - Certification and Benefit Issuance | 137 Did the SFA accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document? | Some students are listed on the benefit list as "Approved for Reduced last year" when they are listed in JMC as free this year. Recommend contacting JMC to see if you can fix this. Students should be listed according to their current benefit status - not their status from last year once the 30 day carry over is done or the SFA has received new documentation. The 30 day carry over needs to extend a full 30 operating days into the new school year before benefits are discontinued. |
| 200 - Verification | 208 When a confirmation review was conducted: | All applications that the SFA chooses to verify must be reviewed by a second person as the confirming official. |
| 200 - Verification | 210 a. Did the SFA attempt to directly verify selected applications? | Verify the selected application prior to sending the household a letter by checking e-lookup for all students on the application. If the students are |

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| | | found on e-lookup, verification is complete. If not, then proceed to send the household notification letter and complete the steps to verification. |
| 200 - Verification | 215 a. Did the SFA complete verification by November 15? | Verification must be completed no later than Nov. 15 annually. Recommend starting the verification process shortly after Oct. 1 so that the whole process can be completed on time. |
| 300 - Meal Counting and Claiming | 305 What are the SFA's meal counting and claiming policies and procedures for the following situations: | Both adults and any non-student should pay the adult price for meals since these meals are not subsidized by the federal/state government. Also, recommend the FSD set up a policy and/or recipe for the kitchen staff to follow when making field trip meals. These meals do not follow Offer vs. Serve rules so they must contain all 5 components in their minimum quantities, i.e. 1 oz. eq. M/MA, 1 oz. eq. grain, 1/2 cup fruit, 3/4 cup vegetable, 1 cup milk. Fruit snacks are not an acceptable substitute for fruit. Finally, recommend reviewing your current meal charge policy and alerting staff and households to any changes made in it. |
| 700 - Resource Management | | E-mailed a letter to the Authorized Reps of both the SFSP and the NSLP/SBP which provided options to follow so that both entities would meet Federal Procurement Regulations. The letter is attached to Review Attachments section. |
| 700 - Resource Management | | PROCUREMENT: For micropurchases: Recommend the SFA try to "spread the wealth" a bit more evenly between vendors. They may wish to use the micropurchase log to help track purchases better. Some of the purchases made were not appropriate, i.e. coffee filters, microwave for cafeteria use and equipment repair. Nutrition fund monies should not be used for unallowable costs. Best practice is for the SFA to re-pay the nutrition fund for these unallowable costs as a FY20 adjustment so that only allowable costs are paid for from the nutrition fund. Small Purchases: The Northern Lights vendor is actually a micropurchase instead of a small purchase. In order to qualify as a small purchase, the SFA needs to send out specs which include both federal and local terms and conditions, obtain quotes/bid prices, and have an agreement in place. With this vendor, no specs were sent, the vendor did not submit price quotes and there is no agreement in place. The cook contacted the vendor when she needed something and it is delivered. Based on the amount spent with this vendor during the review year, the SFA did not "spread the wealth" evenly to all micropurchase vendors. Equipment repair is not an allowed expense to the school nutrition fund. All equipment repair in a public school needs to be paid for from the General fund and recouped through the indirect cost rate if desired. The kitchen manager or designee needs to check in the order when the driver drops off a delivery to ensure that only appropriate foods/beverages are accepted. The SFA was serving 1% chocolate milk during the on-site review which was not solicited by the SFA or part of the bid price given from the vendor. Other items noted on invoices were sour cream and cottage cheese. These also were not part of the original solicitation. The SFA needs to include in the vendor solicitation document all items they wish to order from that vendor all year. Formal Procurement: Discussed with the FSD/Kitchen Manager/Business Manager procurement basics, how to complete the procurement plan, when to send out bids, reviewed the small purchase procurement template, how to check bid prices as a way to monitor the contract, and the need to place any nutrition rebates received into the nutrition account. |

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| 800 - Civil Rights | 805 What procedures are in place for accommodating students with disabilities? | All students who receive a diet modification should have signed documentation from either a medical professional or a parent. If the meal pattern can be met within the meal pattern, a parent can request a diet modification. If the meal pattern cannot be met, the SFA needs documentation from a medical provider. The SFA needs to provide accommodations for special foods unless the parent wishes to provide it. Recommend having the parent state in writing that they wish to provide the special food. |
| 800 - Civil Rights | 810 Review program materials. | The posted menu on the website needs to have the USDA non-discrimination statement: "This Institution is an Equal Opportunity Provider." |
| 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? | Both the Wellness Policy and the Goals Assessment need to be made available to the public. Recommend the wellness committee keep meeting minutes to show what was discussed, when the meetings were held and who was invited to attend. |
| 1200 - Professional Standards | 1215 Validate the SFA's response to Question 1205 on the Off-site Assessment Tool, if applicable. | Training topics were discussed with staff as well as where to find training. Topics such as Blood Borne Pathogens and Right to know, etc. are acceptable, but should not take the place of more job specific training. There is no need to limit training to the minimum hours required if additional training is needed to know and understand NSLP/SBP requirements. Substitute kitchen staff should receive adequate training to do their jobs, i.e. basic civil rights training, basic food safety training, basic portioning training, etc., but do not need to meet the full 4 hours training annually unless they work regularly. |
| 1400 - Food Safety | 1403 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable? | Foods that the SFA accepts from their vendor that are non-domestic need to be documented in the Buy American exception log. Both tuna from Thailand and Olives from Turkey were found in the SFA storage area, but no documentation as to why they were accepted was found. |
| 1600 - School Breakfast and SFSP Outreach | 1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements? | The USDA requires SFAs to promote both breakfast and summer meals to households. Breakfast promotion should be at least twice yearly and should show households the breakfast menu, times offered, price and reasons why breakfast is important for students, i.e. increases ability to learn, decreases behavior problems, etc. Outreach to families can be through e-mail, website, PT conferences, intake packets, National Breakfast Week (March), etc. Summer promotion materials can be found on IowaCNP Download Forms and should be shared with all households prior to the end of school each year so that they know how and where to access free meals during the summer months. |
| 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? | Based on the non-program food revenue tool for SY18-19, non-program food costs exceed non-program food revenue. Much of this seems to be related to large total food cost overall. This could be caused by purchasing food from multiple vendors at high prices, providing multiple program meals to staff and free seconds to students, overproduction of meals and excess food waste. It could also be related to inadequate pricing on seconds. All of these areas should be assessed to determine where costs can be contained and revenue increased so that non-program food revenue either meets or exceeds costs. |

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Site - Level Technical Assistance Clay Central-Everyly Elementary At Royal (0409)

| Area | Question | Comments |
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| 400 - Meal Components and Quantities - Lunch | 403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines? | The SFA has 2% lactose free milk on hand for a student. All cows milk must be either FF or 1% fat. Milk substitutes must meet the same nutrition standards as cows milk. Parents cannot be required to provide their own milk substitute for a student. If a parent wants to provide a substitute, it must meet the nutrition requirements of the program and the SFA should have the parent sign the diet modification form stating that they prefer to provide the substitute instead of the school. |
| 400 - Meal Components and Quantities - Lunch | 410 a. Do planned menu quantities meet meal pattern requirements for the review period? | The SFA must plan a minimum of 8 oz. eq. grains into the weekly menu. Food Production Records should reflect what was actually served and planned portion sizes need to be followed. For example, if enriched bread is on hand, the FPR should not state that whole-grain bread was served. Also, if 1/2 cup portion is listed for either NSLP or CACFP meals, the kitchen staff need to serve the full 1/2 cup portion. Please ensure that staff have proper portioning equipment in the kitchen. The FSD should work with the kitchen staff to produce only the number of servings needed. For example, with Offer vs. Serve, not every student will take both the fruit and the vegetable so the full number of servings should not need to be prepared for both. This should help decrease food waste. |
| 500 - Offer versus Serve | 501 Has the cafeteria staff been trained on Offer vs. Serve? | Recommend all kitchen staff and cashiers be trained annually on Offer vs. Serve so that they all understand what must be present on the student's tray in order to make a reimbursable meal for both breakfast and for lunch. On the day of review, the kitchen staff told a student that they needed to take either peas or strawberries. The student already had 1/2 cup vegetable on his tray with the mashed potato. |
| 1100 - Smart Snacks in School | 1105 a. Review 10% of the food and beverages sold during the review month. | It is difficult to tell what is sold and what is given away to students for free. Giving away food for free constitutes larger portions and must be included in the allowed dietary specification ranges, i.e. calorie, saturated fat and sodium. Based on a discussion with the FSD, it appears that the SFA already plans meals at the higher end of these ranges so providing extra food to students for free would exceed the amounts allowed. All foods sold to students during the school day must meet Smart Snacks requirements and the SFA should have documentation on file for each food sold to support this. The exception to this is a second entree sold as part of the reimbursable meal that day or the day prior. Fat free and 1% flavored and unflavored milk is also allowed for all grades. Foods and beverages given to students as snacks, etc. should follow the wellness policy guidelines, but do not need to meet Smart Snacks. |
| 1400 - Food Safety | 1406 Is the most recent food safety inspection report posted in a publicly visible location? | The SFA should contact the public health department that completed the last inspection June, 2019 to obtain a copy of the inspection. The latest inspection needs to be posted in a public place. |
| 1400 - Food Safety | 1407 Was the SFA's written food safety plan implemented? | The HACCP manual has a Standard Operating Procedure (SOP) on Personal Hygiene that states the kitchen staff need to wear hairnets or clean caps designed to effectively restrain all hair while in the kitchen. The State Agency did not observe kitchen staff wearing these. Recommend the FSD review all SOPs with the staff so they are aware of the expectations. Also, recommend the FSD update the HACCP manual so that only pertinent information is included. For example, the current |

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| | | <p>manual contains SOPs on transporting food to satellite sites and preventing cross-contamination at Food Bars. This SFA has neither of these issues. Include in the manual all forms that the SFA uses for recording temperatures, dishmachine chemical checks, etc. so current and future staff know what is expected. Finally, staff cannot take food back from one student after it has been sold and serve it to another student. This is not only a food safety violation, it is also considered "double dipping" by selling the same food twice.</p> |
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Org - Level Commendations

| Description |
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| Access to benefit information is correctly limited. Free meals are extended to all members in the household. Waivers are provided to applicants and households that qualify for meal benefits by direct certification. Eligibility is kept confidential. |
| PROCUREMENT: Micropurchases: Each transaction is under the micropurchase threshold and prices are reasonable. The SFA conducted micropurchases through multiple vendors during the reviewed year. Small Purchases: The SFA sent out specs to 3 vendors for milk that included local terms and conditions. The total purchase for milk was less than the small purchase threshold. Only 1 vendor responded to the milk bid. All records were kept on file to show specs sent to specific vendors, contract pricing and invoices. Formal Procurement: The SFA has a copy of their AEA contract on file. The kitchen manager has saved the price lists received from the SFA's prime vendor. Processing: In SY2018-19, the SFA used 165% of their USDA Foods allotment between direct distribution and the DOD program. |
| Reports are filed to the State Agency in a timely manner and records are kept for at least 3 years + the current year. |
| The And Justice for All civil rights poster was posted in the cafeteria. Civil rights training was provided to all staff involved in the program. Ethnic/racial information is collected and the summary form is complete and on file. No discrimination was observed. SFA on-site monitoring was completed before the Feb. 1 due date last year and is on file. |
| The correct number of applications were verified this year. |
| The district has a current wellness policy on file. Goals are set for nutrition promotion, nutrition education, physical activity, and other, school based wellness activities. The latest assessment of the policy was available. |
| The SFA followed regulations for the district's size category when hiring a new director. He has met the minimum amount of Professional standards training this year. |

Site - Level Commendations Clay Central-Everyly Elementary At Royal (0409)

| Description |
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| Meal counts during the on-site review were reasonable when compared to the (October) review month counts. Meal count totals for the month of October appeared accurate and complete. There was a point of service, POS, at the end of the line as approved on the SFA application. Students from K-6 enter their PIN at the POS in exchange for their meal. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. |
| The cashier asked the kitchen manager prior to breakfast service to clarify how breakfast items credited so that she knew how to properly count food items at the POS. |
| The cooks did a good job of offering all foods to each student who went through the line. Water and cups were provided for all students. All vegetable sub-groups were offered in at least their minimum amounts. At least 50% of the grain foods offered were whole-grain rich. All meal components were available throughout service of each meal observed. Documents, including labels and standardized recipes, were available to support meal pattern contributions. Many low sodium foods were found in storage. Signage was posted showing students what they needed to take to make a reimbursable meal. Food production records were available for all meals served. |
| The kitchen staff take and record food storage temps for the refrigerator, freezer and milk cooler. Food temperatures are recorded on the food production records. |

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