

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Pella Comm School District (51660000)
February 18-20, 2020**

Program Year: 2020
Month of Review: February
Lead Reviewer: Shea Cook
Org Representative(s): Connie Boldt

Site - Level Findings: Pella High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Breakfast	V-0300	SFA claimed 240 reduced priced meals at breakfast for reimbursement in January. SFA edit checks for the month of January only show that 20 reduced breakfasts meals were served.	Please revise your January claim and upload a copy of the updated claim page to verify revision was complete.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	Although the district has a very thorough and detailed wellness plan, an assessment of the local school wellness policy completed. An assessment should be completed on a triennial basis.	For your response please provide the timeline for completion of the assessment of the local school wellness policy and the location where the assessment will be posted for public access.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The nonprofit school nutrition account had an operating balance in excess of the three month's operational expenses.	LEA has developed a spend down plan and submitted it to the SA. No further action is required.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	Nonprogram foods are defined as any food sold during the school day that is not part of a reimbursable meal to a student. Provision 206 of the Healthy Hunger Free Kids Act requires that nonprogram foods raise revenue sufficient to cover the costs of the food. The financial report on IowaCNP indicates the district is not currently raising enough revenue from the sale of its nonprogram foods.	For your response please complete and submit the nonprogram revenue tool. If the tool indicates that additional nonprogram revenue is needed please describe your plan to increase nonprogram revenue.	

Org - Level Technical Assistance

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Area	Question	Comments
100 - Certification and Benefit Issuance	133 Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified?	Documentation is on file from the homeless liaison to verify student status and eligibility for free meals. SA advised FSD to make sure that list includes year in date of determination.
700 - Resource Management		<p>Technical Assistance for Procurement was given in the following areas:</p> <p>Micro Purchase: SA gave clarification on spreading the wealth for micro purchases.</p> <p>Small Purchase: SFA was advised that vendors should be given a minimum of 4 weeks to respond to requests for pricing. Documentation of pricing from each vendors contacted should be maintained.</p> <p>Formal Purchase: Bread was procured as a formal purchase, but a formal procurement was not necessary given that the total value of the contract was well below the district's formal threshold. If the SFA choose to continue to procure bread as a formal contract estimated annual usage should be included in the IFB documents. Additionally, responders should be given a minimum of 4 weeks to respond to requests and formal bids must be publicly advertised.</p>
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	If a parent wishes to file a complaint about a USDA program they should be provided the following link: www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer
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?	As per requirement, the local wellness policy includes language that prohibits the marketing of foods and beverages that do not meet Smart Snack requirements. Non-compliant soft drink logos were observed on recycling containers located in the lunchroom and on a vending machine. Logos should be covered up or replaced with compliant product logos.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	SFSP link on website does not work and needs to be updated. SA also encouraged SFA to conduct additional outreach at the end of the school year. Free promotional materials can be found at the following location: http://bestpractices.nokidhungry.org/programs/summer-meals/promote-summer-meals#summer-meals-outreach-resource-toolkit
RMCR - Nonprofit School Food Srvc Acct	9 If the SFA encumbered bad debt from unpaid student meal accounts during the RM review period, how did it ensure that only allowable non-Federal revenues were used to restore operating losses? (Unpaid Meal Charges: Guidance and Q&A SP 23-2017)	SA discussed strategies for addressing district's negative account balance. Clarification was given on what information can and cannot be communicated to students under Iowa code. SA suggested signage reminding students that a la carte purchases are not allowed if a student's account balance is negative or they do not have cash in hand.
RMCR - Indirect Costs	8 Confirm that the nonprofit school food service account was not charged directly for expenses that were included in the indirect cost pool (double dipping). Did such charges occur?	Maintenance charges were charged directly to the nutrition account and by Iowa code maintenance is not an allowable direct cost. Because the nutrition fund was also charged indirect costs and maintenance is used to

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		calculate the indirect cost base this is considered double dipping. In Iowa maintenance is not an allowable direct cost to child nutrition programs.
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Site - Level Technical Assistance Pella High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	SA suggests additional signage reminding students to take at least a half a cup of fruit or vegetable for a reimbursable meal.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	Documentation that items in vending machines meet Smart Snack guidelines should be kept on file. The LEA contact responsible for the management of the beverage contract should provide documentation to the FSD to document compliance.
1400 - Food Safety	1411 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?	Non-domestic produce, cucumbers and peppers from Mexico and jalapenos from Turkey, were observed in storage. SA provided guidance on keeping a log to document any non-domestic produce received. Log should include date, description of item, and reason for its acceptance.

Org - Level Commendations

Description
CERTIFICATION AND BENEFIT ISSUANCE: The 30 days of eligibility status is provided to all families who were eligible for benefits in the previous school year. • The approved letter of notification of eligibility is sent to all families who apply for benefits including those families who were denied benefits. • Applications are processed and benefits are administered within 10 operating days of the application being received. • Direct certification lists are downloaded in a timely manner and kept on file. All students in the household are extended benefits. • Income applications are complete with parent signatures, income information, names of all family members and social security numbers. • Denied applications were determined accurately. • The correct income guidelines were used and the conversion rates were used properly. • Documents are well organized and no application errors were found.
CIVIL RIGHTS: The correct public release was sent to a local media outlet and published. • The SFA provides forms in other languages as needed for Limited English Proficient households including income applications, verification information and the negative balance policy. • The SFA works closely with the school nurses, students and families to ensure that all students have their special dietary needs met. Diet modification forms are completed and on file for students with special dietary needs. • All staff with responsibilities in the school nutrition program received civil rights training, including all non-food service staff and substitutes. Documentation is on file. • The "And Justice For All" poster is on display in all cafeterias. • The racial ethnic form was completed and shows that students were not discriminated against when applying for free or reduce price meals.
COMPETITIVE FOODS: Nutrition calculator printouts are on file for all a la carte foods and beverage items sold. • All competitive foods sold during the on-site review meet the Smart Snack requirements. • Leftover entrée items are sold the next day as an a la carte item.
FISCAL ACTION: There is no fiscal action associated with this review.
FOOD SAFETY: The temperatures for hot foods are monitored and recorded. • Temperatures are monitored and recorded for the refrigerators, freezers and milk coolers. The temperatures for the dishwasher are also monitored and recorded. • The food safety inspection report is on display in a public location. • The food service director requested a 2nd inspection. • The SFA's HACCP plan is available at each site. • The food service director, head cooks at each site and many food service staff are ServSafe certified. • Good food safety practices were observed while SA was on-site. • Foods are stored properly.
MEAL PATTERN AND NUTRITION QUALITY: The menu offers a daily salad bar and hot vegetable options to provide many options to students. • The menu offers a variety of vegetables, fruits and entrees. • Signage is made available informing students of how the menu constitutes a reimbursable meal. • The breakfast menu provided during the review period met the daily and weekly meal pattern requirements for all grade groups. • The lunch menu met the daily and weekly meal pattern requirements for fruit, grain, meat/meat alternate, and milk, dark green, red/orange, other and starchy vegetable subgroups. • Food production records, CN labels, and standardized recipes were on file for all meals served during the review period. • The SFA purchases many low or reduced fat, low sodium products. • The SFA offers 3 different and approved types of milk to students. • The food service director completed the menu certification worksheets. • Free, potable water is available for students during their meal times.

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<p>ON-SITE MONITORING: • On-site monitoring forms have been completed for all sites in the district for lunch. • On-site monitoring forms have been completed for all sites in the district for breakfast.</p>
<p>PROCUREMENT: The bids sent to potential vendors contain the Buy American provision and staff monitor products to ensure items delivered are made in the US. • The SFA conducts contract management as staff ensures orders received are what was delivered and that prices match what was written on the bid. • All vendors have signed a debarment certification statement. • Micro purchases were conducted accurately as funds were spent evenly throughout the community. • Small purchases were made according to the SFA's local purchasing thresholds. • The SFA completed the off-site procurement questionnaire and the food service director attended the regional procurement training. • The SFA has a written Procurement Plan that includes federal and local thresholds, identifies the estimated value and procurement method for each anticipated procurement event. • The district is a member of a Group Purchasing Organization, which helps to keep prices down. • The signed agreement states that the school district agrees to procure food (excluding bread and milk) and non-food supplies through the Group's awarded Prime Vendor. • The district has maintained a file for all procurement-related information. • The food service does a good job utilizing USDA Foods Planned Assistance Level (PAL). Last SY, more than the allocated PAL was used.</p>
<p>PROFESSIONAL STANDARDS: Training hours are tracked for all staff with school nutrition responsibilities. • Civil rights training was provided to all staff with school nutrition program responsibilities. • Documentation is on file for all training received. • Full and part time school nutrition employees have received the required number of training hours for the school year.</p>
<p>RESOURCE MANAGEMENT: The SFA charges the correct paid student lunch price according to the required PLE tool exemption and the correct adult lunch price. • The SFA has a negative balance policy to address negative student lunch accounts. • Expenses made during the review period were allowable. • Revenues received went directly into the school food service line item account and there are numerous checks and balances to ensure the process is followed. • Records are kept for 3 years plus the current year.</p>
<p>SCHOOL BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM OUTREACH: Families are informed of the school breakfast program and the Summer Food Service Program through the district's website and school announcements.</p>
<p>SCHOOL WELLNESS POLICY: The wellness policy contains all of the required elements and has been updated in the past 3 years as required. • The wellness policy is available to members of the public via the district's website. • The district has a wellness link on their website, thus making it easier for the public to find all wellness documents in one location. • The general public is invited to participate in the wellness committee as meeting information is posted on the districts website. • The SFA has a detailed school wellness action plan that details the goals that are currently being implemented or will be implemented.</p>
<p>VERIFICATION: The verification report and process were completed on time. • The correct information was collected from parents and eligibility status was determined correctly. • Families were notified of verification selection and the verification results with a letter that contained the correct information including information on their ability to appeal if they disagree with the results. • The applications selected for verification were confirmed and signed to show that the original eligibility status was determined correctly.</p>

Site - Level Commendations Pella High School (0109)

Description
<p>Civil Rights: The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.</p>
<p>Food Safety: A copy of the written food safety plan was available on site. • The latest Health Inspection Report was posted in a publicly visible location. • Temperature logs are maintained for all coolers-including milk coolers, freezers, refrigerators and for the dishwasher. • Food temperatures are recorded on the daily food production record. • Good food safety procedures were observed. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Most staff are ServSafe certified.</p>
<p>Meal Components and Quantities: Students have a large number of entrée selections to choose from daily. • All meal components were available at the beginning of meal service on the day of observation and throughout meal service. • All meals observed met at least the minimum daily requirements. • The menus met weekly and daily meal pattern requirements for the grade groups. • CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • At least three types of milk are offered. Students had sufficient of time to eat after receiving meals. • Signage was posted explaining what constitutes a reimbursable meal at lunch.</p>
<p>Meal Counting and Claiming: The Point of Service is at the end of the line and students punch their unique number into a key pad. • Meal counts during the on-site review were reasonable when compared to the review month counts. • Meal count totals for the month of January were accurate and complete. • Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. • Cashiers are trained and appeared aware of what constitutes a reimbursable meal. • Edit checks are performed.</p>
<p>Offer vs. Serve: Offer vs. Serve is being implemented properly. • All students observed taking a reimbursable meal selected 1/2 cup of fruit and/or vegetable. • Cafeteria staff have been trained on offer vs. serve. • There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at breakfast and lunch.</p>