

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Spirit Lake Comm School District (61200000)**  
**On-Site Review Dates: February 18-20. 2020**

**Program Year:** 2020  
**Month of Review:** January  
**Lead Reviewer:** Deann Murphy  
**Org Representative(s):** Jason Olson

**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 errors out of the 226 students reviewed.	All benefit issuance errors were fixed on site. No further corrective action is needed.	
200 - Verification	V-0200	Income information was calculated incorrectly on 1 application being verified. Too many applications were verified for cause. Households were not given a full 10 days to appeal when benefits were lowered before the student's status was changed in the POS. The SFA did not attempt to directly verify those applications selected on E-lookup prior to sending households income requests.	Based on the errors found with verification, the FSD will watch the webinar titled Preparing to Do Verification Fall 2019 found at <a href="https://educateiowa.gov/pk-12/nutrition-programs/school-meals/income-eligibility-and-verification">https://educateiowa.gov/pk-12/nutrition-programs/school-meals/income-eligibility-and-verification</a> . He will submit to the State Agency the Professional Standards certificate signed and dated showing that he watched the webinar.	
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFA has not yet calculated non-program food revenue for SY18-19 as is required.	The SFA will submit their completed non-program food revenue tool to the State Agency. If the tool shows that non-program food revenue does not cover non-program food costs, the SFA will state how they intend to fix this.	

**Site - Level Findings: Spirit Lake High School (0109)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	USDA limits no more than 50% of fruit served in the form of juice. The SFA currently offers a full cup of juice and 1/2 cup whole/canned fruit most days. The amount of juice served exceeds the 50% allowed.	The SFA will state how they plan to limit juice to no more than 50% of the total fruit offered each week at breakfast.	
500 - Offer versus Serve	V-0500	The cafeteria staff have not had training on offer vs. serve and did not seem to fully understand	The kitchen staff will be trained on Offer vs. Serve. The SFA will submit to the State Agency which training	

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		what students had to take to make a reimbursable meal.	was used, a sign-in sheet with all kitchen staff signatures, and the date the training was held.	
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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	130 Is household notification of denied benefits consistent with FNS requirements?	If a households income application is denied, the SFA must give them a denial letter in writing.
200 - Verification	209 Based on the review of verified applications:	The Eligibility Manual was e-mailed to the FSD. We discussed when it is appropriate to verify an application for cause, how to use direct verification, and the need to give households a full 10 days to appeal before their status is lowered in the POS.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	Non-district students (J Term) who eat lunch or breakfast should pay the full adult price since their meals are not subsidized by the federal/state government to the district. Field trip/sack meals must contain all 5 components in their minimum quantities in order to claim the meals for reimbursement. Water cannot be sent in place of milk on a field trip.
700 - Resource Management		PROCUREMENT: Discussed with the FSD changes to make in his procurement plan to more closely resemble his practices, i.e. having the school set a small purchase threshold in their local policy, splitting out Prime Vendor contracts into 2 procurement events, increasing the amount spent on micropurchases for next year. Micropurchases: Many of the micro-purchases from the reviewed vendor were for unallowable foods (non-WGR bread products). Nutrition Funds should not be spent on unallowable foods. Small Purchases: Specs should be sent to vendors to allow them 4 weeks to respond to the SFA. Specs need to be specific to each item the SFA wishes to order, i.e. at least 51% whole grain rich, 2 oz eq. hamburger bun, 12 count, etc. Also, all federal terms and conditions need to be included, especially Buy American language for all food/beverage items. Smart Snack ice cream items should also have individual specs listed. Vendors need to include pricing for all items they are offering in their bid pricing. The SFA should use extended pricing in figuring the total bid price for both bread and milk. Reviewed the Small Purchase template with the FSD to use for all milk/bread bids next school year.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The State Agency provided the SFA with the USDA complaint procedure and complaint form. They should keep these on file and follow the procedure/form if they get a discrimination complaint regarding the school meals program.
800 - Civil Rights	805 What procedures are in place for accommodating students with disabilities?	Students who need a dietary accommodation which does not fit into the meal pattern requirements must have a medical provider's order to serve foods outside of the meal pattern. For example, if a student needs lactose free milk, this must be available for the student to choose. A student may refuse it using OVS, but the household should be contacted to see if they

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		want the student to have it. A list of acceptable milk substitutes were e-mailed to the FSD. These milk subs can be used in place of cows milk at a student's or parent's request.
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?	The wellness policy and the most recent assessment of the policy goals need to made available to the public. This can be done by posting it on the school's website, through a newsletter, e-mail, etc. All stakeholders invited to the wellness policy meetings should have input into the policy and goals assessment.
1200 - Professional Standards	1207 a. Has the State Agency allowed the SFA flexibility to complete annual training requirements over a 2-year period?	When combining training over the course of multiple years, the SFA can only combine 2 years at a time. They cannot roll training over year after year after year. The FSD either needs to contain all training into 1 year or determine which 2 years he wants to combine, i.e. SY18-19 and SY19-20.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1206 on the Off-site Assessment Tool, if applicable.	The staff member who serves as the confirming official should be trained annually on Application Approval. This training is a live webinar in July and is recorded on the DE website under Learning Tools - Schools. She should watch it prior to confirming the verified applications. This training can count towards her required professional standards training annually.
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?	Households need to be notified at least 2 times annually regarding the school breakfast program. Notification should include the breakfast menu, times available, prices and information telling participants why eating breakfast is important. Notification can be done on the school's website, newsletter, e-mail, text blast, at the beginning of school and at the new semester, during PT conferences, during National Breakfast Week in March, etc. Households also need to be notified that free summer meals are available across the state. The notification should be sent close to the end of the school year and can be done on the school's website, newsletter, e-mail, text, etc.
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	The non-program food revenue template and instructions/example were sent to the FSD and Business Manager. Non-program food revenue needs to be calculated annually at the end of each fiscal year to determine if non-program food revenues cover non-program food costs.

**Site - Level Technical Assistance Spirit Lake High School (0109)**

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	321 a. Are total meal counts, by category, for the review period reasonable compared to meal counts for the day of review?	Recommend the FSD consider making the yogurt parfait into a reimbursable meal to help increase breakfast participation. On the day of observation, this was a very popular choice, but was only offered as an a la carte option.
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The SFA offers a full 1 cup portion of juice daily at breakfast and most days offers 1/2 cup portion of whole/canned fruit. USDA only allows 50% of all fruit offerings as juice. The SFA needs to cut back the amount of juice offered at breakfast daily. Food Production Records should record the actual portion served.

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500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Discussed OVS rules with the HS kitchen staff prior to lunch service. Students are not required to take the entree nor the milk. At lunch, students are only required to take 3 components, with 1 component being a minimum of 1/2 cup fruit or vegetable. If the 3 components they take are fruit, vegetable, milk, either the fruit or the vegetable must be 1 full cup. OVS at breakfast is based on items, which is different than components at lunch. Offer vs. Serve trainings for both breakfast and lunch can be found at <a href="https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts">https://educateiowa.gov/pk-12/nutrition-programs/team-nutrition/school-nutrition-staff-training-webcasts</a> . The OVS manual was e-mailed to the FSD. Staff should be trained on OVS annually.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	The Business teacher who's class sells foods to students during the school day was educated on Smart Snacks requirements. We discussed which foods being sold were compliant and which were not. A USDA Smart Snacks booklet was e-mailed to the FSD to forward onto the teacher and her students. All foods sold to students during the school day must meet Smart Snacks regulations. Also, the SFA sells yogurt parfaits a la carte at breakfast and at lunch and pudding at lunch. Both of these items need to have documentation that they are Smart Snack compliant.
1100 - Smart Snacks in School	1106. Does the school hold fundraisers during the school day where students may purchase food or beverages?	Any foods sold to students during the school day, i.e. midnight until 30 minutes after school ends each day, must be Smart Snack compliant. Students may sell foods during the school day that are meant to be taken home and eaten, i.e. frozen foods that must be baked prior to eating. Recommend the FSD visit with the administrator who approves fundraisers at the school so that they are aware of these regulations.
1400 - Food Safety	1407 Was the SFA's written food safety plan implemented?	Recommend discussing temping cold foods and documenting temperatures with the health inspector.

**Org - Level Commendations**

Description
All staff have met or almost met their minimum professional standards requirements for SY19-20. Training is tracked for all staff who have a role in the child nutrition programs.
Annual 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 to ensure that all schools are meeting program requirements. The current state and federal non-discrimination statements are listed on household notification letters and the shortened statement is on the posted menu.
Benefit documents and other paperwork were well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. All applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Carry over 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.
Fiscal action will be under the \$600 USDA disregard so no claim adjustment will be needed for this review.
Lunch menus met all daily and weekly requirements. Documentation indicated that foods purchased and food production ensured meals contained the required minimum components and quantities. CN labels and Product Formulation Statements, as well as nutrition facts and ingredient labels used for producing meals were on file and well organized. Food production records were available for all meals served. Water was available as required. Many low sodium food items were observed in storage. Calorie ranges seem to be met for the HS age group. Students seemed to have sufficient time to eat after receiving meals.

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Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. Kitchen staff were very polite and respectful to students, visitors and each other. All but one meal was reimbursable. The cashiers had a basket of Craisins available for students that were short on fruits/vegetables so students did not need to go back to the serving line for more. The SFA has a flavor station so that students can add flavoring to their food.

**PROCUREMENT:** The SFA does have a SY19-20 Procurement plan and Code of Conduct in place. The Code of Conduct lists the disciplinary actions they will use if the Code is violated. **Micropurchases:** Each micropurchase was under the local threshold and was reasonably priced. The FSD uses a tracker to ensure that he has spread the wealth evenly between micropurchase vendors. **Small Purchase:** All small purchases were under the formal purchase threshold. At least 2 vendors were contacted for bids. All documentation detailing the small purchases are on file. The vendor did honor the prices in the bid and the SFA only ordered items in the bid. **Formal Procurement:** The FSD has a copy of the AEA Purchasing disk on file. He keeps copies of the monthly/weekly price lists that the vendor sends out. Kitchen staff check in products from vendor and refuse the product if poor quality. Price disputes are settled prior to the bill being paid. The FSD spot checks invoice prices against bid prices. All prices were correct during on-site review. **USDA Foods:** The SFA used 101% of their USDA Foods entitlement in SY18-19. The SFA used DOD for fresh fruits and vegetables.

The district has a current wellness policy on file. Goals are set for nutrition education and promotion, physical activity, and other wellness based school activities. The latest assessment of the policy was available per building. The SFA has a wellness committee that meets and includes a wide variety of stakeholders.

Verified applications were correctly selected from error prone applications. Applications chosen to be verified were confirmed by a second official prior to sending the households a request for their income documentation. The verification process was completed in a timely manner.

**Site - Level Commendations Spirit Lake High School (0109)**

Description
Meal counts during the on-site review were reasonable when compared to the January review month counts. Meal count totals for the month of January appeared accurate and complete. There was a point of service, POS, at the end of the line as approved on the SFA application. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
The High School had a written Food Safety plan that included the required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers- including milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean.