

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
MOC-Floyd Valley Comm School District (41490000)
On-site Review Dates: February 6-9, 2018

Program Year: 2018
Month of Review: January
Lead Reviewer: Deann Murphy
Org Representative(s): Russ Adams

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	2 Application errors made resulting in a 1.97% error rate for the district.	The errors were fixed on-site so no further Corrective Action is needed.	

Site - Level Findings: Orange City Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The review week menu was short grains for both the day and the week. Staff reported that they served a 2 oz portion of brown rice on Friday which resulted in only 0.5 oz eq grain provided and this did not meet the 1 oz eq. grain required. Also, only 7.5 oz eq. grains were provided for the review week which is short of the required minimum of 8 oz eq. grains.	The SFA will state how they intend to ensure that a minimum of 1 oz eq. whole-grain rich foods are offered daily to K-5 grade students and how a minimum of 8 oz eq. whole-grain rich foods are offered weekly on the menus.	
500 - Offer versus Serve	V-0500	The SFA application states that they will use the Offer vs. Serve (OVS) serving method at breakfast at the Elementary. On the day of review, the cook stated that all students were served everything on the menu and OVS was not used. There was no signage for breakfast showing staff or students what they needed to take to make a reimbursable breakfast.	1). Since the SFA plans to follow OVS, they will provide documentation showing that all staff at Orange City Elementary have received training on OVS. 2.) The SFA will also submit an example of their breakfast signage showing staff and students how to make a reimbursable breakfast.	
900 - SFA On Site Monitoring	V-0900	The on-site monitoring for Orange City Elementary was completed prior to the February 1 deadline, but the other 4 sites monitoring forms have not yet been completed.	The SFA will complete the on-site monitoring form NSLP260 for both breakfast and lunch for the other 4 sites in the district and submit them to the State Agency.	

Org - Level Technical Assistance

Area	Question	Comments
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100 - Certification and Benefit Issuance	126 Are the correct conversion factors used when processing applications that indicate more than one income frequency? If NO, explain.	When determining applications, please fill in the "Received By" date when the application is received by the district. This helps determine if the application was processed within 10 operating days. Also, please use the individual income tab when only one income frequency is reported, i.e. monthly tab when only monthly income is reported. Only use the Annual tab for mixed income frequencies or reported annual or self-employment income. This helps with accuracy. Finally, please carefully check household members vs. names written on the application. If these do not match, please confirm with the family who is in the household before completing the determination process.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable):	<p>Field trip/sack lunch meals must contain all 5 components in their minimum quantities, including a full 3/4 cup vegetables, if students are handed a bag using the "Serve Only" meal style. Recommend developing a recipe showing what needs to go into a sack lunch meal including how it credits so all students are assured of a reimbursable meal.</p> <p>Recommend charging all students the same price for a lost lunch ticket regardless of their eligibility status so that students are not overtly identified as receiving free/reduced/paid meals.</p> <p>Meal Charge policy should be communicated to all households annually and included in new student information packets so everyone is aware of the District policy.</p>
700 - Resource Management		<p>PROCUREMENT:</p> <ul style="list-style-type: none"> • Technical assistance provided to include all anticipated purchases for SY 2018-19 on the Written Procurement Plan including micro-purchases, sole source purchases, small and formal purchases. Items billed as indirect costs, continuing education fees, etc. do not need to be included in the procurement plan. • Required federal terms and conditions must be included when procurement is conducted using small and formal methods of procurement. Please refer to the state-prototype template posted on IA_CNP. The SFA must initiate the bid with the vendor rather than allowing the vendor to send the SFA the bid specs, price, etc. Small purchase contracts must be awarded to the most responsive and responsible vendor who gives the lowest bid price. • When using the micro-purchase method, purchases must be equitably distributed among vendors to

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		<p>"spread the wealth."</p> <ul style="list-style-type: none">• When procuring milk and bread, along with specifications for all items to be procured, the estimated annual usage for each item should be provided. To ensure the district selects a responsive vendor with the overall lowest price, the cost of each item on price quotation request or bid must be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template to calculate extended cost for milk was provided. A similar process should be used for bread products.• It is best practice to include the school calendar when requesting pricing from vendors to ensure deliveries are not made during holidays, breaks, etc.• In the milk solicitation, other things to consider when requesting price from vendors are: prices are for paper cartons or plastic bottles, coolers will be provided at no charge, HACCP plan to ensure clean crates and milk cartons, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should state whether a firm fixed price or a fixed price with economic adjustment (escalator clause) is requested.• Allow vendors a minimum of four weeks from date vendor is contacted to the due date for milk and bread procurement. For any formal procurement, allow 8-12 weeks from the time the bid/proposal is issued to the due date of the bid/proposal. This is to allow the vendor adequate time to respond.
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		<ul style="list-style-type: none">• The food service director should spot check invoices from the Prime Vendor to ensure products delivered match the order and the specifications of the product solicited. Price on the invoice should match bid pricing. Items not in the bid specifications must be procured using the appropriate procurement methods.• Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-domestic agricultural commodity is accepted.• Food service equipment repair and preventive maintenance should be an indirect cost to the school nutrition fund. <p>Only items included in the bid specification sent to vendors should be purchased from the awarded vendor. If a food item is not part of the specification, it should be re-bid.</p> <p>The SFA may wish to consider the DOD program to use more of their USDA Food allotment and get fresh fruit and vegetables for their program. Currently the SFA has used some of their diverted foods, but not all. Recommend the FSD contact the USDA Foods consultant, Sarah White, to determine how to proceed with this.</p> <p>Only use Child Nutrition funds to pay for food items that are compliant with the meal pattern requirements, i.e. white buns, tortillas may not be compliant. Provide education to kitchen staff who might be buying these from the store.</p>
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1200 - Professional Standards	1221 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	The School Nutrition managers still need 3 hours Professional Standards training. The Confirming Official needs 1 hour Civil Rights training. One nutrition staff needs Civil Rights training. All training should be completed by June 30, 2018.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	A copy of your HACCP manual needs to be in all site kitchens. Recommend going through your manual to only include pertinent Standard Operating Procedures (SOPs) that relate to each particular site. For example, if a site does not receive deliveries, it does not need an SOP related to how to receive deliveries. If a site serves meals in the classroom, an SOP should be included on food safety/sanitation in the classroom. Clean out old SOPs that no longer apply or are duplicate copies from several years ago.
1400 - Food Safety	1401 If conducted as part of the Administrative Review, are SFA contracted and self-operated warehouses, storing all foods (commercial and USDA) properly? If NO, explain.	Boxes need to be stored at least 6" off the freezer floor.
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? If NO, explain.	USDA Summer Meals Meet-Up flier was e-mailed to the FSD to send out to families before the end of the school year. Summer meals information should be provided to households annually in the spring so they know where they can go for free meals during the summer months.
Resource Mgt Comprehensive Review	4 Did the SFA apply the indirect cost rate to the correct direct cost base?	Indirect costs need to be applied to the correct cost base consisting of food service staff salaries, supplies, and travel costs. Do not include purchased food into the cost base.
Resource Mgt Comprehensive Review	6 Review the year-end Statement of Revenues and Expenses from the SFA's nonprofit school food service account. Were general expenses reasonable, necessary, and allocable?	Party supplies purchased to help celebrate the end of school are not an allowable cost. The SFA may purchase stickers, etc. to help promote School Breakfast Week or something else that directly promotes the Child Nutrition Program, but other than that, trinkets, treats, decor should not be purchased using Child Nutrition funds.
Resource Mgt Comprehensive Review	8 If so, was the equipment included on an approved State agency equipment list or did the SFA otherwise secure prior approval from the State agency before purchasing the equipment?	An approved equipment list was sent to the SFA which lists allowable equipment purchases over \$5,000. If a piece of equipment is not found on this list and costs over \$5,000 each, the SFA needs to get State Agency permission before buying it per USDA requirements.

Site - Level Technical Assistance Orange City Elementary School (0409)

Area	Question	Comments
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300 - Meal Counting and Claiming - Lunch	319 Electronic Systems Only	During lunch, adults at the Elementary school can either purchase a full meal or pieces of a meal a la carte. The price charged a la carte for the entire meal is less than the charge for a full meal. The cashier must write down what the adult is buying and enter that into the POS individually between students or at a later time. This increases the risk of errors in the meal counting and claiming system. It also allows adults to undercut the price of a meal by buying it in pieces. The intent of the adult meal charge is for adults to pay the full price for a meal without it being subsidized by federal, state and commodity dollars - no matter what they choose to take - and it is strongly suggested that the SFA charge the full meal price for adult meals. Visiting students/children to the district should also pay the full adult meal price as their meal is not being subsidized by government funding.
400 - Meal Components and Quantities - Breakfast	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	The OVS manual was sent to the FSD to help train the staff on Offer vs. Serve rules. Students need to be offered a full cup of fruit at breakfast daily. They can choose to take only 1/2 cup if they wish under OVS. Sample breakfast signage was sent to the FSD to help educate staff and students how breakfast items are counted each day. Signage should be posted at the beginning of the serving line daily.
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Recommend all food be served using standardized scoops instead of tablespoons, slotted spoons, etc. to ensure appropriate portions are provided to all students. Discussed with the FSD the need for appropriate labels to accurately determine component contributions. USDA requires processed entrees either have a CN label or Product Formulation Statement (PFS) to verify component contributions. Vendor specification sheets are not appropriate sources of labeling.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students?	Lunch signage showing students what must be taken to make a reimbursable meal was provided to the FSD during the on-site review. Signage should be posted at the beginning of the meal service line.

Org - Level Commendations

Description
Benefit documents were well organized. The current application form is 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. The correct and current benefit issuance list was available. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential.
The And Justice for All civil rights poster was posted in the Elementary cafeteria. The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. Annual civil rights training was provided to most Child Nutrition staff. 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 summary form is completed. No discrimination was observed. The current state and federal non-discrimination statements were on household notification forms and the shortened statement was on the menu.
The correct number of applications were verified and were correctly selected randomly. All income sources were verified, and the process was completed on time. The applications selected for verification were confirmed prior to verification.
The Food Service Director works very hard along with the SFA's consultant dietitian to plan reimbursable meals that meet both the meal pattern and the dietary specifications (calories, saturated fat, sodium). Standardized recipes are used for homemade products. Water is offered to students as required. The cafeteria is bright and cheery and well supervised. Students seemed to have adequate time to eat both breakfast and lunch.

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The FSD tracks all Professional Standards for identified nutrition and non-nutrition staff. Most staff have fulfilled their required training for this year.
The SFA has a comprehensive written Procurement Plan that includes local thresholds, procurement methods and documentation for most purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA also has a written Code of Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances.
The SFA has a district-wide written Food Safety plan that includes the required elements. The latest Health Inspection Report was posted in a publicly visible location at the Elementary. Temperature logs are maintained for all refrigerators, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures.
The SFA has an active wellness committee made up of a variety of stakeholders. The committee meets 1-2 times annually and keeps meeting minutes. The district has a comprehensive Local Wellness Policy that was recently reviewed and contains all the required goals for nutrition education and promotion, physical activity and other student and staff based wellness activities. An assessment of those goals has been completed and the RN plans to post this in the school newsletter.

Site - Level Commendations Orange City Elementary School (0409)

Description
Foodservice staff and cashier at the Elementary were friendly to staff, students and guests. They offered students each food item for lunch. All but one student received a reimbursable lunch with a friendly staff prompt when needed.
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. The Point of Service was at the beginning of the line, which agreed with the elementary application.
The only a la carte sold to Elementary students was extra milk which met Smart Snack guidelines.