

**Iowa Department of Education  
Bureau of Nutrition and Health Services  
State Review Summary Report  
Polk County Youth Services  
May 15-17, 2018**

**Program Year:** 2018  
**Month of Review:** April  
**Lead Reviewer:** Christine Crow  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The eligibility application that the SFA is using has been modified from the SA's template and does not contain ethnic - racial information. The ethnic and racial identities must be included on the application. If the household does not complete the section describing their race and ethnicity, the SFA must complete it for them to the best of their ability. TA provided to the authorized representative. There were 5 students that were counted on the claim as receiving free meals during the review period, but did not have a completed RCCI application. These students have been discharged from the facility. RCCIs must have a roster or application for all students enrolled that indicates their intake and discharge dates, household income, and eligibility status. TA provided to the authorized representative.	Submit a copy of the revised application so that it includes the racial and ethnic identities. Describe how the SFA will ensure there is a RCCI application for all students admitted and included in the count/claim.	
800 - Civil Rights	V-0800	The Iowa and USDA nondiscrimination statements must be on all materials that contain information regarding the NSLP or SBP. The menu and the student handbook don't contain either statement. If there is not enough room for the whole statement,	Submit a copy of the menu that contains the nondiscrimination statement.	

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		<p>the abbreviated statement can be used. The most recent statements can be found on the IDOE Nutrition Program website: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs">https://www.educateiowa.gov/pk-12/nutrition-programs</a></p>		
1000 - Local School Wellness Policy	V-1000	<p>The SFA's wellness policy contains goals for nutrition education and promotion and physical activity but does not contain goals for other school-based activities, nutrition standards for all foods and beverages sold during the school day, standards for food and beverages, not sold to students, but made available throughout the school day, or policies for food and beverage marketing, as required. SFAs must also have a wellness committee that involves a variety of stakeholders to develop, implement, review, and modify the policy and an assessment must be completed at least once every 3 years that monitors the progress being made on the implementation of the goals listed in the wellness policy. TA and a folder of wellness resources provided to the wellness leader.</p>	<p>Describe when the SFA will revise their policy to include the required elements. Describe when the first wellness committee meeting will take place. Describe when the wellness committee will complete the assessment of wellness policy goals.</p>	
1200 - Professional Standards	V-1200	<p>SFAs must have a food service director and all food service directors must receive 12 hours of training annually in school nutrition program topics. Staff working more than 20 hours per week in school nutrition programs must have 6 hours of training annually and those working less than 20 hours per week in school nutrition program must have 4 hours of training annually. Training must be related to their responsibilities within the school nutrition program. Documentation must be on file for all training provided and include the</p>	<p>Develop a training plan for the 2018-2019 school year that includes the training topics and approximate dates in which training will be provided for all staff with school nutrition program responsibilities. Submit the tracking training tool that will be used.</p>	

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		title of the training, date and time the training occurred, objectives of the training, and names of all attendees. All training provided to school nutrition program staff must be tracked on a tracking tool. The tracking tool must include the names of all staff with nutrition program responsibilities, training titles, dates and hours provided, and types of training. TA on professional standard requirements and tracking tool templates provided.		
1400 - Food Safety	V-1400	Every SFA must have a Hazard Analysis and Critical Control Points (HACCP) Plan that describes the steps to identify, evaluate, and control food safety hazards as food flows through a food service operation from purchasing to serving. The plan must classify food items served into 1 of 3 categories according to the process approach and include Standard Operating Procedures that address any potential hazards throughout the flow of food. The HACCP plan must be organized and available in the kitchen. TA provided including sample plans and checklists.	Provide a HACCP Plan table of contents and describe when the plan will be completed.	

**Site - Level Findings: Meyer Hall Elem High (8614)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Food production records and supporting documents indicate that the pancakes and some of the cereal options (Bunch O' Crunch, Frosted Flakes, and Fruit Whirls) are not whole grain rich. Unless the SFA has a whole grain rich exemption, all grains served must be whole grain rich. The menu on the day of the onsite review and the	Describe how the SFA plans on meeting the calorie and sodium requirements for the day that biscuits and gravy is served. Submit a label or recipe for the cereals and pancakes that the SFA will begin serving to show that they are whole grain rich.	

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		<p>food production records for the review period indicate that the biscuit and gravy menu is significantly over the calorie and sodium range for the 9-12 grade group requirements possibly because 2 biscuits are served. SA encourages the SFA to decrease the serving size of both the biscuit and sausage gravy. TA provided.</p>		
<p>400 - Meal Components and Quantities - Lunch</p>	<p>V-0400</p>	<p>There were 2 days during the review period and the day of the onsite review, in which the 2 oz. grain requirement was not met because the bun served only credits as 1.75 oz. grain. There were 2 days in the review period and the day of the onsite review in which the total vegetable requirement of 1 cup was not met because romaine lettuce only credits as half of the portion size served. The grain and total vegetable requirements were met on all other days during the review period. The SFA offers many homemade menu options including the beef and noodles, meatloaf, and tacos served during the review period. The recipes available for these items were either not standardized recipes or did not coincide with what the food service staff was actually preparing based on information on the food production records. Standardized recipes must be available for all homemade items served to ensure the product quality is consistent every time the item is served and that the meal pattern requirements are always met. Standardized recipes include ingredients, preparation instructions, critical control points, serving size, serving utensils, total yield, total number of servings, and how it credits towards the meal pattern. TA provided to the authorized representative on</p>	<p>Submit the standardized recipe that the SFA will begin using for the beef and noodles, meatloaf, and beef tacos. Submit a copy of the new bun label to show that it meets the 2 oz. grain requirement. Describe how the SFA will meet the vegetable requirement when lettuce is served.</p>	

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		available standardized recipes, the grain bread chart, and meal pattern requirements.		
1700 - Afterschool Snack	V-1700	The food production records indicate that three days per week during the review period, homemade cookies, brownies, and cereal bars were served. The cereal bar was served on the day of review and the recipe provided was not standardized and indicated that it credits as 0.5 oz. grain equivalent, thus not meeting the 1 oz. grain requirement. There was not a standardized recipe for the cookie or brownie. TA provided to the authorized representative on snack requirements, standardized recipes, and sample recipes.	Provide a standardized recipe for the cereal bar.	

**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management (2018)		Procurement: TA provided to the authorized representative on purchasing methods, including micro purchases, their spending threshold, and spreading purchases equitably among all qualified sources within the community. TA provided to the authorized representative on providing nutrition and quality specifications (examples include CN labeled products, whole grain rich grain/bread items, bread/bun size etc.) for the foods to be procured, to the administration at the county level who write, distribute and evaluate bids.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs? Provide a copy.	SFAs must follow the USDA complaint procedure in the event that a civil rights complaint is made against the school nutrition program. The complaint procedure and form were provided and reviewed with the authorized representative.
800 - Civil Rights	805 How are students with special dietary needs accommodated?	All students requesting a special diet that limits the SFA's ability to comply with the meal pattern requirements must have a diet

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		modification statement signed by a prescribing official. The form must state the food(s) to be avoided and the alternative foods to provide instead. SFAs are strongly encouraged to meet the needs of all students with special diets, including those with a lactose allergy. Milk alternatives that are nutritionally equivalent to cow's milk (soy milk and lactose free milk) can be offered to students without a prescribing official's order. The diet modification form is found in Download Forms (NSLP 452). TA provided to the FSD on documentation and the diet modification form.
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.	SFAs must inform families about the SFSP even if they do not offer the program. SFSP marketing materials are available on the IDOE Summer Meals Program site. SA encourages the SFA to include SFSP materials in the exit packet for students.
Resource Mgt Comprehensive Review	8 An SFA that sells a limited number of nonprogram foods with an identifiable per-serving cost (i.e. milk) may find that it must add funds to its nonprofit school food service account despite selling its nonprogram foods at prices that cover its full costs. State agencies may review these SFAs to determine if the compliance assessment does not fully represent the SFA's pricing practices for nonprogram foods and if it does not, the SA may instead base compliance on whether or not the SFA is recovering more than the per-serving food cost of these nonprogram food items (See Q&A #3 in FNS Policy Memo 20-2016).	The 2016-2017 financial report indicates that the nonprogram revenue does not cover the cost of nonprogram food but the SFA does not sell nonprogram foods. Staff are provided meals for free and students receive a free supper meal. The organization's general fund supports the school nutrition program by providing the resources to cover the cost of all salaries and benefits for all school nutrition program staff, 100% of the school nutrition program supply costs, 62% of the food cost (from 2016-2017 school year), and all other program costs. The authorized representative is encouraged to contact Patti Harding for additional TA in completing future financial reports.

**Site - Level Technical Assistance Meyer Hall Elem High (8614)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?	Signage that describes how the menu constitutes a reimbursable meal must be posted for both breakfast and lunch. There was no signage on display in the cafeteria for breakfast or lunch. TA and sample posters provided to the food service director.
400 - Meal Components and Quantities - Lunch		TA provided to the food service director on approved CN labels, product formulation statements, standardized recipes, the whole grain rich requirement, the grain bread chart and meal pattern requirements for breakfast and lunch.

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1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	The most recent food safety inspection report must be on display in a location where the public can read it. TA provided to the authorized representative.
1700 - Afterschool Snack	1710 Is the USDA/FNS approved non-discrimination poster prominently displayed and visible to program participants?	The afterschool care snack is served in the individual units instead of the cafeteria. There is not an "And Justice For All" poster on display in each unit. SA provides 3 posters for each unit and provides TA to the authorized representative.

**Org - Level Commendations**

<b>Description</b>
<p><b>AFTER SCHOOL CARE SNACK PROGRAM:</b> - The SFA has food production records and the snack count form available for all meals claimed during the review period and onsite review. - The snack count forms provided for the review period match the claim. - The snack count during the onsite review was reasonable when compared to the snack count during the review period. - The authorized representative conducts the snack onsite monitoring review twice a year. - The afterschool care snack program is provided in an area eligible site and has the documentation on file to prove eligibility. - The snack count is taken at the point of service.</p>
<p><b>CIVIL RIGHTS:</b> • Civil rights training was provided to all staff with school nutrition program responsibilities, including staff who complete the meal rosters. Approved documentation was on file. • The “And Justice For All” poster was on display in a public location. • The racial ethnic form was completed to show that no discrimination was made when awarding benefits to students with an income application. • No discrimination was observed while SA was on site. • The food service director works with the nurse and food service staff to ensure all students with special dietary needs receive the foods that they need.</p>
<p><b>FOOD SAFETY:</b> - Food temperatures are monitored and recorded on food production records. - Temperatures for all cooling equipment and the dishwasher are being monitored and recorded. - Food is stored properly and all freezers and refrigerator temperatures were within the appropriate range when SA was onsite. - The food service staff exhibits good food safety practices. - Food found in storage met the Buy American provision.</p>
<p><b>LOCAL WELLNESS POLICY AND COMPETITIVE FOODS:</b> The SFA has a wellness policy that includes elements for nutrition education and promotion and physical activity. - The SFA does not sell competitive foods.</p>
<p><b>MEAL COUNTING AND CLAIMING:</b> • The breakfast, lunch, and snack counts on the roster match the numbers on the claim. The determining official and claim preparer each count the checkmarks on the rosters to ensure they are claiming the correct number of meals. • All breakfast and lunch meals served to students during observation were reimbursable. • The breakfast, lunch and snack meal counts taken during the onsite review were reasonable compared to the review period. • The point of service line is organized and orderly to ensure all students with a reimbursable meal are counted and claimed accurately.</p>
<p><b>MEAL PATTERN REQUIREMENTS:</b> • The SFA offers a variety of entrees at lunch and breakfast and has a cycle menu for breakfast, lunch and snack. • Food production records are available for all meals claimed and are complete with the menu items served, including condiments and milk, total quantity prepared, serving sizes, planned number and actual number of servings provided. • At least two different, approved types of milk are made available for students. • The breakfast and lunch meals that were served during the onsite review provided all daily meal component requirements. • Water is available for students at both breakfast and lunch. • The breakfast menu served during the review period met the daily and weekly meal pattern requirements for milk, fruit and grains. • The lunch menu served during the review period met the daily and weekly meal pattern requirements for milk, meat/meat alternate, fruit, and the other, starchy, bean/legume, red/orange, and dark green vegetable subgroups. - The SFA has an exemption to offer all students the 9-12th grade meal pattern.</p>

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**PROFESSIONAL STANDARDS:** - The SFA has documentation available to show all employees with school nutrition program responsibilities have civil rights training this school year. - The food service director and all food service staff are ServSafe certified.

**RESOURCE MANAGEMENT & PROCUREMENT:** • The SFA utilizes their USDA food allotment efficiently as evidenced by the 2016-2017 school year usage of 146%. • The invoices available during the review period indicate all expenses were allowable. • The school nutrition account has less than 3 months of operating costs. • The SFA does not sell any nonprogram foods. • All records are kept for 3 years plus the current year. • The SFA distributes funds evenly throughout the community when conducting micro purchases.