

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**SOUTHEAST POLK COMM SCHOOL DIST (61010000)**  
**January 8 – 12, 2018**

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

**Site - Level Findings: Spring Creek Elementary School (0438)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The food production records and standardized recipes provided for the review period show that the daily vegetable requirement was not met on one day and the weekly bean/legume requirement was not met. The rock'n Caesar salad standardized recipe states that the 1/2 cup serving provided only 1/8 cup vegetable. When combined with the 1/2 cup broccoli served that day only 5/8 vegetable was offered when 3/4 cup is required. The baked bean recipe used at Spring Creek (other schools were using a different recipe) states that 1/2 cup provides 3/8 cup bean/legume vegetable when 1/2 cup of beans/legumes are required to be offered throughout the week. Technical assistance provided to the FSD on how the recipe serving sizes credit towards the meal pattern requirement and alternatives to meeting the meal pattern requirement.	Provide the Spring Creek food production record on the day in the cycle menu which the rock'n ceasar salad and baked beans are served to show the modifications to the serving sizes. If different recipes will be used or if the recipes have been modified, send a copy of the standardized recipe for the salad and baked beans.	

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1400 - Food Safety	V-1400	The FSD is in the process of updating the HACCP Plan and intends to finish it by the start of the 2018-2019 SY. The current HACCP Plan is missing many required Standard Operating Procedures (SOP) including (but not limited to) an SOP for cleanup of blood and bodily fluids, transportation of food, share table, and field trips.	Submit a revised table of contents for the SFA's revised HACCP Plan to show all SOPs that will be included.	

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		Iowa State University Extension and Outreach has a HACCP Plan website ( <a href="https://www.extension.iastate.edu/foodsafety/Standard-Operating-Procedures#facility">https://www.extension.iastate.edu/foodsafety/Standard-Operating-Procedures#facility</a> ) that contains sample SOPs that may be modified to fit the SFA's needs. TA provided.		
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**Site - Level Findings: Southeast Polk Junior High School (0209)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Site - Level Findings: Centennial Elementary School (0418)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	105 How long does the application's approval take from the date the SFA receives the application from the household?	Applications received are determined by the nutrition program secretary and then confirmed by the food service director. The original determining official, initials and dates the bottom of the application and the confirming official (food service director) signs on the determining official line. There were 2 applications reviewed that didn't contain a signature on the determining official line but the nutrition secretary's initials and date were on the applications. Technical assistance provided on the having the secretary sign on the determining official line and the food service director sign on the confirming official line. The FSD agrees to implement this practice and has updated the application in CNP to reflect the changes.
200 - Verification	205 a. Did the SFA complete verification?	The SFA conducted standard verification and 3% of the total number of applications was 11.13. SFAs must

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		round up and therefore 12 applications should have been selected when 11 applications were selected to verify. SA notified the SFA of this discrepancy and the food service director worked with the SA to correct this error prior to the on-site review.
700 - Resource Management		The school nutrition account has more than 3 months of operating costs. If an SFA has more than 3 months operating costs in the foodservice account, the SFA must have a plan on how they intend to spend down their balance and receive SA approval. The FSD is planning to request a waiver to avoid increasing paid student lunch prices for the 2018 -2019 school year. TA provided
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	The student handbook provides information on the National School Lunch and Breakfast Programs but does not include the Federal and Iowa non-discrimination statements. All program materials must contain the non-discrimination statements. The statement is available on the website. Technical assistance provided to the food service director who submitted the correct statements to the administrative assistant. The statements will be added to the handbook and go to the School Board for approval.
Resource Mgt Comprehensive Review	4 Did the SFA apply the indirect cost rate to the correct direct cost base?	SA has recently been given new guidance on indirect costs. When determining the amount that districts can charge the school food service account for indirect costs the unrestricted indirect cost rate must be applied to the food service labor costs, food service travel costs and food service supply costs (not including food). Technical assistance provided and the SA encourages the SFA to be aware of additional guidance to be provided by the IDOE.
Resource Mgt Comprehensive Review	6 Did the SFA:	The non-program revenue tool calculation for SY 2016-2017 included all non-program foods (adult meals, a la carte items, 2nd milk, 2nd entrees, and catering events) except for the PreK snacks and snacks purchased by adults through the Afterschool

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		<p>Care Snack Program. The non-program food revenue tool calculated for the 2016-2017 SY shows that the non-program food revenue, as a percentage of total food revenue, adequately covers the non-program food cost, as a percentage of total food cost. When charging those programs for the snacks, the food service director includes the cost of the food, utilities, time/labor needed to store, prepare and deliver the food. Technical assistance provided and the food service director agrees to include the preK snacks and adult afterschool care snacks when calculating the non-program revenue tool.</p>
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**Site - Level Technical Assistance Southeast Polk Junior High School (0209)**

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The meat/meat alternate crediting information provided on the standardized recipe for the macaroni and cheese and the chili (served at Spring Creek and Centennial) were not accurate when compared to the CN label information for the meat/meat alternate components used in the recipe. Despite the error, the serving size of both the chili and macaroni and cheese served still met the daily meat/meat alternate requirements for both entrée options. Technical assistance provided to the food service director on checking and modifying the crediting information on recipes.
1700 - Afterschool Snack	1706 Review production records for a minimum of 5 days from the review period.	The fruit served for the Afterschool Care Snack Program is listed as a whole apple which credits for 1 cup fruit and therefore meets the meal pattern requirement of 3/4 cup fruit. Whole, fresh oranges were also included on the day of observation and documented on the food production record during the review period. Fresh oranges credit as 1/2 cup fruit and therefore do not meet the requirements. The FSD removed the oranges prior to the students arriving for the snack and educated the staff on the required serving size and fruit option to be made available to

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		students for the Afterschool Care Snack Program. TA provided.
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**Site - Level Technical Assistance Centennial Elementary School (0418)**

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students?	There is signage that explains a reimbursable meal for the main entrée, but the alternate meal was not included on the signage. SA suggested including the alternate meal so that students would know what components are a part of the alternate meal.

**Site - Level Technical Assistance Spring Creek Elementary School (0438)**

Area	Question	Comments
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?	One student had a medical statement with the medical professional ordering Almond milk in place of cow's milk. Other students who are unable to consume cow's milk also wanted the Almond milk and staff were allowing them to have the Almond milk. TA provided with the Head Cook that unless Almond milk is ordered by the medical professional to be substituted for cow's milk the milk substitute used must be nutritionally equivalent to cow's milk. The Food Service Director stated that the staff was supposed to be using Kikkoman Pearl which is nutritionally equivalent to cow's milk.

**Org - Level Commendations**

Description
AFTERSCHOOL CARE SNACK PROGRAM: • The 2 components offered during the observed snack and the menu documented on the food production records reviewed show that the snack requirements were met during the day of review and the review period. • The SFA conducted on-site monitoring of all sites that provide the afterschool care snack program. • The “And Justice For All” poster is on display where snacks are served. • The snack count was taken at the point of service and is reasonable when compared to the review period count. Rosters are on file for snacks claimed during the review period and the snacks counted match the claim. • The program is in a non-area eligible site and the SFA claims students based on their free, reduced

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price or paid eligibility status.

**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 twice monthly and kept on file. Benefits are extended to all members of the household. • 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.

**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 food service staff work 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. An approved milk alternate is made available for students with a dairy intolerance, schools are peanut aware and the SFA has a gluten free menu available. • 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 observed cafeterias. • The racial ethnic form was completed and shows no discrimination was made when processing income applications. • The SFA follows the USDA’s complaint procedure as needed.

**COMPETITIVE FOODS:** • Nutrition calculator printouts are on file for all a la carte foods and beverages and vending machine items sold. All competitive foods sold during the on-site review meet the Smart Snack requirements. • Administration at each site is informed of the Smart Snack regulations to ensure that fundraisers that take place during the school day are Smart Snack approved.

**FOOD SAFETY:-** The temperatures for hot foods are monitored and recorded on the food production records at all sites. - Temperatures are monitored and recorded for the refrigerators, freezers, milk coolers and dishwasher at all reviewed sites. - The food safety inspection report is on display in a public location at all sites. - The food service director emailed the health inspector requesting a 2nd inspection at all sites. - The SFA’s HACCP plan is available at all reviewed sites. - The food service director, head cooks at each site and many food service staff are ServSafe certified. - Good food safety practices were observed at all reviewed sites. - The kitchen and storage areas are orderly and clean, food was stored properly and opened food products were labeled and dated at all 3 of the reviewed sites.

**MEAL COUNTING AND CLAIMING:** • The point of service line at all observed sites for breakfast and lunch is organized and orderly which allows staff to ensure all students receive a reimbursable meal. • All students at the reviewed sites had a reimbursable meal at the breakfast and lunch meals and the observed snack. • The edit check reports from all sites matched the claim. • The day of review meal counts were reasonable with the review period counts. - Cashiers and food service staff at all sites are trained and aware of what constitutes a reimbursable meal with offer versus serve meal service.

**MEAL PATTERN AND NUTRITION QUALITY:** • A daily salad bar and 2 hot vegetables provide a variety of vegetable options to students at the Junior High School and the menu at all 3 of the reviewed sites offer a variety of vegetables, fruits and entrees. - All menu components were available at the beginning and throughout the entire meal service at all sites. • The cafeteria has many posters encouraging healthy foods and activity. • 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 at Centennial and the Junior High met the daily and weekly meal pattern requirements for all menu components including all of the vegetable subgroups. The lunch menu at Spring Creek 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 at all sites during the review period. • Condiment portions are limited to control calories and sodium. • The SFA purchases many low or reduced fat, low sodium products. • The SFA offers 4 different and approved types of milk to

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students at all sites. • The food service director completed the menu certification worksheets. • Foods found in storage at all reviewed sites met the Buy American provision. • Free, potable water is available at all sites during the breakfast and lunch meal times.

**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 50% of the breakfast sites, as required.

**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 deliveries match what was ordered and that prices match what was written on the bid. The food service director has developed a buying guide with the primary vendor so that staff only order approved products that have been included 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 procurement plan that includes a signature page, debarment certification statement, code of conduct and purchasing methods that will be used based on local purchasing thresholds.

**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. - Substitute employees received civil rights training and training applicable to their job responsibilities. - Non-food service employees received civil rights training and training based on the school nutrition program responsibilities. - The SFA hired a new FSD on or before 07/01/2015 and she met the hiring standards.

**RESOURCE MANAGEMENT:** - The non-program food revenue adequately covers the cost of the non-program foods. - The SFA charges the correct paid student lunch price according to the required PLE tool and the correct adult lunch price. - The SFA recently created a negative balance policy to address negative student lunch accounts and notified families through email and through a mailed letter while SA was on-site. Going forward, the SFA will provide families who enroll a copy of the policy upon their registration. - Expenses made during the review period were allowable. - Revenues received went directly into the school food service line item account and there are checks and balances to ensure the process is followed. - Records for all sites are kept for 3 years plus the current year.

**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, social media and school announcements. The SFA also reminds families of school breakfast through the promotion and celebration of National School Breakfast Week.

**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 and assessment are made available to members of the public as they are both posted on the district's website. The district has a wellness tab on their website, 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, community newsletter and social media sites. - The SFA participated in the Meet the Challenge RDN Wellness Coach project during the 2016 – 2017 school year. - The SFA has a detailed school wellness action plan that details the goals that are currently being implemented or will be implemented.

**SPECIAL MILK PROGRAM:**• The Special Milk Program daily milk count records match the claim for reimbursement for the review period. • The counting procedures are done at the point of service, with a roster, to ensure an accurate count is taken. • Milk is stored in a milk cooler until consumed. The milk cooler temperatures are monitored and recorded to ensure milk is stored safely.

**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

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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.