

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Albia Comm School District (00810000)**  
**November 5-7, 2019**

**Program Year:** 2020  
**Month of Review:** October  
**Lead Reviewer:** Shea Cook  
**Org Representative(s):** Christine Wyatt

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Two students were identified as directly certified but no documentation exists to verify that status.	Notify family of reduction in benefits and attach a copy of the notification letter.	
800 - Civil Rights	V-0800	The USDA racial ethnic data form has not been completed for the current school year.	Complete and attach the USDA Racial Ethnic data form. The form should be completed annually and kept on file with free and reduced applications.	
1200 - Professional Standards	V-1200	SFAs must have a system to track professional standards training. Training logs should include: employee name, position (full or part time), title of training, topic area of training, date training was completed, and creditable training hours.	For your response, complete and submit tracking tool that reflects the required information and the hours completed for all staff for the current school year thus far.	
1200 - Professional Standards	V-1200	Employees outside of nutrition program with responsibilities within the program must complete yearly civil rights training at minimum. The one employee identified as having duties within the program is not listed as having participated in civil rights training.	For your response, employee should complete the civil rights training and sign in sheet showing training was completed should be attached.	
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.	

**Site - Level Findings: Grant Center (0409)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
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400 - Meal Components and Quantities - Breakfast	V-0400	There was no signage available on site to identify the components of a reimbursable meal for breakfast or lunch.	For your response obtain correct signage, indicate where it will be posted in your cafeteria, and identify who will be responsible for updating the signage daily.	
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**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	One household application listed "baby" as a household member. Unborn children are not considered a member of the household. Application should have been corrected and family should have been instructed to complete updated application once the child was born and could be counted as a member of the household. Baby was born before the start of the school year, approximately one week after the application was submitted, so the error did not result in a benefits error and no CA was required. Application of file was updated with name/dob of child so the household number could be verified.
200 - Verification	208 When a confirmation review was conducted:	Although not complete yet for SY20, applications selected for verification do indicate that a confirmation review was conducted. However, applications selected for verification in SY19 did not have a signature indicating a confirmation review was conducted. SA reminded SFA to make sure confirming official signs applications to verify review was completed.
600 - Dietary Specifications and Nutrition Analysis		Food production records and product formulation statements indicate that grains for 9-12 students were short on 10/18/19. Product formulation statement for the muffin offered indicate it is a one ounce grain equivalent. 9-12 students must be offered 2 oz. of grain per day to meet the minimum. SA recommends SFA offer a larger muffin or additional grains for 9-12 students. The error was not at the targeted site, so no CA is required.
700 - Resource Management		<p>Technical Assistance for Procurement was given in the following areas:</p> <p>MICRO PURCHASE: One micro purchase was identified as an unallowable direct cost. RevTrak fees are not an allowable direct cost and cannot be paid for out of nutrition funds. • Ecolab was identified as a micro purchase on the off-site review tool, but it cannot be a micro purchase if money was not spent with other vendors. • Two software purchases were identified as micro purchases and should have been identified as sole source purchases.</p> <p>SMALL PURCHASE: • When utilizing the small purchase method SFA is sending letters requesting bids. This language is incorrect and suggest a formal contract. SFA should change the language on small purchase pricing requests to "Request for Pricing" to accurately reflect the type of purchase method being used. • Guidance was given on writing more specific product specifications in price request documents, including but not limited to size, nutritional information, delivery expectations, packaging, etc. • SFA was advised that vendors should be given a minimum of 4</p>

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		<p>weeks to respond to a request for pricing. SA encouraged SFA to exercise best practice of at least 6 weeks response time. • A number of required statements were absent from the price request documents including Buy American, debarment statement, termination for cause and convenience, equal opportunity, small business, etc. SFA was advised to use Small Purchase Three Bids and a Buy document to help identify which statements are required, as determined by the value of the procurement event. • SFA should include estimated annual usage in request for pricing in order to get best pricing. • Two vendors, one for produce and one for beverages, were identified as small purchases on the off-site procurement review tool that were not small purchases as there was no price comparisons with other vendors. • Two vendors, one for milk and one for bread, were identified as formal procurements on the off-site procurement review tool, however both events were procured as small purchases.</p> <p>FORMAL PURCHASE: Formal bid documents were not publically advertised as required by regulation. • Per Procurement in the 21st Century, allow vendors 6-12 weeks from the time solicitation is issued. The district allowed four (4) weeks. • SFA did not include estimated annual usage in bid request documents. • A number of required federal terms and conditions were not included in the contract. • Bid documents did not include protest procedures. • Language on the document indicates it is an Invitation for Bid (IFB) which is a firm, fixed price award but in the language of the contract in Specific Delivery Needs it states, "Any delivery minimum, rebate, or fee schedule must be identified in the bid response." Under Specification Spreadsheet Instructions, there is a column for vendor to complete allowances and rebates. Under General Terms, Conditions, and Instructions the SFA states pricing should be firm for 2019-2020. Language contradicts IFB and may indicate that it is a Request for Proposal (RFP). • Specifications should allow for an equal product unless there is justification for a brand product. • There is a statement in the Specification Spreadsheet Instructions about justification for a particular brand product due to student taste testing, sales records show decline in purchases, specific recipe needs. Is this provision being followed? • There is no statement in the solicitation asking or requiring vendors to hold prices firm for or ask vendor to provide documentation to justify sharp increase in prices. • No local terms included such as district's no smoking policy, etc. are included in the contract language. • Contract language does not include an option for renewal. • There is no statement on audits by SFA to verify distributor prices.</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?	The link for the USDA complaint process/form which should be used if parents wish to file a complaint about any child nutrition program is: <a href="http://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer">www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer</a> .
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	Make sure to complete on site monitoring for all buildings by Feb. 1 deadline. As of date of review on site monitoring has only been completed for one location.

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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 triennial building progress report should be available to the public. SA recommends posting on the district website. The progress report is scheduled to be updated by the end of SY20. It is the expectation that after the updated assessment is completed it will be posted on the district website. Additionally, documentation of wellness committee members, meeting announcements, invitations, etc. should be kept on file to demonstrate that involvement was permitted by all stakeholders including parents, physical education teachers, administrators, students, school nurse, general public, food service director, and school board member,
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	SFA does have a HACCP plan with all of the required elements, but plan could use updating. SFA should review plan and date when individual SOPs are updated. SA encourages SFA to enlist staff in helping to review individual SOPs to make sure that they are site specific and reflect what is done in each individual kitchen.
RMCR - Nonprofit School Food Srvc Acct	1 Were the SFA's year-end expenses greater than its year-end revenues, requiring a general fund transfer to cover the balance?	SA shared resources on financial management with FSD and CFO. Additionally SA discussed strategies on marketing, menus, etc. for increasing participation to raise revenue.
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 encouraged SFA to evaluate negative balance policy to make sure that policy reflects practice. Current policy includes using a school flexibility account to cover unpaid meal charges, but school does not have a flexibility account it uses for this purpose.

**Site - Level Technical Assistance Grant Center (0409)**

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	318 At the selected school(s), does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	At this site the exchange at the POS for meal service varies by age of the student. While the majority or older students punch a unique PIN into a keypad, the younger students make an exchange by saying their name. On observation some of the youngest students would walk by without saying anything. The POS operator knows all of the students and would say their name to them and sometimes they would acknowledge her and sometimes they would not. SFA indicated that the long term goal is to have all students punch in a PIN at the POS in exchange for their meal. SA encouraged FSD to remind POS operators that there must be an exchange at POS for all students and encouraged site to implement PIN requirement for all students.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	SA and SFA had a conversation about OVS vs Serve Only at this site. SFA is interested in serve only, but the young population and the setup of the cafeteria make it challenging. SA suggested some possible ways to implement OVS including pre-plating a variety of trays with different options that students could choose from.
1100 - Smart Snacks in School	1106. Does the school hold fundraisers during the school day where students may purchase food or beverages?	One school group continues to sell candy bars during the school day for a fundraiser. This is not allowable as it violates wellness regulation and the district's own wellness policy. There are no exempt fundraisers in Iowa. All items sold and consumed during the school day must be Smart Snack compliant.
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?	Although the reviewed site did not store agricultural products because it was a satellite kitchen, SA discusses keeping a Buy American log at production kitchen.

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**Org - Level Commendations**

Description
<b>CERTIFICATION AND BENEFIT ISSUANCE:</b> 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.
<b>CIVIL RIGHTS:</b> The correct public release was sent to a local media outlet and published. • The SFA works 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. • All nutrition received civil rights training and documentation is on file. • The "And Justice For All" poster is on display in the cafeteria.
<b>COMPETITIVE FOODS:</b> 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.
<b>FOOD SAFETY:</b> The temperatures for hot foods are monitored and recorded. • Temperatures are monitored and recorded for the refrigerators, freezers and milk coolers. • The food safety inspection report is on display in a public location. • The food service director emailed the health inspector requesting 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.
<b>MEAL COUNTING AND CLAIMING:</b> All students at the selected site had a reimbursable meal at the breakfast and lunch meals observed. • The edit check reports matched the claim. • The day of review meal counts were reasonable with the review period counts.
<b>MEAL PATTERN AND NUTRITION QUALITY:</b> 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 at the reviewed site. • Food production records, CN labels, and standardized recipes were on file for all meals served during the review period. • Condiments are proportioned and limited to control calories and sodium. • 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. • Foods found in storage met the Buy American provision. • Free, potable water is available for students during their meal times.
<b>ON-SITE MONITORING:</b> • On-site monitoring were completed for all sites in the district for lunch in SY19. • On-site monitoring forms have been completed for 50% of the breakfast sites in SY19.
<b>PROCUREMENT:</b> 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 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.
<b>PROFESSIONAL STANDARDS:</b> Civil rights training was provided to all nutrition staff. • Documentation is on file for all training received.
<b>RESOURCE MANAGEMENT:</b> The SFA charges the correct paid student lunch price according to the required PLE tool 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.
<b>SCHOOL BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM OUTREACH:</b> Families are informed of the school breakfast program and the Summer Food Service Program through the district's website and other district communication.
<b>SCHOOL WELLNESS POLICY:</b> 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 as it is posted on the district's website.
<b>SPECIAL MILK PROGRAM:</b> 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.
<b>VERIFICATION:</b> 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.

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**Site - Level Commendations Grant Center (0409)**

Description
Civil Rights: The And Justice for All civil rights poster was posted in the serving line. • No discrimination was observed.
Food Safety: 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. • Good food safety procedures were observed. Opened food products were labeled and dated. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Many staff members are ServSafe certified.
Meal Components and Quantities: 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. • Three types of milk are offered. • Students had sufficient of time to eat after receiving meals.
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 or tell the cashier their name. • Meal counts during the on-site review were reasonable when compared to the review month counts. • Meal count totals for the month of October were accurate and complete. • Point of Service counts and filed claims appear accurate. • 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.
Water: Free potable water is available to all students for lunch.