

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Oelwein Comm School District (48690000)**  
**Date of Review: December 4<sup>th</sup> – 8<sup>th</sup>, 2017**

**Program Year:** 2018  
**Month of Review:** November  
**Lead Reviewer:** Donna Matlock  
**Org Representative(s):** Hallie Roth

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	2 household applications for verification were not correctly approved: one family should be reduced and the second family should be paid.	Submit copies of letters notifying households of an increase or decrease in benefits. Completed onsite during visit, no further action required. SFA corrected FNS-742 verification report to mirror corrections 12/5/17.	The IT feel it was more than likely me who did not click save after entering the data. They did say that there is a flag that pops up when you do not save and you try to leave that screen so what they think happened is that I entered the data got called away from my computer before saving and then the session timed out and it closed without me seeing a reminder flag or being able to save. I will definitely be more diligent about this in the future.

**Site - Level Findings: Oelwein Middle School (0209)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		<p>1).The AEA Purchasing and School Food Authority (SFA) signed agreement for SY 2017-2018 is for prime vendor and small wares only. The agreement does not include ware washing. The SFA is purchasing ware washing supplies through the prime vendor without conducting a competitive procurement. After attending regional procurement training, the food service director understood she would have to competitively procure ware washing supplies. For current School Year (SY), the food service director will contact AEA Purchasing to amend the written agreement to add ware washing.</p> <p>2). Technical assistance provided to track rebates by each vendor and vendor totals for entire year on an Excel spreadsheet. This is to ensure that all rebates accrue to the district child nutrition funds.</p> <p>3). The bread and milk price quotations did not include a list of federally</p>

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		<p>required terms and conditions such as targeted small business, Buy American provision, termination of cause and convenience, Equal Employment Opportunity, Debarment statement.</p> <p>4). When calculating a bottom-line price, the price for each item specified and estimated annual usage of each should be multiplied to get the extended cost. The sum of all extended costs is the bottom line pricing. The contract must be awarded to the vendor with the lowest overall price. There must be documented justification if contract is not awarded to vendor with lowest overall price.</p> <p>5). Three different types of pizza are ordered once a week from NPC International (Pizza Hut, Inc.). No competitive procurement was conducted. The food service director is new and just completed her first year in the position. A competitive procurement must be completed either using a small purchase or formal procurement method. The solicitation should be sent to at least two franchise vendors. The town has a Pizza Ranch. A review of NPC International invoices suggest price of pizza is reasonable.</p> <p>6). Technical assistance was provided that certain expenses such as equipment repair, online payments to school lunch accounts, pest control will now be an indirect cost. The district business manager is aware of the updated Department of Education guidance.</p>
700 - Resource Management	711 Were indirect costs charged to the SFA's nonprofit school food service account?	SA (State Agency) finance department is in process of finalizing indirect costs for SFA to implement for nutrition fund.
1000 - Local School Wellness Policy	1005 Provide a copy of the most recent assessment on the implementation of the local school wellness policy.	<p>SA provided LEA with the School Wellness Folder including the School Building Progress Report form. Provided TA on assessment requirements if the assessment has taken place over 3 years ago.</p> <p>SFA submitted a copy of the "Does Your Wellness Policy Measure Up?" as the assessment of goals. This only provides details to ensure the Local Wellness Policy (LWP) captures all the requirements issued by USDA.</p>
Resource Mgt. Comprehensive Review	5 If so, what process did the SFA use to calculate its compliance with the revenue from non-program food requirements in 7 CFR 210.14(f)?	SA shared USDA Non-program Revenue tool and discussed averaging meal prices and price increases for non-program food items (a la carte, 2nd meals, adult meals).
Resource Mgt. Comprehensive Review	6 Did the SFA:	<p>a. Included all of its non-program revenues and costs in its calculation? No</p> <p>FSD is new in position so non-program food costs and revenue process were discussed.</p>

**Site - Level Technical Assistance Oelwein Middle School (0209)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	Discussed with FSD about grain and meat/meat alternate contributions for breakfast menu. As long as 1 oz. minimum grain is offered, meat/meat alternate can count towards the grain component to help meet the weekly grain averages.

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400 - Meal Components and Quantities - Lunch	406 If school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	SA discussed with SFA about having FPR's (Food Production Records) started before the first meal service of the day. This allows staff to review and know quantities and portion size requirements per meal. Head cook completes her own cheat sheet for prepping meals.
600 - Dietary Specifications and Nutrient Analysis	603 Were any areas identified during the Off-site review requiring technical assistance or corrective action prior to the beginning of the On-site portion of the review? If so, explain.	New FSD was unsure of how to complete the 6 Cent Certification Worksheets. SA assisted FSD in completing worksheets during onsite visit and uploaded revised documents to Review Attachments for SFA.
1400 - Food Safety	1407 Were on-site (or Off-site, if observed) storage violations observed? If YES, explain.	SA (State Agency) observed sealed packages of ground beef thawing in refrigerator on upper shelves above fresh produce. Discussed with Head Cook about food safety that all meat needs to be on bottom shelves of refrigerator to prevent leakage to other food products.

**Org - Level Commendations**

Description
<ul style="list-style-type: none"> <li>• Benefit documents, as well as all paperwork, were very well organized. • The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. • The correct and current benefit issuance list was available. • All applications were correctly determined, signed and dated by the household member and the SFA, were complete with SSN's and case numbers, and all applications were determined within ten days. • Income was only converted to annual when there was more than one frequency of income. • Rollover 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. • Waivers are provided to applicants and indicate specific fees. • Eligibility is kept confidential. • The SFA has a back-up system for benefit issuance documents and system.</li> </ul>
<ul style="list-style-type: none"> <li>• School Breakfast Program (SBP) outreach was sent out at the beginning of the year to inform families of the availability of the program. • Reminders of the SBP were also sent out throughout the school year. • Outreach included announcements, newsletters, the school website, posters, etc. • Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer. • The information was shared via websites, lunch menus, newsletters, phone calls, flyers, etc.</li> </ul>
<ul style="list-style-type: none"> <li>• The "And Justice for All" civil rights poster was posted in the 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 food service staff and documented. • A copy of the district's public release was on file, documenting that it was submitted to local media. • 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 form is completed. • No discrimination was observed. • SFA on-site monitoring was completed to ensure that all schools are meeting program requirements. • The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and at least 50% were completed for breakfast prior to February 1st. • The correct state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school's website.</li> </ul>
<ul style="list-style-type: none"> <li>• The correct number of applications were verified and were correctly selected from error prone applications. • All income sources were verified with at least one month's income, and the process was completed on time. • The application(s) selected for verification were confirmed prior to verification. • The SFA had at least one person attend training. • The verification report was completed accurately and on time.</li> </ul>
<ul style="list-style-type: none"> <li>• The district has a current wellness policy on file. • The SFA's wellness policy was reviewed and revised on 9/7/2017. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. • The wellness policy are available to the public via district website. • Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.</li> </ul>
<ul style="list-style-type: none"> <li>• The Resource Management section of the Off-Site Assessment tool was completed on time. • Financial records that were reviewed, indicated appropriate and allowable expenditures. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. • The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. • The Paid Lunch Equity (PLE) tool was completed and prices were increased as required. • Money is not transferred out of the account to support other programs. • The SFA effectively utilizes its USDA entitlement for commodities. • Reports are filed on time, and all records are maintained for at least three years plus the current year. • The SFA developed and approved a meal charge policy on June 19, 2017. The policy was mailed (emailed) to all households and staff were informed of the policy. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.</li> </ul>
<ul style="list-style-type: none"> <li>• The staff training agendas covered many important topics and shows a commitment to ensure food program compliance. • The newly hired Food Service Director meets the hiring standards. All nutrition staff have obtained the required training for SY 2017-2018.</li> </ul>

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**PROCUREMENT:** The Food Service Director attended the Regional Procurement Training in Waterloo. The district Purchasing Policy was revised to increase the small purchase threshold for Child Nutrition Programs. There is a written procurement plan and code of conduct. The local policy for disciplinary actions for violations of the code has been identified on the written code of conduct. When using the micro-purchase method, each transaction with the vendor was below the local micro-purchase threshold of \$3,500. The purchase prices were reasonable. The invoices from vendors were well-organized. The invoices had a date, vendor name and address, items purchased were clearly identifiable. The district used the small purchase method and obtained price quotations for milk and bread. Three vendors were contacted for milk price quotations. The milk price quotation included specifications for milk items, annual estimation of each type of milk to be purchased, the request for two deliveries (day to be mutually agreed upon between school and awarded contractor). Bread product price quotations was solicited from two vendors. Each procurement was in compliance with the requirements for the local small purchase threshold of less than \$150,000. The district has a signed agreement with a Group Purchasing Organization for prime vendor to supply food and non-food supplies. A review of milk, bread, and prime vendor invoices validated the district was receiving the products as bid and prices were charged as bid. The school utilized 94 percent of their Planned Assistance Level (PAL).

**Site - Level Commendations Oelwein Middle School (0209)**

Description
<ul style="list-style-type: none"> <li>• All meal components were available at the beginning of meal service on the days of observation and throughout meal service. • All meals observed met at least the minimum daily requirements. • Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption. The SFA provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal. • Free potable water is available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)? • Offer vs. Serve (OVS) was being implemented properly. All students observed selected ½ cup of fruit and/or vegetable. Students have the option to decline any one or two of the five components. • At least two types of milk are offered. • Many low fat and low sodium food items were observed in storage. • Students had sufficient amount of time to eat after receiving meals. • Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch. A monthly menu is also posted. • Food service staff was polite and respectful to students, other staff, and each other. • Nutrient analysis was not required.</li> </ul>
<ul style="list-style-type: none"> <li>• Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of November were accurate and complete. • Point of Service (POS) 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. • Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. • Cashiers are trained, and daily edit checks are performed. • All students selected a reimbursable meal without having a prompt to select a ½ cup of fruit or vegetable as one of the three required components.</li> </ul>
<ul style="list-style-type: none"> <li>• Students may purchase a second entrée and/or a second milk at lunch. Second entrees are correctly documented on production records. • Beverages sold meet the standards for the various age groups of students. Students are able to purchase foods via a la carte sales. • The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte. • All foods sold meet the Smart Snack standards for nutrition content. Exempt leftover NSLP entrees are only sold the same day, or the day after, they are initially offered.</li> </ul>
<ul style="list-style-type: none"> <li>• The district has good breakfast participation. [reason] • Grab and Go breakfast is provided which increases participation. • Signage was posted explaining what constitutes a reimbursable meal. A monthly breakfast menu is also posted. • Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one of four items offered at breakfast.</li> </ul>
<ul style="list-style-type: none"> <li>• The Food Service Director completed the USDA menu worksheets for the week of Dec 4th-8th for breakfast and lunch at the Middle School. The worksheets showed that all components and portion sizes met the meal pattern. • The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Middle School school is at Low risk for (non)compliance with Dietary Specifications regulatory requirements. • Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, controlling the portion sizes of condiments, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats.</li> </ul>
<ul style="list-style-type: none"> <li>• The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. • 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, dishwasher, and thermometer calibration. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Good food safety procedures were observed. • FSD is very organized and training is done annually on SOP's.</li> </ul>