

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Starmont Comm School District (61750000)
Date of Review: December 11th – 13th, 2017

Program Year: 2018
Month of Review: November
Lead Reviewer: Donna Matlock
Org Representative(s): Marsha Thomas

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	11 household applications were not correctly approved: 4 applications were missing the 4 digit social security number; 7 applications were based on missed income or incorrectly determined free, reduced, or paid.	Determining Official will participate in the State Agency's "Application Approval and Direct Certification" webinar this 2018 fall which will include new memos and information on "Other Free & Reduced" listed on direct certification lists. State your intentions to do this.	
200 - Verification	V-0200	Q212aF: The SFA did not make updates to the eligibility status on the benefit issuance list when a student's eligibility changed due to verification. Q212bF: Benefits were not decreased no later than 10 operating days from the final verification decision.	Q212aC: Identify who will be responsible for making updates to the eligibility status on the benefit issuance list when a student's eligibility changes due to verification. Q212bC: Identify who will be responsible for decreasing benefits no later than 10 operating days when verification results in a benefit decrease.	
700 - Resource Management (2018)	V-0700	The school districts "Negative Account Balance" policy needs to state "Students who qualify for free meals shall never be denied a reimbursable meal."	Provide the SA (State Agency) with a plan to include statement in board policy code #710.4.	
900 - SFA On Site Monitoring	V-0900	Q900F: The SFA does not ensure that all schools are meeting program requirements for meal counting and claiming through use of on-site monitoring. <i>FSD provided previous years completed "Onsite Monitoring" form. It was not completed by Feb. 1st as required by USDA regulations.</i>	Q900C: Describe how you will ensure that all schools are meeting program requirements for meal counting and claiming. Please conduct and provide the SA (State Agency) with a copy of the "Onsite Monitoring" form for current school year 2017-2018.	
1100 - Smart Snacks	V-1100	SFA has a "coffee shop" operated by the National Honor Society where beverages and food items do not meet the "Smart Snacks Standards" established by the Healthy Kids Act. Items include: salted caramel hot cocoa; regular hot cocoa, various flavored coffee pods, coffee sweeteners, blueberry muffins, and Otis Spunkmeyer banana nut muffins/cookies. All	Describe in a plan who will be responsible running all products through the product calculator and ensuring all food and beverages will meet the Smart Snacks Standards.	

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		items exceed calories and sugar requirements, or food is not whole grain or fruit based as first ingredient.		
Resource Mgt. Comprehensive Review	V-RMCRF	SFA charged the nutrition fund, \$450, for a "water cooler installation" in November. Equipment repairs now need to be paid out of the general fund and recouped by using indirect costs. You may wish to contact either the Finance Department at the Department of Ed. There have been articles in the "School Business Alert" June and Nov. 2017 regarding this that you can reference.	Describe in a plan how the district will ensure only allowable costs/expenses will be charged to the nutrition fund. Establish or include in "Purchase Policy" identifying allowable costs.	

Site - Level Findings: Starmont High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	FSD uploaded a <i>blank</i> "Breakfast Certification Worksheet".	Please complete breakfast certification worksheet and submit with FPR's to SA (State Agency). <i>Menu for review period met the meal pattern.</i>	
1100 - Smart Snacks in School	V-1100	Competitive foods and beverages sold to students during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) did not meet Smart Snack guidelines. SA observed the sale of beverages and food at the "Coffee Café". SA ran items through the Smart Snack calculator at "Alliance for a Healthier Generation" website, coffee pods and muffin nutrient information, which all were non-compliant by exceeding calories, and muffins are not whole grain rich.	Please describe in a plan how you will ensure all beverages/food items sold via vending machines and coffee shops, sold during school hours, will meet Smart Snacks standards. All items need to be checked using the "Product Calculator" at the website "Alliance for a Healthier Generation" website: https://foodplanner.healthiergeneration.org/ .	
1100 - Smart Snacks in School	V-1100	Fundraisers (monster cookies) conducted during the school day failed to meet Smart Snacks guidelines.	Please describe in a plan how you will ensure all beverages/food items sold via fundraisers, sold during school hours, will meet Smart Snacks standards. All items need to be checked using the "Product Calculator" at the website "Alliance for a Healthier Generation" website: https://foodplanner.healthiergeneration.org/	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	103 At the beginning of the school year, how is benefit status handled for children who have not submitted an application for the current school year?	Carry over is set up to end on the 1st day of October. Regulation require carry over to be based on 30 operating days.

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100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	Q 124 ta: Technical assistance was provided for completing "Step 4, Authorized Personnel Only, section - number of household members, income conversions used for determination and benefit status."
100 - Certification and Benefit Issuance	127 Are the correct income eligibility guidelines used to certify applications? If NO, explain.	Q 125 ta: Technical assistance for correctly approving applications was provided.
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency? If NO, explain.	Q 128 ta: Income is only converted to annual income when income is reported on the application in more than one frequency. SFA was using ICAVES annual income tab for all applications. At times SFA rounded up or down when cents were listed on applications and at times missed additional income listed.
100 - Certification and Benefit Issuance	134 Does the SFA perform Direct Certification matches according to the required timeframes? If NO, how often are matches conducted?	Q 132-135 ta: Technical assistance was provided on direct certification: correct certification, documentation, and timelines. SFA uses "Meal Tracker" for meal counts and benefit issuance list but need to enter in "beginning and ending" date columns to indicate when direct certification benefits became effective as well as for application approval date based on income.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable):	SA observed a student paying with cash for the main entrée. Discussed with cashier the meal cannot be denied when using cash, even though student has a negative account balance as well as cash cannot go towards account balance unless it is requested by student/parent.
700 - Resource Management		PROCUREMENT: <ol style="list-style-type: none"> 1. The district is using the state-prototype Code of Conduct policy. The local policy for disciplinary actions for violations of the code was not identified on the written code of conduct. TA provided to enter policy #404.3 and title in the blank line on the state-prototype. 2. Technical assistance provided on determining the local purchase threshold. The school food service purchase threshold for each procurement method was corrected. 3. The school district must use a formal method of procurement either Invitation for Bid (IFB) or Request for Proposal (RFP) when procuring milk and dairy products. Based on last year's records, the annual amount spent for milk and dairy products exceeds the district's local small purchase threshold of \$20,000. 4. If the school district would prefer to continue using the small purchase (3 Bids and a Buy) method for procuring milk, the superintendent and the school board should consider raising the local small purchase threshold. 5. A public notification in a major circulating newspaper in the school district's service area is required when using either formal methods of procurement - Invitation for Bid (IFB) or Request for Proposal (RFP). A copy of the printed advertisement must be retained with the procurement documentation. 6. Required federal terms and conditions must be included when procurement is conducted using small purchase and formal

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		<p>methods of procurement. Please refer to the state-prototype templates posted on IA_CNP.</p> <ol style="list-style-type: none"> 7. When using the micro-purchase method, purchases must be equitably distributed among vendors to "spread the wealth." 8. 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. 9. It is best practice to include the school calendar when requesting pricing from vendors to ensure deliveries are not made during holidays, snow days, etc. 10. In the milk solicitation, other things to consider when requesting price from vendors are: 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. 11. 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. 12. On reviewing invoices from the Prime Vendor, there were two items found that were not on the bid, two other items had an invoice price that did not match the price on the original bid response or the monthly price list. The food service director should spot check invoices 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. 13. 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. 14. The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification at equal or lesser price.
700 - Resource Management	710 Did the SFA sell non-program foods including, but not limited to, a la carte foods (e.g., milk; 2nd entrees; Smart Snacks), catering (e.g., foods/beverages for school board meetings; foods for outside entities & programs), and/or adult meals (e.g., meals for teachers, parents, etc.)?	Discussed with FSD on USDA Non-Program Revenue Calculator. Completed tool and discussed options in increasing prices to recoup non-program food costs.
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (e.g., cafeteria staff, determining officials) and their supervisors?	Cooks also require civil rights training. All persons who interact with students during meal service require civil rights training.

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800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	SA shared the "Ethnicity Racial Form" required to track data from eligibility applications. The document is located in "Download Forms" of IowaCNP. It must be completed annually and best practice is to update as new eligibility applications are received during the school year, then filed with eligibility applications.
1000 - Local School Wellness Policy	1000 Provide a copy or appropriate web address of the current Local School Wellness Policy.	Recommended SFA remove "USDA School Meals Initiative (SMI)" as this is no longer used for Administrative Reviews. Need to revised section C. Beverages, #1 (page 2) of "Wellness Regulation" from 50% fruit juice to 100% fruit juice. Also, include on page 3 of "Wellness Regulation" section "Other Food Available at School" - A. Verbiage addressing school day/hours "midnight from night before to 30 minutes after school is finished (last bell). SFA needs to incorporate the "Coffee Café" to meet the Wellness Policy Regulation on page 3 (A. #3) and page 5 (A. #2) to operate during school hours.
1000 - Local School Wellness Policy	1005 Provide a copy of the most recent assessment on the implementation of the local school wellness policy.	SA provided LEA with the School Wellness Folder including the School Building Progress Report form. Provided TA on assessment requirements and if the assessment has taken place the past 3 years.
1400 - Food Safety		SA recommended SFA stamp date cold/refrigerated foods to ensure food safety standards.
Resource Mgt. Comprehensive Review	5 How does the SFA ensure that only allowable costs are charged to the nonprofit school food service account (e.g. staff training, the implementation of checks and balances/internal controls, etc.)?	Rev Trak fees were being charged only to the nutrition fund in November 2017. SFA now breaks down expense, the software company provides the percentages of each department using this service and each account is charged accordingly.
Resource Mgt. Comprehensive Review	7 Did the SFA correctly calculate its non-program food ratio and its food cost ratio?	SFA is only recouping 10% revenue from 18% food costs. Discussed increasing prices on non-program foods sold to recover funds for food costs.

Site - Level Technical Assistance Starmont High School (0109)

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? If SFA/school is offering 1% flavored milk, check that approved waiver from State Agency is on file.	SA observed some students during lunch choose 8 oz. juice for their beverage instead of a milk. The serving should be the same for fruit and juice to meet the 50-50 rule of no more than half of the fruit offerings may be in the form of juice. For example, SFA offers 8 oz. containers of juice, the fresh/canned fruit offered must be equivalent to 1 cup/8 oz. to meet the 50-50 rule. Discussed with FSD removing juice from milk section listed on menu so it doesn't appear to be a choice of milk or juice. Also, list juice beside the fruit of the day in menu as a choice for the fruit of the day. Or offer juice as an a la carte option, keeping it separate from a reimbursable meal.
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.	FSD uploaded a blank breakfast menu certification worksheet. During visit, it was explained she had difficulty clicking on boxes.

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1100 - Smart Snacks in School	1104. Where are students able to purchase foods during the school day?	SA shared link and worked with FSD walking through the website, "Alliance for a Healthier Generation" product calculator and list of compliant products if food and beverages are to be sold during school hours.
1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	Inspection report was located in kitchen on bulletin board. Corrected onsite 12/13/17.
1400 - Food Safety	1405 Was the SFA's written food safety plan implemented? If NO, explain.	Recommended to FSD to date all refrigerated food items to ensure usage by expiration date.

Org - Level Commendations

Description
<ul style="list-style-type: none"> • 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. • 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. • Eligibility is kept confidential. • The SFA has a back-up system for benefit issuance documents and system.
<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> • The district has a current wellness policy on file. • The SFA's wellness policy was reviewed and revised on December 12, 2017. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. • Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.
<ul style="list-style-type: none"> • 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. • No indirect costs are charged to the food service program. • 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 9/20/2017.
<p>PROCUREMENT: The Food Service Director attended the Regional Procurement Training in Waukon. There is a written procurement plan and code of conduct policy. 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 to obtain price quotations for milk and bread. Two vendors were contacted for milk price quotations. The milk price quotation included specifications for milk items. Bread product price quotations was solicited from two vendors. The bread procurement was in compliance with the local small purchase threshold of less than \$20,000. The district is a member of a Group Purchasing Organization. A signed agreement with the Group Purchasing Organization for SY 2017-2018 is on file. The signed agreement states that the school district agrees to procure food (excluding bread and milk) and non-food supplies through the Group's awarded Prime Vendor as well as vendors awarded the ware wash and small ware contracts. A review of milk and bread invoices validated the district was receiving the products as bid and prices were charged as bid. The school utilized 100 percent of their Planned Assistance Level (PAL).</p>

Site - Level Commendations Starmont High School (0109)

Description

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• 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. • Menus included many homemade entrees, and standardized recipes are used for food production. • 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.

• 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.

• 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. • Students have a variety of meal components to select at breakfast. Students have a daily choice of a hot or cold breakfast.

• The Food Service Director completed the USDA menu worksheets for the week of December 11th-15th for lunch at the high school. The worksheets showed the serving portions and component contributions meeting the meal pattern. • The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the high 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.

• 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. • 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.