

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
BCLUW Comm School District (05400000)
Dates of Review: November 15-17, 2016

Program Year: 2017
Month of Review: October
Lead Reviewer: Deb Linderblood
Org Representative(s): Cami Parker

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The SFA only has one staff person that is trained to be a determining official. Benefit issuance errors were greater than 8%, thus next school year the SFA will be required to do an Independent Review of applications and thus will need a second person trained to certify household applications.	State who will be selected to learn how to certify household applications/enter eligibility into the JMC system, how they will be trained to do this function and your intentions to maintain a minimum of two individuals who are knowledgeable on certifying household applications/entering eligibility into the JMC system.	
100 - Certification and Benefit Issuance	V-0100	SFA's direct certification notification letter does not give directly certified households the opportunity to sign a waiver statement.	Add the waiver statement to the direct certification letter and attach a copy of the revised letter.	
100 - Certification and Benefit Issuance	V-0100	Numerous households did not turn in an application for SY2016-2017 and at the end of 30 operating days their benefit status was not changed to paid.	Describe your plan to assure that households who do not submit an application in the new school year are not given more than 30 days of benefits into the new school year.	
100 - Certification and Benefit Issuance	V-0100	The SFA's notification of denied benefits does not have the hearing officials name, address and phone number.	Revise the notification letter that is sent to denied households so that it has the hearing official's name, address and phone number. Attach a copy of the revised letter.	
	V-0700	Fiscal action is still possible pending the results of the November claim.	None	
	V-0700	The SFA does not have adequate oversight to ensure that contractors perform in accordance with terms, conditions and specifications of their contracts or purchases.	State your intentions to ask the vendor for monthly and weekly product lists with current pricing. State your plan for ensuring that you are charged the price that is on the most current price list.	
	V-0700	The SFA has not completed their Procurement Plan for School year 2016-2017.	Complete and attach a copy of your Procurement Plan for School year 2016-2017.	
800 - Civil Rights	V-0800	The SFA does not have a procedure for receiving and processing complaints alleging discrimination.	Develop and attach a procedure for receiving and processing complaints alleging discrimination.	
800 - Civil Rights	V-0800	The Determining Official and two cashiers have not had civil rights training in School Year 2016-2017.	Have these staff members complete Civil Rights training. Attach a sign-in sheet showing that their training was completed.	

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1000 - Local School Wellness Policy	V-1000	The SFA currently does not have all of the required participants on their wellness committee, the policy has not been revised since 2012 so does not include any of the Smart Snacks requirements, and the policy has not been assessed.	State your plans and provide a timelines for: 1.) Forming a wellness committee including who will be permitted to participate and how you will go about inviting them to participate 2.) Revising of the Wellness Policy 3.) How you plan to make the policy available to the public 4.) When reviews and/or revisions will be made to the policy 5.) When each school in the district will be assessed on the implementation of the Local School Wellness Policy 6.) How the district will make the assessment on the implementation of the Local School Wellness Policy available to the public.	
1600 - School Breakfast and SFSP Outreach	V-1600	The SFA is not informing eligible families about the availability and location of free meals for students via the Summer Food Service Program.	State your plan for informing eligible families about the availability and location of free meals for students via the Summer Food Service Program.	
Resource Mgt Comprehensive Review	V-RMCRF	The SFA does not have a process for calculating its compliance with the revenue from nonprogram foods requirements in 7 CFR 210.14(f).	Complete and attach the USDA nonprogram foods tool. Describe how you calculated the nonprogram food cost.	

Site - Level Findings: BCLUW High School (0172)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	There is not signage at breakfast explaining what constitutes a reimbursable breakfast to students and cashiers.	Develop breakfast signage and attach copies for one week's worth of breakfast menus.	
400 - Meal Components and Quantities - Lunch	V-0400	The ham patty that was served as a 3rd choice on 10/18/16 only credits as .75 oz. eq. of meat, so did not provide the required 2 oz. eq. needed for 9-12th graders.	State how you will ensure that each entrée offering will meet the meal pattern requirements.	
1100 - Smart Snacks in School	V-1100	The SFA has a coffee shop that sells foods to students during the day. Food items are sold that do not meet the Smart Snacks standards.	State your plans for revising the types of foods that are sold in the coffee shop so that these foods meet the Smart Snacks standards.	

Org - Level Technical Assistance

Area	Question	Comments
		TA provided on where to find the four recorded Procurement webinars. TA provided that SFA needs to obtain debarment form from prime vendor, bread and milk vendor. TA provided that total estimate of each event should be for the year thus allowing for more competitive purchasing. TA provided that SFA should be receiving monthly and weekly prices from their prime vendor as this is state in the contract. <i>Buy American provision must be</i>

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		added for CNP procurement. TA-SFA should request CD with items on market basket.
100 - Certification and Benefit Issuance	110 Does the SFA use the direct certification notification letter provided by the State agency?	TA provided that since the SFA uses a notification letter that is generated by their POS system, they must have the letter approved by the SA each summer.
100 - Certification and Benefit Issuance	131 Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified? If NO, explain. Record errors on the Certification and Benefit Issuance Error Worksheet, SFA-1.	TA provided that SFA needs to have a homeless liaison.
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? If NO, explain.	TA provided on where to find sample wellness policies, reviewed minimum participation, need for triennial assessments and making the assessments available to the public. Provided SFA with the "Does Your Wellness Policy Measure Up" handout and the progress report. Showed the SFA where to find additional information on the DE website regarding the wellness policy.
1200 - Professional Standards	1214 a. After review of documentation, if the SFA hired any new directors on or after July 1, 2015 were hiring requirements met? If no new directors were hired mark NA and proceed to question 1216.	The current Food Service Director is considering retiring in the near future, so TA was provided on the hiring standards for Food Service Directors. Provided handout with the requirements.
1200 - Professional Standards	1221 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	Reviewed the required training needed for the various staff that have nutrition duties.
1600 - School Breakfast and SFSP Outreach	1600 How did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	TA provided on where to go on the DE web site to find breakfast promotion materials.
200 - Verification	202 Who serves as the confirming official? (Name and/or position title or software used is acceptable)	TA provided that the confirming official needs to review the selected applications which are selected for verification and sign the application under "Confirming Official."
200 - Verification	207 Based on the review of verified applications:	TA provided that when using the Standard process, the SFA is to select from error prone applications.
200 - Verification	208 a. Did the SFA attempt to directly verify selected applications?	TA provided on what direct verification is and that if the SFA selects an application with a case number on it they should try to find the household on Elookup. If found, this household is directly verified.
200 - Verification	209 Does the SFA's verification notification letter include all required information? If NO, explain.	TA provided that the SFA needs to use the State agencies verification notification letter as it contains all of the required elements and the updated USDA nondiscrimination statement.
200 - Verification	213 a. Did the SFA complete verification by November 15?	TA provided on how to complete the Verification Report. Assisted SFA in completing the verification report for school year 2016-2017.
300 - Meal Counting and Claiming	306 What procedures are used as internal controls to ensure the meal counts do not exceed enrollment or attendance adjusted enrollment?	Assisted SFA in determining how to print an edit check report off of their JMC system and provided TA that this is the report that the SFA should use for obtaining numbers to use in their monthly claim. Explained that SFA should compare the daily number served to the number eligible and to the adjusted attendance factor.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?	TA provided that there is a new USDA nondiscrimination statement and that it can be found on IowaCNP under download forms.
800 - Civil Rights	805 How are students with special dietary needs accommodated?	TA provided that SFA needs to use the Diet Modification form for students with special dietary needs. Showed SFA where to find form on DE web site and pointed out Q&As also available. Explained that when the nurse

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		receives a completed form, a copy should be provided to the Food Service Director.
800 - Civil Rights	806 a. When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (i.e., cafeteria staff, F/R application approval staff) and their supervisors?	TA provided on where to find the Civil Rights power point presentation on the DE web site.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	TA provided that the SA is in the process of completing a form for SFAs to use to do Meal Counting and Claiming On-site review at 50% of their schools for breakfast.
Resource Mgt Comprehensive Review	5 What process did the SFA use to calculate its compliance with the revenue from nonprogram food requirements in 7 CFR 210.14(f)?	TA provided on completion of the nonprogram revenue tool and the Financial Report on IowaCNP. Emailed the SFA the USDA nonprogram revenue tool and excel spreadsheet for determining average cost of a meal. Explained how to complete the nonprogram revenue tool.

Site - Level Technical Assistance BCLUW High School (0172)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students?	TA provided on where to find breakfast signage templates on the DE web site. TA provided to food service director that breakfast signage needs to indicate how many items each food item contributes.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	TA provided that there is an Offer vs. Serve manual. SA provided copy to Food Service Director.
Dietary Specifications Assessment Tool - Lunch	24 Students are offered salt:	TA provided that salt shaker should be removed from the condiment station. Food Service Director has pepper, salt free all-purpose seasoning, Southwest seasoning and BBQ seasoning for students to use in place of salt.

Org - Level Commendations

Description
Certification and Benefit Issuance: 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 all but one denied applications were correctly determined. All applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Access to benefit information is correctly limited. Free meals are extended to all members in the household when one member is directly certified.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria, annual civil rights training has been provided to nearly all food service staff and documented. The SFA submitted the annual Public Release to the Grundy Register. Ethnic/racial information is collected and the form is completed. No discrimination was observed. SFA on-site monitoring was completed in school year 2015-2016 to ensure that all schools are meeting program requirements prior to February 1st.
Food Safety: 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 reviewed. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all refrigerators, freezers, food served, and the dishwasher. The kitchen is clean and organized. Good food safety procedures were observed, including proper hand washing, glove usage and hair restraints worn. Six food service workers are Serve Safe Certified.
On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch in school year 2015-2016 prior to February 1st. Monitoring forms for lunch are completed for school year 2016-2017 as well.
Procurement: The SFA has started a written Procurement Plan that includes procurement methods. The plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events. The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances.

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Professional Standards: The Food Service Director obtained 43.5 hours of training in 2015-2016 and 27.5 hours to date this year. All nutrition staff are on track to complete their required training for school year 2016-2017. The Determining Official has also completed her required training for school year 2016-2017.
Reporting and Record Keeping: Reports are filed on time, and all records are maintained for at least three years plus the current year
Resource Management: All expenditures that were reviewed appeared allowable. There were no unresolved findings from the previous Administrative Review or from a state audit. 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 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. All records are maintained for at least three years plus the current year
Smart Snacks: All a la carte foods sold a la carte meet the Smart Snack standards for nutrition content. Exempt leftover NSLP entrees are only sold the same day. Vending and a la carte beverages sold meet the standards for the 9-12th grade students.
Verification: 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 SFA had one person attend training.
Wellness Policy: The SFA's wellness policy was reviewed in 2015. The public is made aware of the SFA's wellness policy via the SFA's web site.

Site - Level Commendations BCLUW High School (0172)

Description
Meal Components and Quantities: A nutrient analysis was not required. 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. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch—including many fresh fruits and vegetables. At least two types of milk are offered. Many low fat and low sodium food items were observed in storage. The Food Service Director works hard to offer foods that the students enjoy and to give them a variety of foods to choose from.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Point of Service counts and filed claims appear accurate. No overt identification of students who receive benefits was observed. Food Production Records were available for all meals claimed for reimbursement for the review period. Cashiers are trained.
Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of October 17-21, 2016 for breakfast and lunch at the high school. The worksheets showed that all required meal components were offered at breakfast and lunch except for being short on the quantity of meat provided on one day during the week as a third entrée offering. 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 noncompliance 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.
Offer vs. Serve: Offer vs. Serve is being implemented properly. All student's observed selected 1/2 cup of fruit and/or vegetable. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at breakfast and lunch.
Water: Free potable water is available to all students for lunch and for breakfast.