

**Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
West Branch Comm School District (69300000)
SNP - Review ID: 1849**

Program Year: 2017
Month of Review: January
Lead Reviewer: Sandra Fiegen
Org Representative(s): Chris Wilson

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One application was incorrectly approved for free benefits based on income and should have been approved for reduced price. It is noted that the income guidelines in the software program used by the district appear to be incorrect, because this was used to determine the incorrect free benefit. Three applications were 'back dated' in approval (application was received by the office at a date later than the effective date). of 137 eligibility determinations, 7 were in error, resulting in a 5% error rate.	In order to continue to use the application approval program in Total K-12, each year's eligibility guidelines and conversion factors must be correctly entered and correctly converting. Please indicate how you will ensure that the system is updated correctly and used correctly. Free and Reduced Price eligibility based on an income application cannot be back-dated. The date of receiving the application by the approving official is the earliest date that it can be approved. In your corrective action response, please indicate your plans for timely approval going forward. Please notify the family incorrectly approved, allowing the correct timeframes for them to request a hearing, and include information regarding timeframes in your corrective action response.	

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700 - Resource Management	V-0700	Food items for snacks during testing week and half pints of milk for preschool/kindergarten students are not accurately billed to individual students or to teachers ordering the snacks. All food sales from foodservice for a la carte must be invoiced and paid from invoice; foodservice funds cannot pay for unallowable expenses not related to reimbursable meals or a la carte sold by foodservice. Beginning July 1, 2016, SFAs were required to have written standards of conduct that pertain to employees purchasing on behalf of Child Nutrition Programs. The standards must include language about conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. There was no written code of conduct pertaining to CNP purchases.	In your corrective action, please indicate how each family will pay for each half pint of milk purchased from the foodservice account, and how this activity will be tracked. If parents wish to put \$75 on their lunch account, it can be withdrawn each day for each individual half pint. Teachers need to keep track of which students receive a milk each day so that the account information can be entered. For snacks during test week or cookies that are made available from the foodservice supplies, there must be an invoice noting which fund or person pays the foodservice for each item. The invoice and payment will be tracked through school foodservice account funds--both the expense of foodservice purchasing and the income of foodservice receiving payment for the items. All miscellaneous purchases such as these must be tracked, as they are all a la carte/nonprogram purchasing, and it is unallowed for foodservice to give away the food without being reimbursed. In your corrective action response, please indicate specifically what your plan of action will be in these activities from this point forward, attach your CNP purchasing code of conduct, and where the employee code of conduct policy is located in policy information and distributed to all employees who can purchase or direct money from the foodservice account.	
900 - SFA On Site Monitoring	V-0900	Annual onsite monitoring of each building is not completed prior to Feb 1.	Using the form in download forms, complete onsite monitoring of both breakfast and lunch as required prior to CA deadline. In your CA response, please indicate how you will plan to complete this annually in the future.	

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1200 - Professional Standards	V-1200	The person in charge in the Elementary/Middle School cafeteria is viewed as the manager for the purposes of professional development. This person must receive training applicable to her responsibilities. The Food Service Director has a subject listing of training she plans yet for all staff, but no timeline or indication of how much time would be spent on subjects, and who would need to complete the training.	In your corrective action plan, please indicate the training that each person in the foodservice area and in administrative areas will receive, how they will receive the training, and the number of hours/minutes that each of the planned trainings will take. Additionally, please indicate when (the month) that the training will occur. Please refer to the professional development guidelines and requirements at https://www.educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition for more specific information. Please indicate how the training will be tracked and who maintains the training log for all persons.	
1400 - Food Safety	V-1400	A complete HACCP plan has 7 Steps/components and other factors, including comprehensive Standard Operating Procedures, SOPs, at each site; a Process List of menu items; critical control points indicated on recipes; temperature logs with corrective action indicated; annual training; and a plan to periodically review and revise HACCP. The USDA guidance on writing and maintaining your plan is found at https://www.educateiowa.gov/pk-12/nutrition-programs/food-safety-haccp . The latest health inspection report must be posted in a publicly visible location in the cafeteria, not on the office window. The food inspection completed in September 2016 indicates three corrective actions that the sanitarian required to be completed, and in observation on the day of review, all three were not fully corrected. Temperature monitoring logs are not being maintained on storage areas of the kitchen, including all refrigeration, freezing and dry storage areas.	For your response, submit your HACCP plan's index along with a list of SOP's that will be in place at each building. Indicate the date the plan will be available, where it will be stored at each site, and how staff will be trained each year on the complete plan. As corrective action for the health inspection report posting and compliance, indicate where the report will be posted, when it was moved to the publicly visible location, and your steps to comply with the corrective actions requested by your sanitarian. For your response with regard to monitoring storage temperatures, please indicate each storage unit that will be monitored, where the monitoring logs will be located, how the completed logs will be reviewed and where they will be maintained.	

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Site - Level Findings: Hoover Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Breakfast	V-0300	Student breakfasts are pre-ordered by families calling the office prior to the start of the day. The full meal (no offer versus serve is implemented) is assembled and placed in a convenient location where the child can pick it up upon arriving at school. The meal pickup is not supervised by adults, there is no point of service counting when the child picks up the meal, the meal is not held in temperature control conditions, and the child does not take all parts of the meal as evidenced by the items that are returned to the kitchen. Approximately 25 meals per day are served this way. Sometimes a child's account is debited for the meal, sometimes not based on a guess of whether they ate or not.	Breakfast meals must be served under food safe conditions. As indicated in your agreement to participate in the School Breakfast Program, offer versus serve is implemented for breakfast. Each child must be able to identify the food items that they want as part of their reimbursable meal, and a point of service count must take place for each meal, where the meal is determined to be reimbursable as taken by the student. The cashier at breakfast must be able to identify and count a full reimbursable meal according to what the student chooses. Student's meal accounts must be accurately debited for their meals. In your corrective action plan, please identify specifically where middle school and elementary school students will obtain breakfast meals, how and where a point of service meal count for each student will occur, and how food safety will be maintained. Also, please identify the medium of exchange at breakfast and the training for the cashier in offer versus serve and the correct counting procedures.	
300 - Meal Counting and Claiming - Lunch	V-0300	A small number of students did not have their meal tickets with them at the point of service. Cashier entered their transaction without the student providing any medium of exchange. Student rushed on by, and she was also not able to review their tray for a complete reimbursable meal.	Each student must provide a medium of exchange at the point of service. In lieu of having their ticket, they can state their name, provide a student ID number, write their name down, or some other medium. They cannot rely on the cashier to identify them and enter information for them. In your corrective action response, please indicate what will happen at the point of service when a student fails to have their lunch ticket (medium of exchange).	
400 - Meal Components and Quantities - Breakfast	V-0400	No signage available to indicate the items included in a reimbursable breakfast, including the requirement to take at least 1/2 cup of fruit/vegetable/juice. Also no signage available at lunchtime.	In your corrective action response, please indicate how and what you will use to post, each day, each breakfast and lunch meal items/components to be served for a full reimbursable meal, and how you will include the requirement to take 1/2 cup of fruit/vegetable/juice with the meal.	

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400 - Meal Components and Quantities - Breakfast	V-0400	Several grain items are not whole grain rich as required. Complete documentation for all food items used as reimbursable meals is not available, including CN labels, PFS, ingredient statements.	As required corrective action response, attach in review attachments the planned monthly menu for April for breakfast. Attach in the review attachments each product formulation statement, CN label, ingredient statement for each grain item or processed food item that contains grain, proving that it is whole grain rich. Identify where you will maintain this documentation on file. The menu must also identify the serving size and meal pattern crediting for each food item (for example, there must be 1 cup of fruit/vegetable/juice planned and identified each day, at least 8 oz equivalents of whole grain rich grain items per week, and 1 cup of milk per day).	
400 - Meal Components and Quantities - Lunch	V-0400	In the review week, several grain items were not whole grain rich. Documentation on meal compliance (CN labels, PFS, ingredient statements, recipes) was not available to prove that meals met the meal pattern. Vegetable servings were inadequate on most days, with only 1/2 cup planned for K-4. Food Production records were not completed and not all available for the test week.	As required corrective action response, attach in review attachments the planned monthly menu for April for lunch. Attach in the review attachments each product formulation statement, CN label, ingredient statement and recipe for each grain item or processed food item that contains grain, proving that it is whole grain rich. Attach recipes for each entrée item. Recipes must be standardized and must be the recipe that will be used. Identify where you will maintain each type of documentation on file at the school and in the food service director's office. The menu must also identify the serving size and meal pattern crediting for each food item (for example, at the K-8 grade level, there must be 3/4 cup of vegetable daily with subgroup requirements met weekly, 1/2 cup fruit planned and identified each day, at least 8 oz equivalents of whole grain rich grain items per week, 9 ounce equivalents of meat/meat alternate, and 1 cup of milk per day). Also, please indicate what tools you will use in careful menu planning going forward to ensure that all meal requirements are met, and where you will keep the menu planning documentation. for more information on menu planning, please see the resources and recipes at https://www.educateiowa.gov/school-nutrition-standards-2012 .	

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500 - Offer versus Serve	V-0500	Offer versus serve requirements include a correct identification of a reimbursable meal at the cashier. The middle/elementary school cashier was not aware that she must ensure that meals are reimbursable prior to counting the meal and was not aware of meal pattern requirements with regard to serving sizes for breakfast or lunch. She has not received required offer v serve training.	Please indicate your plans for ensuring that adequate, full and complete offer versus serve training for both breakfast and lunch is completed by all cashiers and servers prior to the corrective action deadline. Please indicate what training resources will be used, and how this training will be tracked on the professional development tool.	
900 - SFA On Site Monitoring	V-0900	Onsite monitoring for lunch and breakfast counting and claiming procedures not conducted. The monitoring form is located in download forms in the IowaCNP application area.	In your required corrective action, please indicate how you will ensure that each year, monitoring is completed prior to February 1. Also, before the corrective action deadline, complete the monitoring required and attach to the review attachments. Indicate where onsite monitoring documentation will be maintained.	
1500 - Reporting and Recordkeeping	V-1500	Food production records are not maintained onsite for each meal claimed for reimbursement. Daily temperature logs, sanitation logs for dishwasher, calibration logs and other logs are not maintained as required by HACCP.	Food production records are a required documentation and must be completed daily onsite, and stored onsite. All required monitoring logs must be completed and maintained onsite. They should not be removed from school building. In your corrective action plan, please indicate how you will ensure that these records are completed in a timely manner and maintained onsite.	

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Org - Level Technical Assistance

Area	Question	Comments
1000 - Local School Wellness Policy	1005 Obtain a copy of the most recent assessment on the implementation of the Local School Wellness Policy.	School Wellness Policy has not been updated yet but meetings are planned. The policy has not been assessed nor the assessment posted to a public location as required. For more guidance and the final regulations on LWP, please see the information at https://www.educateiowa.gov/pk-12/nutrition-programs/school-wellness . A sample assessment tool is found there also.
1100 - Smart Snacks	1103 Who is responsible for tracking Smart Snacks compliance at the:	Three opened cases of 20 ounce bottles of Gatorade were found in one of the kitchen refrigeration units. These were identified as belonging to the kitchen manager in the elementary/middle school. As a reminder, 20 ounce bottles of Gatorade do not comply with the requirements of Smart Snacks for the age group of children in the middle or elementary school, and cannot be sold to students.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.	Discussed the need to document the number of hours of training, any handouts or agendas, and full information for Food Service Director training also, on the training log.
200 - Verification	213 a. Did the SFA complete verification by November 15?	Encouraged using the verification summary worksheet in ICAVES to record the steps of verification (dates and actions taken)

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Description
Benefit documents, as well as all paperwork, were very well organized.
Free meals are extended to all members in the household.
Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
Students have a variety of meal components to select at breakfast. Students have choices of hot or cold breakfast items.
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 SFA effectively utilizes its USDA entitlement for commodities.
The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events.
The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months.
Water was available as required. New water bottle filling stations are available in the building.