

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Area Substnce Abuse Coun System (10538006)**  
**SNP - Review ID: 4948**

**Program Year:** 2018  
**Month of Review:** October  
**Lead Reviewer:** Sandra Fiegen  
**Org Representative(s):**

**Site - Level Findings: Area Substnce Abuse Coun (8618)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Food items were offered in a self-serve bar that was not part of the meal service line. The entire menu must be indicated in the printed menu, including food items offered in a self service bar area. All foods contribute calories, sodium and fat and must be planned into the daily meal offered.	In your corrective action response, please indicate how you will ensure that all food and beverages offered at each lunch meal will be included in the written menu. If revising the menu to include all additional salad bar items, please attach a copy of the revised menu that includes all food items offered at lunchtime. If no revisions will be made, please state that in your response.	
400 - Meal Components and Quantities - Lunch	V-0400	In the October food production record information, 21 of 31 days did not meet the meal pattern for lunch according to the serving sizes and items indicated on the food production record. Also, the food production records did not match the planned and typed menu. After further discussion with residential staff, they indicated that the Saturday and Sunday meals were frequently catered in and did not follow the planned and typed menu. Additionally, the food production records were not completed with total amount prepared and servings left over. Whole grain rich items are required unless the institution has specifically requested a waiver for certain items. Even when serving grain items that are not whole grain rich along with whole grain	In the previous review conducted in 2014, ASAC was cited for not following the meal pattern with regard to whole grain rich requirements. The same finding is made during this review, so reimbursement for Monday, December 11 lunch will not be paid. In your response documents, please scan and attach the daily meal count information for the month of December so that it is clear to see Monday, December 11 lunch count is not included in the total to be claimed. Information about whole grain rich requirements and how to apply for a waiver is attached to this corrective action, and was previously sent to the Authorized Representative as well as being available on the Bureau website. Additional corrective action is required: Please scan and attach the first 3 weeks of your 5 week lunch cycle menu, indicating on the menu the component contributions of each food item. For all grain and protein/meat items, send the recipe or child nutrition label, the nutrition facts label, the ingredient statement that pertains to each item that shows how you establish that the component crediting is correct. Also, please make a typed list of all grain items included for lunch meals, indicating which ones you will request a waiver for if you intend to use some non-whole grain rich items going forward. Waivers must be sent to Patti Harding for approval. The exemption request form is located in Download Forms.	

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		rich, at least 50% of items must be whole grain rich. At the time of review, many items served were not whole grain rich. Other supporting documentation that must be on file and was missing includes labeling information such as Child Nutrition labels, product formulation statements, nutrition facts labels and ingredient statements.		
500 - Offer versus Serve	V-0500	For breakfast meals, all children were required to take the full breakfast. At lunch time, all children were required to take the 'hot food' items but could decline the full fruit, milk and salad bar items. Under offer v serve, children must be in charge of taking or declining all food items. Because ASAC is an RCCI, they can request a waiver from participating in offer v serve for high school age students.	In your corrective action response, please indicate if you will participate in offer v serve or if you will request a waiver from this requirement for high school age students. Please ensure that all staff who supervise or help serve are knowledgeable about offer v serve in order to assist students correctly. As additional corrective action response, please indicate who will participate in offer v serve training and how you will document that training, if you choose to serve meals under this provision. If you intend to not serve under offer v serve rules, all students must take all food items indicate on the menu every lunch and/or breakfast meal. This includes milk, fruit, vegetables, grain and protein/meal item in the full planned serving size.	
1400 - Food Safety	V-1400	A HACCP plan is not in place. The original USDA guidance is available onsite in a 3 ring binder labeled 'HACAP'.	Please read and follow the guidance in developing your onsite HACCP plan. Additional resources are available at <a href="https://www.extension.iastate.edu/foodsafety/haccp-school-foodservice">https://www.extension.iastate.edu/foodsafety/haccp-school-foodservice</a> . Your plan must include SOP's and other instruction for the small kitchenette and dining room in the residential area also. In your corrective action response, please send a list of all SOP's that you will have available in your plan, an index of the other parts of the plan, and information about how residential and foodservice staff will be trained on the contents of the HACCP plan and food safety, and where the documentation of training will be maintained.	

**Org - Level Findings**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
700 - Resource Management	V-0700	no year-end review of federal fund use is made to determine if all reimbursement income is correctly expensed to non-profit reimbursable program.	At the time of the review, it was discussed with financial personnel that there needs to be a method to determine if all reimbursement is used toward allowable expenses in order to show non-profit status. We discussed identifying an average cost of breakfast, lunch and afterschool snack, taking those values times the number of meals claimed, and applying that against the allowable expenses documented each month and year in order to show expenditures that meet or are in excess of reimbursement. In your corrective action response, please indicate your plan for documenting a non-profit status with regard to reimbursement received for NSLP, SBP and ASAP.	
700 - Resource Management	V-0700	Students are allowed to purchase from vending machines as a reward for good behavior. Adult staff meals are purchased.	Documentation must show that the income from vending purchases and adult staff meal purchases are at a level sufficient to offset the expenses of the items purchased. Please complete the nonprogram revenue tool and attach to this corrective action. For more information about the nonprogram revenue tool, please see the items attached here. The one you will complete is the 'USDA nonprogram revenue worksheet'.	
1100 - Smart Snacks	V-1100	School age clients (those claimed for reimbursement) are allowed to purchase items from 3 vending machines located near the cafeteria area. The permission to	Only items that meet the Smart Snacks compliance are allowed to be sold to school age clients during the school day. Information about determining compliance on foods and beverages was left with Ms. Trinh during the review. As corrective action, please utilize the Smart Snacks calculator found at <a href="https://www.healthiergeneration.org/take_action/schools/snacks_and_beverages/smart_snacks/alliance_product_calculator/">https://www.healthiergeneration.org/take_action/schools/snacks_and_beverages/smart_snacks/alliance_product_calculator/</a> for each food and beverage to determine if each item intended to be sold is compliant. Save a copy of the readout for each	

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		purchase is a reward for good behaviors. Several non-compliant food and beverage items are being sold in the machines.	item, and also scan, save as a PDF and attach a copy of all of the readouts to this finding. Also indicate a comment as to how you will ensure that all items sold meet the requirements going forward this year and in future years.	
1200 - Professional Standards	V-1200	School Nutrition Program/Food Service Director did not meet the requirement for 12 continuing education hours in the school year 2016-17.	Information regarding the requirement for professional development hours was left at the time of review. A list of resources to find relevant training is attached to this finding. In your corrective action plan, please indicate a timeline for planned training that will show: Who is receiving training, What they will use to receive the training (webinar, tutorial, etc), How much time each training activity will take, and When the planned training will happen. Please make a planned schedule that will show attaining at least 12 hours of training for this year for the food service director, 8 hours for each full time employee, and training relevant to the duties performed for all other persons who complete food service duties (planning, serving food, counting meals, financial responsibilities, etc). Attach the planned schedule/timeline to this finding. Also, please indicate how you will ensure that each person receives the required minimum amount of training each year going forward.	
1200 - Professional Standards	V-1200	All training received by persons who complete food service duties must be fully tracked. for tracking tools that you can use, please see resources at <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition">https://www.educateiowa.gov/pk-12/nutrition-programs/professional-standards-school-nutrition</a> .	In your corrective action response, please complete the tracking tool you will use, for the training received in the prior year. Also, please start a new tracking tool to be completed as training is done, and attach that tool. the new tracking tool will show the names of those anticipated to receive training, any training received from July 1, 2017 to now, and will continue to be completed through June 30, 2018. Please indicate where the training documentation including the tracking tool, will be maintained for at least 3 years.	

**Org - Level Technical Assistance**

Area	Question	Comments
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?	Civil rights statement supplied is not correct. for the correct statement, see <a href="https://www.educateiowa.gov/pk-12/nutrition-programs">https://www.educateiowa.gov/pk-12/nutrition-programs</a> . The federal statement must be used on all materials that mention the child nutrition program.
800 - Civil Rights	805 How are students with special dietary needs accommodated?	incorrect dietary needs accommodation form is being used. Please use the form found on the download form section of IowaCNP. Questions and answers about how to fill out and use the form can be found at <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/national-school-lunch-program">https://www.educateiowa.gov/pk-12/nutrition-programs/national-school-lunch-program</a> .
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?	All persons who serve meals must have USDA civil rights training. Training information is found on the download form section of IowaCNP. All persons who must have training include the residential care counselors who prepare and serve breakfast, lunch or snack on the unit. Training documentation must be maintained on file for at least 3 years.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	Onsite monitoring of meal counting and claiming procedures is not normally required for one-site sponsors; however, due to the large number of people who complete meal counting and serving duties, it is highly encouraged that the onsite monitoring form be completed yearly. the form can be found on download forms section of IowaCNP.
1000 - Local School Wellness Policy	1005 Obtain a copy of the most recent assessment on the implementation of the Local School Wellness Policy.	Wellness policy has multiple goals in each of the 4 required areas, but does not mention assessment of the goals, or how assessment will be shared. The policy needs revision to include who will do assessment, when assessment will happen and how results of assessment are shared.

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**Site - Level Technical Assistance Area Substance Abuse Coun (8618)**

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students?	Breakfast service area must have a sign that indicates the parts of a breakfast meal and serving sizes, along with the information that each child must take at least 1/2 cup of fruit. We discussed what could be used as signage, and they are going to start posting the menu on the door for the children to read while they wait for their meal.
400 - Meal Components and Quantities - Breakfast	409 Review production records and other supporting documentation, did all reviewed meals during the review period indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students? If NO, explain any errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record the number of meals observed missing required meal components on the S-1, 15. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 16.	Food production records were completed for breakfast, but label information that supports the credibility of food items is not on file. Menu indicated serving sizes and components.
1700 - Afterschool Snack	1700 Were any areas identified requiring technical assistance or corrective action? If YES, explain.	The menu for the afterschool snack program must be maintained along with the food production records for each snack that shows the items and serving sizes of items included, as well as the count of children receiving the snack.
1700 - Afterschool Snack	1707 a. Has the program been monitored within the first 4 weeks of operation each year?	Each year the afterschool snack program must be monitored within the first 4 weeks of operation, which would be sometime in July or early August in this program because year-round school is in operation.

**Org - Level Commendations**

Description
• At least two types of milk are offered
• Food Service workers wore proper hair restraints and practiced good gloving procedures. • Good food safety procedures were observed.
• 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.
• Menus included many homemade entrees, and standardized recipes are used for food production.
• The SFA effectively utilizes its USDA entitlement for commodities.
• Water was available as required.