

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Central Lyon Comm School District (10950000)**  
**On-site Review Dates: December 6-8, 2016**

**Program Year:** 2017  
**Month of Review:** November  
**Lead Reviewer:** Deann Murphy  
**Org Representative(s):** Marla Freese

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Site - Level Findings: Central Lyon Middle School (0209)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	TK-1 grade students were "served" all 5 components of their lunch on the day of review. They were not able to participate in OVS which allows them to take less than the required 3/4 cup vegetable each day. All of these students received 1/2 cup creamed corn instead of the required 3/4 cup. This was the only vegetable served. The 1/2 cup serving was inadequate to meet the minimum vegetable requirements for the day.	The SFA will explain how they will ensure students are served the minimum portion of vegetables each day.	We are now offering TK-1 OVS to all the students. It is going very well with the students they seem to feel important by picking what they would like to have.
400 - Meal Components and Quantities - Lunch	V-0400	On the day that chili was served during the review week, it was found that inadequate vegetables were planned into the menu. Also, inadequate red/orange vegetables were planned into the menu during the review week. Upon an expanded review of the menu, inadequate vegetables were planned on the day that chicken noodle soup was served with the carrots/celery in the soup as the only vegetable that day. This does not meet the required 3/4 cup daily vegetable requirement.	The FSD will submit one month of menus and food production records showing that at least 3/4 cup vegetables have been planned into the menu each day AND that the minimum vegetable subgroup requirements have been met.	
600 - Dietary Specifications and Nutrient Analysis	V-0600	Students in grades 4-8 are offered a full salad bar 2 to 4 days weekly. The salad bar is after the POS and is lacking a supervisor trained in reimbursable meals. Students are allowed to take as much or as little of each food item as they want. There is no signage telling them how much they need to take to make a reimbursable meal or how to limit their intake to fit into the calorie,	The SFA will explain how they plan to ensure students who choose the salad bar meal option both take a reimbursable meal and limit their choices to fit into the calorie, saturated fat and sodium levels allowed for each age group. These levels currently include 550-650 calories, <10% saturated fat, 1230 mg sodium for 4-5 graders and 600-700 calories, <10% saturated fat and 1360 mg sodium for 6-8 graders.	

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		saturated fat and sodium requirements. Based on simplified calculations of the salad bar offerings (see review attachments) and on-site review observation, dietary specifications are being exceeded in all 3 areas.		
1100 - Smart Snacks in School	V-1100	HS vending machine contains 20 oz bottles of Gatorade which is not compliant with Smart Snacks regulations. The SFA sells Rice Krispie Bars at breakfast a la carte which are not complaint with smart snacks. A la carte/vending foods have not been run through Smart Snacks Calculator to determine compliance.	1). The SFA will state how and when they will become Smart Snacks complaint, especially in regards to the Rice Krispie bars and the Gatorade, AND who will be responsible to monitor compliance in the future. 2). The SFA will submit 3 snack labels along with their calculator print-outs showing that they are complaint with Smart Snacks regulations.	

**Org - Level Technical Assistance**

Area	Question	Comments
		Much assistance and written guidelines were given to the SFA to help them develop their Procurement Plan and Code of Conduct. These need to be reviewed and updated annually and all bids/contracts need to follow this document.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	The FSD should add "Cleaning up of Bodily Fluids" policy to the SFAs HACCP manual. Use the HACCP manual as a training tool for staff throughout the year.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable):	Sack lunches that are not OVS must contain all 5 components in their minimum quantities in order to be reimbursable.  Be careful when providing a student with a negative balance a sack lunch so that they are not overtly identified as owing money. Once the SFA has a negative balance policy that is publicized to households, all staff should follow the policy as written.
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?	Recommend doing edit checks daily or weekly to ensure meal counts do not exceed enrollment and are appropriate.
300 - Meal Counting and Claiming	309 If a school has more than one meal service line, how does the point of service system prevent duplicate or second meals from being claimed?	It is difficult to prevent a student from coming back for a second meal when the POS is at the beginning of the line out in the hallway. At breakfast during the on-site review, the cooks were asking students if they had purchased a meal or just a juice. The SFA should consider having 2 POSs at the end of the line at the MS for lunch and putting the POS at the end of the line at breakfast. The application was updated on-site to reflect your current practice of the POS at the beginning of the line. Contact your consultant if this changes.
800 - Civil Rights	805 How are students with special dietary needs accommodated?	In order to change the meal pattern, a licensed medical practitioner must declare that a food allergy is related to a disability. If so, the SFA must comply with accomodations as stated by the provider. If the allergy is not a disability, the SFA may comply, but must still offer all 5 components of the meal pattern with acceptable food items, i.e. milk can be substituted for an appropriate lactose free milk product, students can avoid food with OVS, Foodservice can substitute with an alternative compliant food item. Non-disability related changes to the meal pattern result in non-reimbursable meals. A list of the approved lactose free milk products was sent to the FSD.
Resource Mgt Comprehensive Review	4 If not, did the SFA receive prior approval from the SA to maintain a net cash resource balance that exceeded the three month maximum?	As of June 30, 2016 the SFA had excess funds in their nutrition account above 3 months ave. expenses. FSD has recently received 4 bids on a new steam kettle. Excess funds should be expended no later than January 30, 2017.

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**Site - Level Technical Assistance Central Lyon Middle School (0209)**

Area	Question	Comments
1400 - Food Safety	1402 Is a copy of the written food safety plan site specific and available at each school?	A copy of the SFAs HACCP manual needs to be in both the MS and the HS.
1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	The FSD was instructed to move the food safety inspection report to a public place.
400 - Meal Components and Quantities - Breakfast	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	During the meal observation some students were asking for only 1 waffle stick or 1 sausage link only. It takes 3 waffle sticks to equal 1 oz grain and 2 sausage links to equal .75 grain at breakfast. Full portions of each item must be served in order for them to count as a full component. Staff may need further training to comply with this standard. FSD was e-mailed the Bread/Grain chart to help determine how much grain is needed to equal 1 oz. eq.
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students?	There is currently no signage telling students what items must be chosen to make a reimbursable breakfast. An example and the DE web address was e-mailed to the FSD with more signage examples. Breakfast signage needs to be in place to meet requirements.
400 - Meal Components and Quantities - Lunch	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	It was noted during the on-site review that foodservice staff ran out of creamed corn for the last 3 students who went through the line. Staff substituted carrots for the corn. No other starchy vegetables were planned into the menu for the week. Menu substitutions should be like-for-like instead of crossing vegetable sub-groups. In this case a different starchy vegetable should have been subbed for the creamed corn.
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	The FSD was instructed during the serving line that K-1 students needed to receive the full 3/4 cup serving corn if they are not given the option of OVS. Students in grades 2-8 participated in OVS so they could limit their serving to 1/2 cup if they wanted but must be allowed to take the full 3/4 cup required vegetable serving if they wish.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	Menus from review month and menu certification worksheets were reviewed with the FSD showing that an inadequate amount of vegetables on days where chili and chicken noodle soup are served. Also, red/orange vegetable subgroup is short of the required 3/4 cup during the review week. The FSD was sent updated food production records to use for breakfast, lunch and salad bar to be used instead of current records which are meant for a Residential Child Care Institution.
600 - Dietary Specifications and Nutrient Analysis	605 Based on the Nutrient Analysis, did the school meet the Dietary Specifications (Calories, Saturated Fat, Sodium, and Trans Fat) for the appropriate age/grade group being served?	Based on the simplified nutrition assessment at breakfast, average daily calorie and sodium levels may be too high for grades K-8. Sodium levels will be no more than 485 mg at breakfast for grades K-8 starting July 1, 2017. FSD needs to seek out alternate menu options and food products that are lower in calories and sodium. Menu ideas can be found at <a href="http://www.educateiowa.gov">www.educateiowa.gov</a> under Iowa Gold Star Menus and at Healthier Kansas Menus at <a href="http://www.kn-eat.org/SNP/SNP_Menus/SNP_Resources_Healthier_Kansas_Menus_Breakfast_SY2014-15.htm">http://www.kn-eat.org/SNP/SNP_Menus/SNP_Resources_Healthier_Kansas_Menus_Breakfast_SY2014-15.htm</a> .
900 - SFA On Site Monitoring	901 a. Was the on-site review of the lunch counting and claiming procedure completed prior to February 1?	Be watching for the updated SA On-site monitoring form which will include breakfast meal counting and claiming and observation of general areas. This form will need to be completed prior to Feb. 1, 2017 for at least 1 site for breakfast.

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**Org - Level Commendations**

Description
Civil Rights training completed for all applicable staff. No discrimination was observed. Racial/Ethnic data are collected annually.
Documents related to Child Nutrition Programs are kept on file for 3 years plus the current year as required. The non-program food revenue tool showed adequate revenue was received in SY2015-16 to cover non-program food costs.
The sample of Free/Reduced meal applications that was reviewed were approved correctly. The approval was done within 10 days as required. Denied household were given the decision in writing with appeal information. The SFA uses the State Agency prototype notification letter with all non-discrimination statements. ICAVES was used correctly. Direct Certification (DC) was properly extended to all children in the household and DC downloads were on file as required. Records are kept confidential and students are not overtly identified at the POS.
The SFA has a written Procurement Plan and a Code of Conduct that references school policies on disciplinary actions as is required. They plan to update their Procurement Plan annually.
The SFA has developed a comprehensive Local Wellness Policy that meets all the federal requirements and has been reviewed within the last 3 years. They have completed an assessment of their policy and both the policy and the assessment are posted on their website. They have a wellness committee that meets, keeps minutes of their meeting and is made up of a variety of stakeholders.
The SFA is using a tracking form for Professional Standards. Both nutrition and non-nutrition staff are on track to complete required training hours by June 30, 2017.
The SFA on-site monitoring forms were completed at lunch for both sites prior to the Feb 1 due date.
The SFA posts on their website Lunch page the non-discrimination statements, a complaint policy/form, and gives information about the summer foodservice program.
The SFA receives local funding to pay for fresh fruit snacks for all students.
Verification was completed correctly and in a timely manner. The verification report was filled out correctly. The correct number of applications were verified. Household notification was sent using the State Agency prototype so all appeal/non-discrimination statements were provided to households. One household asked for a hearing and the proper procedures were followed and documented. The benefit list was updated after verification was complete giving households 10 days written advance notice of the change.

**Site - Level Commendations Central Lyon Middle School (0209)**

Description
All breakfast meals observed were reimbursable. When 1% milk and the fruit choice were gone, staff refilled them immediately. The foodservice staff interacted well with students.
Meal counts on the day of review were appropriate when compared with the review month (November). The POS provided accurate count of Free/Reduced/Paid students. Edit check reports are available. Counts were used correctly for claiming meals for reimbursement.
No food storage violations were noted. Buy American is being followed. The SFA had 2 food inspections last year and one this year.
The water fountain is right outside the cafeteria for easy access. Staff will provide cups upon request.
There were no benefit issuance errors and only one meal was considered non-reimbursable so fiscal action will be under the USDA disregard amount for this review. No claim adjustment will be needed.