

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Shenandoah Comm School District (59760000)
SNP - Review ID: 5088

Program Year: 2019
Month of Review: March
Lead Reviewer: Brenda Windmuller
Org Representative(s): Emily Furst

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	Proper documentation for verification was not on file. The SA was unable to determine if the proper procedure was followed and what the outcomes were.	The SFA will watch the Verification webinar posted on the SA's web site. Submit the date the training is to be completed.	
800 - Civil Rights	V-0800	Not all program materials contain the non-discrimination statement or an abbreviated version of the statement.	The SFA will submit the May 2019 menu showing that the non-discrimination statement has been added.	
1000 - Local School Wellness Policy	V-1000	The Wellness Assessment must be completed at a minimum, once every 3 years and be made available to the public.	The SFA will complete the assessment by the end of the 2018/2019 school year. The SFA will submit a date of when they plan to complete the Wellness Assessment and describe how they will make the information available to the public.	

Site - Level Findings: Shenandoah High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The SFA does not have standardized recipes or CN Labels on file. Standardized recipes must be used for all food items containing two or more ingredients. CN Labels or Product Formulation statements must be on file for all applicable food items.	The SFA will explain their process of locating and utilizing a collection of standardized recipes. The SFA will also explain how they will gather and file CN Labels and Product Formulation Statements going forward.	
400 - Meal Components and Quantities - Lunch	V-0400	The SFA's production records are incomplete. Information must be documented to show serving sizes for the appropriate age group, the number	The SFA will submit the production records for April 22nd through May 3, 2019 for breakfast and lunch at the High School demonstrating compliance.	

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		of servings planned and total students served.		
1100 - Smart Snacks in School	V-1100	The LEA is holding fundraisers with food items which do not comply with Smart Snacks standards. The Life Skills Program was selling chocolate Easter eggs and Peeps on the day of the on-site review at the High School.	The SFA should share the Smart Snacks regulation with all teachers, staff, and advisors within the district. The SFA should develop a system for monitoring fundraisers to ensure compliance with regulation. Submit your plan on how this will be communicated and monitored.	
1700 - Afterschool Snack	V-1700	The SFA is not following the Afterschool Snack Program regulations. Documentation was not available at the time of the review to support claims.	The SFA will: 1. Watch the Afterschool Snack webinar and submit the date to be completed. 2. Train all staff preparing and serving the snack and submit the date to be completed. 3. Submit production records, menu, and count sheet for the Afterschool Snack Program for the week of April 22-26 operated at the Middle School to demonstrate understanding of requirements. 4. State your plan to ensure compliance in the 2019/2020 school year.	

Org - Level Technical Assistance

Area	Question	Comments
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	Verification documentation was not all available for review. The SFA must keep copies of the applications selected, pay stubs and other information submitted by the household, and copies of all communication with the household to include letter of notice to review and letter with the results of the verification.
700 - Resource Management		PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. The SFA is using the IFB method rather than the RFP for milk and bread bids as identified on the Procurement Plan. The SFA was not able to produce documentation to include: IFB package sent to potential vendors, responses and documentation of no response on small & formal purchases and matrix showing the low bid.

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		<p>Micro purchases are not spreading the wealth equitably. The SFA should re-evaluate the process with vending items from Smith.</p> <p>All invoices should be itemized. (Example: Hy- Vee receipts says produce @8, should identify the specific product purchased.)</p> <p>Fareway, Hy-Vee and Walmart should be classified as micro purchases.</p> <p>SFA should keep a log of micro purchases.</p> <p>No documentation is available for US Foods. For this to be a Formal purchase, all regulation must be followed.</p> <p>The SFA should identify which AEA Purchasing group they are associated with.</p> <p>SA provided templates with all required elements for Small and Formal Procurement.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>Must have signed debarment certifications kept on file.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Agreements valued at \$10,000 or more should have a termination for cause clause.</p> <p>A designated member of the staff should be comparing prices on invoices to contract prices to ensure accurate.</p> <p>A designated member of the staff should monitor to be sure all aspects of the contract are fulfilled by the vendor.</p> <p>Develop a process for rebates- Who/how submitted? How are they tracked by accounting? How do ensure they are deposited in Lunch Account?</p> <p>SFA should keep on file:</p> <ul style="list-style-type: none"><input type="checkbox"/> All price adjustments throughout the year<input type="checkbox"/> All invoices
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		<ul style="list-style-type: none"><input type="checkbox"/> All contracts and agreements<input type="checkbox"/> All bids solicited<input type="checkbox"/> Documentation that a vendor did not reply to bid (if applicable)<input type="checkbox"/> Documentation of why you selected a specific vendor (Selection Rubrics)<input type="checkbox"/> Copies of bid solicitation<input type="checkbox"/> Debarment statements<input type="checkbox"/> CD provided by the AEA (if applicable) <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$10,000(or local purchasing threshold if more restrictive) can be made without a quotation.</p> <ul style="list-style-type: none"><input type="checkbox"/> Track micro purchases, what purchased when and dollar amount.<input type="checkbox"/> Purchases should be distributed around community, not just one store. <p>Small Purchases- Purchases that are under \$250,000 (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <ul style="list-style-type: none"><input type="checkbox"/> Include all terms and conditions<input type="checkbox"/> Include terms: Buy American and Equal Opportunity<input type="checkbox"/> Include Termination for Cause and Convenience if \$10,000 or more<input type="checkbox"/> Attain Signed Debarment Statements
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		<input type="checkbox"/> Awarded on lowest price (unless written documentation to justify) <input type="checkbox"/> Maintain documentation Formal Purchase- Purchases equal to and exceeding \$250,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used. <input type="checkbox"/> Notice of accepting all types of formal purchase must be advertised. <input type="checkbox"/> Include all requirements of a small purchase <input type="checkbox"/> If working with the AEA purchasing group, you should have a CD on file with the details of the agreement. <input type="checkbox"/> Everything must be in writing.
700 - Resource Management		The SFA is not allowed to tell students how much money is left in their account, if they do this, it must be done very discreetly so that nobody else can hear per Iowa HF2467.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	The Ethnic Racial data submitted to the SA was not accurate. The SA and SFA discussed how to collect the information next year and how to complete the form.
800 - Civil Rights	810 Review program materials.	The menus do not contain the non-discrimination statement as required by USDA regulation. The SFA may use the abbreviated version on the menus. All printed materials must contain the nondiscrimination statement. The abbreviated version was provided by the SA.
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?	<p>WELLNESS POLICY: Provided Technical Assistance, the district is required to complete an assessment of the wellness policy at minimum of every three years and make the results public. Best practice would be to complete the assessment annually.</p> <p>Provided the Local Wellness Policy folder from Team Nutrition that includes the handout on the Summary of the LWP Final Rule, the "Does Your Wellness Policy Measure</p>

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		Up?" handout and the school Building Progress Report form.
1500 - Reporting and Recordkeeping	1501 Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	All program records must be maintained for three years plus the current year. Some documentation has been lost in the transition between Food Service Directors mid-year. It is the responsibility of the SFA to maintain these records.

Site - Level Technical Assistance Shenandoah High School (0109)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	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?	Breakfast entrée was not being offered with a grain. Students selecting this item would only have had vegetable, meat/meat alternate, neither of which count towards a reimbursable meal. This was corrected at the beginning of service by adding toast as part of that meal.
400 - Meal Components and Quantities - Breakfast	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	Students with signed diet modification forms stating that they may not have milk must be offered a substitution. Substitutions must have the same nutritional value as cow's milk. A list of pre-approved products was supplied by the SA.
400 - Meal Components and Quantities - Breakfast	409 Review production records and other supporting documentation.	PRODUCTION RECORDS & STANDARDIZED RECIPES: Production records evaluated from the review period do not include quantities produced, or planned quantities for each age level. These numbers should be recorded daily and kept for three years plus the current year to serve as documentation that the SFA is meeting the meal pattern.
400 - Meal Components and Quantities - Lunch		The SFA must maintain copies of production records, and CN labels to document the food prepared each day. This documentation is used to prove that you are meeting the meal pattern. Production records must include the serving size for each age level, the quantity prepared and the quantity served. The SFA should be using standardized recipes for all food items which combine 2 or more ingredients. Recipes should include ingredients, ingredient specifications, quantity of ingredients, serving size, yield, mixing

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		procedures, cooking procedures, times, temperatures, holding temperatures, procedures for leftovers.
400 - Meal Components and Quantities - Lunch	404 a. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?	Technical Assistance was provided to post signs listing the daily menu. This will help communicate to students not only what is being served, but help them decide what they will select as they go through the serving line. The SA reminded staff that at breakfast, students must select 3 items (not components) and provided the meal pattern requirements. The SA also provided some signs and an electronic templates.
1100 - Smart Snacks in School	1106. Does the school hold fundraisers during the school day where students may purchase food or beverages?	<p>SMART SNACKS: 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) must meet Smart Snack guidelines and nutrition standards.</p> <p>These items must be: whole grain-rich; first ingredient must be fruit, vegetable, dairy product or a protein; or be a combination food that contains at least ¼ cup of fruit and/or vegetable. Items must met the calorie, sodium, fat and sugar standards. Items must also adhere to the size restrictions for each age group. A brochure was provided.</p> <p>The Life Skills students are currently selling food items which do not meet Smart Snacks standards.</p>
1700 - Afterschool Snack	1701 Is documentation maintained that the site is located in an area eligible school in which 50% or more of the enrolled students are certified eligible for F/R price meals?	<p>AFTERSCHOOL SNACK PROGRAM: All documentation for the Afterschool Snack Program must be maintained for a period of 3 years plus the current year to include: participant counts, menus, production records, on site monitoring, and claim information.</p> <p>On site monitoring must be completed within the first 4 weeks of operating the program each year. The program must include educational or enrichment activities. The SFA must follow the prescribed meal pattern. Production records must be maintained daily. The “And Justice for All” poster must be present in the location that the snacks are served. And counting must be done at the point of service</p>

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		<p>after staff have verified that the student has a reimbursable snack.</p> <p>The SA provided the FSD with a copy of the Afterschool Snack Program handbook.</p>
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Org - Level Commendations

Description
<p>BREAKFAST & SUMMER PROMOTION (1600): The SFA does an excellent job of promoting breakfast with reminder signs, daily announcements, and special promotions. Menus are posted in the cafeteria as well as the website. Summer Food Service Program information is shared via websites, lunch menus, newsletters, flyers and the local radio station.</p>
<p>Certification and Benefit Issuance: The SFA uses an online application system which appears to be processing applications correctly. The system makes it easy to look up specific applications and groups students by household. Processing is instant.</p>
<p>CIVIL RIGHTS (800): The And Justice for All civil rights poster was posted in the cafeteria. Annual civil rights training was provided to food service staff and documented. The district has taken reasonable steps to ensure that most students with special dietary needs are adequately accommodated and that proper documentation is on file. No discrimination was observed. SFA on-site monitoring was completed to ensure that all schools are meeting program requirements.</p>
<p>LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years (July 2018). The policy has nutrition education, physical activity and other wellness goals included. A wellness committee is in place and meets at least one time per year. Minutes are kept.</p>
<p>MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of March appeared accurate and complete.</p>
<p>MEAL PATTERN: All students observed on the on-site visit had a reimbursable meal, the menu was complete with all food groups represented and served in their proper quantity. Offer vs. Serve was implemented properly and staff was monitoring food items on trays. Water was available to all students during meal times. Menus for the month of review contained all required components.</p>
<p>PROCUREMENT: The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases. 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. IFBs and RFPs for milk and bread are advertised.</p>
<p>PROFESSIONAL STANDARDS (1200): The SFA followed regulations for the district's size category when hiring a new Food Service Director in the spring of 2019. Tracking was provided that documents that the managers received the required 10 hours of training, Full time staff have completed 6 hours and all other staff have received at least 4 hours of annual training. The new FSD has already registered for several training opportunities in the near future. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.</p>
<p>RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Review month receipts were reviewed and indicated appropriate and allowable expenditures. The Paid Lunch Equity (PLE) too was completed and prices were increased as indicated by the PLE tool. The Business Official has a good understanding of applying the Indirect Cost Rate and has documentation of that process. Errors are expected to fall below the \$600 disregard, no fiscal action is expected at this time.</p>

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Site - Level Commendations Shenandoah High School (0109)

Description
HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes all required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers, milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Food Service workers wore proper hair restraints and practiced good gloving procedures
Smart Snacks: Smart Snacks and a la carte items sold by the SFA have been run through the Smart Snacks Calculator and are compliant.
The SFA has good participation at breakfast at the high school.