

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Xavier High School (10538105)**  
**Dates of Review: April 8 – 10, 2019**

**Program Year:** 2019  
**Month of Review:** February  
**Lead Reviewer:** Deb Linderblood  
**Org Representative(s):** Lorraine Gaffney

**Org - Level Findings**

<b>Area</b>	<b>Findings ID</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
100 - Certification and Benefit Issuance	V-0100	There is currently no one trained to be a back-up person for the Determining Official.	Identify who will be trained to be a back-up person for the Determining Official and by when they will be trained.	
700 - Resource Management	V-0700	The SFA does not have a Code of Conduct policy.	Develop and attach your Code of Conduct policy and make reference to policies that reference ethics, gifts and disciplinary action.	
800 - Civil Rights	V-0800	The SFA's menu currently has the following statement on their monthly menu "This building is an equal opportunity provider." TA provided that it needs to be "This institution is an equal opportunity provider."	Correct the non-discrimination statement on your monthly menus. Attach May's menu showing that the proper statement is now on the menus.	
800 - Civil Rights	V-0800	The SFA did not provide the public release to the local media, unemployment office or any company having large lay-offs. TA provided that the public release is posted on IowaCNP under download forms. The SFA is not required to pay to have the media include the public release. Documentation should be kept showing that the public release was sent to the local media.	State your intentions to provide the public release to the local media, unemployment office and any company having large lay-offs each school year.	
1000 - Local School Wellness Policy	V-1000	The Wellness Committee currently does not have students or the Food Service Director as part of the committee. The policy does not have goals for nutrition promotion, nutrition education, physical activities or other school based activities. The SFA has not completed an Assessment of their goals and thus has not made an assessment available to the public. Provided and reviewed with the Food Service Director the following handouts: Does Your Wellness Policy Measure Up?, a sample Wellness policy from another non-public school, the progress report template and Non-Food Classroom Reward and	State your plan and by when each of the following will be completed: 1.) To invite students and the Food Service Director to be a part of the Wellness Committee 2.) To add goals for nutrition education, nutrition promotion, physical activity and other school-based activities to your policy 3.) To complete an assessment of wellness goals 4.) To make the assessment available to the public.	

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		Celebration Ideas.		
1400 - Food Safety	V-1400	The school's Food Safety manual has not been reviewed or updated since 2016. A sound food safety plan is critical to establishing and maintaining a safe food environment. It is also a valuable tool for training staff on food safety.	State your plan to assess, update and implement the food safety manual to ensure it complies with current food safety requirements and matches your actual practices.	
RMCR - Indirect Costs	V-RMCR	The SFA is currently not using an indirect cost rate to charge the nutrition account for items such as electricity, water, heating, pest control and payroll.	State your plan to begin to use an indirect cost rate to charge the nutrition account for items such as electricity, water, heating, pest control and payroll.	
RMCR - Nonprofit School Food Srvc Acct	V-RMCR	The SFA has net cash resources exceeding the allowed amount of 3 months operating expenses. They do not have a plan approved by the State Agency to spend this down.	Develop and attach a plan for how you will spend down the funds in the nutrition account so that it does not exceed 3 month operating costs. The plan should show specifically how you plan to spend down your balance, an approximate cost and a timeline in which this will happen. Also submit your plan to Patti Harding for approval.	

**Site - Level Findings: Xavier High School (8105)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Breakfast signage does not indicate the number of items each food product counts as.	Develop and attach one week's worth of breakfast signage.	
400 - Meal Components and Quantities - Lunch	V-0400	The SFA was short on grain on Thursday during the week that the menu certification worksheets were done as only one slice of bread was served. TA provided that for 9-12th graders the SFA must offer 2 oz. eq. of grain per day.	State your plan for how you will revise your Thursday menu so that 2 oz. eq. of grain is offered. TA provided that for 9-12th graders they must be offered 2 oz. eq. of grain per day.	

**Org - Level Technical Assistance**

Area	Question	Comments
200 - Verification	210 a. Did the SFA attempt to directly verify selected applications?	TA provided that upon selecting an application for verification the SFA should attempt to find the student(s) on Elookup. If found, the household is directly verified and a letter of selection does not need to be sent to the household.
700 - Resource Management		<ul style="list-style-type: none"> <li>The procurement event page on the written procurement plan should be revised to reflect the upcoming school year's procurement events, correct procurement methods and contract award type. It is recommended that the procurement event page of the written procurement plan be reviewed annually (about February). It is best practice to keep a separate procurement event page for each school year. This practice will</li> </ul>

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		<p>help ensure that the correct procurement method is identified based on the estimated value of a particular purchase. On the plan the SFA should identify if they will award based on line item or bottom line for any purchasing event using small or formal purchasing method.</p> <ul style="list-style-type: none"><li>· TA also provided that the SFA needs to have debarment statements from vendors when using small or formal procurement methods.</li><li>· The SFA needs to have a written code of conduct that identifies the specific board policies that make a reference to disciplinary action. A board approved policy that reference gifts was re identified. Write in the policy numbers and titles on the school food service code of conduct that would apply to officers and employees who violate procurement procedures.</li><li>· Required federal terms and conditions must be included when procurement is conducted using the small purchase (3 Bids and a Buy) and formal methods of procurement. Please refer to the state-prototype templates posted on IA_CNP.</li><li>· When using micro-purchase method, purchases must be equitably distributed, to the maximum extent practicable, among vendors to "spread the wealth." Went over how to complete the small purchase template.</li><li>· When procuring milk and bread, along with specifications (descriptions) for all items to be procured, the estimated annual usage for each item should be provided. To ensure the district selects a responsive vendor with the overall lowest price (bottom line), the cost of each item on price quotation request should be extended by multiplying the unit cost with the estimated annual usage for each item to obtain the extended cost for the item. The sum of the extended cost for all specified items is the total extended cost (bottom line). A template that calculates extended cost for milk is available on IowaCNP in download forms.</li><li>· For milk, other things to consider when requesting price from vendors are: is pricing requested for paper cartons or plastic bottles, coolers to be provided at no charge, Hazard Analysis Critical Control Plan (HACCP) plan to ensure clean crates and milk cartons are delivered, rotation of milk by delivery individual to ensure First In, First Out (FIFO), straws, date stamped on milk cartons. The district should inform vendors whether a firm, fixed price or a fixed price with economic adjustment (escalator clause) is requested.</li><li>· For bread, provide vendors with a package count/package weight/weight per serving for each bread product. Review current school year bread product purchases to include any regularly</li></ul>
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		<p>purchased items when requesting price quotes.</p> <ul style="list-style-type: none"> <li>· The food service director should spot check invoices from the prime vendor to ensure products delivered match the order and the description of the product solicited by GPO. Prices on the invoice should match bid pricing or be lower unless SFA was given advance written notification per solicitation of any price increase. Food items procured by the SFA not on the GPO solicitation must be procured using appropriate procurement methods.</li> <li>· Food service director or designated individual should check deliveries to ensure Buy American provisions are met. A log should be maintained when a non-domestic agricultural commodity is accepted.</li> <li>· The prime vendor must get prior approval to substitute a product. The substitute product must be of an equal or superior quality as the product on the bid specification and be at equal or lesser price.</li> <li>* The SFA needs to keep an Exception Log listing items they have accepted that are non-domestic. Examples of non-domestic foods found in storage include mandarin oranges, bananas, pineapple, tuna and black olives. The exception log needs to list the date that the non-domestic item was accepted, item name/description, and the reason it was accepted. Two reasons are valid for accepting non-domestic foods, i.e. 1). food is not available in the US or not available in adequate quantities in the US or 2). the domestic product is significantly higher priced than the non-domestic product. Provided the Exception Log template.</li> <li>* Provided the SFA with the credit and rebate tracking forms and explained their use.</li> </ul>
700 - Resource Management		In school year 2017-2018 the SFA utilized 87.8% of their allotted PAL dollars. TA provided that the SFA needs to utilize as close to 100% as possible.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The link for the USDA complaint process/form which should be used if parents wish to file a complaint about any child nutrition program is: <a href="http://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer">www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer</a> .
RMCR - Nonprofit School Food Srvc Acct	10 Excluding equipment purchases made with USDA grants, did the SFA purchase equipment during the RM review period that cost at or above the capitalization level established by the State or SFA for financial statement purposes or at or above \$5,000 (whichever was less)?	TA provided that the State Agency has developed a pre-approved equipment list. If the equipment is on this list the SFA does not need State Agency approval to purchase the piece of equipment. If not on the list, State Agency approval is needed. Provided the Food Service Director with the pre-approved equipment list.
RMCR - Indirect Costs	1 Did the SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency?	TA provided that the SFA as a non-public school needs to use an indirect cost rate of 10% or less. Provided a handout which explains indirect cost for non-public schools. Provided a handout explaining indirect cost.

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**Site - Level Technical Assistance Xavier High School (8105)**

Area	Question	Comments
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	The food safety inspection was not posted in a publicly visible location. TA provided that the inspection has to be posted where students can see it. The inspection was moved to a publicly visible location while the State Agency was on site. No further action is required.

**Org - Level Commendations**

Description
Certification and Benefit Issuance: Benefit documents were very well organized. The current application for free and reduced price meals/milk and income guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the Point Of Service (POS) system, and denied applications were correctly determined. All applications were correctly determined, signed and dated by the household member and the SFA, were complete with Social Security Numbers and case numbers, and all applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential. The SFA has a back-up system for benefit issuance documents.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria, services are offered for Limited English Proficient households, annual civil rights training was provided for all food service staff and documented. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The correct state and federal non-discrimination statements are provided on the school's food service website.
Fiscal Action: No fiscal action will be assessed to this review.
Food Safety: The SFA has a district-wide written Food Safety plan that includes all required elements. Temperature logs are maintained for all coolers-including milk coolers, freezers and refrigerators. Food temperatures are documented on the Food Production Record. Dishwasher temperatures are taken and documented. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Food Service workers wore proper hair restraints and practiced good gloving procedures. Opened food items are labeled and dated. The Food Service Director is ServeSafe Certified.
Local Meal Charge Policy; The SFA developed and approved a meal charge policy in April of 2018. The policy was e-mailed or mailed to all households and staff were informed of the policy.
Professional Standards: The Food Service Director has completed 17 hours of Professional training of the required 12 hours. All nutrition staff have met required training for Professional Standards in school year 2019. An organized annual Training Spreadsheet is maintained showing at a glance which staff have been trained and meet required annual hours.
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. The Non-Program Revenue (NPR) tool was completed and no increase in prices were required. Indirect costs are charged to the food service program. Money is not transferred out of the account to support other programs.
School Breakfast and Summer Food Service Program Outreach: School Breakfast Program (SBP) outreach consisted of having second chance breakfast from 9:15-9:45 and breakfast menus are posted on the district's web site and in the cafeteria. Summer Food Service Program (SFSP) outreach consisted of forms from the IACNP forms download being hung up around school and in the lunchroom. An email also goes out to all parents and students the first week of May.
Verification: The correct number of applications were verified and were correctly selected from error prone applications. The income source was verified with one month's income, and the process was completed on time. The application selected for verification was confirmed prior to verification. The SFA had at least one person attend training. The verification report was completed accurately and on time.
Wellness Policy: The SFA's wellness policy was adopted on 9/10/2005 and was reviewed and revised on 01/2019. The public is made aware of the SFA's wellness policy via the school's web site in the Food Service section. The following individuals are involved in reviewing and updating the LWP: Xavier School Board, Xavier High School Board of Education and Xavier High School SIAC (School Improvement Advisory Committee).

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**Site - Level Commendations Xavier High School (8105)**

Description
Meal Components and Quantities: The Food Service Director does a god job of menu planning and has a six week cycle menu. Students are offered a variety of choices which increases participation. 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. The menus met weekly and daily meal pattern requirements for the 9 - 12th graders. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month—including many fresh fruits and vegetables. Standardized recipes are used for food production. At least two types of milk are offered. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of February were accurate and complete. Point of Service (POS), counts and filed claims appear accurate. Etrition is used as the school's POS system. The three POS stations were organized and orderly. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records (FPRs) were on file for all meals claimed for reimbursement for the review period. Cashiers are trained and appeared aware of what constitutes a reimbursable meal. Edit checks are performed.
Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of February 4 - 8, 2019 for breakfast and lunch. The worksheets showed that all meal components were offered. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the 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, and draining fat from browned meats. A nutrient analysis was not required.
Offer vs. Serve: Offer vs. Serve is being implemented properly. All students observed selected 1/2 cup of fruit and/or vegetable. Cafeteria staff have been trained on offer vs. serve. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at lunch.
Smart Snacks: Students are able to purchase foods via a la carte sales and a vending machine. All foods sold meet the Smart Snack standards for nutrition content. Exempt leftover National School Lunch Program entrees are only sold the same day they are initially offered. Beverages sold meet the standards for the 9-12th grade students. Documentation was available to show that all a la carte and vended items sold to students met Smart Snack standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte and in vending.
Water: Free potable water is available to all students for lunch and for breakfast via a water fountain just outside of the cafeteria.