

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Albert City-Truesdale Comm School District (00720000)
On-Site Review Dates: February 25-27, 2020

Program Year: 2020
Month of Review: January
Lead Reviewer: Deann Murphy
Org Representative(s): Kim Ellrich

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The SFA does not provide written notification to families who are denied meal benefits. This is a repeat finding from the last 2 Administrative Reviews.	For your response, please submit a copy of notification of denied benefits that you will use. Describe when/how you will provide the family with their notification letter.	I have attached a letter that will be used. The correct dates will be entered for the hearing timeline according to the time the application is received. I will provide the letter to the parent(s) at the time the application is determined.
1000 - Local School Wellness Policy	V-1000	The SFA does not have an active wellness committee made up of a variety of stakeholders. The wellness policy has not been evaluated and the evaluation has not been made public. This finding has been addressed with the SFA at the last 2 Administrative Reviews.	The SFA will submit to the State Agency their agenda for their upcoming wellness committee meeting. The agenda needs to include the date the meeting is planned for, the members invited to the meeting and topics they plan to discuss. The SFA will also state when and how they plan to make the wellness assessment available to the public. This must all be completed prior to June 30, 2020.	
1600 - School Breakfast and SFSP Outreach	V-1600	The SFA does not promote breakfast to households which has been a finding on the past 2 Administrative Reviews with Technical assistance provided to the SFA from the State Agency staff.	Please provide documentation to show what you are using to promote breakfast to households.	We have added more information to our website banner promoting breakfast. Also, the breakfast menu has been added to the website in the Lunch/Breakfast box. See attachment.
RMCR - Revenue From Nonprogram Foods	V-RMCR	The SFAs non-program food revenue tool shows that they are not taking in adequate revenue to meet their non-program food costs. This is a repeat finding from the last Administrative Review.	The SFA will explain how they intend to have non-program food revenue cover or exceed non-program food costs.	Please see the attachment.

Site - Level Findings: Albert City-Truesdale High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	At breakfast during the review week, the FSD served an omelet with homemade muffin on Tuesday. The muffin only credited 0.75 oz. eq. and there was no other grain offered that day. SFAs may only serve a M/MA (omelet) if they first	The FSD will submit her standardized recipe showing that the muffin credits as 1 oz. eq.	

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		serve 1 full oz. eq. of grain.	
400 - Meal Components and Quantities - Lunch	V-0400	On Thursday of the review week, the SFA only served 0.75 oz. eq. M/MA and so was short of the required 1 oz. eq. required. Because of this, the SFA was also short on M/MA for the review week, serving 8.75 oz. eq. instead of the required 9-10 oz. eq. served for the week. This is a repeat finding where both technical assistance and corrective action were provided during the SFAs last Administrative Review.	1). The SFA will submit to the State Agency one week of lunch menus, fully completed food production records, standardized recipes, CN labels, etc. which prove that the menu met all daily and weekly menu requirements. All foods served to students should be listed on the food production records. 2). Because this was a repeat finding, the State Agency will disclaim all meals served on the first day of the on-site review week, Monday, February 24, 2020. The SFA will file their February claim as usual. The State Agency will adjust the January claim after all fiscal action has been calculated.
1100 - Smart Snacks in School	V-1100	The SFA is selling foods to students as seconds during lunch, but the foods sold do not have Smart Snacks documentation that they are compliant.	The SFA will submit to the State Agency Smart Snacks calculator print-outs and food labels for 3 items they plan to sell to students during the school day. The SFA does not need a print-out for an entrée or milk. If the SFA decides not to sell sides to students, please explain that in place of the print-outs.

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	130 Is household notification of denied benefits consistent with FNS requirements?	Households who complete an application and are denied must be given notification of the denial in writing.
100 - Certification and Benefit Issuance	137 Did the SFA accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document?	The SFA should contact JMC to find out how they can change each students benefit status to show the current years correct benefits. Currently, the benefit document shows many students with the carry over status of "Approved Free last year," etc. even if they have completed a new application and have updated benefits. The SFA should be able to delete last years information once a new application or DC listing is on file.
200 - Verification	208 When a confirmation review was conducted:	All verified applications need to have a confirmation review and confirming official signature and date prior to sending a request to the household for income information. The confirming official needs 4 hours Professional Standards training during the year.
300 - Meal Counting and Claiming	305 What are the SFA's meal counting and claiming policies and procedures for the following situations:	If sack meals are provided to students, meals must meet minimum reimbursable meal requirements. For this age group, the SFA would need to provide each student with at least 1 oz. eq. M/MA, 1 oz. eq. grain, 3/4 cup vegetable, 1/2 cup fruit, 1 cup milk. Non-students who eat a meal must be charged the full adult price since they do not receive subsidized meals like the district students do.
700 - Resource Management		PROCUREMENT: Technical assistance was provided regarding the written procurement plan and code of conduct. The SFA should re-evaluate the link they used for disciplinary actions so that it describes the process the

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		<p>SFA will use in case the Code is violated. Highly recommend that the SFA staff involved in the procurement process attend the upcoming regional training on Procurement to learn more about it. Micropurchases: The SFA is not spreading the wealth for their micropurchases. They should preferably use 3 vendors for their micropurchases. Much of the food being purchased is unallowable to be paid for by the nutrition fund. Discussed with the Superintendent, Business Manager and FSD the need to refrain from spending School Nutrition money on unallowable costs. All foods served to students should be listed on the menu/food production records. Foods purchased for classroom birthdays, special functions, etc. should be noted as a non-program cost and paid for accordingly. Small Purchases: The SFA needs to include federal as well as local terms and conditions in their small purchase specs sent to vendors. The FSD should monitor the contract by spot checking monthly bid prices against invoice prices to ensure the vendor is charging appropriately. Discussed with the SFA using the small purchase template for milk/bread procurement. Formal Procurement: The SFA is responsible for knowing what is in the RFP through their buying group, i.e. AEA Purchasing. This information is either found on the disk the buying group sent to the SFA or through the Martin Brothers website. This information contains the original bid pricing. The SFA is also responsible to keep all monthly/weekly bid prices on file for 3 years + current year. The FSD should only be purchasing products from the Market Basket as these are the only products from the vendor that have been solicited through their original contract with AEA Purchasing. The FSD should check in all products the vendor sends to ensure that what she purchased was what was delivered, the products are adequate quality, and any substitutions are appropriate. The FSD should also spot check the invoice prices against the monthly/weekly or original bid prices provided by the vendor. If prices are different, any discrepancies should be settled before the bill is paid.</p>
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	The public release is to be sent to the local newspaper annually. The newspaper does not need to print it and the SFA does not need to pay for it. The SFA should keep a copy showing proof that it was sent.
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 SFA was provided with the USDA complaint procedure and complaint form. If a parent/student has a discrimination complaint, the SFA should follow this procedure and form and send it to the USDA directly.
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?	The Wellness policy needs to have an assessment of policy goals that is reviewed annually by the wellness committee. The wellness committee needs to consist of stakeholders who represent parents, community, students, Food service, health care professional, PE teacher, administration, board representative. Each of these groups should have someone invited to attend committee meetings. It was suggested to the superintendent to have the committee meet at least twice annually - once to set which goals to work on during the year and once to evaluate those goals. Both the most recent wellness policy and assessment need to be made public.
1200 - Professional Standards	1219 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	The Confirming Official needs to have 4 hours training annually. Part of this training needs to include Civil Rights. The rest of the training should be on Application Approval so that she understands how to confirm the applications for verification.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements?	The SFAs HACCP manual contains many Standard Operating Procedures

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		(SOPs) that do not apply to this district, i.e. food bars, etc. The FSD should go through the manual and only include those SOPs that apply to this SFA. Recommend kitchen staff receive training annually on the SOPs in the manual as part of their professional standards training.
1400 - Food Safety	1403 a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?	The SFA is required to record any food item they accept from their vendor that is non-domestic. Discussed with the FSD using the Buy American log found on IowaCNP, Download Forms. This needs to be completed and kept on file for 3 years + current year.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	USDA requires SFAs to promote breakfast to households. Promotion should be done at least 2 times annually. It should contain the breakfast menu, price, times available and information on why eating breakfast is important. The SFA can find helpful breakfast information at https://www.educateiowa.gov/pk-12/nutrition-programs/school-meals/school-breakfast-program . Promotion can be done through the School newsletter, website, email, PT conferences, National School Breakfast Week, etc.
RMCR - Revenue From Nonprogram Foods	10 If the SFA found that its revenue ratio was less than its food cost ratio, did the SFA take additional steps to sufficiently increase its nonprogram food prices, add sufficient funds to its nonprofit food service account, and/or take other actions to adequately resolve the problem?	Non-program food revenue must be adequate to cover non-program food costs. Currently prices for seconds and sides are very low. Also, total food costs seem high. Adjusting both would help resolve the problem. Suggested the Business manager do a self-check calculation mid-year in SY20-21 to see if non-program revenues will be on target for covering costs next year.

Site - Level Technical Assistance Albert City-Truesdale High School (0109)

Area	Question	Comments
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?	Milk served to students and not consumed may not be placed back into the program to be resold or reused. This is considered "double dipping" since the milk was already sold once. It should be discarded unless the SFA wants to contact the DE for a waiver to have a share table.
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	If the FSD wants to include a M/MA component on the breakfast menu, a full 1 oz. eq. grain component must also be served. Standardized recipes for homemade items, i.e. muffins, etc., need to credit as a full ounce equivalent. The FSD was e-mailed a grain crediting tool to help her know how her homemade bread recipes credit.
400 - Meal Components and Quantities - Breakfast	411 a. Did the school comply with the planned menu for the review period?	All foods served at breakfast need to be listed on the food production records. Since the SFA has decided to use Serve Only serving method, all foods listed on the menu must be served to each student and are included in the calorie, fat, and sodium range allowed. Students do not get choices. If the FSD wishes to serve breakfast bars, these need to be a part of the menu and listed on the food production record instead of offering them as a choice. All menu options must meet minimum meal pattern requirements.

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400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	All recipes need to be standardized so that everyone who uses them would get the same results. Many of the previously standardized recipes from Iowa Gold Star have been changed and the changes have resulted in foods being non-compliant to the meal pattern requirements. The FSD was e-mailed a template and instructions how to re-write her recipes so that they are standardized. She can also find pre-written recipes from Iowa Gold Star, Healthier Kansas Recipes, USDA recipes, etc. that are already standardized and provide menu component contributions.
1100 - Smart Snacks in School	1105 a. Review 10% of the food and beverages sold during the review month.	The FSD and Authorized Rep were emailed a link to the Smart Snack calculator. For any food or beverage sold to students during the school day, the SFA must keep documentation on file that it is Smart Snack compliant. Exceptions to this are entrees sold during the reimbursable breakfast or lunch that day or the following day and FF and 1% milk. These items do not need proof that they are compliant.
1400 - Food Safety	1406 Is the most recent food safety inspection report posted in a publicly visible location?	Both the "And Justice For All" poster and the current health inspection need to be posted in a space that is available to the public. These were moved to the hallway bulletin board during the on-site review.
1400 - Food Safety	1408 Were the selected relevant temperature logs available for review?	The FSD reports that while the kitchen staff check the dish machine temperatures daily to ensure they meet the sanitizing temperature of 180 F, they do not record these temperatures. The FSD was directed to record both wash and rinse temperatures once daily. Temperature records are important in case there is a food borne illness outbreak. These need to be kept on file for at least 6 months.

Org - Level Commendations

Description
Annual civil rights training was provided to most staff involved in the program. The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. Ethnic/racial information is collected and the summary form is complete and on file. No discrimination was observed. The current state and federal non-discrimination statements are listed on household notification letters and the shortened statement is on the posted menu.
Benefit documents were well organized. The current application form and guidelines were used, direct certification is downloaded as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were correctly approved, they were complete with SSN's and adult signatures, and all applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Carry over 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.
PROCUREMENT: The SFA has a procurement plan and code of conduct on file for SY19-20 as required. Micropurchases: Micropurchases were below the micropurchase threshold. Purchase prices were reasonable. Small Purchases: Milk purchases were within the local threshold. The SFA did reach out to 2 vendors with specifications. Specs were not overly restrictive. The SFA has kept all documentation on file that shows the history of the procurement. Products purchased from the vendor were the ones submitted in the original bid. The vendor sent monthly price lists, allowing the SFA to monitor their contract.
Six staff members were identified as needing Professional Standards training. The FSD received 12 hours training and 4 others have received at least 4 hours training as required. Employee training is tracked on a spreadsheet to ensure adequate and appropriate training is being done.
The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time.
The district has a current wellness policy on file. The policy is posted on the schools website for public viewing. Goals are set for nutrition promotion, nutrition education, and physical activity.
The SFA had a positive balance in their nutrition account as of December 31, 2018 so they were not required to complete the PLE tool. Reports are filed on time and most documents pertaining to the nutrition program are kept on file for the required 3 years + current year. The SFA effectively uses their USDA Foods entitlement money. In SY18-19 the SFA used 117% of their allotment.

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The SFA promotes a neighboring community's free summer feeding program to households by posting information about where and when meals are served on the schools website.

Site - Level Commendations Albert City-Truesdale High School (0109)

Description
Meal counts during the on-site review were reasonable when compared to the January review month counts. Meal count totals for the month of January appeared accurate and complete. There was a point of service, POS, at the end of the line as approved on the SFA application. Students gave the cashier their name in exchange for their meal. 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.
The SFA has a written Food Safety (HACCP) plan that includes the required elements. Temperature logs are maintained for all coolers-including milk coolers, freezers, and food served. The kitchen and storage areas were orderly and clean.
There is good meal participation at the school. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. The FSD makes many homemade bread items. CN labels for many processed foods served were on file. The FSD completed the certification worksheets for both breakfast and lunch prior to the on-site review. Water is available as required. Many low sodium vegetable items were observed in storage. Students seemed to have a sufficient amount of time to eat after receiving meals. Signage was posted explaining what constitutes a reimbursable meal. The daily menu is also posted. Food service staff were polite and respectful to students and guests. All students were observed to have a reimbursable meal during the review.