

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Center Point-Urbana Community School District (10620000)**  
**November 12-14, 2019**

**Program Year:** 2020  
**Month of Review:** November  
**Lead Reviewer:** Christine Crow

**Site - Level Findings: Center Point-Urbana Intermediate School (0418)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The cinnamon roll that was served to the students during the observed breakfast credits as 0.5 oz. grain equivalent when 1 oz. grain equivalent is the daily minimum required. There were other, 1 oz. grain equivalent options available and all students that selected the cinnamon roll during the observed meal selected another grain to meet the daily minimum requirement. Since this cinnamon roll is served at all sites, all nutrition staff must be trained on how this roll credits towards the meal pattern. TA provided.	Provide documentation of the training provided to nutrition staff throughout the district on how to serve this cinnamon roll at breakfast.	
400 - Meal Components and Quantities - Lunch	V-0400	During the observed lunch period, there were 2 students who were counted and claimed as having a reimbursable meal when their tray only had 2 components instead of the required 3 components. To constitute as a reimbursable lunch meal, a student must select at least 3 components and one of those must be ½ cup fruit or vegetable. This differs from a reimbursable breakfast meal which must consist of 3 items. TA provided to the food service director, food service manager and point of	Provide training on what constitutes a reimbursable lunch to all nutrition staff within the district and provide documentation of that training.	

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Center Point-Urbana Community School District (10620000)**  
**November 12-14, 2019**

		service cashier.		
1300 - Water	V-1300	Free, potable water must be made available at breakfast and lunch for all students. Although water was available at lunch, no water was available at breakfast at the Intermediate School. TA provided.	Confirm that water will be made available at breakfast at the Intermediate school and all other sites within the district.	

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
800 - Civil Rights	V-0800	The nondiscrimination statement posted on the website is not the most current USDA or Iowa nondiscrimination statements. The most current USDA and Iowa nondiscrimination statements are found in Download Forms of the IowaCNP (NSLP 140 and NSLP 141) and on the Iowa Department of Education Nutrition Programs website ( <a href="https://www.educateiowa.gov/pk-12/nutrition-programs#USDA_Nondiscrimination_Statement">https://www.educateiowa.gov/pk-12/nutrition-programs#USDA_Nondiscrimination_Statement</a> ). They must be included on all program materials, including the website and menus. TA provided.	Update the website with the most current Federal and Iowa non-discrimination statements and provide the link to this website.	

**Org - Level Technical Assistance**

Area	Question	Comments
100 - Certification and Benefit Issuance	105 How long does the application's approval take from the date the SFA receives the application from the household?	The received date must be included on the application so that the SFA can show that they processed the application within 10 operating days as required.

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Center Point-Urbana Community School District (10620000)**  
**November 12-14, 2019**

100 - Certification and Benefit Issuance	129 Is household notification of eligibility consistent with the responses provided on the Off-Site Assessment Tool?	If the SFA would like to use a letter of notification of eligibility status other than the State Agency template located in Download Forms (ELIG075), they must complete the approval form (Download Forms ELIG010) and submit it to Deb Linderblood for approval. TA provided to the determining official.
200 - Verification	202 Who serves as the confirming official? (Name and/or position title or software used is acceptable)	The application selected for verification must be confirmed by someone other than the person who originally processed the application and determined eligibility. The confirming official must confirm that the eligibility status was determined correctly prior to notifying the family that they were selected for verification. The confirming official must sign and date the application.
700 - Resource Management		The SFA has a negative balance policy but it appears outdated as it does not reflect what the SFA is doing to manage negative balance accounts. TA provided on updating the policy and making it available to all families annually.
700 - Resource Management		<p><b>PROCUREMENT:</b></p> <ul style="list-style-type: none"> <li>· The milk bid that was sent more closely resembled an informal bid than a formal bid. The milk bid contained a debarment certification, a list of products that they wanted to purchase, a due date for the bid response, a request for the company's HACCP Plan, and delivery specifications. Although the SFA asked for plastic bottle and carton pricing, they did not specify that they planned on purchasing mostly plastic bottles. The SFA did not purchase with the lower priced company since they did not offer plastic half-pint milk bottles. TA provided that they must specify items that will impact their evaluation decision. Required terms and conditions must also be included</li> </ul>

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Center Point-Urbana Community School District (10620000)**  
**November 12-14, 2019**

		<p>and if doing a formal procurement method, they must also advertise with a widely distributed publication and either create an evaluation checklist for an RFP or have a public opening for an IFB. TA provided. Procurement resources available in Download Forms.</p> <ul style="list-style-type: none"><li>· The equipment purchase was initially described as a small purchase but documentation available shows it to be a micropurchase as no bids were sent to vendors, including the vendor they purchased from. The SFA simply purchased the piece of equipment from a vendor. As a micropurchase, the piece of equipment was a one-time purchase that was reasonably priced and this event was within the SFA's local purchase threshold. TA provided on the difference between a micropurchase and a small purchase.</li><li>· The SFA had a procurement plan that contained the prime vendor purchases, milk, and the point of service update. TA provided on including all GPO contracts including small wares, ware wash, and food separately on the procurement plan.</li><li>· Contract management is a 2 step process that includes checking to ensure the products received are what was ordered and that the invoice matches what was delivered and includes the price that was agreed upon in the bid. Both steps of the contract management are required and although the SFA is checking deliveries, the price is not being compared to the price lists. TA provided on contract management and on saving price lists.</li><li>· If items are being received and/or purchased that do not meet the Buy American provision, the SFA must document these items in a log. There is a Buy American exception log template located in Download Forms. TA provided to the food service director.</li></ul>
--	--	--

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Center Point-Urbana Community School District (10620000)**  
**November 12-14, 2019**

		<p>· All micropurchases must be tracked in a log to ensure that funds are distributed equitably. The SFA did not report any micropurchases for the 2018-2019 school year, TA was provided for any potential micropurchases made this school year.</p>
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>The SFA must assess the implementation of the goals written within the wellness policy. Although the committee notes contained assessments and action plans for many goals there was not an assessment of the physical activity goals, or the goals for foods sold and provided to students during the school day. The assessment of the implementation of wellness policy goals must be made available to the public. SA suggested that they put a wellness link on the district website that includes the assessment, policy, upcoming wellness committee meeting information, and other health related information.</p>
1200 - Professional Standards	1217 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mechanism.)	<p>The food service director tracks training hours for all staff using the Iowa professional standards tracking tool. Training that employees received over the course of multiple school years are being entered into the same tracking tool which does not allow the director to easily check to ensure employees met annual training requirements. TA provided on using a new tracking tool for every school year.</p>
1400 - Food Safety		<p>SA provided information on the steps that SFAs must take (waiver application) to collect perishable and non-perishable food items on a share table to the food service director.</p>
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?	<p>If products are purchased or accepted upon delivery that do not comply with the Buy American provision, the SFA must document these items on a log that details the product, date received and reason why the SFA purchased an item that did not comply with the Buy American provision. A Buy American exception</p>

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Center Point-Urbana Community School District (10620000)**  
**November 12-14, 2019**

		log can be found in Download Forms. TA provided.
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?	All SFAs must inform families annually of the Summer Food Service Program. SA suggests putting information about the SFSP in the end of the year newsletter to inform families of the SFSP child nutrition program. Templates provided and are available on the Iowa Department of Education and USDA's website. TA provided.
RMCR - Revenue From Nonprogram Foods	8 Did the SFA:	The food service director calculated the nonprogram food revenue using all revenue collected from non-program foods but did not include the cost of adult meals, 2nd entrees, 2nd milks, or catering events when calculating the nonprogram food cost. The food service director charges the adult lunch price required by USDA, and charges an amount that covers the cost for food and labor for 2nd entrees, milks, and catering events. TA provided to the food service director on calculating the average cost of a reimbursable meal and the average cost of an entrée to determine the cost of catering events, adult meals, 2nd entrees, and milks. TA provided on using this information for determining nonprogram food costs.

**Org - Level Commendations**

Description
CERTIFICATION AND BENEFIT ISSUANCE: - The SFA had appropriate documentation on file to show that all free and reduced students selected for review were eligible to receive those benefits. • The SFA provides benefits for 30 operating days to students who received benefits in the previous school year. • Benefits are provided to all students in a household when one student is eligible for benefits. • Applications contain all required information and the eligibility is accurately determined for all applications reviewed. • The SFA obtains the DC list as it is available and provides the correct benefit status to the student in a timely manner. The determining official prints off and files the DC list. • The correct benefit status is transferred from the application and/or DC list to the point of service system accurately. • The racial ethnic form is completed to show that no discrimination was made when providing benefits.
CIVIL RIGHTS: • The SFA uses a translator for families with Limited English Proficiency. • Civil rights training is provided to staff annually. • The racial ethnic form is completed annually and shows that no discrimination was made in providing meal benefits to students. • The diet modification form is on

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Center Point-Urbana Community School District (10620000)**  
**November 12-14, 2019**

the district's website. The food service staff at each site work with their school's nurse to ensure any student who needs a special diet has those dietary needs met. Documentation is on file for students with a special diet need from their prescribing official. The district offers a milk alternative that is nutritionally equivalent to cow's milk. • The SFA follows the USDA complaint procedure for any families who have a civil rights complaint regarding the school nutrition program. • The "And Justice For All" poster is on display for the public to view.

**FOOD SAFETY:** • The temperature logs are kept up to date for all cooling equipment, dishwasher, and hot foods. • Good food safety practices were observed while SA was onsite including hand washing, clean aprons and hair net use. • The most recent food safety inspection report was on display in a public location. • The HACCP Plan contains all required elements and individualized Standard Operating Procedures. The director trains staff on the HACCP plan. - The food service director and manager of the observed site are ServSafe certified. • Food is being stored properly.

**MEAL COUNTING AND CLAIMING:** • The SFA has a backup plan in case their point of service computer system does not work. • The SFA does an edit check to ensure that meal counts do not exceed enrollment. • The point of service line is organized and orderly to ensure that students get counted and claimed properly. • Offer versus serve is implemented correctly. - The edit check report for October 2019 matches the claim and the number of free, reduced and paid meals did not exceed the number of students enrolled. - The number of meals claimed during the observed breakfast and lunch meals were reasonable when compared to the daily meals claimed in October.

**NUTRITION AND MEAL PATTERN REQUIREMENTS:** • The monthly menu has a variety of entrée options as well as 2 fruit and vegetable options daily. Many homemade items are included on the menu. • Food production records are complete with all menu items served including milk and condiments, total quantity prepared, serving sizes, planned and actual servings, leftovers, and additional comments. - The serving size of condiments is controlled in an attempt to limit sodium. • The lunch and breakfast menus served on the day of observation (11/13/2019) and during the review period, met the daily and weekly meal pattern requirements for all components. • All students that were counted and claimed as having a reimbursable breakfast had all required components. • At least 50% of the grains served during the observed lunch and breakfast meal as well as all meals served during the targeted week of review were whole grain rich. • At least 2 different types of milk were available for students to select. • Free, potable water and glasses were available at lunch. • Signage was on display to inform students on how the breakfast and lunch menus constitute a reimbursable meal. • CN labels are on file for all foods served during the observed meals and during the review period.

**ONSITE MONITORING:** The on-site monitoring form was completed for breakfast and lunch at all sites in the previous school year. The food service director is working to complete the onsite monitoring forms for each site for the current school year as they are due on February 1.

**PROCUREMENT:** • The SFA has a procurement plan that includes all required elements including their local thresholds, items to purchase and their amounts, the procurement method, contract award type, and individuals responsible for contract management. • The SFA has a code of conduct for procurement that meets USDA requirements. • Documentation is on file to show the procurement process for the AEA GPO agreement, dairy bid, and all invoices for purchases made with the school nutrition fund. • The debarment certification statement was collected for the milk vendor.

**PROFESSIONAL STANDARDS:** - The food service director tracks the training of all employees with responsibilities within the school nutrition program. - Documentation is on file for training provided to staff to show that all staff received the required number of training hours.

**RESOURCE MANAGEMENT:** • The school nutrition funds are tracked separately from all other school funds. • The school nutrition fund has less than 3 months of operating costs. • Internal control procedures are in place to ensure the school nutrition fund is used only for allowable costs and that all revenues are directed into the account. • The school food service account had a positive balance as of 12/30/2018 and did not need to use the PLE tool or increase paid student lunch prices. • The SFA charges the correct adult lunch price as required by USDA. • All nonprogram foods are charged at an amount that covers the cost and revenue was collected and entered into the school nutrition fund. • The district charges the school nutrition fund for indirect costs (repairs, administrative labor, custodial labor, and office supplies) by applying the appropriate indirect cost rate to the correct direct costs. • The SFA has a negative account policy that adheres with the Iowa law HF2467.

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Center Point-Urbana Community School District (10620000)**  
**November 12-14, 2019**

School Breakfast Program Outreach • The SFA informs families of their breakfast program as they post information on their website and in their newsletter.

VERIFICATION: • The applications selected for verification are selected from the error prone applications first. • The eligibility status of applications selected for verification were confirmed and signed by the confirming official prior to notifying the family that they were selected for verification. • The verification process and report were completed on time. • The SFA notified the family that they were selected for verification and notified them of their verification results through a letter that contained all required information. • The benefits of the application selected for verification increased after verification and the SFA increased the benefit status of the students within 3 operating days.

WELLNESS POLICY AND COMPETITIVE FOODS: • The SFA's wellness policy is on the district's website and available for the public to read. • The wellness policy contains all required elements. • The wellness committee strives to ensure a variety of stakeholders are included in the wellness committee meetings. Meetings are held regularly as evidenced by meeting notes. • The wellness policy is reviewed annually. • The Smart Snack calculator is used to determine if items sold outside of the reimbursable meal meet regulations. The food service director has all nutrition calculator printouts organized in a binder to show that the Smart Snacks she sells meet requirements. • The vending machine at the high school contains beverages that meet requirements.