

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Cal Community School District (09160000)**  
**Date of Review: May 8<sup>th</sup> – 10<sup>th</sup>, 2018**

**Program Year:** 2018  
**Month of Review:** April  
**Lead Reviewer:** Donna Matlock  
**Org Representative(s):** Amanda Heiden

**Site - Level Findings: Cal-Dows High School (0109)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	SA observed students passing by the cashier quickly which was difficult for SA and cashier to ensure that all students going through the line were captured for a reimbursable meal. <i>The cashier knew every students ID number and was entering every student's number for them without any exchange from student which results in missing meals when students are passing too quickly. (Students need to verbally exchange their name, ID # or enter ID number themselves, etc.). This will ensure accurate meal counts.</i>	Please provide a plan explaining how the POS (point of serve/sale) is corrected.	
1400 - Food Safety	V-1400	SA observed improper storage practices: boxes of food were sitting on the floor - food must be place approximately 6 inches above the floor to avoid cross contamination and pests. Concession stand foods are stored in CNP (Child Nutrition Program) freezer.	Please indicate your plan to correct the storage violations that were observed.	

**Org - Level Findings**

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Cal Community School District (09160000)**  
**Date of Review: May 8<sup>th</sup> – 10<sup>th</sup>, 2018**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	<p>SFA is not utilizing their USDA PAL dollars. In 2016-2017 SFA spent 44% of PAL and 2018 only 26%.</p> <p>When funds are not utilized the SA's (State Agency) allocation is decreased resulting in less funds allocated to SFA's.</p>	Provide a timeline and plan to the SA describing when and how the PAL funds will be utilized moving forward.	
1000 - Local School Wellness Policy	V-1000	The most recent assessment of the local wellness policy was not completed or submitted.	Submit the district's plan on how it will conduct an assessment of the wellness goals and make the Local School Wellness Policy available to the public.	
Resource Mgt. Comprehensive Review	V-RMCRF	<p>SFA did not take steps to adequately increase its non-program food revenues and/or secure non-federal funds if out of compliance with the Revenue from Non-program Foods requirements. Financial report 2016-2017 lists non-program revenue (9%) is not adequately contributing to non-program food costs (17%).</p> <p>Since SFA's last 2014 AR (Admin. Review) the food costs have increased and revenue continued to not to adequately support food costs resulting from \$5676 (2014) to \$12,398 (2017) non-compliance.</p>	<p>Provide a plan describing how the SFA will adopt internal controls to ensure that noncompliance does not occur in the future.</p> <p>Available in IowaCNP "Download Forms" are tools to assist in determining non-program food costs. NSLP120 - Menu Costing Worksheet and NSLP150 - Non-Program Revenue Tool or access additional guidance and tools at <a href="https://educateiowa.gov/reporting-nonprogram-food-costs-how-and-why-may-2016">https://educateiowa.gov/reporting-nonprogram-food-costs-how-and-why-may-2016</a>. <b>Recommend using "Food Cost Calculator" to accurately reflect program/non-program food costs.</b></p>	

**Org - Level Technical Assistance**

Area	Question	Comments
------	----------	----------

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Cal Community School District (09160000)**  
**Date of Review: May 8<sup>th</sup> – 10<sup>th</sup>, 2018**

100 - Certification and Benefit Issuance	126 a. Certification and Benefit Issuance Review Method:	Some applications were missing the "Determining Official" signature. SA discussed with SFA to be sure to complete application process with signature.
100 - Certification and Benefit Issuance	128 Are the correct conversion factors used when processing applications that indicate more than one income frequency? If NO, explain.	SA discussed with Board Secretary about using correct income frequency tabs on ICAVES to ensure all error prone applications are captured.
100 - Certification and Benefit Issuance	134 Does the SFA perform Direct Certification matches according to the required timeframes? If NO, how often are matches conducted?	DC (direct certification) lists are not being imported into JMC software system. SFA has been updating the software system manually. By importing DC list into JMC will reduce any chances of benefit errors.
200 - Verification	206 When a confirmation review was conducted,	The confirming official and the determining official must be two different individuals. Technical assistance was provided on Confirmation Reviews. Prior to any other verification activity, a confirming official, other than the official who made the initial eligibility determination, must review each approved application selected for verification to ensure that the initial determination was accurate. (page 71 Eligibility Manual) The confirming official then signs and dates the application(s).
700 - Resource Management		Discussed with SFA that it's their responsibility of ensuring GPO is procuring properly. All solicitation require "Buy American & Debarment Statement" and other documents when over \$10,000.
700 - Resource Management	705 Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?	Discussed with SFA that some charges to the nutrition fund should be paid out of the general fund (Auto pay fee, hood inspection, vehicle gas, equipment repairs).
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	SFA did not send out a public release notification informing the community of the "free & reduced" eligibility applications. This form is located in "Download Forms" on IowaCNP and must be sent to media every school year and documentation retained.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	SA discussed with SFA that the self-monitoring form must be completed annually for all district sites. One was completed for the high school; self-monitoring needs to

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Cal Community School District (09160000)**  
**Date of Review: May 8<sup>th</sup> – 10<sup>th</sup>, 2018**

		include St. Paul's Lutheran School also as it's a part of the district.
1000 - Local School Wellness Policy	1003 a. Who is involved in reviewing and updating the Local School Wellness Policy?	SFA did not have available a list of stakeholders/committee members to indicate whether students are involved with the LWP (Local Wellness Policy). The list of names and titles of members must be available to the public along with the LWP by website, newsletters, or other media platforms.  USDA guidelines require LEA/SFA's at a minimum; to include the general public and the school community (including parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) to participate in the wellness policy process.
1000 - Local School Wellness Policy	1005 Provide a copy of the most recent assessment on the implementation of the local school wellness policy.	SFA has not done an assessment of wellness goals which is required to be conducted every three years as is reviewing/updating the LWP (local wellness policy). SA provided SFA with a folder of resources which includes an assessment template.

**Site - Level Technical Assistance Cal-Dows High School (0109)**

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	325 b. Were the counts by category correctly used in the Claim for Reimbursement?	SFA may be using the meal count summary report for filing claims resulting with inaccurate meal counts. Edit Check report shows daily meal counts for the month and are to be used for claims. This occurrence also affects breakfast.
400 - Meal Components and Quantities - Lunch	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines? If SFA/school is offering 1% flavored milk, check that approved waiver from State Agency is on file.	Substitute milk needs to be a creditable substitution to be counted as a reimbursable meal. A list of substitute milks can be found at this link: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs/school-meals-0">https://www.educateiowa.gov/pk-12/nutrition-programs/school-meals-0</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?	SFA completed an old version of the self-monitoring form for high school only. SFA is required to complete a copy for all schools including St. Paul Lutheran School to ensure the integrity of the nutrition program.

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Cal Community School District (09160000)**  
**Date of Review: May 8<sup>th</sup> – 10<sup>th</sup>, 2018**

Dietary Specifications Assessment Tool - Lunch	1 Are specifications considered when purchasing menu items and condiments to limit the following?	SFA has in store room shortening containing 2.5 grams of trans fat. USDA requires all food products to be trans-fat free except for natural production in some foods.
--	---	---

**Org - Level Commendations**

Description
<ul style="list-style-type: none"> <li>• Benefit documents, as well as all paperwork, were very well organized. • The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. • The correct and current benefit issuance list was available. • All applications were correctly determined, signed and dated by the household member, were complete with SSN's and case numbers, and all applications were determined within ten days. • 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. • Waivers are provided to applicants and indicate specific fees. • Eligibility is kept confidential. • The SFA has a back-up system for benefit issuance documents and system.</li> </ul>
<ul style="list-style-type: none"> <li>• The correct number of applications were verified and were correctly selected from error prone applications. • All income sources were verified with at least one month's income, and the process was completed on time. • The verification report was completed accurately and on time. • The staff training agenda covered many important topics and shows a commitment to ensure food program compliance.</li> </ul>
<ul style="list-style-type: none"> <li>• The district has a current wellness policy on file. • The SFA's wellness policy was reviewed and revised on January 2017. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.</li> </ul>
<ul style="list-style-type: none"> <li>• The invoices from vendors were well-organized. The invoices had a date, vendor name and address, items purchased were clearly identifiable. • The district used the small purchase method and obtained price quotations for milk and bread. Three vendors were contacted for milk price quotations. The milk price quotation included specifications for milk items, annual estimation of each type of milk to be purchased, the request for two deliveries (day to be mutually agreed upon between school and awarded contractor). • Bread product price quotations was solicited from two vendors. Each procurement was in compliance with the requirements for the local small purchase threshold of less than \$150,000. • The district has a signed agreement with a Group Purchasing Organization for prime vendor to supply food and non-food supplies. • A review of milk, bread, and prime vendor invoices validated the district was receiving the products as bid and prices were charged as bid.</li> </ul>
<ul style="list-style-type: none"> <li>• The Resource Management section of the Off-Site Assessment tool was completed on time. • Financial records that were reviewed, the district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. • The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. • The Paid Lunch Equity (PLE) tool was completed and prices were increased as required. • No indirect costs are charged to the food service program. • Money is not transferred out of the account to support other programs. • Reports are filed on time, and all records are maintained for at least three years plus the current year. • The SFA developed and approved a meal charge policy. The policy was mailed (emailed) to all households and staff were informed of the policy. The policy states that students who qualify for free meals shall never be denied a reimbursable meal.</li> </ul>
<ul style="list-style-type: none"> <li>• The staff training agenda covered many important topics and shows a commitment to ensure food program compliance. • School Breakfast Program (SBP) outreach was sent out at the beginning of the year to inform families of the availability of the program. • Reminders of the SBP were also sent out throughout the school year. • Outreach included announcements, newsletters, the school website, posters, etc. • Summer Food Service Program, SFSP, outreach was sent out to families at the end of last school year to inform the families of the availability and location of free meals in the summer. • The information was shared via websites, lunch menus, newsletters, phone calls, flyers, etc. All nutrition staff have obtained the required training for SY 2018.</li> </ul>

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Cal Community School District (09160000)**  
**Date of Review: May 8<sup>th</sup> – 10<sup>th</sup>, 2018**

• Meal counts during the on-site review were reasonable when compared to the review month counts. • 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. • All students selected a reimbursable meal without having a prompt to select a ½ cup of fruit or vegetable as one of the three required components.

**Site - Level Commendations Cal-Dows High School (0109)**

<b>Description</b>
<p>• The “And Justice for All” civil rights poster was posted in the cafeteria. • The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. • Annual civil rights training was provided to food service staff and documented. • 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 form is completed. • No discrimination was observed. • The correct state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school’s website.</p>
<p>• The Food Service Director (FSD) does a great job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat. • 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. • Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. 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 were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption. The SFA provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal. • Menus included many homemade entrees, and standardized recipes are used for food production. • Free potable water is available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)? • Offer vs. Serve (OVS) was being implemented properly. All students observed selected ½ cup of fruit and/or vegetable. Students have the option to decline any one or two of the five components. • At least two types of milk are offered. • Many low fat and low sodium food items were observed in storage. • Students had sufficient amount of time to eat after receiving meals. • Signage was posted explaining what constitutes a reimbursable meal at both breakfast and lunch. A monthly menu is also posted. • Food service staff was polite and respectful to students, other staff, and each other. • Nutrient analysis was not required.</p>
<p>• The Food Service Director completed the USDA menu worksheets for the week of May 7th - 11th for breakfast and lunch at the Cal CSD High School. The worksheets showed the serving portions and component contributions meeting the meal pattern. • The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated the school is at low risk for (non)compliance 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, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats.</p>
<p>• The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. • The latest Health Inspection Report was posted in a publicly visible location. • Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. • Food Service workers wore proper hair restraints and practiced good gloving procedures.</p>