

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Pocahontas Area Comm School District (52830000)
04/11/17 – 04/13/17

Program Year: 2017
Month of Review: April
Lead Reviewer: Christine Crow
Org Representative(s): Diane Pattee

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	One student was claimed as being free through their income application but according to their income and family size SA determined them, through the use of leaves, to be reduced price eligible. The student is one that is enrolled at another district but comes to the Pocahontas CSD for classes and lunch. Even though the district where the student is officially enrolled determined the eligibility the SFA that claims the students meals are required to ensure the original eligibility status was determined correctly. Technical assistance provided.	While the SA was onsite, the determining official contacted the neighboring district to correct the students eligibility status. The district sent the approved letter informing the family of their status change within the correct timeframe and their appeal rights. SA confirmed that the status was changed in the POS after the 10 day required timeframe. No further action required.	
200 - Verification	V-0200	If the household selected does not respond to the initial request for verification the SFA is required to follow up with the family at least once through email, letter, or phone call to request verification documentation. If the SFA does not receive any response and/or documents provided for verification cause the household's benefits to be reduced, notification of results and the reduction of benefits must be sent to inform families that their benefits will be reduced in 10 calendar days and that they can appeal within 10 calendar days without impacting their benefits until a hearing and decision have been made. Technical assistance provided.	Confirm that the verifying official will listen to the verification training webinar for the 2017 - 2018 school year.	
300 - Meal Counting and Claiming	V-0300	The claim information must come from the edit check report and not the summary transaction report. The SFA has been basing their claim on the summary transaction report instead of the edit check report. Technical assistance provided.	Confirm that the determining official will begin using the edit check report instead of the summary report when determining claim information.	
700 - Resource Management	V-0700	PROCUREMENT: The SFA is required to have a procurement plan for all items purchased. In addition to the plan, a signature page, code of conduct and debarement certification statement	Submit a copy of the SFAs procurement plan for the 2017-2018 school year.	

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		must be included. Sample plans and a template provided along with technical assistance in all areas.		
800 - Civil Rights	V-0800	In addition to the food service staff, the determining official and authorized representative are required to have civil rights training annually. When SA arrived onsite neither the authorized representative or the determining official had their civil rights training. The determining official provided documentation while SA was on site that her civil rights training was completed. Technical assistance provided.	Submit the training documentation to show the authorized representative received civil rights training.	
1000 - Local School Wellness Policy	V-1000	School districts are required to form wellness committees that participate in the development, implementation and review of the Local Wellness Policy at least once every three years. The committee should consist of the following stakeholders: School Board members, School Administrators, teachers, school health professionals, school physical education teachers, general public, parents, and students. The district's wellness policy has not been individualized to the wellness needs of the district as it contains information not applicable to the programs offered within the district. Each school building must complete an assessment of the implementation of all required wellness policy goals within each school building. The assessment must be completed at least once every 3 years and be made available to the public. A folder of wellness policy resources was provided along with technical assistance.	Describe the districts timeline and plan of when the wellness policy will be reviewed and updated. Describe how the district will form a wellness committee and when the first meeting will take place. Describe when the assessment of the implementation of policy goals for each school building will take place and how it will be made available to the public.	
1200 - Professional Standards	V-1200	Food service directors are required to have 12 hours of professional standards training annually while staff who work more than 20 hours per week in school nutrition programs must have 6 training hours and staff who work less than 20 hours per week in school nutrition programs must have 4 training hours annually. This includes the authorized representative, determining official, and all cashiers. All training sessions must be documented. Webinar links and other training opportunities discussed with the FSD.	Describe how the food service director will obtain the remaining 7.5 hours of training, how the full time staff will obtain their remaining 3.5 hours of training, how part time staff will get their remaining 1.5 hours of training and how the determining official and the authorized representative will obtain their 4 hours of training for the 16-17 school year.	
Resource Mgt Comprehensive Review	V-RMCRF	The nonprogram revenue and costs were not calculated accurately. SA provided the business manager on what a nonprogram food is and how best to calculate the nonprogram revenue tool. The nonprogram revenue tool provided.	Submit the revised the nonprogram revenue tool.	

Site - Level Findings: Pocahontas Area Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
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300 - Meal Counting and Claiming - Breakfast	V-0300	The preschool class count was not taken on the point of service but was based on the teachers memory for both breakfast and lunch. Currently the teacher tells the cashier which students ate breakfast or lunch and the cashier would enter those students into the POS system. The counting and claiming must be based off of the point of service count. Technical assistance provided and the SFA has already begun implementing a new process to ensure preschool student's meal counts are based on the point of service. The preschool teacher will complete a checklist that has all student names on it to show how received a reimbursable breakfast or lunch meal. The checklist and process was approved by SA. No further action required.	No further action required.	
300 - Meal Counting and Claiming - Lunch	V-0300	During the lunch observation, the State Agency observed the price of student's lunches (at the free, reduced or paid price) populating on the POS screen after the student's ID card was scanned thus identifying a students eligibility status. It is unnecessary for cashiers or food service to be aware of student's eligibility status and this information must be kept confidential. Technical assistance provided and the FSD quickly responded by working with the IT person and the POS provider in changing the screen at both the elementary and high school. No further action required.	No further action required.	
400 - Meal Components and Quantities - Breakfast	V-0400	It is required that 100% of grains served be whole grain rich items. During the breakfast observation, SA observed 4 types of cereal (fruit loops, corn pops, apple jacks and frosted flakes) being served that were not whole grain rich. Breakfast rolls in the freezer were also not whole grain rich. Per the FSD, the cereals were not what was ordered from their primary vendor as the cereals served at the other school site had the whole grain rich cereal. Technical assistance provided.	Describe how the SFA will begin ensuring that 100% of grains served are whole grain rich and that items ordered are what is actually received.	
400 - Meal Components and Quantities - Breakfast	V-0400	Approved CN labels and standardized recipes were missing for some menu items served preventing the SA to determine the ounce equivalents for meat/meat alternate and grain. On 3/7/17 there weren't any grains offered on the breakfast food production record or menu. The meal is not considered reimbursable if all menu components aren't offered. Fiscal action is possible for this error. The food production records did not include the fruit (fresh, canned or frozen) served other than the 4 oz serving of 100% juice. During the breakfast observation, SA did observe fresh fruit being served in the	Submit one week of breakfast food production records with supporting CN labels and/or standardized recipes to show all menu component requirements were made available to students.	

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		required servings and the FSD reports that fresh fruit is available daily for breakfast. Technical assistance provided on CN labels, recipes, and food production record requirements.		
400 - Meal Components and Quantities - Lunch	V-0400	Approved CN labels and standardized recipes were missing for some items served during the review period and the day of observation. Therefore, SA was not able to determine how some menu items credited towards their respective menu components. Serving sizes were not always listed on the salad bar food production records making it unclear if all of the vegetable subgroup requirements were met for the week of the review period and 2 days that the salad bar was offered there weren't any grain options available for students who opted for the salad bar option. The FSD reports that the salad bar is a new option offered to students and they aren't confident that it will continue. Technical assistance on food production records and CN labels provided.	Submit a week of lunch food production records, including the salad bar food production records if the SFA decides to continue it, with CN labels or standardized recipes to show that all meal pattern requirements were met.	
900 - SFA On Site Monitoring	V-0900	Starting this 2016-2017 school year, SFAs with more than one site are required to complete the on-site monitoring tool for 50% of sites that offer breakfast every 2 years. The revised on-site monitoring form that includes both breakfast and lunch can be found under Download Form in the CNP. Both the breakfast and lunch monitoring forms must be completed prior to February 1st of every school year. Technical assistance provided.	Submit a completed breakfast on-site monitoring form for 50% of sites that offer breakfast.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	128 Is household notification of denied benefits consistent with FNS requirements? If NO, explain.	The SFA is required to send a letter of notification of eligibility status to all households who complete an income application and are denied. The letter must contain information on how to appeal the eligibility decision. The State Agency template letter of notification (found in Download Forms) can be used. A copy of the letter sent should be kept on file.
1200 - Professional Standards	1219 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.	SFAs are required to track the training hours of all employees with school nutrition program responsibilities including the determining official, authorized representative and cashiers. SA provided the Iowa Tracking Tool along with technical assistance. The FSD agrees to use this tracking tool and to track all employees with school nutrition program responsibilities.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	The SFA has a HACCP Plan that appears to contain all of the required elements. The plan was not well organized, did not have a Table of

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		Contents or page numbers making it difficult to find the Standard Operating Procedures or ensure that all required Standard Operating Procedures were available. Technical assistance provided.
200 - Verification	206 When a confirmation review was conducted,	The determining official signed all applications where the confirming official is to sign. The determining official line was signed by the superintendent. There was confusion with the responsibilities associated with those titles. The determining official is the person who determines the original benefit status of the students. The confirming official is to confirm that the original determination of benefit status is accurate prior to notifying households they have been selected for verification. Therefore, only applications selected for verification must be confirmed. The confirming official must check the calculations of the original determination prior to signing. Technical assistance provided.
700 - Resource Management		As of July 1, 2017, districts are required to have a negative balance policy describing how they will consistently implement an approved process throughout the district to manage negative lunch account balances. A list of items to consider when developing a policy provided.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?	All school nutrition program materials must contain the most current Federal and Iowa non-discrimination statement. The most current statements can be found here: https://www.educateiowa.gov/pk-12/nutrition-programs#Federal_Civil_Rights_Statement If there is not enough room on hard copy materials the abbreviated statement can be used.
Revenue from Nonprogram Foods Testing Chart	1 Determine what the SFA's process is to ensure that all meals/a la carte provided to schools outside of the LEA's district or to other programs were captured/recorded. Were internal controls sufficient to ensure that all meals/a la carte provided to schools outside of the LEA or for other programs were documented for billing purposes?	The CACFP check must be deposited into the daycare's account and not the SFA's account. The business manager also charges the daycare for each lunch meal. Technical assistance provided and the business manager agrees to deposit the daycare's CACFP check into their own account and then bill them accordingly for each meal provided.

Site - Level Technical Assistance Pocahontas Area Elementary School (0409)

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	325 b. Were the counts by category correctly used in the Claim for Reimbursement?	The SFA was basing their claim from the summary report and not the edit check. The claim from the review period shows 1 more paid meal was claimed for the month than what was on the edit check. Technical assistance provided and the claim preparer agrees to begin using the edit check report for the claim.
400 - Meal Components and Quantities - Lunch	406 If school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	As of October 1, 2017 students less than 5 years of age (preschool students) are required to receive the CACFP meal pattern instead of the NSLP meal pattern. SA provided a copy of the CACFP meal pattern and technical assistance to the FSD.

Org - Level Commendations

Description

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<p>CERTIFICATION AND BENEFIT ISSUANCE: - The SFA provides the 30 day carryover of eligibility status from the previous year. - The SFA's applications are complete with parent and staff signatures and corresponding dates. - The SFA has all of the Direct Certification lists downloaded and on file. - Certification and benefit issuance documents are very well organized. - The letters used to notify families of their Direct Certification eligibility status is the State agency Approved template letter. - The SFA completed the ethnic racial form accurately and on time. The form does not show any discrimination was made in determining the eligibility status of applicants. - The SFA extends eligibility status to all families within the household.</p>
<p>CIVIL RIGHTS: - The SFA provides program documents in alternate languages as needed for Limited English Proficient households. - Civil rights training was provided to food service staff prior to the first day of school. (8/19/16) - The racial/ethnic form was completed and shows no discrimination was made in determining benefit eligibility of households who completed an income application. - The public release was sent to the local media outlet prior to first day of school. - No discrimination was observed during the on-site breakfast or lunch observation. - The "And Justice For All" poster was on display.</p>
<p>FOOD SAFETY: - The SFA has a HACCP Plan available at every site that contained all of the required elements. - The SFA had 2 food safety inspections this year and it was on display in a public location. - Temperature logs are up to date and available for both milk coolers, both refrigerators and the freezer at the review site. - Food temperatures were monitored and reviewed. - Good food safety practices were observed while on-site. - Food at the review site was stored properly.</p>
<p>LOCAL WELLNESS POLICY: The district recently revised the wellness policy and is presenting to the board for approval at their next board meeting.</p>
<p>MEAL COUNTING AND CLAIMING: • All meals that were counted and claimed at the point of service at breakfast and lunch were reimbursable meals. • The edit check count for the observed breakfast and lunch were reasonable when compared to the edit check count for the review period. • The count on the edit check for the review period did not exceed the total number of students enrolled per their eligibility status.</p>
<p>MEAL PATTERN REQUIREMENTS: - The SFA completed the menu certification worksheets for the review period. - The SFA had lunch and breakfast signage on display that described how the menu constituted a reimbursable meal. - Two different and approved milk types are offered to students. - The menu items are given creative names and the food service staff does many fun meal events/celebrations for students. - Daily dated food production records and menus are available for all meals claimed. - The menus contain the non-discrimination statement. - Offer versus serve is made available to all students. - All menu components were available to students during the observed breakfast and lunch as well as during the review period. - During the review period, the lunch menu and food production records show that all of the daily requirements were met for the milk, fruit, vegetables and meat/meat alternate for all grade groups. - Signage was posted throughout the cafeteria promoting healthy foods. - The SFA is working on introducing a wider variety of fresh vegetables to their elementary school students.</p>
<p>ONSITE MONITORING FORM: - The SFA has completed onsite monitoring forms for lunch for 4 of their sites.</p>
<p>PROFESSIONAL STANDARDS: - The SFA has documentation of all training provided thus far to the food service staff including attendance logs and/or certificates of training events.</p>
<p>RESOURCE MANAGEMENT:- The SFA has their own financial account and is charging the correct paid lunch price according to the PLE tool. - The SFA is also charging the correct adult lunch price. - The SFA's financial account has less than 3 months of operating costs in it. - All revenues received are directly deposited in the SFA's financial account. - The bid documents are on file for the milk and bread bids.</p>
<p>SUMMER FOOD SERVICE PROGRAM AND SCHOOL BREAKFAST PROGRAM OUTREACH: - The SFA provides outreach of both the School Breakfast Program and the Summer Food Service Program through newsletters, local media outlets and flyers.</p>
<p>VERIFICATION: - The verification process and report were completed on time. - The letter of notification of verification selection and results were approved letters. - The SFA picked the correct number of applications to verify.</p>
<p>WATER AND COMPETATIVE FOODS: Free, potable water is available at both breakfast and lunch. - The competitive foods offered at the review site include 2nd entrees and 2nd milk.</p>