

Arizona Department of Education

Health and Nutrition Services Division

Administrative Review Summary Report

	Aun	mistrative neview summary	, itcpo					
Scho	ool Food Authority Name: Integrity Education	Incorporated						
CTD	: 07-87-51							
Site	: Integrity Education Centre							
Con	Contacts: Ken Mullan, Principal and Susan Scott, Director							
	Review Date: September 27, 2019							
	Review Period: August 2019							
	Programs Reviewed:	School Lunch School Break	xfast	✓ Afterschool Snack				
		Fresh Fruit & Vegetable	Special	Milk				
No.	Review Observations & Findings	Technical Assistance Provi	ided	Required Corrective Action				
	Performance Sta	ndard 1: Certification & Benefit Is	ssuance-	Critical Area				
	No findings.							
	Performance S	Standard 1: Meal Counting & Clair	ming- Cr	itical Area				
	No findings.							
		ndard 2: Meal Components & Qua						
	Quantities observed during the review period did			Please provide a written description of the				
	not meet minimum amounts required by the	• • • • • • • • • • • • • • • • • • • •	_	changes that have been made to ensure that				
	meal pattern. Specifically, the minimum daily fruit			daily fruit quantities at breakfast meet minimum				
	requirements were not met at breakfast on	continue (e.g., changes in portion		amounts required by the meal pattern.				
	8/14/19 or 8/15/19; only 7/8 cup was offered	recipes, type of fruit offered, etc.) Discussed with cafeteria staff how						
	when 1 cup is required. This was attributed to							
	clementines/tangelos being credited as a 1/2 cup when the Food Buying Guide indicates that 1	properly identify and count reimb						
	whole clementine/tangelo is 3/8 cup.	meals, as well as procedures if a s does not select a reimbursable me						
	whole clementine/tangelo is 3/8 cup.	Meal pattern requirements for th						
		School Breakfast Program can be						
1		on ADE's website at	Tourid					
1		www.azed.gov/hns/nslp/mealpat	ttern					
		The Step by Step Instruction: How						
		Plan a Breakfast Menu can be fou						
		ADE's website at						
		http://www.azed.gov/hns/nslp/tr	rainingp					
		s/online/. Please note that repeat						
		violations involving food quantities						
		result in fiscal action and/or term						
		of performance-based reimburse						

(extra 7 cents).

Quantities observed during the review period did Discussed how current system allowed not meet minimum amounts required by the meal pattern. Specifically, the minimum weekly grain requirement was not met for grades 6-12 at continue (e.g., increasing portions, breakfast.

for this to happen and potential changes that could be made to ensure it doesn't having an additional item available at least 4 times a week, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the School Breakfast Program can be found on ADE's website at

www.azed.gov/hns/nslp/mealpattern.

The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at

http://www.azed.gov/hns/nslp/trainingp s/online/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).

Please provide a written description of the changes that have been made to ensure that weekly grain quantities at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Breakfast Menu must be submitted.

not meet minimum amounts required by the meal pattern. Specifically, the minimum weekly red/orange vegetable requirement was not met for grades 6-8 and 9-12. This was the result of "salad" and "veggie dipper" sides not specifying what vegetables were provided each time they were served.

Quantities observed during the review period did Discussed how current system allowed that could be made to ensure it doesn't continue (e.g., increasing 3/8 cup vegetable portions to 1/2 cup, documenting everything that is offered each day, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at

www.azed.gov/hns/nslp/mealpattern.

The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at

http://www.azed.gov/hns/nslp/trainingp s/online/. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingp s/snparchivedwebinars/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performancebased reimbursement (extra 7 cents).

Please provide a written description of the for this to happen and potential changes changes that have been made to ensure that weekly red/orange vegetable quantities at lunch meet minimum amounts required by the meal pattern.

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Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum daily grain requirement was not met at lunch on 8/17/19 for grades 6-8 and was not met on 8/12/19, 8/13,19, 8/15/19, or 8/16/19 for grades 9-12.

Discussed how current system allowed that could be made to ensure it doesn't continue (e.g., revising recipes, documenting crouton offering, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable must be submitted. meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at

www.azed.gov/hns/nslp/mealpattern.

The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at

http://www.azed.gov/hns/nslp/trainingp s/online/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).

Please provide a written description of the for this to happen and potential changes changes that have been made to ensure that daily grain quantities at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu

Quantities observed during the review period did Discussed how current system allowed not meet minimum amounts required by the meal pattern. Specifically, the minimum weekly grain requirement was not met for grades 6-8 and continue (e.g., revising recipes, 9-12 at lunch.

that could be made to ensure it doesn't increasing portions, documenting all grain offerings, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at

www.azed.gov/hns/nslp/mealpattern.

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Please provide a written description of the for this to happen and potential changes changes that have been made to ensure that weekly grain quantities at lunch meet minimum amounts required by the meal pattern.

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Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the daily fruit requirement was not met at lunch on 8/12/19, 8/13/19, or 8/16/19 for grades 9-12.

Discussed how current system allowed that could be made to ensure it doesn't continue (e.g., increasing portions, documenting all fruits served, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern.

The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at

http://www.azed.gov/hns/nslp/trainingp s/online/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).

Please provide a written description of the for this to happen and potential changes changes that have been made to ensure that daily fruit quantities at lunch meet minimum amounts required by the meal pattern.

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly fruit requirement was not met at lunch for grades 9-12.

Discussed how current system allowed that could be made to ensure it doesn't continue (e.g., increasing portions, documenting all fruits served, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern.

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http://www.azed.gov/hns/nslp/trainingp s/online/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).

Please provide a written description of the for this to happen and potential changes changes that have been made to ensure that weekly fruit quantities at lunch meet minimum amounts required by the meal pattern.

7

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the daily vegetable requirement was not met at lunch on 8/12/19, 8/15/19, or 8/16/19 for grades 9-12.

Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., increasing portions, revising recipes, documenting all vegetables served, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at

Discussed how current system allowed for this to happen and potential changes that have been made to ensure that that could be made to ensure it doesn't daily vegetable quantities at lunch meet continue (e.g., increasing portions, minimum amounts required by the meal pattern.

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The Step by Step Instruction: How to Plan a Lunch Menu can be found on

www.azed.gov/hns/nslp/mealpattern.

ADE's website at

http://www.azed.gov/hns/nslp/trainingp s/online/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly vegetable requirement was not met at lunch for grades 9-12.

Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., increasing portions, revising recipes, documenting all vegetables served, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at

www.azed.gov/hns/nslp/mealpattern.

The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at

http://www.azed.gov/hns/nslp/trainingp s/online/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).

Discussed how current system allowed for this to happen and potential changes changes that have been made to ensure that that could be made to ensure it doesn't weekly vegetable quantities at lunch meet continue (e.g., increasing portions, minimum amounts required by the meal pattern.

Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically, only 1/2 cup of fruit (juice) was offered at breakfast when a minimum of 1 cup of fruit is required.

Discussed how current system allowed that could be made to ensure it doesn't continue (e.g., always having 2 fruit options at breakfast). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at

www.azed.gov/hns/nslp/mealpattern.

Please provide a written description of the for this to happen and potential changes changes that have been made to ensure that daily fruit quantities at breakfast meet minimum amounts required by the meal pattern.

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The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingp s/online/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).

The changes made to the planned menu on the day of review were not acceptable. Specifically, grapes were planned to be served at breakfast but were not offered at breakfast causing the daily fruit quantity to be below minimum requirements.

Discussed acceptable changes to the menu and the importance of ensuring requirements to be met. The Step by Step Instruction: How to Plan a Breakfast requirements. Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingp s/online/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).

Please provide a written description of the changes that have been implemented at substitutions still allow the meal pattern breakfast to ensure that any changes made to the planned menu will meet meal pattern

Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically, only 1.75 oz. eq. grain (1.5 oz. eg. from pizza + 0.25 oz. eg. from croutons) was offered at lunch for grades 9-12 when a minimum of 2.0 oz. eq. grain is required.

Discussed how current system allowed that could be made to ensure it doesn't continue (e.g., changes in recipes/products, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at

www.azed.gov/hns/nslp/mealpattern.

The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at

http://www.azed.gov/hns/nslp/trainingp s/online/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).

Please provide a written description of the for this to happen and potential changes changes that have been made to ensure that daily grain quantities at lunch meet minimum amounts required by the meal pattern for grades 9-12.

On the day of review, it was observed that 5 breakfasts counted for reimbursement did not contain all of the required meal components. Specifically, 2 breakfasts did not contain a fruit and 3 breakfasts did not consist of at least 3 items. This contributed toward fiscal action

calculations.

Discussed how current system allowed that could be made to ensure it doesn't continue. Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a Service must be submitted. reimbursable meal. The Recognizing a Reimbursable Breakfast Meal at the Point of Service Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingp s/snparchivedwebinars/.

Please provide a written description of the for this to happen and potential changes changes that have been made to ensure that all meals counted for reimbursem ent contain all of the required meal components. Additionally, the certificate of completion of Recognizing a Reimbursable Breakfast Meal at the Point of

Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

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Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

No findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

OVS was not implemented properly at breakfast. Although students were allowed to refuse items, they were not instructed to take the minimum of 3 items (1 being a 1/2 cup fruit or vegetable).

Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be found on ADE's website at http://www.azed.gov/hns/nslp/program guidance/.

Please provide a written description demonstrating how OVS will be implemented properly at breakfast. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast.

Discussed feasible options for signage and potential content, plan for creating, and posting. Printable POS Signage can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpat will be displayed for all students to see. tern/.

Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast. Additionally, please provide written assurance that this sign

15

		Resource Management					
	No findings.						
General Program Compliance: Civil Rights							
	No findings.						
	Compared	Program Compliance: SFA On-Site Monito	avina				
	No findings.	Program Comphance. SPA On-Site Monito	oring				
	Conor	N Drogram Compliance Local Wellness De	alie.				
	The recent assessment of the implementation of	al Program Compliance: Local Wellness Po Discussed requirement to complete an					
	the LWP did not meet the Final Rule requirements. Specifically, an assessment of the school itself was conducted rather than an assessment of the wellness policy.	assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their LWP, how the LEA's LWP compares to the model wellness policy, and	None required at this time.				
16		progress made in attaining the goals of the wellness policy. Sample evaluation tools can be found on ADE's website at http://www.azed.gov/hns/nslp/lwp/. Also discussed feasible means for notifying the public of the results of the most recent assessment.					
	General P	rogram Compliance: Competitive Food Se	ervices				
	No findings.						
	General	Program Compliance: Professional Stand	lards				
17	The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	Discussed 12-hour requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/hns/nslp/training/	Please provide the expected date that the training requirement will be met as well as the name, date, and content information of trainings that the School Nutrition Program Director is registered for.				
		•					
18	Part-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	Discussed 4 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/hns/nslp/training/	Please provide the expected date that the training requirement will be met as well as the name, date, and content information of trainings that Part-time School Nutrition Program staff is registered for.				

No findings.

General Program Compliance: Food Safety, Storage and Buy American

The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) at off-site storage facilities: Suncup Juices (grape, apple, orange, and fruit punch). Additionally, sufficient documentation justifying a from the nonprofit food service account Buy American exception was not maintained.

Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy must be used to procure food products that comply with the Buy American Provision. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at

http://www.azed.gov/hns/nslp/forms/. Buy American Recorded Webinar and FAQ can be found on ADE's website at http://www.azed.gov/hns/sfp/.

Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that American Webinar, and FAQ. Funds used the requirements of the Buy American Provision are met. Additionally, please provide the form that will be utilized for tracking any exceptions to the Buy American Provision.

General Program Compliance: Reporting & Recordkeeping

Discussed required sections of

Production records for breakfast and lunch did not contain all required sections. Specifically, they did not contain leftovers, and the amount of meals served were not consistently being filled out.

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19

production records. Parts of a Production Record Guidance can be found on ADE's website at tern/. Production Record for Multiple Grades can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpat tern/. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingp s/snparchivedwebinars/.

Please provide copies of completed breakfast and lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the http://www.azed.gov/hns/nslp/mealpat certificate of completion of Production Record Overview must be provided.

It was observed on site that the caterer is completing production records for breakfast and lunch when the caterer does not serve breakfast and is not present at breakfast service to count 21 the actual amount of items served and the actual amount of items left over.

Discussed importance of the server (whether SFA or caterer depending on meal service) completing production records before meal service to document the actual amount of items served and after meal service to record the actual amount of items left over.

Please provide a written description of the changes that have been made to procedures for completing production records to ensure items served and items left over are accurately recorded

Production record crediting and recipe crediting are inconsistent. Specifically, the following recipes listed crediting information that differed from the production record: Chicken Caesar Salad, Hamburger, and Pizza.

Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage -

http://www.azed.gov/hns/nslp/mealpat tern/.

Please provide updated recipes and production records with consistent crediting.

23		end of the school year and determined which was most feasible. Summer feeding locations can be found at http://www.eatwellbewell.org/. Call 1(800) 5-HUNGRY for more information and/or go to http://www.whyhunger.org/.	to the end of the school year, and written assurance that this will occur.				
	Other Federal Program Reviews: Afterschool Snack Program						
24	Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met on 8/16/19. Specifically, fruit snacks were served as the fruit component.	Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at http://www.azed.gov/hns/nslp/ascsp/.	Please provide ASP production records for 5 consecutive days that demonstrate that the ASP meal pattern requirements have been met. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times.				
25	The Afterschool Snack Program monitoring review was not conducted within the first four weeks of operation and one additional time during the school year.	Discussed ASP monitoring requirements. A sample ASP monitoring form can be found on ADE's website at http://www.azed.gov/hns/nslp/ascsp/.	Please provide written assurance that the ASP will be monitored once within the first four weeks of operation and one additional time during the school year, and that documentation to support this will be maintained.				
	Other Fed	leral Program Reviews: Seamless Summer	Option				
	Will be reviewed in Summer 2020 if applicable.						
	Other Federa	l Program Reviews: Fresh Fruit & Vegetab	le Program				
	Not applicable.						
		ederal Program Reviews: Special Milk Pro	gram				
	Not applicable.						
_	Other Federal Program Reviews: At-Risk Afterschool Meals						
	Not applicable.						

General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

of the availability of the SFSP prior to the will be notified of the availability of the SFSP prior

Households were not notified of the availability

of the SFSP prior to the end of the school year.

Comments/Recommendations:

Congratulations! Integrity Education Incorporated has completed the Administrative Review for the 2019-2020 school year. Thank you for your hospitality and organization during the review process. It is evident that you are working hard to ensure your students are fed healthy meals in a warm, welcoming environment.

To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at http://www.azed.gov/hns/nslp/.

Fiscal Action Assessed?				
✓ No- SBP	Yes- SBP	\$9.11		
✓ No- NSLP	Yes- NSLP	\$3.76		
Fiscal Action under \$600 will be disregarded.				

Please submit corrective action response by December 4, 2019 to Kariann Gallegos at Kariann.Gallegos@azed.gov or 1535 West Jefferson Street Bin #7, Phoenix, AZ 85007.

10/7/2019

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the National School Lunch Program Administrative Review Appeal Procedures found here:

https://cms.azed.gov/home/GetDocumentFile?id=58dbe2581130c01500d4b08b

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