



**Arizona Department of Education**  
**Health and Nutrition Services Division**

**Administrative Review Summary Report**

School Food Authority Name: Winslow Residential Hall Inc.

CTD: 09-27-01

Site: Winslow Residential Hall

Contacts: Isabel Britton, Homeliving Supervisor & Lisa John, Food Service Head Cook

Review Date: October 22, 2019

Review Period: September 2019

Programs Reviewed:

☐ National School Lunch

☒ School Breakfast

☐ Afterschool Snack

☐ Fresh Fruit & Vegetable

☐ Special Milk

☐ At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
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**Performance Standard 1: Certification & Benefit Issuance- Critical Area**

No findings.

**Performance Standard 1: Meal Counting & Claiming- Critical Area**

No findings

**Performance Standard 2: Meal Components & Quantities- Critical Area**

1	Quantities observed during the review period at breakfast did not meet minimum amounts required by the meal pattern. The daily grain requirement was not met on one day due the bread crediting less than 1 oz/eq. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.	Discussed requirement to serve 1 oz/eq grain before serving a M/MA during breakfast and potential changes, such as replacing the bread or increasing the serving size. Referred to SBP meal pattern and whole grain resources found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern/">http://www.azed.gov/hns/nslp/mealpattern/</a> . Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<i>Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum amounts required by the meal pattern at breakfast.</i>
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**Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area**

No findings

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**Meal Access & Reimbursement: Certification & Benefit Issuance**

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| 2 | Local Educational Agency (LEA) is requiring all households to complete an Application for Free and Reduced Price School Meals . | Discussed that households are not required to complete household application anytime during the school year. Referred to Eligibility Manual: <a href="https://cms.azed.gov/home/GetDocumentFile?id=595e4a163217e115acbc32bd">https://cms.azed.gov/home/GetDocumentFile?id=595e4a163217e115acbc32bd</a> . | Please provide written assurance that households will not be required at any time during the school year to complete an Application for Free and Reduced Price School Meals. |
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**Meal Access & Reimbursement: Verification**

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No findings.

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**Meal Access & Reimbursement: Meal Counting & Claiming**

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| 3 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims. | Discussed how to complete daily edit checks and where to find the attendance factor.   | Please provide a completed daily edit check worksheet for the month of October . Additionally, please provide written assurance that daily edit checks will be conducted. |
| 4 | LEAs handbook requires that students eat breakfast on a daily basis.   | Discussed that it is not allowable to require students to eat breakfast. Discussed updating language so the requirement is associated with attending breakfast service and not eating. | Please provide a written description of changes made in the language regarding eating breakfast.  |

Observation.

Students may be required to work during meal service if they do not attend on the prior day. Reminded LEA to make sure that it is clear that the requirement for students to work is associated with attendance and not taking a meal during breakfast. None required.

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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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| 5 | Signage which explains what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable was not displayed to students at breakfast. | Discussed requirement and provided example signage. Printable POS Signage can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern/">http://www.azed.gov/hns/nslp/mealpattern/</a> | Please provide the sign that has been displayed explaining what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable. Additionally, please provide written assurance that this sign will be displayed for all students to see. |
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**Meal Pattern & Nutritional Quality: Meal Components & Quantities**

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No findings.

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**Resource Management**

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No findings.

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**General Program Compliance: Civil Rights**

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| 6 | Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place. | Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves. Additional guidance can be found on ADE's website at:<br><a href="http://www.azed.gov/hns/civilrights/">http://www.azed.gov/hns/civilrights/</a> .<br>The Step by Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at<br><a href="http://www.azed.gov/hns/nsip/trainingps/online/">http://www.azed.gov/hns/nsip/trainingps/online/</a> . | <i>Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs.</i>   |
| 7 | Program staff have not been trained on civil rights topics.  | Discussed that the civil rights training must occur annually and how to document that the requirement has been met. An acceptable civil rights power point training material can be found on ADE's website at<br><a href="http://www.azed.gov/hns/civilrights/">http://www.azed.gov/hns/civilrights/</a> .   | <i>Please provide written assurance that all food service staff will be trained at hire and as needed on Civil Rights Compliance in Child Nutrition Programs. Describe the process that will be implemented to ensure that this requirement is adhered to and properly documented.</i> |

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**General Program Compliance: SFA On-Site Monitoring**

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No findings.

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**General Program Compliance: Local Wellness Policy**

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| 8 | The LWP did not contain policies for food and beverage marketing. | Discussed updating the LWP to include policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Explained that this requirement applies to exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing. | <i>None required at this time.</i> |
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9	A recent assessment of the implementation of the LWP has not been conducted nor have plans been developed to complete the assessment.	Discussed requirement to complete an 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 progress made in attaining the goals of the wellness policy. Sample evaluation tools can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/lwp/">http://www.azed.gov/hns/nslp/lwp/</a> . Also discussed requirement to notify the public of the results of the most recent assessment.	<i>None required at this time.</i>
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**General Program Compliance: Competitive Food Services**

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No findings.

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**General Program Compliance: Professional Standards**

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No findings.

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**General Program Compliance: Water**

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No findings.

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**General Program Compliance: Food Safety, Storage and Buy American**

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10	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: mandarin oranges & pineapple. Additionally, documentation justifying a Buy American exception was on file.	Discussed the Buy American provision requirements and procedures to ensure compliance. Funds used from the non-profit food service account must be used to procure food products that comply with the Buy American Provision. Referred to SP38-2017, which can be found on ADE's website at <a href="http://www.azed.gov/hns/memos/">http://www.azed.gov/hns/memos/</a> . The Buy American exception form can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a> . The Buy American Recorded Webinar and FAQ can be found on ADE's website at <a href="http://www.azed.gov/hns/sfp/">http://www.azed.gov/hns/sfp/</a>	<i>Please provide a written description of the changes that have been made to recordkeeping and/or procurement procedures to ensure that the requirements of the Buy American Provision are met.</i>
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**General Program Compliance: Reporting & Recordkeeping**

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No findings.

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

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No findings.

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**Other Federal Program Reviews: Afterschool Snack Program**

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Not applicable.

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2020 if applicable.

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**Other Federal Program Reviews: Fresh Fruit & Vegetable Program**

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Not applicable.

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**Other Federal Program Reviews: Special Milk Program**

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Not applicable.

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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Not applicable.

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**Comments/Recommendations:**

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Congratulations on completing the Administrative Review! Thank you for your hard work and cooperation during this process. You are doing a wonderful job implementing the School Breakfast Program and it was a pleasure visiting your school. Please keep up the great work!

**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/>.

**Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at**  
<http://www.azed.gov/hns/nslp/trainingsps/>.

Fiscal Action Assessed?

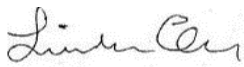
☒ No- SBP

☐ Yes- SBP

\$164.66

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by December 6, 2019 to [Lindsey.Cler@azed.gov](mailto:Lindsey.Cler@azed.gov) or 1535 W. Jefferson St, Bin #7, Phoenix, AZ 85007.



11/6/2019

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>

Kathy Hoffman, Superintendent of Public Instruction  
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