



Arizona Department of Education
Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Second Mesa Day School

CTD: 09-91-02

Site: Second Mesa Day

Contacts: Dianne Lomahaftewa-Albert, CSA & Newman Albert, Food Service Manager

Review Date: October 21, 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

1	Meal count totals by category for the month of review were not correctly combined and recorded for breakfast. This was deemed a non-systemic error and contributed toward fiscal action calculations.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue, including double-checking the totals from daily summary sheets to the number entered in claim.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines provide an accurate count by eligibility category.</i>
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Performance Standard 2: Meal Components & Quantities- Critical Area

No findings.

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

2	Parmesan cheese was not pre-portioned and was available outside the POS in cafeteria on the day of review. While this is not a violation of program requirements, it could cause the sodium range requirements as well as the saturated fat and calorie limits to be exceeded.	Recommended pre-portioning cheese or having staff serve the cheese with appropriate serving utensil. Also discussed that this should be clear it's available to all students.	<i>None required at this time.</i>
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| 3 | Second meals or bonus food items are offered to students, but these items are not included in the dietary specifications. | Discussed that additional food offered to students at no charge must be counted toward the dietary specifications.
Referred to Memo SP 38-2019: Meal Requirements Q&A found on ADE's website at http://www.azed.gov/hns/memos/ . | <i>Please provide a written description of changes that have been made to include additional items in the dietary specifications.</i> |
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Meal Access & Reimbursement: Certification & Benefit Issuance

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| 4 | Households are not notified of free meal benefits at the beginning of the school year per operating the Community Eligibility Program. | Discussed requirement to notify families of program benefits and required content for notification. Provided sample parent letter which can be found on ADE's website at http://www.azed.gov/hns/nsfp/forms/ . | <i>Please provide a copy of the parent letter that will be distributed to households in the beginning of each school year stating all students will receive free meal benefits. Additionally, please provide written assurance that households will be notified of program benefits according to requirements henceforth.</i> |
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Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

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| 5 | Daily edit checks are not being conducted. | Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. The Daily Edit Check Worksheet can be found on ADE's website at http://www.azed.gov/hns/nsfp/forms/ . The Step by Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at http://www.azed.gov/hns/nsfp/trainings/online/ . | <i>Please provide a completed daily edit check worksheet for the month of October. Please provide written assurance that daily edit checks will be conducted. Additionally, the certificate of completion of Step by Step Instruction: How to Complete Daily Edit Checks must be submitted.</i> |
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

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| 6 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch. | Discussed requirement to post signage and where to post it. Printable POS Signage can be found on ADE's website at http://www.azed.gov/hns/nsfp/mealpattern/ . | <i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
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Resource Management

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| 7 | LEA did not provide reviewer with requested information for the resource management review. | Discussed the importance of establishing a financial management system and internal controls needed to accurately track all revenues and expenditures and ensuring that only allowable charges are made to the nonprofit food service account. Refer to ADE's Resource Management Webpage at http://www.azed.gov/hns/nslp/rm/ . | <i>Please provide a written description of how all revenues and expenditures are tracked. Please provide written procedures for ensuring that only allowable charges are made to the nonprofit food service account.</i> |
| 8 | Reviewer was unable to select a sample of expenses to review because LEA did not provide any resource management documentation. | Discussed importance of having proper documentation on file and referred to ADE's Resource Management Webpage at http://www.azed.gov/hns/nslp/rm/ . | <i>Please provide a copy of the detailed general ledger or comparable document for School Year 2018-19. Provide supporting documentation for one month of expenses for all purchases using non profit food service account funds.</i> |
| 9 | The Annual Financial Report was not submitted on time. | Discussed that the report was due on October 15th. Refer to ADE's Grants Management webpage for more information: http://www.azed.gov/grants-management/ . | <i>Please provide a copy of the AFR submitted for school year 2018-19. Provide all supporting documentation for the AFR. Please provide written assurance that the Annual Financial Report will be submitted on time to ADE each year.</i> |
| 10 | Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment was sufficient to cover the overall cost of the meal. | Discussed ways to determine adult meal prices, which included pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs. Referred to adult meal pricing tool on ADE's website at http://www.azed.gov/hns/nslp/rm/ . | <i>Please provide a written description of the steps which have been taken to increase adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i> |

General Program Compliance: Civil Rights

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| 11 | The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs. | Discussed requirements and timeframe for public/media release, and best options locally for submitting the release to. Provided template, which can be found on ADE's website at http://www.azed.gov/hns/nslp/forms/ . | <i>Please provide written procedures for distributing the public/media release and written assurance that the public/media release will be submitted to the local media, the unemployment office and local employers considering large layoffs prior to the start of each school year.</i> |
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12 Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place.	<p>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 must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. 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:</p> <p>http://www.azed.gov/hns/civilrights/.</p> <p>The Step by Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at</p> <p>http://www.azed.gov/hns/nslp/trainingps/online/.</p>	<i>Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs. Additionally, the certificate of completion of Step by Step Instruction: How to File a Civil Rights Complaint must be submitted.</i>
13 Program staff have not been trained on civil rights topics.	<p>Discussed requirement 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</p> <p>http://www.azed.gov/hns/civilrights/.</p>	<i>Please provide written assurance that all food service staff will be trained annually 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>
14 The Civil Rights Compliance form is not being completed every year by December 15 and kept on file.	<p>Discussed requirement for completing form and how to collect racial/ethnic data from program participants. Provided the form, which can be found on ADE's website at</p> <p>http://www.azed.gov/hns/civilrights/.</p> <p>The Step by Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at</p> <p>http://www.azed.gov/hns/nslp/trainingps/online/.</p>	<i>Please provide written assurance that the Civil Rights Compliance form will be completed by December 15 each year and kept on file for 5 years. Also, please indicate who will be responsible for completing this form. Additionally, the certificate of completion of Step by Step Instruction: How to Complete the Civil Rights Compliance Form must be submitted.</i>

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

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| 14 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 http://www.azed.gov/hns/nslp/lwp/ . Also discussed requirement for notifying 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

No findings.

General Program Compliance: Professional Standards

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| 15 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 attending upcoming applicable trainings as well as utilizing ADE's Training Trackers. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/hns/nslp/training/ . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ . | <i>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. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i> |
| 16 Full-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 6 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/ . | <i>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 two full-time School Nutrition Program staff are registered for.</i> |
| 17 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/ . | <i>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 three Part-time School Nutrition Program staff are registered for.</i> |

18	Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP 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, employees' job duties and applicable trainings that could be provided and feasible timeline. Online and in-person training opportunities can be found on ADE's Training and Professional Standards webpage at http://www.azed.gov/hns/nslp/trainings/ .	<i>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 three non-nutrition staff will receive.</i>
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General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

19	The written food safety plan was not site specific and contained SOPs that were not applicable.	LEA utilizes ADE's Prototype Food Safety Plan, but it was not filled out. Discussed that the plan should be site specific and modified to fit the school's operations and procedures.	<i>Please provide a copy of the updated food safety plan that is site specific.</i>
20	LEA is not keeping temperature logs on file for 6 months.	Discussed requirement to maintain temperature logs on file for at least 6 months.	<i>Please provide a written description of the changes that have been made in order to keep temperature logs on file for 6 months.</i>
21	Temperature logs for food are not being maintained.	Discussed requirements for maintaining temperature logs for all food items. Discussed utilizing temperature log included in the food safety plan or writing the temperature on the production records.	<i>Please provide a copy of the temperature log that will be used for food as well as written assurance that logs will be kept daily and maintained on file for 6 months.</i>
22	Storage violations were observed. Specifically, food is not stored 6 inches off the floor.	Discussed specific violations in the freezer and feasible solutions. Referred to Arizona's School Food Safety Guidance found on ADE's website at http://www.azed.gov/hns/nslp/foodsafety/ .	<i>Please provide a written description of the changes that have been made to correct the storage violations found.</i>

23	The following reviewed products indicated violations of the Buy American Provision [7CFR 210.21(d)]: banana. Additionally, documentation justifying a Buy American exception was not on file.	Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the non-profit food service account 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/	<i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>
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General Program Compliance: Reporting & Recordkeeping

24	Production records for breakfast and lunch provided did not contain all required sections: Specifically, production records used/left over section is not completed adequately and some items were not included.	Discussed required sections of production records. Also discussed importance of including all items that are served during meal service. Parts of a Production Record Guidance can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/ . Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/ .	<i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days. Additionally, the certificate of completion of Production Record Overview must be provided.</i>
25	The correct recipe and ingredient labels were not provided for the cornbread served during the week of review.	Discussed having proper documentation on file and ensuring that the labels are consistent with what is listed in the recipe. Also discussed that the recipe should be consistent with the amount prepared.	<i>Please provide copies of the correct cornbread recipe and labels.</i>

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

26	The SFA is not providing reminders throughout the school year about the availability of the SBP.	Discussed methods of notifying families of the availability of the SBP throughout the school year and not just the beginning. Additionally, discussed SBP reminders must include: serving times, SBP cost and availability.	<i>Please provide a description of how households will be notified of the availability of the SBP at the beginning of and during the school year, and written assurance that this will occur.</i>
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Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2020 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not applicable.

Other Federal Program Reviews: Special Milk Program

Not applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable.

Comments/Recommendations:

Congratulations on completing the Administrative Review! Thank you for providing free meals to students. Please continue to work with ADE staff and resources in order to assist in the operation of your program.

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/trainings/>.

Fiscal Action Assessed?

☒ No- SBP

☐ Yes- SBP

☒ No- NSLP

☐ Yes- NSLP

Please submit corrective action response by December 13, 2019 to Lindsey.Cler@azed.gov or 1535 W. Jefferson St, Bin #7, Phoenix, AZ 85007.



11/12/2019

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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