



# Arizona Department of Education

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Topock Elementary District

CTD: 08-04-12

Site: Topock Elementary School

Contacts: John Warren, Superintendent and Angela Burns, Kitchen Supervisor

Review Date: November 20, 2019

Review Period: October 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
<b>Performance Standard 1: Certification &amp; Benefit Issuance- Critical Area</b>			

*No findings.*

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

*No findings.*

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

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily grain quantities were not met at breakfast. This was attributed to several items being served each day that did not meet the minimum daily grain quantities: Kix cereal (0.5 oz. eq. grain), Froot Loops cereal (0.75 oz. eq. grain), and Chewy Granola Bar (0.25 oz. eq. grain). This was determined to be a repeat finding from cycle two 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 (e.g., changes in products, increasing portions, 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 Breakfast Program can be found on ADE's website at [www.azed.gov/hns/nslp/mealpattern](http://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/trainingps/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 daily grain quantities at breakfast 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.*

<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly grain quantities were not met at breakfast. This was attributed to several items being served throughout the week that did not meet the minimum daily grain quantities: Kix cereal (0.5 oz. eq. grain), Froot Loops cereal (0.75 oz. eq. grain), and Chewy Granola Bar (0.25 oz. eq. grain). This was</p> <p>2 determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in products, increasing portions, etc.). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a>. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</a>. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that weekly grain quantities at breakfast 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.</i></p>
<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily fruit quantities were not met at breakfast on 10/16/19. This was attributed to bananas being the only fruit offered and only crediting as 1/2 cup when a minimum of 1 cup is required at breakfast. This was</p> <p>3 determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., serving fruits that credit as a full cup, adding an additional fruit when bananas are offered, etc.). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a>. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</a>. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that daily fruit quantities at breakfast meet minimum amounts required by the meal pattern.</i></p>
<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily vegetable quantities were not met at lunch on 10/14/19 when only 5/8 cup of vegetable was served. This was not a repeat finding from cycle two and did not contribute toward fiscal action calculations.</p> <p>4</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in portion sizes, revising recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a>. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</a>. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the meal pattern. Additionally, please provide documentation demonstrating how this specific menu will be served henceforth (e.g., a revised recipe for Broccoli &amp; Cheese, a production record showing an additional vegetable being served along with Broccoli &amp; Cheese, or a statement ensuring this recipe will no longer be used).</i></p>

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly red/orange vegetable quantities were not met at lunch. This was not a repeat finding from cycle two and did not contribute 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 (e.g., indicating portion sizes of red/orange accompaniments, revising recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at [www.azed.gov/hns/nslp/mealpattern](http://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/trainingps/online/>. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/>. 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 red/orange vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu must be submitted.*

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

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*No findings.*

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

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*No findings.*

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**Meal Access & Reimbursement: Verification**

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The verification sample size used was not correct based on the number of applications eligible for verification. Specifically, 1 application should have been verified, but 2 were actually verified.

Discussed correct calculation of sample size and which applications are subject to verification. Referred to Verification Sample Size Calculator and Online Training: Verification Review found on ADE's website at <http://www.azed.gov/hns/nslp/verification/>.

*The SFA is operating a non-base year of Provision 2 and no longer conducts verification activities. Please provide written procedures for how the verification sample size will be determined if the SFA operates another base year or no longer operates on Provision 2.*

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

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*No findings.*

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

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*No findings.*

### Meal Pattern & Nutritional Quality: Meal Components & Quantities

7	<p>Portion sizes observed on the day of review did not match the planned amounts. Specifically, the planned amount of green beans was 3/4 cup per serving; however, 1/2 cup was being prepared. After pointing out that the serving utensil was only 1/2 cup, the staff increased portions to 3/4 cup prior to service.</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, retraining staff, etc.). Meal pattern requirements for the National School Lunch Program 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>. The training Using Appropriate Serving Utensils can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</a>.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that portion sizes meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i></p>
8	<p>Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch.</p>	<p>Discussed feasible options for signage and potential content, plan for creating and posting. 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>.</p>	<p><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></p>

### Resource Management

9	<p>Unallowable costs were paid for by the nonprofit school food service account. Specifically, snacks are provided to students throughout the school day at the expense of the nonprofit school food service account.</p>	<p>Discussed specific unallowable expenses. An extensive list of allowable and unallowable costs can be found in 2 CFR 200 Subpart E General Provisions for Selected Items of Cost.</p>	<p><i>Please provide written procedures for determining the allowability of costs as required by 2 CFR 200.303 (b) (7). Please also provide written assurance that all expenses of the nonprofit school food service account will be limited to those costs which are necessary, reasonable, allocable; and also that these costs are in accordance with 2 CFR 200 Subpart E Cost Principles. Additionally, please provide supporting documentation which reflects that the cost of snacks being provided to students are being paid for through non-Federal funds.</i></p>
10	<p>A system or process to sufficiently separate non-program food costs from program food costs has not been implemented. Specifically, costs for snacks being provided to students throughout the day at the expense of the nonprofit school food service account were not separated from program costs.</p>	<p>Discussed feasible methods for separating costs. Discussed revenue from non-program foods requirements and provided with Non-Program Food Revenue Tool.</p>	<p><i>Please provide a description of the systems that will be developed to separate non-program food costs from program food costs and assurance that those systems will be implemented.</i></p>
11	<p>Compliance with the Revenue from Nonprogram Foods requirements via either the Nonprogram Foods Tool or 5-Day Reference Period as described in FNS Policy Memo SP 20-2016 was not assessed.</p>	<p>Discussed revenue from non-program foods requirements and provided with Non-Program Food Revenue Tool. When non-program foods (i.e., snacks) are provided through the nonprofit school food service account, compliance with revenue from non-program foods must be assessed.</p>	<p><i>Please complete and submit either the USDA Non-Program Foods Tool or 5-Day Reference Period as evidence of compliance with revenue from nonprogram foods requirements.</i></p>
12	<p>Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the meal.</p>	<p>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.</p>	<p><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></p>

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**General Program Compliance: Civil Rights**

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*No findings.*

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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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13	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 feasible means for notifying the public of the results of the most recent assessment.	<i>None required at this time.</i>
	The public was not notified of the results of the most recent assessment of the implementation of the LWP.	Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. The USDA's Local Wellness Policy Outreach Toolkit can be found at <a href="https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit">https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit</a> .	<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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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 feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training/">http://www.azed.gov/hns/nslp/training/</a> . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training/ps/online/">http://www.azed.gov/hns/nslp/training/ps/online/</a> .	<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.</i>

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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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16	Storage violations were observed. Specifically, food boxes were stored on the floor of the walk-in freezer.	Discussed specific violations and feasible solutions. Referred to Arizona's School Food Safety Guidance found on ADE's website at <a href="http://www.azed.gov/hns/nslp/foodsafety/">http://www.azed.gov/hns/nslp/foodsafety/</a> .	<i>Please provide a written description of the changes that have been made to correct the storage violations found.</i>
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The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: Fresh Bananas, Suncup juice cartons, and Mandarin Orange cups. Additionally, documentation justifying a Buy American exception was not maintained/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/nsfp/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 the requirements of the Buy American Provision are met.*

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#### General Program Compliance: Reporting & Recordkeeping

Production record crediting and recipe crediting were inconsistent for the following menu items: Chick on Bun, Meatball Sub, Tacos, and Bean Burrito.

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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/nsfp/mealpattern/>.

*Please provide updated recipes and production records with consistent crediting for Chick on Bun, Meatball Sub, Tacos, and Bean Burrito.*

Recipes provided did not contain all required sections: preparation instructions for Cheeseburger and Bean Burrito.

19

Discussed all menu items that contain more than one ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions. Examples of standardized recipes can be found on ADE's website at [www.azed.gov/hns/nsfp/mealpattern](http://www.azed.gov/hns/nsfp/mealpattern). 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 an updated recipe for Cheeseburger and Bean Burrito. Additionally, please provide written assurance that all recipes will be updated with preparation instructions.*

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

Households were not notified of the availability of the SFSP prior to the end of the school year.

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Discussed methods of notifying families of the availability of the SFSP prior to the 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/>.

*Please provide a description of how households will be notified of the availability of the SFSP prior to the end of the school year and written assurance that this will occur. If you do not plan to operate the SFSP and no other entities reasonably close to your site operate the SFSP, please provide a description of other community resources that will be provided to households prior to the end of the school year.*

#### Other Federal Program Reviews: Afterschool Snack Program

*Not applicable.*

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

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:**

Congratulations, Topock Elementary District has successfully completed the Administrative Review for the 2019–2020 school year. It is recommended that trainings in meal pattern requirements are completed throughout the year. It is also recommended that internal compliance checks are conducted periodically to maintain program integrity. Thank you for your cooperation during the review process.

**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?**

<input type="checkbox"/> No- SBP	<input checked="" type="checkbox"/> Yes- SBP	\$1,067.48
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$0

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by February 13, 2020 to Kariann Gallegos at [Kariann.Gallegos@azed.gov](mailto:Kariann.Gallegos@azed.gov) or 1535 West Jefferson Street Bin #7, Phoenix, AZ 85007.



12/13/2019

Reviewer Signature

Date



12/16/19

Program Director 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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