



Arizona Department of Education
Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Bouse Elementary District

CTD: 15-04-26

Site: Bouse Elementary School

Contacts: Ronald Fletcher, Superintendent and Kristy Lott, Cafeteria Manager

Review Date: November 19, 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
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. Specifically, attendance-based counts were used on the claim for reimbursement due to lack of meal count documentation. 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.	<i>Please provide a written description of changes to the counting and claiming system that have been implemented to ensure that claims for reimbursement reflect actual meal counts. Additionally, please provide meal counts for November to support the November claim.</i>
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Performance Standard 2: Meal Components & Quantities- Critical Area

2	On the day of review, it was observed that 2 breakfasts counted for reimbursement did not contain all of the required meal components. Specifically, one breakfast did not include the full cup of fruit (student did not take juice) and one breakfast did not include milk. This 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. 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. The Recognizing a Reimbursable Meal at the Point of Service Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/ .	<i>Please provide a written description of the changes that have been made to ensure that all meals counted for reimbursement contain all of the required meal components.</i>
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3	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily vegetable quantities were insufficient at lunch on 10/15/19 when only 1/4 cup of vegetable was able to be credited due to insufficient documentation for potato salad and chili beans. This was not a repeat finding and did not contribute to 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., obtaining and maintaining proper crediting documentation for all processed products prior to serving). Meal pattern requirements for the National School Lunch Program and guidance on Product Formulation Statements and CN Labels can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. The CN Labels and Product Formulation Statements 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).</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.</i></p>
4	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily meat/meat alternate quantities were insufficient at lunch on 10/16/19 due to the SFA crediting the beans in the Bean & Cheese Burrito toward both meat/meat alternate and vegetable components. This was not a repeat finding and did not contribute to 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., ensuring enough of each component is being served each day, revising menus, 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/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).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that daily meat/meat alternate 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.</i></p>

5	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly vegetable subgroup quantities were insufficient at lunch for legumes. This was not a repeat finding and did not contribute to 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., revising weekly menus, obtaining proper crediting documentation for items such as chili beans, 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/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).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that weekly legume quantities meet minimum amounts required by the meal pattern.</i></p>
6	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly vegetable quantities were insufficient at lunch. This was not a repeat finding and did not contribute to 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., obtaining proper crediting documentation for all processed items, offering more fresh, unprocessed vegetables, 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/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).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that weekly vegetable quantities meet minimum amounts required by the meal pattern.</i></p>

7	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly meat/meat alternate quantities were insufficient at lunch due to the SFA crediting the beans in the Bean & Cheese Burrito toward both meat/meat alternate and vegetable components on 10/16/19. This was not a repeat finding and did not contribute to 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., ensuring enough of each component is being served each day, revising menus, 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/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).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that weekly meat/meat alternate quantities meet minimum amounts required by the meal pattern.</i></p>
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Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

8	<p>Although the site is operating on Community Eligibility Provision, the school's food service website includes a Free and Reduced Letter , Free and Reduced Application, student meal prices (reduced price and full price), and a meal charge policy.</p>	<p>Discussed how a school participating in the Community Eligibility Provision must ensure reimbursable breakfasts and lunches are provided at no cost to all students and must not distribute or collect applications for free and reduced-price school meals on behalf of children.</p>	<p><i>Please provide written assurance that, while the school is participating in the Community Eligibility Provision, applications for free and reduced-price school meals will not be distributed and students will not be charged for meals. Additionally, please provide a screenshot of the updated food service webpage.</i></p>
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Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

9	<p>Daily edit checks are not being conducted appropriately. Specifically, neither enrollment nor attendance factor are included.</p>	<p>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 http://www.azed.gov/hns/nslp/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/nslp/trainingps/complete-daily-edit-checks/.</p>	<p><i>Please provide a completed daily edit check worksheet for the month of November. Additionally, 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></p>
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No findings.

Resource Management

10	Documentation was not provided to support that nonprofit school food service account expenditures were reasonable, necessary, allocable, and otherwise compliant with the provisions of 2 CFR 200 Subpart E.	Discussed the importance of establishing a financial management system and internal controls needed to accurately track all revenues and expenditures of the nonprofit school food service program.	<i>Please provide the required supporting documentation requested from the reviewer on November 26, 2019.</i>
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General Program Compliance: Civil Rights

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. Showed where template release can be found on ADE's website at http://www.azed.gov/hns/nslp/forms/ . Discussed who would be responsible for doing this.	<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>
12	Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, complaints alleging discrimination within the school meal programs are handled internally.	Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., SA, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights). 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 nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at: http://www.azed.gov/hns/civilrights/ . The Step by Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ .	<i>Please provide a written description of the updated process and procedures for processing complaints alleging discrimination which meets requirements. Additionally, the certificate of completion of Step by Step Instruction: How to File a Civil Rights Complaint must be submitted.</i>

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

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 http://www.azed.gov/hns/nslp/lwp/ . Also discussed feasible means for notifying the public of the results of the most recent assessment.	<i>None required at this time.</i>
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14	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 https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit .	<i>None required at this time.</i>
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General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

15	The School Nutrition Program Director hired after July 1, 2015 did not complete the required 8 hours of food safety training within 30 days of being hired or within 5 years prior to hire date.	Discussed requirement and feasibility for attending an available certification training within current school year. Food Safety Online Courses can be found on ICN's website at http://www.theicn.org/ResourceOverview.aspx?ID=573 .	<i>Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.</i>
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16	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/ . 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>
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17	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/ . 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 full-time School Nutrition Program staff are registered for.</i>
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/ . 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 part-time School Nutrition Program staff are registered for.</i>
19	Professional Standards training hours are not being tracked on an annual basis.	Referred to ADE's Training Tracking forms found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/ . 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 tracker that will be used to track Professional Standards training hours on an annual basis for all School Nutrition Program staff. Additionally, please provide written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis.</i>

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

20	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: Fresh Oranges (Produce of Chile) and Suncup Juices (contains juice concentrate from USA, Argentina, Brazil, China, Chile, and/or New Zealand). 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/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		
21	Site application in CNPWeb indicated that SFA is serving preschool students when the SFA is not serving preschool students.	Discussed steps required to update site application in CNPWeb to reflect current practice of serving only K-8 this school year. <i>Please resubmit a site application indicating that only grades K-8 are being served this school year. Additionally, please provide written assurance that the site application in ADE's CNPWeb will accurately reflect current practices.</i>
22	Sponsor application in CNPWeb indicated that SFA is participating in the USDA Foods Program when the SFA is not participating in the USDA Foods Program.	Discussed steps required to update sponsor application in CNPWeb to reflect current practice of not participating in the USDA Foods Program this school year. <i>Please resubmit a sponsor application indicating that Bouse Elementary District is not participating in the USDA Foods Program this school year. Additionally, please provide written assurance that the sponsor application in ADE's CNPWeb will accurately reflect current practices.</i>
23	Records documenting meal counts and meal production were not kept on file for the minimum required 5 years.	Discussed record keeping requirements and timeframe of 5 years. <i>Please provide written assurance that all documents pertaining to the school meal programs will be retained on file for at least 5 years, as is required by Arizona law, as well as a written plan for ensuring that this requirement is met.</i>
General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach		
24	Households were not notified of the availability of the SFSP prior to the end of the school year.	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/ . <i>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 how households will be informed of resources available to locate operating sites and/or other community resources that will be provided to households prior to the end of the school year.</i>
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, Bouse Elementary District has completed the Administrative Review for the 2019–2020 school year. It is recommended that trainings in meal pattern and professional standards are completed throughout the year. It is also recommended that internal compliance checks are conducted periodically to maintain program integrity and that financial training is provided to an on-site employee. 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?

☒ No- SBP

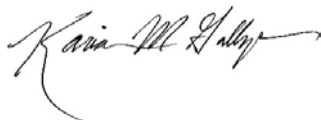
☐ Yes- SBP

☒ No- NSLP

☐ Yes- NSLP

Fiscal Action under \$600 will be disregarded.

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



12/17/2019

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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