



Arizona Department of Education

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Kin Dah Lichii Olta, Inc.

CTD: 01-91-12

Site: Kin Dah Lichi'i Olta

Contacts: Patricia Gonnig, Principal; Ronnie James, Operation Manager; Regina Kinlichee, Lead Cook

Review Date: October 29, 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 did not meet minimum amounts required by the meal pattern. Specifically, on one day during the week of NSLP menu review a bean & cheese burrito was served. SFA provided a specification sheet indicating the burrito contributed 2 M/MA, 2 oz./eq. grain, & 1/4 cup vegetable to the meal pattern. However, the SFA provided reviewer with a PFS to credit towards the meal pattern. The PFS provided indicated that burrito contributed 2 M/MA & 2 oz./eq. grain, but did not indicate that the burrito contributed 1/4 cup vegetable to the meal pattern. On that same day 1/2 cup corn was served to students. Since the PFS did not indicate that the burrito contributed 1/4 cup vegetable, reviewer was only able to credit 1/2 cup vegetable to the meal pattern when 3/4 cup needed to meet minimum daily vegetable requirement.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (i.e. changes in serving utensils/sizes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern . 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 vegetable quantities meet minimum amounts required by the meal pattern.</i>
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2	Fluid milk was not available in at least two varieties at breakfast on day of review (only 1% white milk was offered).	Discussed variety requirement and feasible options for compliance. Allowable milk varieties are fat-free unflavored, fat-free flavored, 1% unflavored and 1% flavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<i>Please provide one week of breakfast production records that demonstrate that fluid milk was available in at least two varieties. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at breakfast.</i>
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Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

3	Daily edit checks are not being conducted appropriately. Specifically, attendance adjusted enrollment (total enrollment multiplied by the attendance factor) is not being calculated/recorded correctly.	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/online/ .	<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.</i>
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Meal Pattern & Nutritional Quality: Offer Versus Serve

Not applicable.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

4	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/mealpattern/ .	<i>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 will be displayed for all students to see.</i>
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Resource Management			
5	Net cash resources available in the nonprofit school food service account exceed the three month expenditure limit and approval from the ADE was not obtained.	Discussed requirement that net cash resources must be limited to an amount that does not exceed 3 months average expenditures without prior approval from the ADE. Referred to 7 CFR 210.19.	<i>Please provide documentation reflecting that net cash resources are below the 3 month average expenditure limit or provide a detailed spending plan to ADE for approval to maintain a balance in excess of the net cash resource limit.</i>
6	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.	Discussed ways to determine adult meal prices which included a per meal cost analysis or 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.	<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			
No findings.			
General Program Compliance: SFA On-Site Monitoring			
Not applicable.			
General Program Compliance: Local Wellness Policy			
7	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 posters, menu boards, etc.	<i>None required at this time.</i>
8	The public is not being notified of the existence and contents of the LWP.	Discussed feasible means of notifying the public about the LWP.	<i>None required at this time.</i>
9	Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the LWP.	Discussed feasible means of notifying potential stakeholders of their ability to participate.	<i>None required at this time.</i>
10	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/ .	<i>None required at this time.</i>

11	A plan is not in place to notify the public of the results of the most recent assessment of the implementation of the LWP, when assessment is conducted.	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

12	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.</i>
13	Professional Standards training hours are not being adequately tracked.	Referred to ADE's Training Tracking forms found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/ .	<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

14	A written food safety plan has not been developed.	Discussed required components of a food safety plan and resources available on ADE's website at http://www.azed.gov/hns/nslp/foodsafety/ .	<i>Please provide a copy of a written food safety plan.</i>
15	Documentation was not maintained to support that the school received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department.	Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year.	<i>Please provide a written description of how you will show/document that two food safety inspections were received and/or requested from the local health department each school year will be maintained.</i>

16	The most recent food safety inspection report was not posted in a publicly visible location.	Discussed making copies of most recent report and feasible places for posting.	<i>Please provide written assurance that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please specify where the report has been posted.</i>
17	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: Tropical Fruit (product of Thailand), Tomatoes (product of Puerto Rico), & Sun Cup Juice (concentrates from U.S., Brazil, China, etc.). 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>

General Program Compliance: Reporting & Recordkeeping

No findings.

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

18	Outreach to families regarding the availability of the SBP was not conducted at the beginning of or during the school year.	Discussed methods of notifying families of the availability of the SBP at the start of and throughout the school year and determined which was most feasible.	<i>Please provide documentation that demonstrates how households are notified of the availability of the SBP at the beginning of and during the school year. Additionally, please provide a written 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! Kin Dah Lichii Olta, Inc. has completed the Administrative Review in the 2019-2020 SY. Thank you for your hospitality during my visit and all of your hard work and organization throughout the AR process. It was a pleasure meeting you all- thank you for working so diligently to assure that your students are receiving nutritious meals. Please let me know if you have any questions.

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 checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$0
<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 **December 26, 2019** to Taryn.Kunkel@azed.gov or AZ Dept. of Education/Health & Nutrition 1701 N. 4th St., Flagstaff, AZ 86004.



11/25/2019

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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