



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Leupp Schools, Inc.

CTD: 09-39-02

Site: Leupp Schools

Contacts: Emma Yazzie, Principal and Phyllis Begay, Lead Food Service Worker

Review Date: October 24, 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
<b>Performance Standard 1: Certification &amp; Benefit Issuance- Critical Area</b>			
	<i>No findings.</i>		

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

1	Breakfast and lunch meal counts from the month of review did not support that reimbursable meal counts are accurate. This was deemed a systemic error and contributed towards fiscal action calculations. A full recalculation of breakfasts and lunches served for the months of August, September, and October was conducted.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. A new counting system was created and implemented during the on-site review.	<i>Changes to the procedures of meal counting and claiming have been made and a recalculation was conducted. Fiscal action calculations were disregarded. No further corrective action is required at this time.</i>
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#### Performance Standard 2: Meal Components & Quantities- Critical Area

2	The meal service was not structured to comply with the meal pattern requirements of the multiple grade groups that were served at lunch. Specifically, lunch waves are divided between grades K-5 and grades 6-12. Although grades 9-12 were allowed access to a salad bar to meet increased vegetable requirements, they did not receive an increased offering of fruit and were only offered 1/2 cup of fruit instead of the required 1 cup.	Discussed allowable meal pattern grade groups per the grades served and feasible options for structuring the meal service to comply with quantity requirements (e.g., portion size changes between lunch waves, how to differentiate between students in different groups, adding fruit to the salad bar). 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 implemented to ensure that meal pattern requirements of the multiple grade groups served are met during lunch.</i>
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Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically, only 1/2 cup of fruit was offered to grades 9-12 at lunch when 1 cup of fruit is required.	<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, adding a fruit to the salad bar, 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/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a>. The Using Appropriate Serving Utensils Webinar &amp; Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/">http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/</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>	<i>Please provide a written description of the changes that have been made to ensure that daily fruit quantities at lunch meet minimum amounts required by the meal pattern for grades 9-12.</i>
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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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4 Direct certification was not conducted according to the proper timeframe, which is once on April 1 each year. Specifically, direct certification was conducted incorrectly using State Match on 5/7/19 and correctly using Standard File Upload on 6/21/19.	Referred to Direct Certification for Assistance Programs section in USDA's Eligibility Manual for School Meals. Used school calendar to plot timeframes for running reports. The NSLP At A Glance Calendar which contains timeframes to run DC can be found on ADE's webpage at <a href="http://www.azed.gov/hns/nslp/">http://www.azed.gov/hns/nslp/</a> .	<i>Please provide a written description of the changes that have been implemented to ensure direct certification will be conducted according to the proper timeframe. Additionally, please provide written assurance that, moving forward, direct certification will be run according to the prescribed timeframe for all students enrolled.</i>
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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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*No findings.*

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

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5 Offer Versus Serve (OVS) was not implemented properly. Specifically, students in grades 9-12 were not given the option to decline components or receive a smaller or larger portion of any component at lunch.	Provided technical assistance on proper implementation of Offer Versus Serve for, at a minimum, grades 9-12 and discussed with kitchen staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/programguidance/">http://www.azed.gov/hns/nslp/programguidance/</a> .	<i>Please provide a written description of changes that have been made to ensure Offer Versus Serve (OVS) will be implemented for grades 9-12 at lunch. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i>
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6	Cafeteria staff have not been trained on Offer Versus Serve.	Discussed importance of staff receiving training on Offer Versus Serve to ensure 9-12 students are able to refuse components at lunch. A training on Recognizing a Reimbursable Meal at the Point of Service while operating OVS can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/">http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/</a> . USDA's Offer Versus Serve Manual can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/programguidance/">http://www.azed.gov/hns/nslp/programguidance/</a> .	<i>Please provide written assurance that all food service staff will be trained on how to operate Offer Versus Serve. Additionally, the certificate of completion of Recognizing a Reimbursable Meal at the Point of Service must be provided.</i>
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#### Meal Pattern & Nutritional Quality: Meal Components & Quantities

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*No findings.*

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Resource Management			
7	Free meals are being provided to nonprogram adults. Specifically, teachers who are accompanying their classes at lunch are being provided free meals.	Discussed that only adults who are directly involved in the operation and administration of school nutrition programs may receive free meals.	<i>Please provide documentation demonstrating that costs are being recovered for nonprogram adult meals (e.g., communication to teachers, adult meal sign-in sheet reflecting ticket payments, etc.).</i>
8	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 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>
9	A system or process to sufficiently separate nonprogram food costs from program food costs has not been implemented. Specifically, costs for catering are not being separated from costs for program (SBP and NSLP) foods.	Discussed feasible methods for separating costs. Discussed revenue from nonprogram foods requirements and provided with Non-Program Food Revenue Tool.	<i>Please provide a description of the systems that will be developed to separate nonprogram food costs from program food costs and assurance that those systems will be implemented.</i>
10	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.	Discussed revenue from nonprogram foods requirements and provided with Nonprogram Food Revenue Tool.	<i>Please complete and submit either the USDA Nonprogram Foods Revenue Tool or 5-Day Reference Period as evidence of compliance with revenue from nonprogram foods requirements.</i>

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#### General Program Compliance: Civil Rights

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11	Documentation to support that program staff have been trained on civil rights topics has not been maintained.	Discussed feasible ways to document that program staff have been trained on civil rights topics including sign-in sheets or training trackers.	<i>Please provide a written description of how training on civil rights topics for all program staff will be documented. Provide a plan for when such a training is expected to be conducted next.</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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12	Documentation to support the review and update of the Local Wellness Policy is not being kept on file.	Discussed what can be done to ensure review and update occurs as specified in the Local Wellness Policy. Discussed maintaining records to document compliance.	<i>None required at this time.</i>
13	A recent assessment of the implementation of the Local Wellness Policy 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> .	<i>None required at this time.</i>
14	The public was not notified of the results of the most recent assessment of the implementation of the Local Wellness Policy.	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 Local Wellness Policy. 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 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 <a href="https://theicn.docebosaas.com/learn/course/external/view/elearning/21/FoodSafetyinSchools">https://theicn.docebosaas.com/learn/course/external/view/elearning/21/FoodSafetyinSchools</a> .	<i>Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.</i>
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 <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/trainingp/online/">http://www.azed.gov/hns/nslp/trainingp/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>

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 <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/trainings/online/">http://www.azed.gov/hns/nslp/trainings/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 full-time School Nutrition Program staff are registered for.</i>
18	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 <a href="http://www.azed.gov/hns/nslp/trainings/s/">http://www.azed.gov/hns/nslp/trainings/s/</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/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a> .	<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 and the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors.</i>
<b>General Program Compliance: Water</b>			
<i>No findings.</i>			
<b>General Program Compliance: Food Safety, Storage and Buy American</b>			
19	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: mandarin oranges (China), pineapple tidbits (Thailand), and Suncup juices (multiple non-domestic origins). 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 nonprofit 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 <a href="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a> . 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 procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>
<b>General Program Compliance: Reporting &amp; Recordkeeping</b>			
20	The Annual Identified Student and Enrollment Data was not submitted to ADE on time.	Discussed reporting requirements for Annual Identified Student and Enrollment Data and who would be responsible for submitting.	<i>Please provide written assurance that the Annual Identified Student and Enrollment Data will be submitted on time to ADE as is required by April 15 each year, as well as the steps that will be taken to ensure this requirement is adhered to.</i>

21	<p>Site application in CNPWeb indicated that SFA is operating Offer Versus Serve at breakfast and lunch services when the SFA is operating Serve Only at both meal services.</p>	<p>Discussed steps required to update site application in CNPWeb to reflect current practice of Serve Only at breakfast. Discussed requirement for Offer Versus Serve meal service to be implemented for grades 9–12.</p>	<p><i>Please resubmit a site and sponsor application indicating the meal service type that will be implemented. Additionally, please provide written assurance that the site application in ADE's CNPWeb will accurately reflect current practices.</i></p>
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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, Leupp Schools, Inc. has successfully completed the Administrative Review for the 2019-2020 school year. It is recommended that trainings in Offer Versus Serve are completed throughout the year. It is also recommended that internal compliance checks are conducted periodically in these critical areas 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?

☒ No- SBP

☐ Yes- SBP

☒ No- NSLP

☐ Yes- NSLP

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by February 19, 2020 to Kariann Gallegos at [Kariann.Gallegos@azed.gov](mailto:Kariann.Gallegos@azed.gov) or 1535 West Jefferson Street Bin #7, Phoenix, AZ 85007.



12/18/2019

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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