



**Arizona Department of Education**  
**Health and Nutrition Services Division**

**Administrative Review Summary Report**

School Food Authority Name: St. Peter Indian Mission School

CTD: 11-20-01

Site: St. Peter Indian Mission School

Contacts: Sister Carol Mathe, Food Program Coordinator and Sister Martha Mary Carpenter, Principal

Review Date: September 30, 2019

Review Period: August 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 for the month of review were not correctly combined and recorded. Contributing factors causing this issue are counts by classrooms and total daily meal counts are not added correctly. This was deemed a 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. Specifically, care must be taken to double check addition of counts by classroom and total daily meal counts. It is recommended that a second review of counts occur prior to total consolidation.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal count sheets are accurately counted and complied. Please provide a Daily Edit Check for October and 1 week of meal count sheets that have been accurately counted and entered.</i>
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**Performance Standard 2: Meal Components & Quantities- Critical Area**

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| 2 | <p>On the day of review, the milk substitution did not meet the minimum daily requirement of 1 cup. Specifically, milk substitute was provided at a 6 oz. portion to a student during the breakfast program. This contributed 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 (i.e. changes in serving cup size). 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 <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/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a>.</p>  | <p><i>Please provide a written description of the changes that have been made to ensure that milk quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of the Step by Step Instruction: How to Plan a Breakfast Menu must be submitted .</i></p>  |
| 3 | <p>Documentation of menu quantities during the review period did not meet minimum amounts required by the meal pattern. The daily 3/4 cup vegetable amount was not met for lunch service on 8-12-19. Specifically, the 1/8 cup iceberg lettuce portion could not credit towards the daily minimum requirement. Raw, leafy salad greens credit as half the volume served. This was 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 (i.e. changes in serving utensils, recipes, 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 <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 -The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar 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> | <p><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, including an updated recipe and completed production record which indicates portion size. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i></p> |

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| <p>4 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the daily minimum grain requirement for the School Breakfast Program was not met on two days. The wheat toast contributed .75 ounce equivalent of grain. Meat/ meat alternates may contribute to the daily grain requirements when at least 1 ounce equivalent is served.</p>                | <p>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 portion size, product change, 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 <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a>. The Step by Step Instruction: 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/trainings/online/">http://www.azed.gov/hns/nslp/trainings/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 grain quantities meet minimum amounts required by the breakfast meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p> |
| <p>5 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly minimum grain requirement for the School Breakfast Program was not met on two days. The wheat toast contributed .75 ounce equivalent of grain. Meat/ meat alternates may contribute to the daily grain requirements when at least 1 ounce equivalent of grain is also served.</p> | <p>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 portion size, product change, 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 <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a>. The Step by Step Instruction: 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/trainings/online/">http://www.azed.gov/hns/nslp/trainings/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 grain quantities meet minimum amounts required by the breakfast meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p> |

6	Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly minimum grain requirement for the National School Lunch Program was not met. The week of review menu provided 7.5 ounce equivalents. 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 (i.e. changes in portion size, product change, 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 <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 - 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 grain quantities meet minimum amounts required by the breakfast meal pattern. Additionally, the certificate of completion of Step by Step by Step Instruction: How to Plan a Breakfast Menu must be submitted.</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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No findings.

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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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No findings.

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

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No findings.

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**Resource Management**

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7	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. The Adult Meal Pricing Tool can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/rm/">http://www.azed.gov/hns/nslp/rm/</a> .	<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>
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**General Program Compliance: Civil Rights**

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| 8 The font size of USDA's nondiscrimination statement is smaller than the rest of the text on the press media release. | Discussed printing requirements for the nondiscrimination statement. Referred to FNS Instruction 113-1 and SNP Guidance Manual. | <i>Please provide a copy of an updated notification letter which demonstrates compliance. Additionally, please provide written assurance that the font size of the nondiscrimination statement on all notification letters will be no smaller than the text of the document.</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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| 9 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 exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing.   | <i>None required at this time.</i>  |
| 10 There is not a designated LWP oversight official.  | Discussed LWP requirements. Guidance on requirements for Local Wellness Policies can be found at <a href="http://www.azed.gov/health-nutrition/wellness-policy/">http://www.azed.gov/health-nutrition/wellness-policy/</a> . Alliance for a Healthier Generation resources and a Model Local Wellness Policy can be found at <a href="https://www.healthiergeneration.org/take_action/schools/wellness_committees_policies/">https://www.healthiergeneration.org/take_action/schools/wellness_committees_policies/</a> .   | <i>Please provide a written plan for how the missing element of the LWP will be included. The plan should include draft language of the element to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i> |
| 11 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. Specifically, the assessment will be distributed to all parents in the school handbook and will be available at the front office for the general public. 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.

### General Program Compliance: Professional Standards

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| 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 <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/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/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. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i> |
| 13 The School Nutrition Program Manager did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.     | Discussed 10 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/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/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 Manager is registered for.</i>   |
| 14 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/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/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>  |
| 15 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/trainingps/">http://www.azed.gov/hns/nslp/trainingps/</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/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/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.</i>  |

16	Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training. Teachers who are responsible for identifying a reimbursable meal have not received training.	Discussed 4 hour training requirement, employees' job duties and applicable trainings that could be provided and feasible timeline. 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 these employees will receive.</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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No findings.

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**General Program Compliance: Reporting & Recordkeeping**

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17	Production record crediting and portion size are inconsistent for raw leafy green vegetables. Specifically, one production record indicates 1/8 cup portion of iceberg lettuce credits as .3 cup vegetable. A second indicates 1/2 cup lettuce (tossed iceberg mix) crediting as 1/2 cup vegetable.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage - <a href="http://www.azed.gov/hns/nslp/mealpattern/">http://www.azed.gov/hns/nslp/mealpattern/</a> .	<i>Please provide one month of updated production records with accurate and consistent crediting of raw leafy vegetables.</i>
18	Production record for School Breakfast Program indicates 1.5 oz. bacon crediting as 1 oz. meat/ meat alternate. Documentation does not support crediting.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage - <a href="http://www.azed.gov/hns/nslp/mealpattern/">http://www.azed.gov/hns/nslp/mealpattern/</a> .	<i>Please provide an updated production record with accurate and consistent crediting of bacon.</i>
19	Production record for School Breakfast Program indicates 4 oz. portion applesauce credits as 1 cup fruit. Documentation does not support crediting.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage - <a href="http://www.azed.gov/hns/nslp/mealpattern/">http://www.azed.gov/hns/nslp/mealpattern/</a> .	<i>Please provide an updated production record with accurate and consistent crediting of applesauce.</i>
20	Production record for School Breakfast Program indicates 1 oz. syrup credits as 1 oz. meat/ meat alternate. Documentation does not support crediting.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage - <a href="http://www.azed.gov/hns/nslp/mealpattern/">http://www.azed.gov/hns/nslp/mealpattern/</a> .	<i>Please provide an updated production record with accurate and consistent crediting of syrup.</i>

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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! St. Peter Indian Mission School has completed the Administrative Review for the 2019-2020 school year. Thank you so much for your hospitality 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 checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$61.60
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	\$1,984.50

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by December 29, 2019 to Sandy Fitzner at [Sandy.Fitzner@azed.gov](mailto:Sandy.Fitzner@azed.gov) or 1535 W. Jefferson St. Bin#7, Phoenix, AZ 85007.

  
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Reviewer Signature                      11/15/2019  
Date

  
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Program Director Signature                      11/15/19  
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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