



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Glendale Union High School District

CTD: 07-05-05

Sites: Cortez High School and Sunnyslope High School

Contacts: Brian Capistran, Superintendent and Dung Quach-Gokool, Administrator of Food Services

Review Date: February 24-25, 2020

Review Period: January 2020

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>			
1	Multiple applications were certified incorrectly or utilized incomplete information. Specifically, two household applications were certified with incorrect or missing household numbers, one application was certified for free benefits with a non-valid case number, one application was incorrectly certified for free benefits where the student should have been certified for reduced benefits and one application was incorrectly certified for free benefits where the student was not eligible for benefits. This contributed toward fiscal action calculations.	Discussed errors found and required corrective action. Referred to Processing Applications, Reviewing Applications Based on Income, Assessing Completeness of Categorically Eligible Applications and Determining Eligibility for Categorically Eligible Applications sections in USDA's Eligibility Manual for School Meals.	<i>Corrections have been made to certification errors. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student.</i>
2	In one instance, the eligibility determined was not transferred correctly to the benefit issuance document (BID). Specifically, the student was certified for reduced benefits but was claimed for free benefits on the BID. This contributed toward fiscal action calculations.	Discussed requirement that eligibility status must be implemented within 10 operating days of receipt of an application and discussed best practices (such as having someone double check) for ensuring eligibility status is transferred to the benefit issuance document on a regular basis. The Step by Step Instruction: How to Create a Benefit Issuance Document (BID) 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>Corrections have been made to the benefit issuance document. Please provide a written description of the process that will be implemented to ensure that the benefit issuance document matches all current students and their eligibility status.</i>

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| 3 | One student in the selected sample did not have supporting eligibility documentation on file. This contributed toward fiscal action calculations. | Discussed that all free and reduced price applications, including applications from households determined ineligible for benefits, must be kept on file for a minimum of five years after the final claim is submitted for the fiscal year to which they pertain as is required by Arizona law. Also discussed best practices of organization for eligibility documentation. | <i>Corrections have been made to the certification status of these students. Please provide written procedures that will be implemented to ensure that all free and reduced price applications will be kept on file according to USDA's requirements and written assurance that this will occur.</i> |
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**Performance Standard 1: Meal Counting & Claiming- Critical Area**

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No findings.

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

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No findings.

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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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| 4 | The SFA was unable to provide documentation to demonstrate the correct verification sample size was used during the verification process. | Discussed correct calculation of sample size, which applications are subject to verification and maintaining documentation of all verification activities. Discussed attending ADE's Drop-in Workshop: Preparing for Verification. Referred to Verification Sample Size Calculator and Online Training: Verification Review found on ADE's website at <a href="http://www.azed.gov/hns/nslp/verification/">http://www.azed.gov/hns/nslp/verification/</a> . Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 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 procedures for how the verification sample size will be determined in the future and how documentation will be saved for 5 years.</i>   |
| 5 | Documentation does not support that a confirmation review took place.   | Discussed how to document the confirmation review by using the 'Office Use Only' section on household applications. Referred to Verification Online Training: Verification Review found on ADE's website at <a href="http://www.azed.gov/hns/nslp/verification/">http://www.azed.gov/hns/nslp/verification/</a> .  | <i>Please provide written procedures for how the confirmation review will be conducted and written assurance that all applications selected for verification will undergo a confirmation review by a separate designated official and that this confirmation review will be documented.</i> |

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

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| 6 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims.  | 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 at on ADE's website at <a href="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a> . The Step by Step Instruction: How to Complete Daily Edit Checks 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 provide a completed daily edit check worksheet for the month of April 2020. Additionally, please provide written assurance that daily edit checks will be conducted.   |
| 7 | The Local Meal Charge Policy does not align with state specific restrictions outlined in HNS14-2017. Specifically, clearly marked notices are provided to students with an outstanding balance. | Discussed the Unpaid Meal Charge Policy and referred to memos SP29-2017, SP29-2017a, SP23-2017 and HNS14-2017, which can be found on ADE's website at <a href="http://www.azed.gov/hns/memos/">http://www.azed.gov/hns/memos/</a> .  | Please provide a copy of the revised local meal charge policy that demonstrates compliance with the state's specific requirements.  |
| 8 | SFA did not communicate their local meal charge policy in writing to all households at the beginning of the school year and/or during the school year for new students.                         | Discussed the Unpaid Meal Charge Policy and referred to memos SP29-2017, SP29-2017a, SP23-2017 and HNS14-2017, which can be found on ADE's website at <a href="http://www.azed.gov/hns/memos/">http://www.azed.gov/hns/memos/</a> .  | Please provide written assurance that moving forward, all households will be notified in writing of the local meal charge policy at the beginning of the school year and any new student will be notified of the policy upon registration.                  |
| 9 | Cashiers and substitute cashiers are not being trained on the meal counting and claiming system (including the backup system) on an annual basis.   | Discussed the regulation that SFAs are required to conduct training for cashiers and serving line staff so they can help students select the required food components/food items in the quantities needed for reimbursable lunches and breakfasts. Annual training is required to meet the professional standards requirements. Referred to USDA's Offer Verses Serve Manual, which can be found on ADE's website at <a href="https://cms.azed.gov/home/GetDocumentFile?id=58d94c4a1130c012245c2534">https://cms.azed.gov/home/GetDocumentFile?id=58d94c4a1130c012245c2534</a> . | Please provide written procedures that demonstrate how cashiers and substitute cashiers will be trained on the meal counting and claiming system on an annual basis. Additionally, please provide written assurance that these procedures will be followed. |

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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.

Resource Management		
10	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. Specifically, SFA is charging \$ 1.75 for breakfast and \$3.50 for lunch. This does not meet the Adult Meal Pricing Tool requirement of \$1.85 for breakfast and \$3.65 for lunch.	Discussed pricing adult meals to reflect the paid student meal price plus the amount of reimbursement received for a paid meal plus the per meal value of entitlement and bonus commodities.
		<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>
11	The nonprofit school food service account has encumbered bad debt from unpaid student meal accounts and the district has not reimbursed the nonprofit food service account.	Discussed Memo SP 47-2016 that states bad debt must be written off as an operating loss and may not be absorbed by the nonprofit school food service account. The funds must be restored using non-federal funds, such as funds from school district's general fund, special funding from state or local governments or any other non-federal sources. The memo can be found here: <a href="https://cms.azed.gov/home/GetDocumentFile?id=58af35d51130c10924ea2c29">https://cms.azed.gov/home/GetDocumentFile?id=58af35d51130c10924ea2c29</a> .
		<i>Please provide a written description of the steps which will be taken to reimburse the nonprofit school food service account for the bad debt. Additionally, please provide documentation to demonstrate the nonprofit school food service account has been repaid using nonfederal funds.</i>
General Program Compliance: Civil Rights		
12	The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs. Specifically, it was only provided to the Department of Economic Security.	Discussed requirements and timeframe for public/media release and best options locally for submitting the release. The template can be found on ADE's website at <a href="http://www.azed.gov/hns/nsfp/forms/">http://www.azed.gov/hns/nsfp/forms/</a> .
		<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>
13	Program staff at Thunderbird High School have not been trained on civil rights topics and there is not a plan in place to provide civil rights training.	Discussed requirement and how to document that the requirement has been met. An acceptable civil rights power point training material can be found on ADE's website at <a href="http://www.azed.gov/hns/civilrights/">http://www.azed.gov/hns/civilrights/</a> .
		<i>Please provide written assurance that all food service staff will be trained at hire and as needed on Civil Rights Compliance in Child Nutrition Programs. Describe the process that will be implemented to ensure that this requirement is adhered to and properly documented.</i>

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| <p>14 Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, the procedure states the complaint will be handled internally.</p> | <p>Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, 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 SFAs procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFAs procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFAs complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at:<br/> <a href="http://www.azed.gov/hns/civilrights/">http://www.azed.gov/hns/civilrights/</a>.<br/> The Step by Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at<br/> <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 updated process and procedures for processing complaints alleging discrimination which meets requirements.</i></p>   |
| <p>15 The medical statement for students with special dietary accommodations includes "Student's Diagnosis".</p>  | <p>Referred to SP 26-2017: Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers (Q&amp;As), question 15, the State agency or SFA may not require that the written medical statement provide a specific diagnosis by name or use the term "disabled" or "disability." Additionally, discussed updating Special Dietary Needs Form to include the language "a physical or mental impairment that restricts the child's diet" as outlined in policy memorandum SP 59-2016: Modifications to Accommodate Disabilities in the School Meal Programs.</p>   | <p><i>Please provide a copy of the updated Medical Statement for Students with Special Dietary Accommodations that includes the language: "a physical or mental impairment that restricts the child's diet."</i></p> |

16	The medical statement for students with special dietary accommodations does not include the ability for State Licensed Healthcare Professionals to complete and sign the form.	For purposes of Child Nutrition Programs, only a "Licensed Healthcare Professional" is permitted to complete and sign a medical statement for meal accommodations in the Child Nutrition Programs. The seven medical professionals listed are permitted to complete and sign a medical statement for meal accommodations in the Child Nutrition Programs administered in Arizona. (HNS# 11-2015): Dentists, Homeopathic Physicians, Naturopathic Physicians, Nurse Practitioners, Osteopathic Physicians, Physician Assistants, and Physicians. The ADE template can be found here: <a href="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a>	<i>Please provide a copy of the updated Medical Statement for Students with Special Dietary Accommodations that includes language to permit State Licensed Healthcare Professionals to complete and sign the medical statement.</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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17	The public is not being notified of the existence and contents of the Local Wellness Policy (LWP).	Discussed feasible means of notifying the public about the LWP, such as posting the policy on the district website or adding language on the website stating where the public can access the LWP.	<i>None required at this time.</i>
18	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, such as on the district website or individual school websites. 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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| 19 Foods and beverages sold to students in grades 9-12 during the school day do not meet Smart Snacks standards. Specifically, granola bars sold during lunch through the cafeteria do not meet Smart Snacks Standards. Additionally, Ramen, Cheetos, Takis, Chimichangas, Hot Pockets, Pizza Rolls and Snapple sold during lunch at the student-run snack bar at Cortez High School do not meet Smart Snacks Standards. | Discussed Smart Snacks requirements for grades 9-12 and why these products did not meet the standards. The Alliance for a Healthier Generation Smart Snacks Product Calculator can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/smartsnacks/">http://www.azed.gov/hns/nslp/smartsnacks/</a> . Smart Snacks Summary Chart can be found on USDA's website at <a href="https://www.fns.usda.gov/school-meals/tools-schools-focusing-smart-snacks">https://www.fns.usda.gov/school-meals/tools-schools-focusing-smart-snacks</a> . The Online Course: Smart Snacks and Competitive Foods Standards in Arizona 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 written procedures for assessing whether a product meets Smart Snacks standards. Additionally, please provide written assurance that all items that do not meet Smart Snacks standards will no longer be sold during the school day and that Smart Snacks standards will be adhered to. Additionally, the certificate of completion of Online Course: Smart Snacks and Competitive Foods Standards in Arizona must be submitted for the employee responsible for Smart Snacks oversight at Cortez High School.</i> |
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**General Program Compliance: Professional Standards**

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| 20 Two School Nutrition Program Managers (Glendale High School and Washington High School) 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/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 the School Nutrition Program Manager is registered for.</i>          |
| 21 Several 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 the trainings that full-time School Nutrition Program staff are registered for.</i> |

22	Several 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 <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 the trainings that Part-time School Nutrition Program staff are 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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23	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Ardmore Farms juice (Product of USA, China, Chile, Mexico, Turkey, Poland and Spain). 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 <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>
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#### General Program Compliance: Reporting & Recordkeeping

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24	Production records for breakfast and lunch did not contain all required sections: Grade group (9-12) and number of reimbursable meals served.	Discussed required sections of production records. Parts of a Production Record Guidance 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> . Production Record Template 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 Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingps/snarchivedwebinars/">http://www.azed.gov/hns/nslp/trainingps/snarchivedwebinars/</a> .	<i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days that demonstrate all required sections are present.</i>
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25	An inaccurate Product Formulation Statement (PFS) was provided to the reviewer for the beef hot dog to demonstrate how the product credits towards the meal pattern.	Discussed when processed products are used in Child Nutrition Programs to meet the meal pattern requirement, the product's contributions must be determined. CN Labels and/or Product Formulation Statements provide valuable crediting information; and only these will be accepted as proper crediting documentation. Guidance on Product Formulation Statements and CN Labels can be found on ADE's website under the Processed Product Documentation section found at <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a> . The CN Labels and Product Formulation Statements Recorded Webinar & 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> .	<i>Please provide a CN label and/or Product Formulation Statement for the hot dog. If unable to provide a CN label or PFS, please provide written assurance that the product will no longer be offered/served to students. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation.</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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26	Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met one day during the week of review at Sunnyslope High School. Specifically, 4 oz. of juice was served (1/2 cup) and does not meet the requirement of 6 oz. (3/4 cup).	Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/ascsp/">http://www.azed.gov/hns/nslp/ascsp/</a> .	<i>Please provide ASP production records for 5 consecutive days that demonstrate that the ASP meal pattern requirements have been met. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times.</i>
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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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Thank you for your cooperation during the review process. Based on your menu documentation provided for the week of review, it appears that you have opted to utilize the flexibility to serve a select number of enriched grain rich items. Please consider switching to serve 100% whole grain-rich items and join your peers who have already signed ADE's Whole Grain Pledge at: <https://www.surveymonkey.com/r/WholeGrainRichPledge>. ADE appreciates your efforts in providing quality meals to Arizona students. Thank you!

**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

**\$0.00**

☒ No- NSLP

☐ Yes- NSLP

**\$0.00**

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 1, 2020 to Kerrie Zigler at [Kerrie.Zigler@azed.gov](mailto:Kerrie.Zigler@azed.gov) or 1535 W. Jefferson St., Bin #7, Phoenix, AZ 85007.



3/26/2020

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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