



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

**Administrative Review Summary Report**

School Food Authority Name: Hackberry School District

CTD: 08-03-03

Site: Cedar Hills School

Contact: Deb Warren, Administrator

Review Date: February 20, 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>			
	No findings.		
<b>Performance Standard 1: Meal Counting &amp; Claiming- Critical Area</b>			
	No findings.		
<b>Performance Standard 2: Meal Components &amp; Quantities- Critical Area</b>			

<b>1</b>	The following products could not be credited towards the meal pattern due to insufficient documentation: Hot dog and turkey taco meat. Without sufficient documentation, the reviewer was unable to determine if the meat/meat alternate quantity requirements were met.	Discussed requirements regarding processed product documentation and importance of this information to be able to credit food and meet meal pattern requirements. Guidance on Product Formulation Statements and CN Labels can be found on ADE's website under the <i>Processed Product Documentation</i> 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/trainingps/snparchivedwebinars/">http://www.azed.gov/hns/nslp/trainingps/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).	<i>Please provide a CN label and/or Product Formulation Statement for the hot dog and turkey taco meat, or for the items that will replace these. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. Additionally, the certificate of completion of CN Labels and Product Formulation Statements must be submitted.</i>
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2 The following vegetable subgroup was not offered during the review period: Beans/peas. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.	Discussed vegetable subgroup requirements and examples in each subgroup. Vegetable Subgroup Quick Guide 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/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</a> . Please note that repeated violations involving vegetable subgroups may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<i>Please provide one week of lunch production records which demonstrate compliance with the vegetable subgroups. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements.</i>
3 Fluid milk was not available in at least two varieties at breakfast.	Discussed variety requirement to have two different types at breakfast. 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>
4 During the week of review, at least 50% of the grains served at breakfast were not whole grain rich.	Discussed whole grain-rich requirements. USDA's Whole Grain Resource for the National School Lunch and Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria 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 Making Sense of the Whole Grain Flexibilities in School Year 2019-2020 Recorded Webinar and Webinar Slides 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> .	<i>Please provide one week of production records and supporting documentation (CN Label, PFS, ingredient lists, nutrition fact labels, etc.) that demonstrate that at least 50% of the grains served at breakfast were whole grain rich. Additionally, the certificate of completion of Making Sense of the Whole Grain Flexibilities in School Year 2019-2020 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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| 5 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor is not included.                   | Discussed how to complete the daily edit checks using ADE's Simplified 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 Check can be found under 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 March. Additionally, please provide written assurance that daily edit checks will be conducted using the correct attendance factor. Additionally, the certificate of completion of Step by Step Instruction: How to Complete Daily Edit Checks must be submitted. |
| 6 | Daily edit checks are not being conducted appropriately. Specifically, the column for total enrollment is not being filled out. | Discussed how to complete daily edit checks using ADE's Simplified 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>   | Please provide a completed daily edit check worksheet for the month of March. Additionally, please provide written assurance that daily edit checks will be conducted appropriately.   |

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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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| 7 | Meals served to Pre-K students did not meet requirements for co-mingling. Specifically, only one milk type was offered to Pre-K students. | Discussed that Pre-k students should be offered the same items if they are co-mingled and also need two milk types. Referred to SP 01-2018 Updated Infant and Preschool Meal Patterns can be found at: <a href="http://www.azed.gov/hns/cacfp/cacfpmealpattern/">http://www.azed.gov/hns/cacfp/cacfpmealpattern/</a> . | None required at this time. |
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**Resource Management**

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No findings.

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**General Program Compliance: Civil Rights**

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| 8 | All program staff have not been trained on civil rights topics. | Discussed requirement and how to document that 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> . | Please provide written assurance that all food service staff will be trained at hire and annually 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. |
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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 recent assessment of the LWP did not completely meet the Final Rule requirements. Specifically, a WellSAT was conducted which meets the requirement to compare the LWP to a model policy however, plans were not in place to assess how the LEA is complying with their own LWP. | 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 and progress made in attaining the goals of the wellness policy. Recommended using ADE's Activity and Assessment Tool. 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> .                                 | None required at this time. |
| 10 | The public was not notified of the results of the most recent assessment of the implementation of the LWP.   | Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. The USDA's Local Wellness Policy Outreach Toolkit can be found at <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> . | None required at this time. |

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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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| 11 | The School Nutrition Program Director hired after July 1, 2015 did not meet the hiring standard requirement.   | Director was going to apply for hiring waiver, however, they are no longer at the school. LEA will be hiring a new director. Discussed hiring standards and option to apply for a hiring waiver since the LEA's enrollment is under 500 students. Referred to ADE Hiring Tracker and SP 05-2020 on ADE's Professional Standards webpage: <a href="http://www.azed.gov/hns/nslp/trainingps/">http://www.azed.gov/hns/nslp/trainingps/</a> .   | If a new director is hired before corrective action is due please provide the Hiring Tracker form and supporting documentation. If not, please provide a written description of your plan for hiring a new director, including a job posting, timeline, etc.  |
| 12 | One employee outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable 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> .  | 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.  |
| 13 | Professional Standards training hours are not being adequately tracked. Specifically, there is no comprehensive tracking system in place. Employee trainings are received through a variety of sources (in person and through multiple software programs) and while these records are kept separately there is no system to combine trainings and ensure that hours are met per employee annually. | Referred to ADE training trackers in order to track training hours. Trackers can be found on ADE's Professional Standard webpage: <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> . | 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. |

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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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| 14 | The written food safety plan did not include adequate SOPs for the share table.  | Discussed making sure the food safety plan is site specific and provided sample templates, which can be found on ADE's website at <a href="http://www.azed.gov/hns/nsfp/foodsafety/">http://www.azed.gov/hns/nsfp/foodsafety/</a> .   | Please provide a copy of the SOPs for the share table that will be included in the food safety plan.  |
| 15 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school at off-site storage facilities: Jackpot mixed fruit. 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/nsfp/forms/">http://www.azed.gov/hns/nsfp/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> | 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. |

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**General Program Compliance: Reporting & Recordkeeping**

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No findings.

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

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| 16 | Outreach to families regarding the availability of the SBP was not conducted during the school year, only at the beginning. | Discussed methods of notifying families of the availability of the SBP throughout the school year and determined which was most feasible. | Please provide a description of how households will be notified of the availability of the SBP during the school year, and written assurance that this will occur. |
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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:

Congratulations on completing the Administrative Review! Thank you for your hard work and cooperation during this process. Please continue working with ADE in order to assist in the operation of your School Nutrition Programs and keep up the great work.

**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      1,673.00

Please submit corrective action response by April 27, 2020 to [Lindsey.Cler@azed.gov](mailto:Lindsey.Cler@azed.gov) or 1535 W. Jefferson St, Bin #7, Phoenix, AZ 85007.



3/19/20

Reviewer Signature

Date



3/19/2020

Program Director 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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