



Arizona Department of Education Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Roosevelt Elementary District

CTD: 07-04-66

Site: Ignacio Conchos School, Martin Luther King Early Childhood Center, Southwest Elementary School, Sunland Elementary School and T G Barr School

Contacts: Dr. Quinton Boyce, Superintendent and Heather Cruickshank, Supervisor

Review Date: February 18 – 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
Performance Standard 1: Certification & Benefit Issuance- Critical Area			

No findings.

Performance Standard 1: Meal Counting & Claiming- Critical Area			
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- | No. | Review Observations & Findings | Technical Assistance Provided | Required Corrective Action |
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| 1 | Martin Luther King Early Childhood Center: Breakfast in the Classroom meal count totals for the month of review were not correctly combined and recorded. This was deemed a systemic error and will contribute towards fiscal action calculations. A full recalculation of breakfasts served during SY19/20 until issue is corrected in SY20/21 will be conducted. | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. | <i>Please provide a written description of the changes made to the system to ensure that meal count totals are accurate. Additionally, provide the SY20/21 start and end date for the 30 day clean count period.</i> |
| 2 | Martin Luther King Early Childhood Center: On the day of review, it was observed that 16 BIC meals counted for reimbursement did not contain all of the required meal components. This 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. 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. The Recognizing a Reimbursable Meal at the Point of Service Recorded Webinar & Webinar Slides can be found on ADE's website at www.azed.gov/hns/nslp/trainingsps/snparchivedwebinars/ . | <i>Please provide a written description of the changes that have been made to ensure that all meals counted for reimbursement contain all of the required meal components.</i> |

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| 3 | <p>Sunland Elementary School: On the day of review, it was observed that several students were claimed for lunch reimbursement without a 1/2c fruit or vegetable. Reviewer stopped the students and instructed them to take a 1/2c fruit or vegetable. Kitchen manager voided the meal if they student did not want to take a 1/2c fruit or vegetable.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. 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. The Recognizing a Reimbursable Meal at the Point of Service Recorded Webinar & Webinar Slides can be found on ADE's website at www.azed.gov/hns/nslp/trainingsps/snparchivedwebinars/.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that all meals counted for reimbursement contain all of the required meal components.</i></p> |
| 4 | <p>Southwest Elementary School: Meal count totals by category for the day of review were not correctly combined and recorded. Specifically, the special needs teacher took 13 meals for her class. POS worker clicked 13 meals without confirming all 13 students received a reimbursable meal. Reviewer confirmed only 9 reimbursable meals were taken by students. This was deemed a systemic error 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. Discussed with staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that all meals counted for reimbursement contain all of the required meal components.</i></p> |

Performance Standard 2: Meal Components & Quantities- Critical Area

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| 5 | <p>Martin Luther King Early Childhood Center: Quantities observed on the day of review did not meet minimum amounts required by the lunch meal pattern. Initially staff was going to serve 2 orange slices (1/4c) to students. Reviewer provided TA to serve 4 orange slices (1 full orange / 1/2c).</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.). Referenced USDA Food Buying Guide and Fresh Fruit Portion Guide found on ADE's website at www.azed.gov/hns/nslp/mealpattern.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that daily fruit quantities meet minimum amounts required by the meal pattern.</i></p> |
| 6 | <p>Martin Luther King Early Childhood Center: Quantities observed on the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, weekly minimum grain requirement of 8oz/eq was not met for lunch. 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.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at www.azed.gov/hns/nslp/trainingsps/online/. 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 weekly minimum grain quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu must be submitted.</i></p> |

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| <p>7 Martin Luther King Early Childhood Center: Quantities observed on the day of review/during the review period did not meet minimum amounts required by the meal pattern. Initially only 4oz juice was provided for Breakfast in the Classroom. Reviewer informed staff to provide an additional 1/2c of fruit for breakfast. Bananas were delivered to all classrooms prior to the end of meal service. Reviewer confirmed all students had a full cup of fruit available on the day of review.</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 Breakfast Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at www.azed.gov/hns/nslp/trainingps/online/.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that fruit quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p> |
| <p>8 Martin Luther King Early Childhood Center: Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, the Southwest Chicken Salad (served 1/15 and 1/29) credited as .75/oz/eq grain, not the required 1oz/eq. grain. This was determined to be a repeat finding from cycle two.</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.). Additionally, discussed with staff how to properly credit grains using Exhibit A of the Food Buying Guide. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that Southwest Chicken Salad grain quantities meet minimum amounts required by the meal pattern.</i></p> |
| <p>9 Southwest Elementary: Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly minimum meat/meat alternate requirement of 9oz/eq was not met for lunch. 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.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly minimum meat/meat alternate quantities meet minimum amounts required by the meal pattern.</i></p> |

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| <p>10 Southwest Elementary: Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly minimum grain requirement of 8oz/eq was not met for lunch. 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.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly minimum grain quantities meet minimum amounts required by the meal pattern.</i></p> |
| <p>11 Southwest Elementary School: Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, the Southwest Chicken Salad (served 1/15, 1/16 and 1/29) credited as .75oz/eq grain, not the required 1oz/eq. grain. This was determined to be a repeat finding from cycle two.</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.). Additionally, discussed with staff how to properly credit grains using Exhibit A of the Food Buying Guide. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that Southwest Chicken Salad grain quantities meet minimum amounts required by the meal pattern.</i></p> |
| <p>12 Southwest Elementary School: On the day of review, the required meal components were not available on every reimbursable meal service line to all students at lunch. Specifically, Protein Pack entree did not initially include a grain component. Meal service was stopped and 1oz/eq grain crackers were added to Protein Pack entree. Reviewer ensured all students received a grain component.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that all 5 required meal components are available on every reimbursable meal service line to all students.</i></p> |
| <p>13 Southwest Elementary School: Milk substitutions did not meet requirements. Specifically, one student's doctor note indicates no chocolate milk, however, the student was provided water.</p> | <p>Provided nutrient requirements for milk substitutes and discussed options for meal service. Q&As - Milk Substitution for Children with Medical or Special Dietary Needs (Non-Disability) can be found on FNS website at www.fns.usda.gov/qas-milk-substitution-children-medical-or-special-dietary-needs-non-disability.</p> | <p><i>If planning to continue offering a fluid milk substitute, please provide a copy of the nutrition facts label of the product that will be used that meets the nutrition requirements. If a fluid milk substitute will no longer be offered, please provide a written description of procedures that will be implemented to ensure only complete meals will be counted for reimbursement.</i></p> |

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| <p>14 Southwest Elementary School: Fluid milk was not available in at least two varieties at lunch for the special needs classroom.</p> | <p>Discussed variety requirement and feasible options for compliance. Allowable milk varieties are fat-free unflavored, fat-free flavored, 1% unflavored and 1% flavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide one week of lunch production records (for special needs classroom) 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 lunch.</i></p> |
| <p>15 Sunland Elementary School: Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly minimum grain requirement of 8oz/eq was not met for lunch. 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.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly minimum grain quantities meet minimum amounts required by the meal pattern.</i></p> |
| <p>16 Sunland Elementary School: Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the Southwest Chicken Salad (served 1/15, 1/29 and 1/30) credited as .75/oz/eq grain, not the required 1oz/eq. grain. This was determined to be a repeat finding from cycle two.</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.). Additionally, discussed with staff how to properly credit grains using Exhibit A of the Food Buying Guide. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that Southwest Chicken Salad grain quantities meet minimum amounts required by the meal pattern.</i></p> |
| <p>17 Sunland Elementary School: On the day of review, the required meal components were not available on every reimbursable meal service line to all students. Specifically, the vegetable component ran out twice during meal service. Kitchen manager stopped the line the 1st time, however, not the 2nd time. Reviewer stopped the line the 2nd time and ensured all students had the option to select a vegetable.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Additionally, discussed having all 5 required meal components available on every reimbursable meal service line to all students.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that all 5 required meal components are available on every reimbursable meal service line to all students.</i></p> |

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| 18 Sunland Elementary School: Vegetables are not being properly portioned. Specifically, on day of review, staff weighed 4oz of cucumbers to credit as 1/2c. | Discussed 2.5oz of cucumber credits as 1/2c. Referenced Buying Guide and Fresh Vegetable Portion Guide found on ADE's website at www.azed.gov/hns/nslp/mealpattern/ . The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at www.azed.gov/hns/nslp/trainingsps/snparchivedwebinars/ . | <i>Please provide a written description of the changes that have been made to ensure that staff has been properly trained on serving the correct portion sizes. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i> |
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Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

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| 19 Southwest Elementary School: Although second meals are not being counted toward the claim for reimbursement, they are not being monitored by staff. | Discussed SFAs must ensure that lunches and breakfasts are planned and produced on the basis of participation trends with the objective of providing one reimbursable lunch and/or breakfast per child per day. Production and participation records must be maintained to demonstrate positive action toward providing one reimbursable lunch and/or breakfast per child per day. If a school elects to offer second servings of any part of a reimbursable meal these foods must be counted toward the daily and weekly component contributions, as well as, towards the weekly dietary specifications and may not be claimed for reimbursement. | <i>Please provide a written description of procedures that have been implemented to ensure that second servings of any part of a reimbursable meal will be properly accounted for.</i> |
| 20 Visiting students are being claimed at the school they are enrolled in, not the school that served the meal. | Discussed how to categorize and count visiting student meals. | <i>Please provide a written description of procedures that have been implemented to ensure visiting students are being claimed at the school that served the meal, not the school they are enrolled in.</i> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

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| 21 | Martin Luther King Early Childhood Center: OVS was not implemented properly. Specifically, students were not allowed to take a full cup of fruit during Breakfast in the Classroom. Several teachers thought students were only able to select 4oz juice or 1 banana. | Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be found on ADE's website at www.azed.gov/hns/nslp/programguidance/ . | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i> |
| 22 | Southwest Elementary School: OVS was not implemented properly. Specifically, special needs classroom is pre-plated all 5 components and are unable to decline components. | Discussed with staff how to properly implement OVS and Serve Only. Staff decided Serve Only would be easier to implement for the special needs classroom. Additionally, discussed increasing vegetable portion size to 3/4c. | <i>Please provide a written description demonstrating how Serve Only will be implemented properly. Additionally, please provide written assurance that moving forward, Serve Only will be implemented properly.</i> |
| 23 | Sunland Elementary School: Signage which explains what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable was not displayed to students at lunch. | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern/ . | <i>Please provide the sign that has been displayed explaining what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |

Meal Pattern & Nutritional Quality: Meal Components & Quantities

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| 24 | Meals served to Pre-K students did not meet requirements. Specifically, an unallowable grain-based dessert item was served to Pre-K students: Mini Cinnamon Roll. | Discussed grain based desserts may not be credited towards the Pre-K meal pattern. Referred to SP 01-2018 Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers. Resources for the new Pre-K meal pattern can be found at: www.azed.gov/hns/nslp/mealpattern/ . | <i>None required at this time.</i> |
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Resource Management

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| 25 | Unallowable costs were paid for by the nonprofit school food service account. The SFA charged Indirect Costs in excess of the allowable amount of \$639,432.00 the amount of \$1,291,368.00 was charged resulting in an overcharge to the Nonprofit School Food Service Account of \$651,936.00 | Discussed specific unallowable expenses. An extensive list of allowable and unallowable costs can be found in 2 CFR 200 Subpart E General Provisions for Selected Items of Cost. | <i>Please provide a copy of existing procedures OR develop procedures for determining the allowability of costs as required by 2 CFR 200.303 (b) (7). Please also provide written assurance that all expenses of the nonprofit school food service account will be limited to those costs which are necessary, reasonable, allocable; and also that these costs are in accordance with 2 CFR 200 Subpart E Cost Principles. Additionally, please provide supporting documentation which reflects that the total amount of unallowable costs \$651,936.00 was reimbursed to the nonprofit school food service account</i> |
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| 26 | Net cash resources available in the nonprofit school food service account exceed the three month expenditure limit and approval from the ADE was not obtained. | Discussed requirement that net cash resources must be limited to an amount that does not exceed 3 months average expenditures without prior approval from the ADE. Referred to 7 CFR 210.19. The Excess Cash Spending Plan can be found on the ADE's website under the Maintenance of the Non-Profit School Food Service Account at:
http://www.azed.gov/hns/rm | <i>Please provide documentation reflecting that net cash resources are below the 3 month average expenditure limit or provide a detailed Excess Cash Spending Plan to ADE for approval to maintain a balance in excess of the net cash resource limit.</i> |
| 27 | The SFAs process for tracking and collecting revenues for adult meals is insufficient as the report from the point of sale states that 1,592 Adult Breakfasts were sold which should have equated to \$3,582.00 of revenue however only \$178.00 was collected, leaving an unpaid balance owed to the nonprofit school food service account of \$3,404.00. Additionally, 7,303 lunches were sold which should have equated to revenue of \$27,386.25 and only \$21,909.00 was collected, leaving an unpaid balance owed to the nonprofit school food service account of \$5,477.25. | Discussed requirement that the full costs of providing meals to adults must be covered by the adult payment. FNS Instruction 782-5 REV. 1, Pricing of Adult Meals in the National School Lunch and School Breakfast Programs, Located at:
http://www.azed.gov/hns/nslp/rm/ | <i>Please provide a written description of the steps which have been taken to ensure that the appropriate amount of revenue is collected for all adult meals served and counted at the point of sale. Additionally, please provide supporting documentation which reflects that the nonprofit school food service account was reimbursed in the amount of \$8,881.25 to support the number of meals that were sold to adults.</i> |
| 28 | SFA did not ensure that all nonprogram food costs were included in its assessment calculation (Nonprogram Food Revenue Tool). Specifically, the SFA did not include costs for Adult Meals, or snacks provided to the head start program. | Discussed requirement that all nonprogram food costs must be included in the assessment when the revenue for these nonprogram foods have been included. FNS Instruction 782-5 REV. 1, Pricing of Adult Meals in the National School Lunch and School Breakfast Programs, CN 19-12 & attachment (CNR 2010: Guidance on Revenue from Non-Program Foods- Revised and Non-Program Food Revenue Tool), SP 13-2014 (School Food Service Account Revenue from the Sale of Non-Program Foods), SP20-2016 Nonprofit School Food Service Account Nonprogram foods Revenue Requirements Located at:
http://www.azed.gov/hns/nslp/rm/ | <i>Please revise the Nonprogram Food Revenue Tool and include the costs for Adult Meals as well as the costs for the snacks provided to the head start program. Please also provide a description of the systems that will be developed to track all non-program food costs and ensure compliance with revenue from nonprogram foods requirements is assessed appropriately.</i> |
| 29 | The nonprofit school food service account was charged costs in excess of the approved indirect cost rate. The SFA charged Indirect Costs in excess of the allowable amount of \$639,432.00 the amount of \$1,291,368.00 was charged resulting in an overcharge to the Nonprofit School Food Service Account of \$651,936.00. | Discussed proper classification of direct/indirect costs. Reviewed requirements that indirect costs be charged consistently across the SFA as required in 2 CFR 200.412-414. Referred to the USDA's Indirect Cost Guidance Manual located at:
http://www.azed.gov/hns/nslp/rm/ to be used as a resource when determining allowable indirect costs. 7 CFR 210.14 (g), SP60-2016 Indirect Cost Guidance at:
http://www.azed.gov/hns/nslp/rm/ | <i>Please provide written procedures for how indirect costs will be calculated and charged to the nonprofit school food service account. Additionally, also provide supporting documentation which reflects that any indirect costs charged in excess of the allowable rate have been returned to the nonprofit school food service account.</i> |

30	Indirect costs were incorrectly calculated. The correct indirect cost rate was applied to an incorrect direct cost base. Indirect Cost Rate of 25% was applied to a direct cost base that included expenditures for food costs \$5,165,471.00 instead of the correct direct cost base of \$2,557,727.00 which excludes food costs. This resulted in the nonprofit school food service account being overcharged by the amount of \$651,936.00.	Discussed proper classification of direct/indirect costs. Reviewed requirements that indirect costs be charged consistently across the SFA as required in 2 CFR 200.412-414. Referred to the USDA's Indirect Cost Guidance Manual located at: http://www.azed.gov/hns/nslp/rm/ to be used as a resource when determining allowable indirect costs. 7 CFR 210.14 (g), SP60-2016 Indirect Cost Guidance at: http://www.azed.gov/hns/nslp/rm/	<i>Please provide a written description of the internal controls that will be implemented to ensure that the correct indirect cost rate will only be applied to allowable food service expenditures, and how you will prevent the overcharging of indirect costs in the future.</i>
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General Program Compliance: Civil Rights

31	The short version of the USDA nondiscrimination statement was used on the public/media release when the long version of the USDA nondiscrimination statement should have been used.	Discussed the long version of the USDA nondiscrimination statement must be used on all program materials regarding student eligibility.	<i>An updated public/media release has already been provided to the reviewer. No further corrective action is required.</i>
32	The font size of USDA's nondiscrimination statement is smaller than the rest of the text on the public/media release.	Discussed printing requirements for the nondiscrimination statement. Referred to FNS Instruction 113-1 and SNP Guidance Manual.	<i>An updated public/media release has already been provided to the reviewer. No further corrective action is required.</i>

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

33	The LWP did not contain goals for nutrition promotion.	Discussed feasible options for nutrition promotion goals that can be written into the LWP. Discussed activity ideas which included offering contests, surveys, promotions and/or taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Team Nutrition Resources can be found at http://teamnutrition.usda.gov .	<i>None required at this time.</i>
34	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>

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| 35 | The recent assessment of the LWP did not completely meet the Final Rule requirements. Specifically, a Well SAT 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 www.azed.gov/hns/nslp/lwp/ . Also discussed feasible means for notifying the public of the results of the most recent assessment. | None required at this time. |
| 36 | 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 www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit . | None required at this time. |

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

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| 37 | Full-time School Nutrition Program staff have not met the pro-rated 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. Additionally, discussed staff hired after January 2020 are only required to complete 3 hours of training. Trainings for School Nutrition Professionals can be found on ADE's website at www.azed.gov/hns/nslp/training/ . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at http://www.azed.gov/hns/nslp/trainings/online/ . | <i>Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that full-time School Nutrition Program staff are registered for.</i> |
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General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| <p>38 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools or at off-site storage facilities: mandarin oranges, cucumber, jalapeno, red bell pepper, lemon, tomato and banana. Additionally, documentation justifying a Buy American exception was not maintained/on file.</p> | <p>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 www.azed.gov/hns/nslp/forms/. Buy American Recorded Webinar and FAQ can be found on ADE's website at http://www.azed.gov/hns/sfp/.</p> | <p><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></p> |
| <p>39 Martin Luther King Early Childhood Center: Documentation was not maintained to support that the school received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department.</p> | <p>Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year.</p> | <p><i>Please provide a written description of how you will ensure that two food safety inspections from the local health department will be obtained each school year.</i></p> |
| <p>40 Martin Luther King Early Childhood Center: The most recent food safety inspection report was not posted in a publicly visible location prior to lunch meal service.</p> | <p>Discussed making copies of most recent report and feasible places for posting.</p> | <p><i>The most recent food safety inspection report was posted in a publicly visible location during lunch meal service. No further corrective action is required.</i></p> |

General Program Compliance: Reporting & Recordkeeping

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| <p>41 Martin Luther King Early Childhood Center: The site application in CNPWeb does not accurately reflect point of service counting and claiming procedures that were observed on-site. Specifically, CNPWeb site application does not have the correct address listed; CNPWeb site application indicates operating afterschool snack care program, however, they are not operating afterschool snack care program; and CNPWeb site application indicates breakfast is served in the cafeteria and in the classroom, however, it is only served in the classroom.</p> | <p>Referred them to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.</p> | <p><i>Please submit a new site application in CNPWeb that accurately reflects the point of service and counting and claiming procedures. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i></p> |
| <p>42 Sunland Elementary School: The site application in CNPWeb does not accurately reflect point of service and counting and claiming procedures that were observed on-site. Specifically, CNPWeb site application indicates breakfast is served at grab n go breakfast carts and in the classroom, however, it is only served in the cafeteria.</p> | <p>Referred them to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.</p> | <p><i>Please submit a new site application in CNPWeb that accurately reflects the point of service and counting and claiming procedures. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i></p> |

<p>43 Southwest Elementary School: The site application in CNPWeb does not accurately reflect point of service and counting and claiming procedures that were observed on-site. Specifically, CNPWeb site application indicates breakfast is served at grab n go breakfast carts, in the cafeteria and in the classroom, however, it is not served in the classroom. Additionally, CACFP Meal Pattern is implemented for At-Risk Supper, however, NSLP is indicated.</p>	<p>Referred them to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.</p>	<p><i>Please submit a new site application in CNPWeb that accurately reflects the point of service and counting and claiming procedures. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i></p>
<p>44 Chicken Taquitos with Pinto Beans recipe is not accurate. Specifically, the recipe indicates 1/2c of beans weighs 4oz.</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.).The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at www.azed.gov/hns/nslp/trainingsps/snparchivedwebinars/.</p>	<p><i>An updated Chicken Taquitos with Pinto Beans recipe has already been provided to the reviewer. No further corrective action is required.</i></p>
<p>45 Peanut Butter Protein Pack recipe is not accurate. Specifically, the recipe indicates 1/4c of celery weighs 2oz and 1/4c baby carrots weighs 2oz.</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.).The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at www.azed.gov/hns/nslp/trainingsps/snparchivedwebinars/.</p>	<p><i>An updated Protein Pack recipe has already been provided to the reviewer. No further corrective action is required.</i></p>
<p>46 Sweet Potato Tots recipe is not accurate. Specifically, the recipe indicates 3/4c of sweet potato tots weighs 6oz.</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.).The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at www.azed.gov/hns/nslp/trainingsps/snparchivedwebinars/.</p>	<p><i>An updated Sweet Potato Tots recipe has already been provided to the reviewer. No further corrective action is required.</i></p>
<p>47 Chef Salad recipe is not accurate. Specifically, the ingredients section indicates 12oz of lettuce, however, the preparation instructions indicate 1.5c of lettuce.</p>	<p>Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage - www.azed.gov/hns/nslp/mealpattern/.</p>	<p><i>An updated Chef Salad recipe has already been provided to the reviewer. No further corrective action is required.</i></p>

48	Hotdog on Bun recipe not accurate. Specifically, chili is not listed in the ingredients or recipe name, however, it is listed in the preparation instructions and shown in the picture. Recipe preparation instructions indicate chili is not required on the hotdog. Additionally, instructions indicate chili can be served on the side or on top of the hotdog. Discussed having a separate chili hotdog recipe and hotdog recipe.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage - www.azed.gov/hns/nslp/mealpattern/ .	<i>An updated Hotdog and Hotdog with Chili recipe has already been provided to the reviewer. No further corrective action is required.</i>
49	Teriyaki Chicken with Vegetable Fried Rice recipe is not accurate. Specifically, the recipe is missing preparation instructions and does not have vegetable fried rice included in the ingredients section.	Discussed updating recipes to reflect current products being used. Additionally, discussed adding preparation instructions.	<i>An updated Teriyaki Chicken with Vegetable Fried Rice recipe has already been provided to the reviewer. No further corrective action is required.</i>
50	Orange Chicken with Noodle Bowl recipe is not accurate. Specifically, the recipe is missing preparation instructions.	Discussed adding preparation instructions.	<i>An updated Orange Chicken Noodle Bowl recipe has already been provided to the reviewer. No further corrective action is required.</i>
51	Chicken Sausage and Waffle recipe is not accurate. Specifically, the recipe is missing preparation instructions.	Discussed adding preparation instructions.	<i>An updated Chicken Sausage and Waffle recipe has already been provided to the reviewer. No further corrective action is required.</i>
52	Cheeseburger recipe is not accurate. Specifically, the recipe is missing preparation instructions.	Discussed adding preparation instructions.	<i>An updated Cheeseburger recipe has already been provided to the reviewer. No further corrective action is required.</i>
53	Field Trip recipe preparation instructions are not in compliance. Specifically, the preparation instructions indicate that milk can be offered separately, if field trip coordinator has a way to keep milk cold until consumption. Reviewer confirmed kitchen staff provided milk during the week of review. Additionally, the preparation instructions do not indicate how to prepare the recipe.	Discussed all 5 components are required to be offered for field trip reimbursable meals. Additionally, discussed updating the preparation instructions to indicate how to prepare the recipe.	<i>An updated Field Trip recipe has already been provided to the reviewer. No further corrective action is required.</i>
54	Grab and Go Pack recipe is not accurate, Specifically, the recipe indicates 1/2c of celery weighs 4oz. Additionally, the recipe does not include preparation instructions.	Discussed how to credit meal components. Referred to the meal pattern webpage - www.azed.gov/hns/nslp/mealpattern/ .	<i>An updated Grab n Go Pack recipe has already been provided to the reviewer. No further corrective action is required.</i>
55	Hummus Plate recipe is not accurate, Specifically, the recipe indicates 1/4c of celery weighs 2oz and 1/4c baby carrots weighs 2oz. Additionally, the recipe does not include preparation instructions.	Discussed how to credit meal components. Referred to the meal pattern webpage - www.azed.gov/hns/nslp/mealpattern/ . Additionally, discussed adding preparation instructions.	<i>An updated Hummus Plate recipe has already been provided to the reviewer. No further corrective action is required.</i>

56	Nachos recipe is not accurate. Specifically, ingredients section indicates 28g of chips (1oz), however, the preparation instructions indicate to serve 2oz of chips. Reviewer confirmed via production record that 10 chips (1oz) was served.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage - www.azed.gov/hns/nslp/mealpattern/ .	<i>An updated Nacho recipe has already been provided to the reviewer. No further corrective action is required.</i>
57	Oriental Chicken Salad recipe is not accurate. Specifically, the meat/meat alternate credits as 1.5oz/eq, not 2oz/eq; the grain credits as 2oz/eq, not .5oz/eq; and ingredients indicate 1/2c of cabbage weighs 4oz.	Discussed how to credit meal components. Referred to the meal pattern webpage - www.azed.gov/hns/nslp/mealpattern/ . Additionally, discussed adding preparation instructions.	<i>An updated Oriental Chicken Salad recipe has already been provided to the reviewer. No further corrective action is required.</i>
58	Protein Pack recipe is not accurate. Specifically, recipe indicates 1/4c of celery weighs 2oz and 1/4c baby carrots weighs 2oz. Additionally, recipe indicates ounces for Ham and Turkey Coins, however, preparation instructions indicates slices for Ham and Turkey Coins.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage - www.azed.gov/hns/nslp/mealpattern/ .	<i>An updated Protein Pack recipe has already been provided to the reviewer. No further corrective action is required.</i>
59	Southwest Chicken Salad recipe is not accurate. Specifically, ingredients indicate using 12oz of romaine, 2oz of black beans and 2oz of corn. Additionally, the recipe is missing instructions.	Discussed how to credit meal components. Referred to the meal pattern webpage - www.azed.gov/hns/nslp/mealpattern/ . Additionally, discussed adding preparation instructions.	<i>An updated Southwest Chicken Salad recipe has already been provided to the reviewer. No further corrective action is required.</i>
60	Recipes in schools are not standardized. Specifically, reviewer was informed 2 versions of recipes are currently being used.	Discussed creating a separate recipe binder for all 4 cycle weeks.	<i>Please provide a written description of the changes that have been to ensure standardized recipes are consistent at schools.</i>
61	Martin Luther King Early Childhood Center and Southwest Elementary School: Head Start does not have a separate production record.	Discussed Head Start should have a separate production record due to different meal pattern requirements.	<i>Please provide copies of completed Head Start breakfast and lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years.</i>
62	Production records for breakfast and lunch did not contain all required sections: Specifically, Portion sizes are not listed for all foods served consistently.	Discussed required sections of production records. Parts of a Production Record Guidance can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern/ .	<i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years.</i>

63	The Free and Reduced-Price Policy Statement on file with ADE is not up-to-date with the current SFA name.	Referred them to FRPPS template on ADE's website at website at http://www.azed.gov/hns/nslp/forms/ .	<i>An updated Free and Reduced-Price Policy Statement has already been provided to the reviewer and Assigned NSLP Specialist. No further corrective action is required.</i>
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General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

64	SBP outreach did not include meals are free of charge for all students.	Discussed methods of notifying families of the availability of the SBP at the start of and throughout the school year and determined which was most feasible. Additionally, discussed SBP reminders must include: serving times, SBP cost and availability.	<i>Please provide the updated SBP outreach that indicates meals are free of charge for all students.</i>
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Other Federal Program Reviews: Afterschool Snack Program

65	Sunland Elementary School: Snack production records are not being completed daily and maintained for 5 years, as is required.	Discussed record keeping requirements of the ASP. A sample production record for the ASP can be found on ADE's website at: www.azed.gov/hns/nslp/ascsp/ .	<i>Please provide copies of completed Afterschool Snack Program (ASP) production records for 5 consecutive days. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>
66	Sunland Elementary School: The Afterschool Snack Program monitoring review was not conducted within the first four weeks of operation and one additional time during the school year.	Discussed ASP monitoring requirements. A sample ASP monitoring form can be found on ADE's website at www.azed.gov/hns/nslp/ascsp/ .	<i>Please provide written assurance that the ASP will be monitored once within the first four weeks of operation and one additional time during the school year, and that documentation to support this will be maintained.</i>

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2020 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

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| 67 | <p>Ignacio Conchos School and T G Barr School: Inaccuracies found in the October 2019 Reimbursement Request:</p> <p>1. Object code 6633 - For invoice #1336264, only \$220.00 was claimed, however, the invoice totals \$286.00 in allowable expenditures.</p> <p>2. Object code 6100(1) - two hours of direct labor were claimed for Jerri Ferro, however, the labor log only indicated that one hour of work was completed (\$25.00 over-claimed). The labor log indicated that the work performed was administrative work which should be under object code 6100(2) indirect labor rather than direct labor.</p> <p>3. Object code 6100(1) - four hours of direct labor were claimed for Bertila Garcia, however, the labor log only indicated that two hours of work were completed (\$32.92 over-claimed).</p> <p>4. Object Code 6610 - Only \$387.5 was claimed, however, invoices #70979 and #70874 provide documentation for \$390.80 in allowable expenditures.</p> | <p>Jessa Zuck, FFVP Coordinator reviewed the object codes allowable for FFVP and how to classify expenditures, with a focus on direct vs. indirect labor.</p> <p>Provided the LEA with the budget tracking template to use for future FFVP reimbursement requests. Additionally, trained the LEA on how to properly use the budget tracking template to ensure that claims are neither under or over reported on the reimbursement requests. Additionally, discussed the LEA must demonstrate that they can submit an accurate claim for reimbursement that matches documentation and is not under or over claimed.</p> | <p><i>Please update the FFVP reimbursement request for the month of October 2019 to decrease the amount claimed under object code 6100(1) and 6100(2) to accurately reflect the documentation for these expenditures as outlined in the review observation and findings section. Additionally, submit all documentation for the next FFVP reimbursement request to Jessa Zuck, FFVP Coordinator for approval prior to submitting in GME. Reimbursement request are due no later than 60 days after the end of the claim month; therefore, documentation must be provided to Jessa Zuck, FFVP Coordinator no later than 2 weeks prior to the deadline to allow time for review, corrections (if needed), and approval in GME.</i></p> |
| 68 | <p>Ignacio Conchos School and T G Barr School: ADE requires that all sites operating FFVP serve at least twice per week during weeks that school is in session, however, the LEA did not serve FFVP during the week of February 17-21. February 17 was an observed holiday. February 18 was a regular school day. February 19, 20, and 21 were early release days with the students leaving school at 1:00pm. FFVP is regularly served on Tuesdays and Thursdays at 2:45pm. LEA shared that their deliveries arrive on Mondays and Wednesdays, thus they did not serve on Tuesday 2/18 because delivery was not available on the normal day as it was a holiday and the proceeding delivery day would have compromised quality. They are unable to switch the time FFVP is offered as this does not align with the teachers schedules and FFVP is served in the classroom.</p> | <p>Jessa Zuck, FFVP Coordinator reviewed the requirement of serving FFVP twice per week during weeks that school is in session. Discussed expectations for serving FFVP during non-typical weeks such as those with early release days and/or holidays. If school is not in session during the normal FFVP service time, then the school is not required to serve FFVP. Since school was in session for a normal day on February 18 and this is a normal FFVP service day, the site should make an effort to serve FFVP on this day. Consider buying produce that will keep better for a longer period so that you are able to have it delivered on an earlier date. Best practice is to serve FFVP at a different time during the school day on early release days or on an alternate day that week if school is not in session during the normal service time.</p> | <p><i>None required.</i></p> |

Other Federal Program Reviews: Special Milk Program

Not applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

No findings.

Comments/Recommendations:

Martin Luther King Early Childhood Center review findings revealed a systemic error in the counting and claiming system, and thus, a fiscal recalculation is necessary. The error was consistently found with Breakfast in the Classroom meal counts. The fiscal recalculation will be based on meal count data from an error-free period of 30 consecutive operating days. This data will be used to recalculate the reimbursement previously received based on erroneous claims. It is imperative that the 30 days of meal counts reflects the corrective action implemented to yield an accurate meal counting and claiming system. If errors are still present, this process will continue until the errors have been resolved.

Due to SY19/20 COVID-19 School Closure, Martin Luther King Early Childhood Center was unable to provide 30 consecutive operating days of meal counts. Additionally, the recalculation of meal counts was not completed. The Roosevelt Elementary District Administrative Review will remain open until 30 consecutive operating days of Breakfast in the Classroom meal counts are received and fiscal action can be determined for Martin Luther King Early Childhood Center.

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!

Child Nutrition Recipe Box for Schools can be found at www.theicn.org/cnrb/recipes-for-schools/.

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/trainingsps/>.

Fiscal Action will be assessed at a later time.

<input type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	TBD
<input type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	TBD

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 22, 2020 to Jennifer.McDonald@azed.gov or Jennifer McDonald at 1535 W. Jefferson St, Bin #7, Phoenix, AZ 85007.



4/1/2020

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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