



Arizona Department of Education Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Bicentennial Union High School District

CTD: 15-05-76

Site: Salome High School

Contacts: Andrew Kauffman, Superintendent & Regina Friedle, Cafeteria Manager

Review Date: January 16, 2020

Review Period: December 2019

Programs Reviewed:

☒ National School Lunch

☒ School Breakfast

☒ Afterschool Snack

☐ Fresh Fruit & Vegetable

☐ Special Milk

☐ At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
Performance Standard 1: Certification & Benefit Issuance- Critical Area			
	No findings.		

Performance Standard 1: Meal Counting & Claiming- Critical Area

- | No. | Review Observations & Findings | Technical Assistance Provided | Required Corrective Action |
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| 1 | Meals counted for reimbursement during a field trip are not served through an adequate point of service. Specifically, SFA is claiming the # of meals sent on field trip based on an attendance list provided by teacher prior to the field trip. | Discussed potential procedures that will be implemented, as well as who would be responsible. Discussed that counting the # of lunches sent or utilizing field trip attendance counts may not be used as a POS. Recommended sending a roster on field trips and having a teacher check off students that receive a reimbursable meal at the POS. | <i>Please provide a written description of procedures that have been implemented to ensure that meals served during field trips are counted through an adequate point of service.</i> |
| 2 | Meal service line observed on the day of review did not provide an accurate count at the point of service. The meal counts on the day of review were much lower than they had been throughout the month of review (December) and throughout the beginning of January, prior to review date. Reviewer was led to believe that the POS did not capture all students who received a reimbursable meal on the day of review- determined to be non-systemic and did not 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 staff how to properly identify and count reimbursable meals. | <i>Please provide a written description of changes to the system that have been implemented to ensure that meal service line provides an accurate count.</i> |

Performance Standard 2: Meal Components & Quantities- Critical Area

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| 3 | Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. On 12/2, a dinner roll was served with a 2/3 cup serving of macaroni & cheese. The macaroni & cheese PFS provided to reviewer indicates that a 3/4 cup serving of macaroni & cheese credits as 2 M/MA & 1 oz./eq. grain. Reviewer was only able to credit the 2/3 cup serving as 1.75 M/MA & .75 oz./eq. grain. M/MA quantity did not meet minimum amounts required by the 9-12 lunch meal pattern- only 1.75 M/MA served when 2 M/MA needed to meet minimum daily requirement. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations. | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (i.e. changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at 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 http://www.azed.gov/hns/nslp/trainingps/online/ . The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/ . Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents). | <i>Please provide a written description of the changes that have been made to ensure that M/MA quantities meet minimum amounts required by the 9-12 meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu must be submitted. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i> |
| 4 | Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, weekly minimum M/MA requirements were not met during week of menu review. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations. | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (i.e. changes in 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. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents). | <i>Please provide a written description of the changes that have been made to ensure that M/MA quantities meet weekly minimum amounts required by the 9-12 meal pattern.</i> |

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| <p>5 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, on 1 day during week of lunch review, SFA credited an orange as 1 cup fruit on production record when a whole orange only credits as 1/2 cup fruit. Based on production records, only 1 orange was offered to students (1/2 cup fruit) when 1 cup of fruit must be offered to meet minimum daily 9-12 meal pattern requirements. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (i.e. changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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 fruit quantities meet minimum amounts required by the 9-12 meal pattern.</i></p> |
| <p>6 Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, weekly minimum fruit quantities were not met during week of menu review. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (i.e. changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that fruit quantities meet weekly minimum amounts required by the 9-12 meal pattern.</i></p> |
| <p>7 Quantities observed on the day of review/during the review period did not meet minimum amounts required by the meal pattern. Daily minimum oz./eq. grain not met on 1 day during week of menu review. SFA provided reviewer with a dinner roll recipe- the recipe did not include a recipe yield, but Director informed reviewer that she makes 150 dinner rolls with recipe provided. Director was crediting each roll as 2 oz./eq. grain when each roll only credits as 1.75 oz./eq. grain. 2 oz./eq. grain is needed daily to meet minimum amounts required by 9-12 meal pattern. 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. update 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. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum amounts required by the 9-12 meal pattern.</i></p> |

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

No findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

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| 8 | 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 http://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> |
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Meal Pattern & Nutritional Quality: Meal Components & Quantities

No findings.

Resource Management

No findings.

General Program Compliance: Civil Rights

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| 9 | Sufficient documentation to support accommodations for special diets has not been maintained. Specifically, SFA has been purchasing gluten free items for 1 student with an allergy, but SFA was not able to provide reviewer with a doctor's note or a completed diet modification form warranting modification | Discussed requirements for accommodating special diets and the need for sufficient documentation. | <i>Please provide written procedures for maintaining documentation supporting accommodations for special diets and written assurance that sufficient documentation to support accommodations for special diets will be maintained.</i> |
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General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

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| 10 | 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> |
| 11 | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the LWP. | Discussed feasible means of notifying potential stakeholders of their ability to participate. | <i>None required at this time.</i> |

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| 12 | The LWP does not specify how and when a review and update of the policy is to occur. | Discussed the best setting and timeframe for the periodic review and update of the LWP as well as how this can be included in the LWP. | <i>None required at this time.</i> |
| 13 | The recent assessment of the implementation of the LWP did not meet the Final Rule requirements. Specifically, the assessment did not compare the LEA's LWP to the model wellness policy. | Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their LWP, how the LEA's LWP compares to the model wellness policy, and progress made in attaining the goals of the wellness policy. Sample evaluation tools can be found on ADE's website at http://www.azed.gov/hns/nslp/lwp/ . | <i>None required at this time.</i> |
| 14 | The public was not notified of the results of the most recent assessment of the implementation of the 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 https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit . | <i>None required at this time.</i> |

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

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| 15 | The SNP Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. The only training reviewer could verify was the 1 hour Civil Rights training that took place on 8/14/19. | Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at http://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/trainingps/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 the School Nutrition Program Director is registered for.</i> |
| 16 | The full-time staff member did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. The only training reviewer could verify was the 1 hour Civil Rights training that took place on 8/14/19. | 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 http://www.azed.gov/hns/nslp/training/ . | <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 member is registered for.</i> |

17 Professional Standards training hours are not being tracked on an annual basis.	Referred to ADE's Training Tracking forms found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/ .	<i>Please provide the tracker that will be used to track Professional Standards training hours on an annual basis for all School Nutrition Program staff. Additionally, please provide written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis.</i>
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General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

18 Temperatures are not consistently taken by using thermometers located inside of storage areas- thermometers were not located inside the milk cooler, refrigerator, or freezer.	Discussed taking temperatures from inside of the storage areas for a more accurate reading.	<i>Please provide written assurance that storage area temperatures will be taken utilizing thermometers located inside of storage areas, not outside of storage areas.</i>
19 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: Sun Cup Grape Juice (concentrates from USA, Argentina, Chile, Mexico and/or Spain), Sun Cup Apple Juice (concentrates from USA, Argentina, Brazil, China, Chile, Poland, and/or New Zealand), and Sun Cup Orange Juice (concentrates from USA, Brazil, Costa Rica, and/or Mexico). 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 http://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/ .	<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>

General Program Compliance: Reporting & Recordkeeping

20 Site application in CNPWeb indicated that SFA has Headstart students at Salome High School when the SFA does not have Headstart students.	Discussed steps required to update site application in CNPWeb to reflect current practices.	<i>Please resubmit a site/sponsor application indicating that Salome High School does not have Headstart students.</i>
21 Production records for breakfast/lunch are not completed correctly. Specifically, production records used/left over section is not completed adequately because SFA is not counting leftovers. Leftovers were recorded as '0' for most items served and reviewer observed leftovers not being counted on day of review	Discussed required sections of production records. Parts of a Production Record Guidance can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/ . Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/ .	<i>Please provide copies of completed breakfast or lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</i>

22	Milk variety is not being recorded on breakfast production records.	Discussed how to properly record milk variety on production records- including how to document planned servings, prepped servings, and leftovers.	<i>Please provide copies of completed breakfast production records for 5 consecutive days.</i>
23	Dinner Roll, Chorizo & Egg w/ Tortilla, and Chicken/Bacon/Tomato Pizza recipes provided did not contain all required sections: serving size and recipe yield. Additionally, the Chicken/Bacon/Tomato Pizza recipe did not indicate the amount of dough needed for pizza.	Discussed all menu items that contain more than 1 ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions. Examples of standardized recipes can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/ .	<i>Please provide an updated recipe for one of the following: Dinner Roll, Chorizo & Egg w/ Tortilla, and Chicken/Bacon/Tomato Pizza. Additionally, please provide written assurance that all recipes will be updated with serving size, recipe yield, and ingredient amounts.</i>

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

24	Outreach to families regarding the availability of the SBP was not conducted during the school year.	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.	<i>Please provide a written description of how households will be notified of the availability of the SBP at the beginning of and during the school year, and written assurance that this will occur.</i>
25	Households were not notified of the availability of the SFSP prior to the end of the school year.	Discussed methods of notifying families of the availability of the SFSP prior to the end of the school year and determined which was most feasible. Discussed other resources within the local area to provide families regarding meals during the summer months when school is not in session (i.e. local food bank). Summer feeding locations can be found at http://www.eatwellbewell.org/ . - AND/OR- Call 1(800) 5-HUNGRY for more information and/or go to http://www.whyhunger.org/ .	<i>Please provide a description of how households will be notified of the availability of the SFSP prior to the end of the school year and written assurance that this will occur. If you do not plan to operate the SFSP and no other entities reasonably close to your site operate the SFSP, please provide a description of other community resources that will be provided to households prior to the end of the school year.</i>

Other Federal Program Reviews: Afterschool Snack Program

26	The counting system employed does not result in accurate snack counts: SFA over claimed by 11 snack meals. On 1 day during ASP review period, SFA counted 30 students participating in snack when reviewer counted 19 students.	Discussed ways to improve the counting system or alter it to ensure accurate counts are submitted in the claim for reimbursement.	<i>December claim has been revised to reflect accurate snack count. Please provide a written description of the system that will be implemented to ensure accurate snack counts are claimed for reimbursement.</i>
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Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2020 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not applicable.

Other Federal Program Reviews: Special Milk Program

Not applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable.

Comments/Recommendations:

Congratulations! Bicentennial Union High School District has completed the Administrative Review in the 2019-2020 SY. Thank you for your hospitality during my visit. It was a pleasure meeting you all- thank you for working so diligently to assure that your students are receiving nutritious meals. Please let me know if you have any questions.

To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <http://www.azed.gov/hns/nslp/>.

Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainings/>.

Fiscal Action Assessed?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$0
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	\$1,250.82

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **March 10, 2020** to Taryn Kunkel at Taryn.Kunkel@azed.gov or AZ Dept. of Education/Health & Nutrition 1701 N. 4th St. Flagstaff, AZ 86004.



Reviewer Signature Date 2/6/2020

 2/11/2020

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
1535 West Jefferson Street, Phoenix, Arizona 85007 • (602) 542-5460 • www.azed.gov
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