



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Blackwater Community School, Inc.

CTD: 11-40-02

Site: Blackwater Community School

Contacts: Jagdish Sharma, Principal; Ofelia Inurriaga, Food Service Manager

Review Date: October 24, 2019

Review Period: September, 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
<b>Performance Standard 1: Certification &amp; Benefit Issuance- Critical Area</b>			

No findings.

#### Performance Standard 1: Meal Counting & Claiming- Critical Area

No findings.

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

1	The following product could not be credited towards the meal pattern due to insufficient documentation: Malt O Meal Granola served at breakfast on September 9, 2019, Diced chicken served at lunch on September 10, 2019. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met. This was determined not to be a repeat finding from cycle two therefore, did not contribute towards fiscal action calculations.	Discussed requirements regarding processed product documentation and provided examples. 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> . USDA Food Fact Sheets can be found on USDA's website at <a href="http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets">www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets</a> . The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/">http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/</a> . 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 Malt O Meal Granola and a CN label for the diced chicken. 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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| <p>2 Quantities observed on the day of review/during the review period did not meet minimum amounts required by the meal pattern. Specifically the minimum 3/4 cup vegetable was not offered at lunch on one day during the review period, Wednesday 9/11/19 The salad offered to students credits as 1/2 cup vegetable. This was not a repeat finding from cycle two, therefore did not contribute toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (i.e. changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a>. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a>. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/">http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/</a>. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that vegetable quantities at lunch meet minimum amounts required by the lunch meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu must be submitted. Please provide one week of lunch production records that demonstrate the minimum vegetable requirement was met every day.</i></p> |
| <p>3 Fluid milk was not available in at least two varieties for part of breakfast service. Specifically, a staff member was handing participants milk as they moved through the line, only offering students one milk type for part of breakfast service. This was not a repeat finding from cycle two, therefore did not contribute toward fiscal action calculations.</p>  | <p>Discussed variety requirement (even for Headstart) 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 breakfast production records that demonstrate that fluid milk was available and served 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></p>   |

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**Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area**

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No findings.

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**Meal Access & Reimbursement: Certification & Benefit Issuance**

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No findings.

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**Meal Access & Reimbursement: Verification**

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No findings.

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

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No findings.

<b>Meal Pattern &amp; Nutritional Quality: Offer Versus Serve</b>		
No findings.		
<b>Meal Pattern &amp; Nutritional Quality: Meal Components &amp; Quantities</b>		
No findings.		
<b>Resource Management</b>		
No findings.		
<b>General Program Compliance: Civil Rights</b>		
No findings.		
<b>General Program Compliance: SFA On-Site Monitoring</b>		
No findings.		
<b>General Program Compliance: Local Wellness Policy</b>		
4	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.
5	There is not a designated LWP oversight official.	Discussed LWP requirements. Guidance on requirements for Local Wellness Policies can be found at <a href="http://www.azed.gov/health-nutrition/wellness-policy/">http://www.azed.gov/health-nutrition/wellness-policy/</a> . Alliance for a Healthier Generation resources and a Model Local Wellness Policy can be found at <a href="https://www.healthiergeneration.org/take_action/schools/wellness_committees_policies/">https://www.healthiergeneration.org/take_action/schools/wellness_committees_policies/</a> .

*None required at this time.*

*Please provide a written plan for how the missing element of the LWP will be included. The plan should include draft language of the element to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.*

6	A recent assessment of the implementation of the LWP has not been conducted nor have plans been developed to complete the assessment.	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 <a href="http://www.azed.gov/hns/nslp/lwp/">http://www.azed.gov/hns/nslp/lwp/</a> . Also discussed feasible means for notifying the public of the results of the most recent assessment.	<i>None required at this time.</i>
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#### General Program Compliance: Competitive Food Services

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7	The school fundraisers were not in compliance with HNS 20-2019: Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers. Specifically the SFA was not requesting fundraising exemptions in advance of operating fundraisers where food being sold did not meet smart snacks standards.	HNS 20-2019: Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers that can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/smartsnacks/">http://www.azed.gov/hns/nslp/smartsnacks/</a> . The Online Course: Smart Snacks and Competitive Foods Standards in Arizona can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</a>	<i>Please provide written assurance that fundraisers will be in compliance with HNS 20-2019 Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers. Additionally, the certificate of completion of Online Course: Smart Snacks and Competitive Foods Standards in Arizona must be submitted.</i>
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#### General Program Compliance: Professional Standards

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No findings.

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#### General Program Compliance: Water

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No findings.

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#### General Program Compliance: Food Safety, Storage and Buy American

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No findings.

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#### General Program Compliance: Reporting & Recordkeeping

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No findings.

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

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No findings.

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#### Other Federal Program Reviews: Afterschool Snack Program

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No findings.

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2020 if applicable.

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**Other Federal Program Reviews: Fresh Fruit & Vegetable Program**

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Not applicable.

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**Other Federal Program Reviews: Special Milk Program**

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Not applicable.

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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Not applicable.

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**Comments/Recommendations:**

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Congratulations on the completion of the SY2019/2020 Administrative Review. Thank you for your efforts to provide a safe and healthy meal program to the program participants. Please note corrective action is due no later than January 2, 2020.

**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

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response no later than January 2, 2020 to Bekah McLeod at [bekah.mcleod@azed.gov](mailto:bekah.mcleod@azed.gov) or 1535 W. Jefferson St., BIN #7, Phoenix, AZ 85007.



12/2/2019

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?pid=58dbe2581130c01500d4b08b>

Kathy Hoffman, Superintendent of Public Instruction  
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