



Arizona Department of Education
Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Bonita Elementary District

CTD: 05-03-16

Site: Bonita Elementary School

Contacts: Ed Houser, Superintendent & Peggy Johnson, Food Service Manager

Review Date: January 14, 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			
1	In multiple instances, the eligibility was not transferred correctly to the benefit issuance document. This contributed toward fiscal action calculations.	Discussed requirement that eligibility status must be implemented within 10 operating days of eligibility changes and discussed best practices (like having someone double check) for ensuring eligibility status is transferred to the benefit issuance document on a regular basis.	<i>Corrections have been made to the benefit issuance document. Please provide a written description of the process that will be implemented to ensure that the benefit issuance document matches all current students and their eligibility status.</i>
2	One application was certified incorrectly. This contributed toward fiscal action calculations.	Discussed errors found and required corrective action. Referred to Processing Applications in USDA's Eligibility Manual for School Meals: https://cms.azed.gov/home/GetDocumentFile?id=595e4a163217e115acbc32bd .	<i>Corrections have been made to certification errors. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student.</i>

Performance Standard 1: Meal Counting & Claiming- Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities- Critical Area

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| 3 | Quantities observed during the review period at breakfast did not meet minimum amounts required by the meal pattern. Specifically, the weekly grain quantity was short, only 4 oz/eq out of required 6.5 oz/eq was offered. | Discussed how current system allowed for this to happen and potential changes that could be made such as offering another item with the daily cereal. 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 http://www.azed.gov/hns/nslp/trainings/online/ . 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 grain 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> |
| 4 | Quantities observed during the review period at breakfast did not meet minimum amounts required by the meal pattern. Specifically, the daily fruit quantity was short on 3 days, only 1/2c was offered rather than the required 1c. | Discussed how current system allowed for this to happen and ensuring that 1 cup of fruit is offered every day. Meal pattern requirements for the National School Breakfast 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). | <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> |
| 5 | Quantities observed during the review period at breakfast did not meet minimum amounts required by the meal pattern. Specifically, the weekly fruit quantity was less than the required 4 cups due to only 1/2c being offered on 3 days. | Discussed how current system allowed for this to happen and ensuring that the daily and weekly fruit requirement is met. Meal pattern requirements for the National School Breakfast 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). | <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> |

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| <p>6 Quantities observed during the review period at lunch did not meet minimum amounts required by the meal pattern. Specifically, the daily vegetable quantity was short on 3 days, only 1/2c was offered rather than the required 3/4c.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue such as including the salad bar in the menu planning. 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/trainings/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 vegetable 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.</i></p> |
| <p>7 Quantities observed during the review period at lunch did not meet minimum amounts required by the meal pattern. Specifically, the weekly vegetable quantity was less than the required 3 cups.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue such as including the salad bar in the menu planning. 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 vegetable quantities meet minimum amounts required by the meal pattern.</i></p> |
| <p>8 Quantities observed during the review period at lunch did not meet minimum amounts required by the meal pattern. Specifically, the red/orange subgroup did not meet the weekly requirements of 3/4c.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue such as including the salad bar in the menu planning. 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 vegetable subgroup quantities meet minimum amounts required by the meal pattern.</i></p> |

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| <p>9 The following products could not be credited towards the meal pattern due to insufficient documentation: Chicken Tenders & Meatballs. Without sufficient documentation, the reviewer was unable to determine if the daily and weekly meat/meat alternate quantity requirements were met.</p> | <p>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 www.azed.gov/hns/nslp/mealpattern. The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/. 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 CN label or Product Formulation Statement for the chicken tenders and meatballs. 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 recorded webinar must be submitted.</i></p> |
| <p>10 The following product could not be credited towards the meal pattern due to insufficient documentation: Chicken Tenders. Without sufficient documentation, the reviewer was unable to determine if the daily and weekly grain quantity requirements were met.</p> | <p>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 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 CN label or Product Formulation Statement for chicken tenders. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation.</i></p> |
| <p>11 The following vegetable subgroup was not offered during the review period: Dark Green.</p> | <p>Discussed vegetable subgroup requirements and utilizing salad bar during menu planning as well as looking into offer versus serve. Vegetable Subgroup Quick Guide can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. Please note that repeated violations involving vegetable sub-groups 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 which demonstrate compliance with the vegetable subgroups. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements.</i></p> |
| <p>12 An unallowable milk type was offered during the review period and on the day of review during breakfast and lunch.</p> | <p>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 a written description of the changes that have been made to the menu to ensure that milk type requirements are met.</i></p> |

13	During the week of review, at least 50% of the grains served at breakfast were not whole grain rich.	Discussed whole grain-rich requirements. USDA's Whole Grain Resource for the National School Lunch and Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/ . The Making Sense of the Whole Grain Flexibilities in School Year 2019-2020 Recorded Webinar and Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/ .	<i>Please provide one week of breakfast production records and supporting documentation (CN Label, PFS, ingredient lists, nutrition fact labels, etc.) that demonstrate that at least 50% of the grains served at breakfast were whole grain rich. Additionally, the certificate of completion of Making Sense of the Whole Grain Flexibilities in School Year 2019-2020 must be submitted.</i>
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Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

14	The benefit issuance document does not contain all required sections: how eligibility was determined (i.e. free-income application, free-DC, etc.).	Referred to Step by Step Instruction: How to Create a Benefit Issuance Document (BID) on ADE's website found at http://www.azed.gov/hns/nslp/trainings/s/ .	<i>Please provide an updated benefit issuance document that contains all required sections. Additionally, please provide the certificate of completion for Step by Step Instruction: How to Create a Benefit Issuance Document (BID) must be submitted.</i>
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Meal Access & Reimbursement: Verification

15	Verification procedures were not followed correctly, specifically, the BID was not updated in a timely manner.	Discussed proper verification procedures and referred to Verification Tracking Form and Online Training: Verification Review found on ADE's website at http://www.azed.gov/hns/nslp/verification/ . Discussed double-checking that the BID is updated anytime changes in eligibility occur during verification.	<i>Please provide a written description of changes to the system that have been implemented to ensure that verification will be conducted according to the required procedures.</i>
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Meal Access & Reimbursement: Meal Counting & Claiming

16	SFA did not communicate their local meal charge policy in writing to all households at the beginning of the school year or during the school year for new students.	Discussed the Unpaid Meal Charge Policy and referred to memos SP29-2017, SP29-2017a, SP23-2017 and HNS14-2017, which can be found on ADE's website at http://www.azed.gov/hns/memos/ .	<i>Please provide the written notification that will be provided to the households at the beginning of the school year and/or during the school year for new students. Additionally, please provide written assurance that moving forward, all households will be notified in writing of the local meal charge policy at the beginning of the school year and any new student will be notified of the policy after registration.</i>
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17	Daily edit checks are not being conducted appropriately. Specifically, the attendance factor and the percent participation are missing.	Discussed how to complete daily edit checks correctly and working with software to run an updated report. The Step by Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingp/online/	<i>Please provide a completed daily edit check worksheet for the month of January. Additionally, please provide written assurance that daily edit checks will be conducted correctly.</i>
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

18	Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast.	Discussed feasible options for serve only meal signage, which can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/ .	<i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i>
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Resource Management

No findings.

General Program Compliance: Civil Rights

19	The USDA nondiscrimination statement used on program materials (menu) is not the most current USDA statement.	Discussed where to find nondiscrimination statement on ADE's website at http://www.azed.gov/hns/civilrights/ and whether long or short statement would be most appropriate.	<i>Please provide updated program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>
20	Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, complaints are handled internally.	Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., SA, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights). The SFA's procedures must note whether an allegation is made verbally or in person. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at: http://www.azed.gov/hns/civilrights/ . The Step by Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingp/online/ .	<i>Please provide a written description of the updated process and procedures for processing complaints alleging discrimination which meets requirements.</i>

21	Sufficient documentation to support accommodations for special diets is not in place.	Discussed requirements for accommodating special diets and referred to ADE's medical statement template, found under program forms: http://www.azed.gov/hns/nslp/forms/ .	<i>Please provide written procedures for maintaining documentation supporting accommodations for special diets and/or the template that will be utilized for special diet accommodations.</i>
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General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

22	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>
23	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>
24	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 http://www.azed.gov/hns/nslp/lwp/ .	<i>None required at this time.</i>
25	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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| 26 | The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. | 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/ . | <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> |
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| 27 | One part-time School Nutrition Program staff has not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. | Discussed 4 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at 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 Part-time School Nutrition Program staff are registered for.</i> |
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| 28 | Professional Standards training hours are not being adequately tracked. | Referred to ADE's Training Tracking forms found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/ . Referred to 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 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> |

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 29 | A written food safety plan has not been developed. | Discussed required components of a food safety plan and making sure it's site specific. Referred to ADE's food safety website at http://www.azed.gov/hns/nslp/foodsafety/ . | <i>Please provide a copy of the written food safety plan and written assurance it has been implemented</i> |
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30	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: mandarin oranges, pineapple, peaches. 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>
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General Program Compliance: Reporting & Recordkeeping

31	Production records for breakfast and lunch provided did not contain all required sections: Specifically, production records used/left over section is not completed adequately.	Although meal counts are taken to help plan for meal preparation, there are typically zero leftovers recorded. Discussed ensuring that this is recorded accurately so it supports that SFA is planning enough food for all students. 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 and lunch production records for 5 consecutive days. Additionally, the certificate of completion of Production Record Overview must be provided.</i>
32	Production records for breakfast listed the incorrect milk type and lunch did not specify the milk type offered.	Discussed required sections of production records and ensuring that all items offered are correctly listed on the production records.	<i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days with the correct milk type listed, as well as written assurance that all records will be maintained for 5 years.</i>
33	Production records for breakfast did not specify the type of cereals offered daily.	Discussed required sections of production records and ensuring that all items offered are correctly listed on the production records.	<i>Please provide copies of completed breakfast production records for 5 consecutive days with the correct cereal type listed, as well as written assurance that all records will be maintained for 5 years.</i>

34	Production records for lunch did not list any of the salad bar items offered.	Discussed required sections of production records and ensuring that all items offered are correctly listed on the production records. Discussed the importance of including the salad bar and proper quantities in the menu planning in order to meet meal pattern requirements.	<i>Please provide copies of completed lunch production records for 5 consecutive days with all of the salad bar items listed, as well as written assurance that all records will be maintained for 5 years.</i>
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General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

No findings.

Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

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 on completing the Administrative Review! Thank you for your hard work and cooperation during this process. Please keep up the great work and continue to utilize ADE's resources and trainings.

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	\$68.52
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$214.77

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by March 13, 2020 to Lindsey Cler at lindsey.cler@azed.gov or 1535 W. Jefferson St, Bin #7, Phoenix.



2/13/2020

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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