



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

**Administrative Review Summary Report**

School Food Authority Name: Flagstaff Unified District

CTD: 03-02-01

Site: Flagstaff High School, Lura Kinsey Elementary School, and Mount Elden Middle School

Contacts: Mike Penca, Superintendent; Bob Kuhn, Assistant Superintendent of Operations; Leslie Nichols, Food Service Administrative Assistant

Review Date: February 10-11, 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
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**Performance Standard 1: Certification & Benefit Issuance- Critical Area**

No findings.

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

1	The meal counting system at Flagstaff High School does not prevent overt identification of students receiving free and reduced price benefits during lunch meal service. Specifically, due to the position of the POS students walking through the meal service line have view of balances charged to students and negative balances owed.	Discussed schools accepting both cash and electronic payments must ensure children are not overtly identified through the method of payment [7 CFR 245.8(b)]. To the maximum extent practicable, schools must ensure the sale of program foods/non-program foods and the method of payment do not inadvertently result in children being identified by their peers as receiving free and reduced price benefits. Additionally, discussed updates to the POS software to hide student eligibility information through 'dummy' balances, moving the POS or placing privacy screens on the POS screen to prevent overt identification from students walking through the meal service line.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines prevent overt identification of students receiving free and reduced price benefits.</i>
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**Performance Standard 2: Meal Components & Quantities- Critical Area**

2	Quantities observed during the review period at Flagstaff High School did not meet minimum amounts required by the lunch meal pattern. On three days during the week of menu review the minimum daily oz./eq. grain was not met. Specifically, the following entrees only contributed 1 oz./eq. grain towards the 9-12 meal pattern: macaroni & cheese and chicken tenders. Additionally, the meatloaf with roll entree only credited as 1.25 oz./eq. grain. 2 oz./eq. grain is needed to meet minimum amounts required by the 9-12 lunch meal pattern.	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> . 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.</i>
3	Quantities observed at Flagstaff High School during the review period did not meet minimum amounts required by the 9-12 lunch meal pattern. Specifically, weekly minimum grain requirements were not met during week of menu review. 8 oz./eq. grain was offered when 10 oz./eq. grain needed to meet minimum weekly amount required by meal pattern.	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.). 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 weekly minimum amounts required by the 9-12 meal pattern.</i>
4	Quantities observed during the review period at Flagstaff High School did not meet minimum amounts required by the lunch meal pattern. On 1/6 the minimum daily M/MA was not met. Specifically, a 2 oz. serving of pork carnitas tacos and pork carnitas nachos was served, only crediting as 1.25 M/MA, when 2 M/MA is needed to meet minimum amounts required by the 9-12 meal pattern.	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.). 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 meal pattern.</i>
5	Quantities observed at Flagstaff High School during the review period did not meet minimum amounts required by the 9-12 lunch meal pattern. Specifically, weekly minimum M/MA requirements were not met during week of menu review. 9.25 M/MA was offered when 10 M/MA needed to meet minimum weekly amount required by meal pattern.	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.). 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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**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.

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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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| 6 | OVS was not implemented for students in detention (during lunch period) at Flagstaff High School. Specifically, on the day of review a staff member came to the cafeteria to get lunches for two students serving detention- students did not have a choice in entrée selection and were automatically given a ham and cheese sandwich with a vegetable, fruit, and milk. Students did not have the option to choose an entrée, vegetable/fruit, and milk type. Additionally, students did not have the option to decline component or receive a smaller or larger portion of any component. | Discussed that utilizing a separate menu and a serve-only meal pattern as a form of disciplinary action is not allowable per FNS 791-1. Discussed proper implementation of OVS with kitchen and point of service staff. Discussed that, per USDA's Offer Versus Serve Manual, OVS is mandatory during lunch at the senior high level. 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 <a href="http://www.azed.gov/hns/nslp/programguidance/">http://www.azed.gov/hns/nslp/programguidance/</a> . | <i>Please provide a written description demonstrating how OVS will be implemented properly for students in detention during lunch meal service. Specifically, please address how these students will be given entree and component options in compliance with OVS meal service. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i> |
| 7 | 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 Flagstaff High School during breakfast.   | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern/">http://www.azed.gov/hns/nslp/mealpattern/</a> .   | <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**

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No findings.

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**Resource Management**

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No findings.

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**General Program Compliance: Civil Rights**

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No findings.

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**General Program Compliance: SFA On-Site Monitoring**

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No findings.

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**General Program Compliance: Local Wellness Policy**

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No findings.

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**General Program Compliance: Competitive Food Services**

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No findings.

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**General Program Compliance: Professional Standards**

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| 8 School Nutrition Program Managers did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.  | Discussed 10 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training/">http://www.azed.gov/hns/nslp/training/</a> . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</a> . | <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 Manager is registered for. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i> |
| 9 Full-time School Nutrition Program staff have not met the 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.   | <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>   |
| 10 School Nutrition Program staff hired after January 1 of the current school year have not met the "pro-rated" training requirements and plans for meeting the requirements have not been developed.  | Discussed if hired January 1 or later, an employee must only complete half of the required training hours during the year that they were hired.  | <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 staff who were hired after January 1 are registered for.</i>   |
| 11 Part-time School Nutrition Program staff have 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.   | <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>   |
| 12 Professional Standards training hours are not being adequately tracked. Specifically, a training tracking spreadsheet was created to track FSMC employee training. This spreadsheet does not include professional standard learning codes and does not include/list upcoming planned trainings to ensure staff members will meet annual training requirements. Additionally, bloodborne pathogen and hazard communication trainings, which are not applicable to the NSLP program, are being tracked. | Discussed creating their own training tracker with all required information. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</a> .  | <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>   |
| 13 Part-time employees were not appropriately categorized per Professional Standards definitions. Per USDA, part-time employees are staff members that work less than 20 hrs. per week.  | Reviewed all employees with NSLP related responsibilities and helped SFA categorize employees appropriately.   | <i>Please provide a written description of how it will be ensured that employees are appropriately categorized per Professional Standards definitions.</i>   |

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**General Program Compliance: Water**

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No findings.

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

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| 14 | <p>The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at Flagstaff High School and Mount Elden Middle School: Bananas (product of Ecuador), Bountiful Harvest Black Olives (product of Portugal), Bountiful Harvest Pineapple Tidbits (product of Indonesia), Sun Cup Apple Juice (concentrates from U.S., Argentina, Brazil, Chile, Poland, and/or New Zealand), Sun Cup Orange Juice (concentrates from U.S., Brazil, Costa Rica, and/or Mexico). Additionally, acceptable 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 <a href="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a>. Buy American Recorded Webinar and FAQ can be found on ADE's website at <a href="http://www.azed.gov/hns/sfp/">http://www.azed.gov/hns/sfp/</a>.</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> |
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**General Program Compliance: Reporting & Recordkeeping**

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| 15 | <p>Meal contribution crediting is not accurate for beef nacho recipe and cheese nacho recipe served at Lura Kinsey Elementary School. Specifically, both recipes indicate that Mission tortilla chips are being used when Tostitos tortilla chips are being used. The Mission chips credit differently than the Tostitos chips. Beef nachos &amp; cheese nachos were served on the day of review and it was observed by reviewer that kitchen staff were filling boats with 10 chips. 10 Tostitos chips credits as 0.75 oz./eq. grain. not 2 oz./eq. grain as indicated by the recipe/production records. Minimum daily grain requirement was met on day of review because nachos served with 1/2 cup rice. Nachos with rice entree credited as 1.25 oz./eq. grain.</p> | <p>Discussed updating recipes to reflect current products being used. Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records.</p>  | <p><i>Please provide an updated recipe for the beef nachos and cheese nachos.</i></p>          |
| 16 | <p>Production record crediting and recipe crediting are inconsistent for two entrees served at Lura Kinsey Elementary School: veggie pizza and egg &amp; cheese breakfast wrap. Production record credited the veggie pizza as 3 oz./eq. grain when the flatbread used only credits as 2 oz./eq. grain. Production record credited the egg &amp; cheese breakfast wrap as 2 M/MA when the wrap only credits as 1 M/MA.</p>  | <p>Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage - <a href="http://www.azed.gov/hns/nslp/mealpattern/">http://www.azed.gov/hns/nslp/mealpattern/</a>.</p> | <p><i>Please provide updated recipes and production records with consistent crediting.</i></p> |

17	Production records indicate that Mount Elden Middle School is operating the 9-12 meal pattern when site has students in grades 6-8 only.	Discussed that schools must plan menus for students using the following grade groups: K-5, 6-8, and 9-12. Discussed that customization of the established grade groups is not allowable & that sites with students in grades 6-8 should not be operating the 9-12 meal pattern.	<i>Please provide one week of lunch production records which demonstrate that Mount Elden Middle School is operating the appropriate meal pattern.</i>
18	Graham crackers are offered/served daily at Flagstaff High School but are not being recorded on breakfast production records.	Discussed how to properly record graham crackers 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 at Flagstaff High School.</i>

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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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Not applicable.

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

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Will be reviewed in Summer 2020 if applicable.

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

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Not applicable.

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

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Not applicable.

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

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Not applicable.

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**Comments/Recommendations:**

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Congratulations! Flagstaff Unified District has completed the Administrative Review in the 2019-2020 SY. Thank you for your hospitality during my visit and all of your hard work and organization throughout the AR process. It was a pleasure meeting you all- thank you for working so diligently to assure that your students are receiving nutritious meals. I appreciate your enthusiasm and willingness to learn. Please let me know if you have any questions.

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!

**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 Assessed?

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

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **April 9, 2020** to Taryn Kunkel at [Taryn.Kunkel@azed.gov](mailto:Taryn.Kunkel@azed.gov) or AZ Dept. of Education/Health & Nutrition 1701 N. 4th St. Flagstaff, AZ 86004.



3/9/2020

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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