



Arizona Department of Education

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: McNary Elementary District

CTD: 01-03-23

Site: McNary Elementary School

Contacts: Melisa Milan, Principal; Cheryl Coates, Office Liaison/Purchasing; Tryphena Endfield, Food Service Manager

Review Date: November 14, 2019

Review Period: October 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
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Performance Standard 1: Certification & Benefit Issuance- Critical Area

No findings.

Performance Standard 1: Meal Counting & Claiming- Critical Area

1	Meal count totals by category for the month of review were not correctly combined and recorded. SFA over claimed by a total of 8 breakfasts and underclaimed by a total of 65 lunches during the month of October. This was deemed a non-systemic error 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>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines provide an accurate count by eligibility category.</i>
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Performance Standard 2: Meal Components & Quantities- Critical Area

2	Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, on 3 days during week of lunch review, the minimum daily vegetable requirement was not met (less than 3/4 cup vegetable served to students each day). 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, creating recipes, etc.). Discussed that leafy greens only credit as 1/2 of the serving size. 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 vegetable quantities meet daily 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. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i>
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| 3 | Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, the weekly minimum vegetable requirement was not met: only 3.5 cups vegetable served throughout the week when 3.75 cups is needed to meet minimum weekly 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, updating production records, creating recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nsllp/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 vegetable quantities meet weekly minimum amounts required by the meal pattern.</i> |
| 4 | Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, on 2 days during week of lunch review, the minimum meat/meat alternate requirement was not met. The minimum daily M/MA requirement is 1 M/MA. 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, creating 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 meat/meat alternate quantities meet daily minimum amounts required by the meal pattern.</i> |
| 5 | Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, the weekly minimum meat/meat alternate requirement was not met: only 6.25 M/MA served when 9 M/MA is needed. 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, creating 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 meat/meat alternate quantities meet weekly minimum amounts required by the meal pattern.</i> |
| 6 | The starchy vegetable subgroup was not offered at lunch during the review period. Please keep in mind that potato/vegetable chips can not credit towards the vegetable component. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations. | Discussed vegetable subgroup requirements for the age/grade groups served. Vegetable Subgroup Quick Guide can be found on ADE's website at www.azed.gov/hns/nsllp/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/nsllp/training/ps/online/ . Please note that repeated violations involving vegetable subgroups may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents). | <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> |
| 7 | Reviewer was unable to determine if fluid milk was available in at least two varieties, at breakfast and lunch, during the week of menu review because milk was not recorded on the production records. | Discussed variety requirement and feasible options for compliance (i.e. recording milk type/variety on production records). 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). | <i>Please provide one week of breakfast and lunch production records 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 breakfast and lunch.</i> |

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

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

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| 8 | An individual separate from the application approval process has not been designated as the hearing official. | Referred to Hearing Procedure section in USDA's Eligibility Manual for School Meals. Discussed school official who could be designated. | <i>Please provide the name and title of the individual designated as the hearing official. Additionally, please provide documentation to demonstrate where households are notified of the hearing official</i> |
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Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

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| 9 | A Local Meal Charge Policy has not been developed. | 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 a copy of the local meal charge policy that has been created.</i> |
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Meal Pattern & Nutritional Quality: Offer Versus Serve

Not applicable.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

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| 10 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast or 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 will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
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Resource Management

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| 11 | Breakfast meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the meal. | Discussed ways to determine adult meal prices which included a per meal cost analysis or pricing adult breakfast meals to reflect the amount of the paid meal price plus the amount of reimbursement received for a paid meal. | <i>Please provide a written description of the steps which have been taken to increase adult breakfast prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that breakfast price has been increased to the appropriate level.</i> |
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General Program Compliance: Civil Rights

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| 12 Civil Rights training provided to staff did not cover all required training subjects. Specifically, a YouTube video was presented to all school staff at a staff meeting but this video did not address required subjects. | Discussed the following subjects must be covered: Collection and Use of Data, Effective Public Notification Systems, Complaint Procedures, Compliance Review Techniques, Resolution of Noncompliance, Requirements for Reasonable Accommodations of Persons with Disabilities, Requirements for Language Assistance, Conflict Resolution, and Customer Service. An acceptable civil rights power point training material can be found on ADE's website at http://www.azed.gov/hns/civilrights/ . | <i>Please provide written assurance that all food service staff will be trained at hire and as needed on Civil Rights Compliance in Child Nutrition Programs. Describe the process that will be implemented to ensure that this requirement is adhered to and properly documented.</i> |
| 13 The shortened USDA nondiscrimination statement used on monthly 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/ . | <i>Please provide an updated monthly menu with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

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| 14 The public is not being notified of the existence and contents of the LWP. | Discussed feasible means of notifying the public about the LWP (i.e. post policy on school website). | None required at this time. |
| 15 The recent assessment of the LWP did not completely meet the Final Rule requirements. Specifically, a WellSAT 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 http://www.azed.gov/hns/nslp/lwp/ . | None required at this time. |
| 16 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 . | None required at this time. |

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

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| 17 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/ . 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/training/ps/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> |
| 18 Reviewer was unable to determine if the School Nutrition Program Manager met the training requirements for the current school year and/or if sufficient plans for meeting the requirements have been developed. Reviewer was provided with a training tracking sheet for Manager with these trainings listed in the 19/20 SY: Shamrock Food Expo (7 hrs.), SNAAZ Conference on 9/20/19 (7 hrs.), and SNAAZ Conference on 9/21/19 (7 hrs.). Reviewer was not provided with supporting documentation (i.e. accompanying agendas) to determine the actual number of training hours and the training topics covered. | Discussed 10 hour training requirement and feasibility for attending upcoming applicable trainings. Discussed how to document training hours recorded on tracking forms. 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/training/ps/online/ . | <i>Please provide supporting documentation for trainings recorded on Manager's tracking form and/or 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.</i> |
| 19 Full-time School Nutrition Program staff member has 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. 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/training/ps/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 member is registered for.</i> |

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 20 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. | 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. | <i>Please provide written assurance that documentation to show that two food safety inspections were received and/or requested from the local health department each school year will be maintained.</i> |
| 21 The most recent food safety inspection report was not posted in a publicly visible location. | Discussed making copies of most recent report and feasible places for posting. | <i>Please provide written assurance that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please specify where the report has been posted</i> |

22	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: Cucumber (product of Mexico), Mixed Fresh Fruit (product of Chile), Tomatoes (product of Puerto Rico), & Mandarin Oranges (product of China). 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

23	Although advertising literature was provided for the Tony's Pepperoni Pizza and the Jennie-O Turkey Sausage Patty, and credited towards meal pattern, required documentation (CN label or PFS) was not provided to reviewer.	Discussed when processed products are used in Child Nutrition Programs to meet the meal pattern requirement, the product's contributions must be determined. CN Labels and/or Product Formulation Statements provide valuable crediting information; and only these will be accepted as proper crediting documentation. Guidance on Product Formulation Statements and CN Labels can be found on ADE's website under the Processed Product Documentation 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/trainingps/snparchivedwebinars/ .	<i>Please provide a CN label and/or Product Formulation Statement for the Tony's Pepperoni Pizza and the Jennie-O Turkey Sausage Patty. If unable to provide a CN label or PFS, please provide written assurance that the product will no longer be offered/served to students. 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 provided.</i>
24	Recipes have not been created for the following entrees served during the week of menu review: tostada, sub sandwich, and chicken alfredo.	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 a recipe for the following entrees: tostada, sub sandwich, and chicken alfredo. If unable to provide a recipe, please provide written assurance that the entrée(s) will no longer be offered/served to students and what entrée item(s) will be served instead.</i>

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! McNary Elementary 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. 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?


☒ No- SBP ☐ Yes- SBP **\$17.30**
☐ No- NSLP ☒ Yes- NSLP **\$1,513.23**

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **February 25, 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 1/21/2020
Date

 1/23/2020

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
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