



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

**Administrative Review Summary Report**

School Food Authority Name: Painted Desert Demonstration Projects, Inc.

CTD: 03-87-53

Site: STAR Charter School

Contacts: Mark Sorensen, CEO and Robyn David, Food Services Manager

Review Date: October 21, 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
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**Performance Standard 1: Certification & Benefit Issuance- Critical Area**

No findings.

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

1 Breakfast meal count totals for the month of review were not correctly combined and recorded. SFA overclaimed by 1 breakfast meal for the month of September 2019. September claim has been updated to reflect accurate meal counts	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 count totals are correctly combined, recorded, and claimed.</i>
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**Performance Standard 2: Meal Components & Quantities- Critical Area**

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| <p>2 Fruit quantities at breakfast observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically, 1 orange was served at breakfast (crediting as 1/2 cup fruit) when 1 cup fruit is needed to meet minimum amounts required by the breakfast meal pattern.</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 Breakfast 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 Breakfast Menu 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>. 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/trainingps/snarchivedwebinars/">http://www.azed.gov/hns/nslp/trainingps/snarchivedwebinars/</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 fruit quantities meet minimum amounts required by the breakfast meal pattern.</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.

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

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No findings.

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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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| 3 | The LWP did not contain goals for nutrition promotion.   | Discussed feasible options for nutrition promotion goals that can be written into the LWP. Discussed activity ideas which included offering contests, surveys, promotions and/or taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Team Nutrition Resources can be found at <a href="http://teannutrition.usda.gov">http://teannutrition.usda.gov</a> . | <i>None required at this time.</i> |
| 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.   | <i>None required at this time.</i> |
| 5 | 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> .  | <i>None required at this time.</i> |
| 6 | A plan is not in place to notify the public of the results of the most recent assessment of the implementation of the LWP, when assessment is conducted. | 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.  | <i>None required at this time.</i> |

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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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| 7 | 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 <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 Director is registered for.</i>  |
| 8 | 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 <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 full-time School Nutrition Program staff are registered for.</i>  |
| 9 | Professional Standards training hours are not being adequately tracked. Specifically, the tracking forms do not include the date training was completed or the number of completed hours.    | Referred to ADE's Training Tracking forms found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingps/">http://www.azed.gov/hns/nslp/trainingps/</a> and discussed how to complete tracking forms.   | <i>Please provide updated training trackers for the School Nutrition Program Director and Full-Time staff member that include the missing information: the date training was completed and the number of hours completed. Additionally, please provide written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis and that tracking forms will be</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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| 10 | 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> |
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<p>11 The following reviewed product indicated violation of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: Bananas (product of Guatemala). Additionally, 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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<p>12 A recipe has not been created for the following entrée served on the day of review: baked chicken thigh. Reviewer observed kitchen staff adding spices/seasoning to chicken on day of review making this an entrée consisting of 1+ ingredient.</p>	<p>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 <a href="http://www.azed.gov/hns/nslp/mealpat tern/">http://www.azed.gov/hns/nslp/mealpat tern/</a>.</p>	<p><i>Please provide a recipe for the baked chicken thigh entrée.</i></p>
<p>13 The 2019 food service Annual Financial Report (AFR) was not submitted to ADE on time.</p>	<p>Discussed reporting requirements for food service AFR and who would be responsible for submitting.</p>	<p><i>Please provide written assurance that the food service AFR will be submitted on time to ADE as is required by October 15th each year, as well as the steps that will be taken to ensure this requirement is adhered to.</i></p>
<p>14 Site application in CNPWeb indicates that SFA is serving breakfast in the classroom but the SFA does not serve breakfast in classroom. Students in grades 2-8 enter the cafeteria in the morning, walk through the service line to receive their breakfast, and bring their trays back to their classroom to eat. However, the POS is not in the classroom.</p>	<p>Discussed steps required to update site application in CNPWeb to reflect current practices.</p>	<p><i>Please resubmit a site/sponsor application indicating that breakfast is not served in the classroom.</i></p>

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

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<p>15 Outreach to families regarding the availability of the SBP was not conducted during the school year.</p>	<p>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.</p>	<p><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></p>
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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:**

Congratulations! Painted Desert Demonstration Projects, Inc. 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?**

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| <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 **March 6, 2020** to Taryn Kunkel at Taryn.Kunkel@azed.gov or AZ Dept. of Education/Health & Nutrition 1701 N. 4th St. Flagstaff, AZ 86004.

*Taryn Kunkel*

2/4/2020

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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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