



Arizona Department of Education
Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Wenden Elementary District

CTD: 15-04-19

Site: Wenden Elementary School

Contacts: Gloria Dean, Superintendent & Kristy Lott, Cafeteria Manager/Nutrition Services

Review Date: January 15, 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
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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 for the month of review were not correctly combined and recorded. SFA informed reviewer that attendance factor (ATF) of 96.08% in CNPWeb did not allow SFA to claim the correct meals counts of 1,148 breakfasts and 1,148 lunch meals- the largest # of meals ATF allowed for was 1,130, so SFA claimed 1,130 breakfasts and 1,130 lunches. 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. Discussed completing and submitting the Attendance Factor Calculation Form to grants@azed.gov to get ATF increased in CNPWeb so SFA is able to claim the actual number of meals served.	<i>Please work with Grants Management to get ATF increased. Please provide reviewer with a copy of the completed ATF Calculation Form submitted to grants@azed.gov.</i>
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Performance Standard 2: Meal Components & Quantities- Critical Area

2	Pre-K students were not co-mingled at breakfast and offer versus serve (OVS) was being implemented.	Referred to SP 01-2018. Introducing children to a variety of healthy foods and new foods at a young age can help shape their eating habits and their attitudes and preference towards foods . Because of this, OVS is not considered appropriate for preschoolers.	<i>None required at this time.</i>
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Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

No findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

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| 3 | 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 breakfast and 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 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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| 4 | Portion sizes observed on the day of review were inconsistent with the planned amounts recorded on production records:
<u>SBP</u> : students were given the option of taking 1/2 biscuit, 1 biscuit, or 1.5 biscuits when serving size was recorded as 1 biscuit on PR's.
<u>NSLP</u> : students were given the option of taking 1/2 sloppy joe sandwich or 1 whole sandwich when serving size was recorded as 1 sandwich on PR's.
Despite the inconsistency, 1/2 biscuit credits as 1 oz./eq. grain & 1/2 sloppy joe credits as 1 M/MA and 1 oz./eq. grain- so the minimum daily M/MA & grain requirements were met. | Discussed meal pattern requirements.
Discussed that portion sizes recorded on production records should be consistent for all students (i.e. if 1 sandwich is recorded on PR's then each student should receive 1 sandwich) to ensure that daily and weekly minimum food quantities are met. | <i>Please provide a written description of the changes that have been made to ensure that portion sizes meet minimum amounts required by the meal pattern.</i> |
| 5 | Serve-only reimbursable meal signage, which explains what constitutes a reimbursable meal, was not displayed to Pre-K students at breakfast. | Discussed feasible options for signage and potential content, plan for creating and posting. | <i>None required at this time.</i> |

Resource Management

6	All revenue from non-program foods did not accrue to the nonprofit school foodservice account: 1) \$163.76- food for Teacher/Staff Dinner on 5/9/19 ; 2) \$72.59- desserts for Pre-K/Kinder Graduation ; 3) \$77.96- cupcakes for 8th Grade Graduation ; 4) \$203.70- food for Father/Daughter Dance ; 5) \$81.78- hot chocolate & cookies for Winter Program Performance ; 6) \$71.04- candy for stockings distributed before winter break ; 7) \$126.77- chips & nacho cheese sauce for concession stand. Total amount = \$797.60.	Discussed requirement that all revenue from the sale of non-program foods must return to the non-profit school foodservice account if non-program foods were purchased through the non-profit school foodservice account as specified in 7 CFR 210.14 (f). Reviewed current procedures for depositing revenue from the sale of non-program foods to the non-profit school foodservice account and suggested changes. Explained that the revenue from the sale of the non-program foods must be returned to the non-profit school foodservice account for fiscal year 2019.	<i>Please provide a written description of the procedures that will be implemented to ensure that all revenue from the sale of non-program foods will accrue to the nonprofit school food service account. Additionally, please provide documentation which reflects that any revenue that did not previously accrue to the nonprofit school food service account for nonprogram foods <u>\$797.60</u> has been reimbursed to this account.</i>
7	Breakfast meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-breakfast 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. SFA is currently charging \$1.50 for adult breakfast but should be charging \$2.20, at a minimum.	Discussed ways to determine adult meal prices which included a per meal cost analysis or pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs.	<i>Please provide a written description of the steps which have been taken to increase adult meal breakfast price and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i>

General Program Compliance: Civil Rights

8	Notification/parent letter did not include the long USDA nondiscrimination statement.	Discussed where to find nondiscrimination statement on ADE's website at http://www.azed.gov/hns/civilrights/ .	<i>Please provide an updated notification/parent letter with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>
9	The Civil Rights Compliance form is not being completed every year by December 15 and kept on file. The 2019/20 Civil Rights Compliance Form was completed on 12/19/19.	Discussed requirement for completing form and how to collect racial/ethnic data from program participants. Showed where form can be found on ADE's website at http://www.azed.gov/hns/civilrights/ . The Step by Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ .	<i>Please provide written assurance that the Civil Rights Compliance form will be completed by December 15 each year and kept on file for 5 years. Additionally, please indicate who will be responsible for completing this form.</i>

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

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| 10 | A recent assessment of the implementation of the LWP has not been conducted nor have plans been developed to complete the assessment. The most recent assessment was completed on March 5, 2015. | 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/ . Also discussed feasible means for notifying the public of the results of the most recent assessment. | None required at this time. |
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General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

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| 11 | 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. The only training reviewer could verify was the 1-hour Civil Rights training that took place in August 2019. | 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/trainingps/online/ . | 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. |
| 12 | 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. The only training reviewer could verify was the 1-hour Civil Rights training that took place in August 2019. | 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/trainingps/online/ . | 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. |
| 13 | Professional Standards training hours are not being tracked on an annual basis. | Referred to ADE's Training Tracking forms found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/ . | 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. |

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 14 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: Sun Cup Grape Juice (concentrates from USA, Argentina, Chile, Mexico and/or Spain), Sun Cup Apple Juice (concentrates from USA, Argentina, Brazil, China, Chile, Poland, and/or New Zealand), and Sun Cup Fruit Punch (concentrates from USA, Argentina, Brazil, China, Chile, Costa Rica, Mexico, Spain, and/or New Zealand), & Grapes (product of Peru). 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

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| 15 Although advertising literature was provided for the Tyson mini corn dogs 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/trainings/s/snparchivedwebinars/ . | <i>Please provide a CN label and/or Product Formulation Statement for the Tyson mini corn dogs. 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.</i> |
| 16 A recipe has not been created for the sloppy joe meat served during the week of review and on the day of review. | 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 sloppy joe meat.</i> |

17	Recipe provided did not contain all required sections: recipe yield, recipe number, and HACCP process/instructions for spaghetti.	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 an updated recipe for spaghetti. Additionally, please provide written assurance that all recipes will be updated with recipe yield, recipe number, and HACCP process/instructions.</i>
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General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

18	Outreach to families regarding the availability of the SBP was not conducted during the school year.	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.	<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>
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Other Federal Program Reviews: Afterschool Snack Program

19	SFA underclaimed by 3 snack meals in the month of December. SFA informed reviewer that attendance factor (ATF) of 96.08% on CNPWeb claim did not allow SFA to claim 1,052 snack meals- the largest number of snack meals ATF allowed for was 1,049, so SFA claimed 1,049.	Discussed completing and submitting the Attendance Factor Calculation Form to grants@azed.gov to get ATF increased in CNPWeb so SFA is able to claim the actual number of snack meals served.	<i>Please work with Grants Management to get ATF increased. Please provide reviewer with a copy of the completed ATF Calculation Form submitted to grants@azed.gov.</i>
20	Production records and other documentation for 12/9/19 do not support that all snacks counted for reimbursement contained two different components. Specifically, a chocolate pudding cup was served as a component of the ASP meal pattern. Pudding is not compliant with the ASP meal pattern and does not credit as a component of meal pattern. This contributed towards fiscal action calculations.	Discussed the meal pattern requirements of the ASP and the requirement that a snack must contain two components if it is to be claimed for reimbursement. The ASP meal pattern table can be found on ADE's website at http://www.azed.gov/hns/nslp/asncsp/ .	<i>Please provide Afterschool Snack Program (ASP) production records for 5 consecutive days that demonstrate that each snack provided to students contains at least two components. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times and that all snacks claimed for reimbursement will contain at least 2 different components.</i>
21	Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met on the following dates: specifically, on two days a 4 oz. juice was served as the fruit component, crediting as 1/2 cup fruit, when 3/4 cup fruit needed to meet ASP meal pattern requirements.	Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at http://www.azed.gov/hns/nslp/asncsp/ .	<i>Please provide ASP production records for 5 consecutive days that demonstrate that the ASP meal pattern requirements have been met. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times.</i>
22	The Afterschool Snack Program monitoring review was not conducted within the first four weeks of operation and one additional time during the school year.	Discussed ASP monitoring requirements. A sample ASP monitoring form can be found on ADE's website at http://www.azed.gov/hns/nslp/asncsp/ .	<i>Please provide written assurance that the ASP will be monitored once within the first four weeks of operation and one additional time during the school year, and that documentation to support this will be maintained.</i>

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! Wenden Elementary District has completed the Administrative Review in the 2019-2020 SY. Thank you for your hospitality during my visit, Kristy and staff. 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/trainingsps/>.

Fiscal Action Assessed?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$37.71
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$24.69

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **March 18, 2020** to Taryn Kunkel at Taryn.Kunkel@azed.gov or AZ Dept. of Education/Health & Nutrition 1701 N. 4th St. Flagstaff, AZ 86004.



2/14/2020

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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