



Arizona Department of Education Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Kaibeto Boarding School

CTD: 03-40-03

Site: Kaibeto Boarding School

Contacts: Veronica Klain, KBS Principal | Heather Aguero, Business Technician | Alison Yazzie, School Cook Supervisor

Review Date: December 10, 2019

Review Period: November 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			
	No Findings		

Performance Standard 1: Meal Counting & Claiming- Critical Area			
	No Findings		

Performance Standard 2: Meal Components & Quantities- Critical Area			
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1	During the NSLP review period, Vegetable sub groups Red/Orange and Beans/Peas did not meet minimum amounts required by the meal pattern during the week of review. This was not a repeat finding and does not contribute 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 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 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 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. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu must be submitted.</i>
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2	During the review period for NSLP, supporting documentation indicated that the daily & weekly grain quantities offered were insufficient during the review period. This was determined to be a repeat finding from cycle one and contributed toward fiscal action calculations	Discussed proper documentation requirements for processed products and other M/MA products within NSLP including CN Labels & Product Formulation Statements from the manufacturer. Resources can be found at: https://www.fns.usda.gov/cn/labeling/food-manufacturersindustry	<i>Please provide CN labels or Product Formulation Statements for the following products:: The Max Cheese Stuffed Crust Pizza. Or Provide written assurance that the aforementioned products will not be menued or served as part of the reimbursable meal. Additionally, Please provide a written description of the changes that will be made in the recordkeeping process to ensure that documentation supports that the meal pattern requirements were met.</i>
3	During the review period for NSLP, supporting documentation indicated that the daily & weekly M/MA quantities offered were insufficient during the review period. This was determined to be a repeat finding from cycle one and contributed toward fiscal action calculations	Discussed proper documentation requirements for processed products and other M/MA products within NSLP including CN Labels & Product Formulation Statements from the manufacturer. Resources can be found at: https://www.fns.usda.gov/cn/labeling/food-manufacturersindustry	<i>Please provide CN labels or Product Formulation Statements for the following products:: The Max Cheese Stuffed Crust Pizza. Or Provide written assurance that the aforementioned products will not be menued or served as part of the reimbursable meal. Additionally, Please provide a written description of the changes that will be made in the recordkeeping process to ensure that documentation supports that the meal pattern requirements were met.</i>

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

4	Daily edit checks are not being conducted appropriately. Specifically, an attendance factor is not in use.	Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. The Daily Edit Check Worksheet can be found on ADE's website http://www.azed.gov/hns/nslp/forms/ . 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/trainingps/online/ .	<i>Please provide a completed daily edit check worksheet for the month of March 2020. Additionally, please provide written assurance that daily edit checks will be conducted. Additionally, the certificate of completion of Step by Step Instruction: How to Complete Daily Edit Checks must be submitted.</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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| 5 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast & 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/ . | Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast & lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see. |
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Resource Management

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| 6 | Meals served to teachers, administrators, custodians, and other adults were not priced in a way that was sufficient to cover the overall cost of the meal. | Discussed ways to determine adult meal prices which included 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. Discussed the annual use of the ADE Adult Meal Pricing Tool found at: http://www.azed.gov/hns/nslp/rm/ | Please provide a written description of the steps which have been taken to increase adult meal prices 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. |
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General Program Compliance: Civil Rights

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| 7 | The USDA nondiscrimination statement used on the notification of benefits 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. | Please provide an updated notification of benefits with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language. |
| 8 | Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place. | Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights). 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/trainingps/online/ . | Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs. Additionally, the certificate of completion of Step by Step Instruction: How to File a Civil Rights Complaint must be submitted. |

General Program Compliance: SFA On-Site Monitoring

No Findings

General Program Compliance: Local Wellness Policy

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| 9 | The public is not being notified of the existence and contents of the LWP. | Discussed feasible means of notifying the public about the LWP such as the school website. | None required at this time. |
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| 10 | A recent assessment of the implementation of the LWP has not been conducted | 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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| 11 | The public is required to be 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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| 12 | 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/ . 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 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. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided. |
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| 13 | 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/trainingps/online/ . | <i>Please provide the tracker that will be used to track Professional Standards training hours on an annual basis. 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> |
| 14 | 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. 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/ . | <i>Please provide the tracker that will be used to track Professional Standards training hours on an annual basis. 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> |
| 15 | Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training. These employees include: Veronica Klain, KBS Principal & Heather Aguero, Business Technician | Discussed 4 hour training requirement, employees' job duties and applicable trainings that could be provided and feasible timeline. 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/ . | <i>Please provide the tracker that will be used to track Professional Standards training hours on an annual basis. Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that these employees will receive.</i> |

General Program Compliance: Water

No Findings

General Program Compliance: Food Safety, Storage and Buy American

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| 16 | 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 a written description of how you will ensure that two food safety inspections from the local health department will be obtained each school year.</i> |
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17	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Jack Pot Pineapple Tidbits. 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/nsfp/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 recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>
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General Program Compliance: Reporting & Recordkeeping

18	The Site application in CNPWeb indicated that SFA is participating in the Afterschool Care Snack Program when the SFA did not participate during the review period or the day of review	Discussed steps required to update sponsor and site applications in CNPWeb to reflect current practice.	<i>Please update the CNP Web Sponsor & Site application to reflect that Kaibeto Boarding School is not participating in the Afterschool Care Snack Program</i>
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General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

19	Although monthly menus are posted on district website and copies are available at each school site, the SFA is not providing reminders throughout the school year about the availability of the SBP.	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. Additionally, discussed SBP reminders must include: serving times, SBP cost and availability.	<i>Please provide a 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>
20	Households were not notified of the availability of the SFSP prior to the end of the school year.	Discussed methods of notifying families of the availability of the SFSP prior to the end of the school year and determined which was most feasible. Summer feeding locations can be found at http://www.eatwellbewell.org/ .	<i>Please provide the documentation of how households will be notified of the availability of the SFSP prior to the end of the school year and written assurance that this will occur. If you do not plan to operate the SFSP and no other entities reasonably close to your site operate the SFSP, please provide a description of other community resources that will be provided to households prior to the end of the school year.</i>

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:

Thank you for your participation in the NSLP Administrative Review!

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

☒ No- NSLP

☐ Yes- NSLP

\$588.00

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 29, 2020 to Brandon.Estrada@azed.gov or 1535 W Jefferson St. Bin #7 Phoenix, AZ 85007.



4/13/2020

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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