



Arizona Department of Education
Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: San Miguel of Tucson Corp.

CTD: 10-19-08

Site: San Miguel Catholic High School

Contacts: Dave Mason, President | Christine Miranda, Executive Assistant to the Principal

Review Date: January 27, 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
Performance Standard 1: Certification & Benefit Issuance- Critical Area			
1	Multiple applications were certified with incomplete information, specifically, missing or incomplete social security data. The missing social security data was corrected and did not contribute to fiscal action.	Discussed errors found and required corrective action. Referred to Processing Applications, Assessing Completeness of Categorically Eligible Applications, Determining Eligibility for Categorically Eligible Applications section in USDA's Eligibility Manual for School Meals.	<i>Corrections have been made to certification errors. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student. Additionally, the certificate of completion of Step by Step Instruction: How to Process Household Applications must be submitted.</i>

Performance Standard 1: Meal Counting & Claiming- Critical Area

No Findings

Performance Standard 2: Meal Components & Quantities- Critical Area

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| <p>2 Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Daily fruit quantities did not meet the school breakfast program's daily requirement for the 9-12 meal pattern at breakfast. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations</p> | <p>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 Breakfast Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/trainings/online/. 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 daily fruit quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Breakfast Menu must be submitted</i></p> |
| <p>3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Daily & Weekly fruit quantities did not meet the school breakfast program's requirement for the 9-12 meal pattern at breakfast. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. 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 daily fruit quantities meet minimum amounts required by the school breakfast program's 9-12 meal pattern. Additionally, please provide copies of production records from one full week of served meals to show that compliance is being met.</i></p> |
| <p>4 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Documentation indicated that daily and weekly Grain quantities for the 9-12 meal pattern were insufficient. This was due to the chicken nugget entrée providing less than the required daily grain requirement for a 9-12 meal pattern. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. 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/trainings/online/. Please note that repeated violations involving food quantities may result in fiscal action</p> | <p><i>Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum amounts required by the National School Lunch Program's 9-12 meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu must be submitted. Additionally, please provide copies of production records from one full week of served meals to show that compliance is being met.</i></p> |

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		
No Findings		
Meal Pattern & Nutritional Quality: Meal Components & Quantities		
No Findings		
Resource Management		
5	Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment 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
		<i>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.</i>
6	A system or process to sufficiently separate non-program food costs from program food costs has not been implemented. This finding is in regard to Adult Meals served.	Discussed feasible methods for separating costs. Refer to FNS Instruction 782-5 REV. 1 for more information about pricing for non-program adult meals. More information on non-program foods revenue can be found at: http://www.azed.gov/hns/nslp/rm/
		<i>Please provide a description of the systems that will be developed to separate non-program food costs from program food costs and assurance that those systems will be implemented.</i>
General Program Compliance: Civil Rights		
7	Sufficient documentation to support accommodations for special diets has not been maintained.	Discussed requirements for accommodating special diets and the need for sufficient documentation.
		<i>Please provide written procedures for maintaining documentation supporting accommodations for special diets and written assurance that sufficient documentation to support accommodations for special diets will be maintained. Additionally, provide the doctors note that will be put into use to accomodate meal pattern modifications</i>

General Program Compliance: SFA On-Site Monitoring

No Findings

General Program Compliance: Local Wellness Policy

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| 8 | A Local Wellness Policy (LWP) has not been developed. | Discussed preliminary planning, such as who will be named as the designated LWP official and how required stakeholders will be invited to participate in the process. Reviewed handouts and discussed developing a LWP with required elements. Guidance on requirements for Local Wellness Policies can be found at http://www.azed.gov/hns/nslp/lwp . Alliance for a Healthier Generation resources and a Model Local Wellness Policy can be found at https://www.healthiergeneration.org/take_action/schools/wellness_committees_policies/ . | <i>Please provide a written plan for development of a Local Wellness Policy. This plan must include who will be designated as the oversight official, who will be invited to participate in the development process and the date by which the policy is expected to be completely developed and adopted. Provide written assurance that the Local Wellness Policy will be specific to your institution. Additionally, Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the element(s) to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i> |
| 9 | The LWP must contain goals for nutrition education. | Discussed developing a LWP with goals for nutrition education. Discussed nutrition education activity ideas which included integrating nutrition into health education classes, promoting skill development and integrating nutrition into core subjects. | <i>None required at this time.</i> |
| 10 | The LWP must contain goals for physical activity. | Discussed developing a LWP with goals for physical activity. Made suggestions to include the number of days per week or minutes per day that students would receive physical activity in addition to physical assessments. | <i>None required at this time.</i> |
| 11 | The LWP must contain goals for other school-based activities. | Discussed developing a LWP with goals for other school-based activities. Discussed other school-based activity ideas which included the HealthierUS School Challenge, offering staff wellness training to inspire them to serve as role models, sponsoring health fairs and incorporating school gardens and/or the Farm to School Program. | <i>None required at this time.</i> |
| 12 | The LWP must contain nutrition guidelines for all foods and beverages sold to students on the school campus during the school day. The nutrition guidelines for all foods and beverages sold to students on the school campus during the school day must be consistent with the Federal regulations for Snacks in school nutrition standards. | Discussed developing a LWP with nutrition guidelines for all foods and beverages sold to students that meet Federal regulations. | <i>None required at this time.</i> |

13	The LWP must contain nutrition standards for all foods and beverages provided, but not sold, to students on the school campus during the school day.	Discussed developing a LWP with nutrition standards for all foods and beverages provided, but not sold, to students.	<i>None required at this time.</i>
14	The LWP must 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 http://teamnutrition.usda.gov .	<i>None required at this time.</i>
15	The LWP must 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>
16	There must be a designated LWP oversight official.	Discussed LWP requirements. Guidance on requirements for Local Wellness Policies can be found at http://www.azed.gov/health-nutrition/wellness-policy/ . Alliance for a Healthier Generation resources and a Model Local Wellness Policy can be found at https://www.healthiergeneration.org/take_action/schools/wellness_committees	<i>None required at this time.</i>
17	The public must be notified of the existence and contents of the LWP.	Discussed feasible means of notifying the public about the LWP.	<i>None required at this time.</i>
18	A review and update of the LWP must be specified in the policy itself & documentation must being kept on file to support this.	Discussed why the review and update is not occurring and what can be done to ensure this occurs as specified in the LWP. Discussed maintaining records to document compliance.	<i>None required at this time.</i>
19	The LWP must specify how and when a review and update of the policy is to occur.	Discussed the best setting and timeframe for the periodic review and update of the LWP as well as how this can be included in the LWP.	<i>None required at this time.</i>

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| 22 An assessment of the implementation of the LWP must be 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. |
| 23 An assessment of the LWP must completely meet the Final Rule requirements. | 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/ . Also discussed feasible means for notifying the public of the results of the most recent assessment. | None required at this time. |
| 24 The public must 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

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| 25 All Arizona iced tea products sold to students in grades 9-12 during the school day do not meet Smart Snacks standards. | Discussed Smart Snacks requirements for grades 9-12 and why all Arizona iced tea products did not meet standards. The Alliance for a Healthier Generation Smart Snacks Product Calculator can be found on ADE's website at http://www.azed.gov/hns/nslp/smartsnacks/ . Smart Snacks Summary Chart can be found on USDA's website at https://www.fns.usda.gov/school-meals/tools-schools-focusing-smart-snacks . The Online Course: Smart Snacks and Competitive Foods Standards in Arizona can be found on ADE's website at http://www.azed.gov/hns/nslp/trainings/online/ | Please provide written procedures for assessing whether a product meets Smart Snacks standards and written assurance that all Arizona iced tea products will no longer be served or sold during the school day and that Smart Snacks standards will be adhered to. Additionally, the certificate of completion of Online Course: Smart Snacks and Competitive Foods Standards in Arizona must be submitted. |
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General Program Compliance: Professional Standards		
No Findings		
General Program Compliance: Water		
No Findings		
General Program Compliance: Food Safety, Storage and Buy American		
No Findings		
General Program Compliance: Reporting & Recordkeeping		
No Findings		
General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach		
26	Households were not notified of the availability of the SFSP prior to the end of the school year.	<p>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/. Call 1(800) 5-HUNGRY for more information and/or go to http://www.whyhunger.org/.</p> <p><i>Please provide documentation to show 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></p>
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. I am confident that following the technical assistance given during the review process, San Miguel High School will continue to thrive.

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 type="checkbox"/> No- SBP	<input checked="" type="checkbox"/> Yes- SBP	\$904.84
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	\$816.05

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by March 20, 2020 to 1535 W Jefferson St. Bin #7 Phoenix, Arizona 85007 or
Brandon.Estrada@azed.gov



Reviewer Signature Date 2/ 25 /20

 2/25/2020

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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