



Arizona Department of Education
Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Superior Unified School District

CTD: 11-02-15

Site: John F Kennedy School

Contacts: Stephen Estatico, Superintendent | Melissa Perez, Food Service Director

Review Date: February 20, 2020

Review Period: January 2020

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

No Findings

Performance Standard 2: Meal Components & Quantities- Critical Area

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| 1 | The following vegetable subgroup was not offered during the review period: Dark Green. 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/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/ . Please note that repeated violations involving vegetable subgroups may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents). | 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. |
| 2 | The following vegetable subgroup was not offered in the correct quantity during the review period: Red/Orange. 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/nslp/mealpattern . | 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. |

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| <p>3 During the review period, production records & supporting documentation indicated that the daily vegetable quantity offered was insufficient during one day of review period. This is not a repeat finding and does not contribute 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 Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. 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 one week of lunch production records which demonstrate compliance with the daily vegetable quantity requirements in a serve only operation. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable requirements.</i></p> |
| <p>4 During the review period, supporting documentation indicated that the daily & weekly M/MA quantities offered was insufficient during the review period. This is not a repeat finding and does not contribute toward fiscal action calculations</p> | <p>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</p> | <p><i>Please provide CN labels or Product Formulation Statements for the following products: Tyson Whole Grain Patties w/ SPC & ISP, 3.26oz Product code: 2154 - 328 Advance Pierre Down Home Flambroiled Beef Salisbury Steak Item number: 16-530-O Arizona Gold Burrito, Bean & Cheese Traditional WHOLE GRAIN SFC #3273821. Or Provide written assurance that the aforementioned products will not be menued or served as part of the reimbursable meal.</i></p> |
| <p>5 During the review period, supporting documentation indicated that the daily grain quantities offered was insufficient during the review period. This is not a repeat finding and does not contribute toward fiscal action calculations</p> | <p>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</p> | <p><i>Please provide CN labels or Product Formulation Statements for the following products: Arizona Gold Burrito, Bean & Cheese Traditional WHOLE GRAIN SFC #3273821. 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></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			
Not Applicable			
Meal Pattern & Nutritional Quality: Meal Components & Quantities			
6	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/ .	<i>Please provide pictures of the signs that will be displayed in the cafeteria to students that demonstrates what constitutes a reimbursable meal at breakfast & lunch.</i>
Resource Management			
7	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/	<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>
General Program Compliance: Civil Rights			
8	The USDA nondiscrimination statement used on monthly advertised menus 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.	<i>Please provide an updated program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>
9	Program staff have not been trained on civil rights topics.	Discussed requirement and how to document that requirement has been met. 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 have been trained 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 with all current staff annually including new hires.</i>

General Program Compliance: SFA On-Site Monitoring

No Findings

General Program Compliance: Local Wellness Policy

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| 10 A Local Wellness Policy (LWP) has not been developed in a way that is specific to district goals or needs | 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. 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. The plan should include draft language of the element(s) to be added. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i> |
| 11 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 http://teamnutrition.usda.gov . | <i>Please provide a written plan for how the missing elements of the LWP will be included.</i> |
| 12 The LWP did not 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 Healthier US 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>Please provide a written plan for how the missing elements of the LWP will be included.</i> |
| 13 There is not 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_policies/ . | <i>None required at this time.</i> |

14 The required stakeholders are not being permitted to be involved in the review and update of the LWP.	Discussed LEAs must permit participation by the general public and school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in the wellness policy process. Guidance on assembling a Local Wellness Policy Team can be found on Team Nutrition's website at https://healthymeals.fns.usda.gov/local-wellness-policy-resources/local-school-wellness-policy-process/assembling-team .	<i>None required at this time.</i>
15 The review and update of the LWP, as specified in the policy itself, is not occurring nor is documentation 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>
16 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>Please provide a written plan for how the missing elements of the LWP will be included.</i>
17 A recent assessment of the implementation of the LWP must be conducted at least triennially	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.	<i>None required at this time.</i>

18	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 .	<i>None required at this time.</i>
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General Program Compliance: Competitive Food Services

No Findings

General Program Compliance: Professional Standards

19	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/trainings/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. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i>
20	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.	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/trainings/online/ .	<i>Please provide a training tracking form for all full time staff. Include 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>
21	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/trainings/online/ .	<i>Please provide a training tracking form for all part time staff. Include 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>

22	Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training.	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/ .	<i>Please provide written assurance that Professional Standards training hours will be tracked for all non-School Nutrition Program staff on an annual basis</i>
23	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/training/ps/ .	<i>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.</i>

General Program Compliance: Water

No Findings

General Program Compliance: Food Safety, Storage and Buy American

No Findings

General Program Compliance: Reporting & Recordkeeping

24	Records documenting The Free & Reduced Price Policy Statement were not kept on file for the minimum required 5 years.	Discussed record keeping requirements and timeframe of 5 years.	<i>Please provide written assurance that all documents pertaining to the school meal programs will be retained on file for at least 5 years, as is required by Arizona law, and a written plan for ensuring that this requirement is met.</i>
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General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

26	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>
28	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. Discussed other resources within the local area to provide families regarding meals during the summer months when school is not in session. 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/ .	<i>Please provide a description 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 sites 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 hospitality during the on site review & for your participation in the NSLP Administrative Review process.

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?

☒ No- SBP

☐ Yes- SBP

☐ No- NSLP

☒ Yes- NSLP

\$889.67

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by April 3, 2020 to at Brandon.Estrada@azed.gov or 1535 W Jefferson St. Bin #7 Phoenix, Arizona 85007.



03/17/2020

Reviewer Signature

Date



3/19/2020

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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