



Arizona Department of Education Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Florence Unified School District

CTD: 11-02-01

Site: Florence High School, Florence K-8 and Mountain Vista Academy.

Contacts: Chris Knutsen, Superintendent and Sheaba Granillo, Food Service Director

Review Date: March 31, 2020

Review Period: February 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
Performance Standard 1: Certification & Benefit Issuance- Critical Area			
1	One selected student was certified as free by income, however, the income fell into the reduced category. This contributed toward fiscal action calculations.	Discussed errors found and required corrective action. Referred to Processing Applications and Reviewing Applications Based on Income, sections 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.</i>
2	Two students in the sample selected did not have supporting eligibility documentation on file. This contributed toward fiscal action calculations.	Discussed that all free and reduced price applications, including applications from households determined ineligible for benefits, must be kept on file for a minimum of five years after the final claim is submitted for the fiscal year to which they pertain as is required by Arizona law. Also discussed best practices of organization for eligibility documentation.	<i>Corrections have been made to the certification status of these students. Please provide written procedures that will be implemented to ensure that all free and reduced price applications will be kept on file according to USDA's requirements and written assurance that this will occur.</i>

Performance Standard 1: Meal Counting & Claiming- Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities- Critical Area

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| 3 | <p>Florence K-8 and Mountain Vista Academy: Portion sizes observed during the month of review did not meet minimum amounts required by the breakfast meal pattern. Specifically, on Thursday of the week of review, pancakes crediting as .5.oz/eq was served with 1oz/eq m/ma of sausage patty. Meat/Meat Alternates may not be counted toward the grain component until after the minimum daily grains requirement (1.0 ounce equivalents) is offered.</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. offering a grain that credits as at least 1.0 ounce equivalent). 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 http://www.azed.gov/health-nutrition/meal-pattern/. 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 breakfast production records which demonstrates that at least 1.0 equivalent of grains was offered prior to crediting Meat/Meat Alternates toward the grain component. Additionally, please provide a written description of the changes that have been made to ensure that at least 1.0 ounce equivalent of grain will be offered prior to crediting Meat/Meat Alternates toward the grain component.</i></p> |
| 4 | <p>Florence K-8 and Mountain Vista Academy: Quantities observed during the review period did not meet minimum amounts required by the breakfast meal pattern. Specifically, Thursday daily minimum grain requirement of 1oz/eq was not met due to the pancake w/ sausage entrée.</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. 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 weekly minimum grain quantities meet minimum amounts required by the breakfast meal pattern.</i></p> |

5	Mountain Vista Academy: Quantities observed during the review period did not meet minimum amounts required by the breakfast meal pattern. Specifically, weekly minimum grain requirement of 9oz/eq was not met due to the pancake w/ sausage patty entrée.	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. 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 a written description of the changes that have been made to ensure that weekly minimum grain quantities meet minimum amounts required by the breakfast meal pattern.</i>
6	Florence K-8: Quantities observed during the review period did not meet minimum amounts required by the breakfast meal pattern. Specifically, weekly minimum grain requirement of 8oz/eq was not met due to the pancake w/ sausage patty entrée.	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. 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 a written description of the changes that have been made to ensure that weekly minimum grain quantities meet minimum amounts required by the breakfast meal pattern.</i>

Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

7	Households selected for verification were not notified adequately. Specifically, the notification letter did not state that documentation of income or receipt of assistance may be provided from any point in time between the month prior to application and the deadline to provide documentation.	Discussed requirements for notifying households selected for verification and potential timelines. Referred to Notification of Verification Letter found on ADE's website at http://www.azed.gov/hns/nslp/verification/ . Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at http://www.azed.gov/hns/nslp/programguidance/ .	<i>Please provide a copy of the updated notification letter. Additionally, provide written assurance that households selected for verification will be notified according to requirements.</i>
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| <p>8 Households selected for verification were not notified adequately. Specifically, the notice did not include a warning that information must be provided by a date specified by the LEA and that failure to do so will result in termination of benefits.</p> | <p>Discussed requirements for notifying households selected for verification and potential timelines. Referred to Notification of Verification Letter found on ADE's website at http://www.azed.gov/hns/nslp/verification/. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at http://www.azed.gov/hns/nslp/programguidance/.</p> | <p><i>Please provide a copy of the updated notification letter. Additionally, provide written assurance that households selected for verification will be notified according to requirements.</i></p> |
| <p>9 Verification procedures were not followed correctly. Specifically, households for whom benefits were to be reduced or terminated were not given 10 calendar days written advance notice to request a hearing.</p> | <p>Discussed an appeal must be filed within the 10 calendar days advance notice period to ensure continued benefits while awaiting a hearing and decision. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at http://www.azed.gov/hns/nslp/programguidance/.</p> | <p><i>Please provide written assurance that households for whom benefits were to be reduced or terminated will be given 10 calendar days written advance notice to request a hearing. Additionally, provide a copy of the form that will be used for this purpose.</i></p> |

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

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| <p>10 Unallowable costs were paid for by the nonprofit school food service account. SFA charged the food service account directly for approximately 1/3 of electricians and HVAC technician's salaries. This method of charging employee salaries is unallowable as the SFA did not document the actual amount of time these employees worked on food service related equipment repairs. Additionally, these employees' salaries were also included in the SFA's indirect cost pool, so food service was also paying a disproportionate amount of these costs as these employees' salaries were also being factored into the indirect cost rate which is calculated and applied to food service expenditures.</p> | <p>Discussed specific unallowable expenses. An extensive list of allowable and unallowable costs can be found in 2 CFR 200 Subpart E General Provisions for Selected Items of Cost. Technical assistance was provided to the SFA detailing the appropriate way to document employee time and compensation costs in order to directly charge them to the nonprofit school food service account.</p> | <p><i>Provide a written description of the changes that have been implemented to ensure only actual employee hours spent repairing food service equipment will be charged to the nonprofit school food service account. As previously discussed the food service account cannot be charged directly for employee time spent repairing integral building fixtures, regardless of these fixtures location, such as building air conditioners as it is the district's responsibility to ensure these are in proper working order. Please also provide a copy of existing procedures for determining the allowability of costs as required by 2 CFR 200.303 (b) (7). Additionally, please provide written assurance that all expenses of the nonprofit school food service account will be limited to those costs which are necessary, reasonable, allocable; and also that these costs are in accordance with 2 CFR 200 Subpart E Cost Principles. Lastly, please provide supporting documentation which reflects that the total amount of unallowable costs \$48,517.16 has been returned to the nonprofit school food service account</i></p> |
| <p>11 The nonprofit school food service account was charged directly for expenses that were included in the indirect cost pool. The nonprofit school food service account was directly for approximately 1/3 of electricians and HVAC technician's salaries. The full amount of these salaries were also classified as indirect costs and included in the indirect cost pool. Costs for these employee salaries in the amount of \$48,517.16 were identified as unallowable expenses in a previous finding during the comprehensive review of the maintenance of the nonprofit school food service account and these costs will be returned to the nonprofit school food service account as part of the required corrective action assessed for this finding.</p> | <p>Discussed proper classification of direct/indirect costs. Reviewed requirements that indirect costs be charged consistently across the SFA as required in 2 CFR 200.412-414. Referred to the USDA's Indirect Cost Guidance Manual located at: http://www.azed.gov/hns/nslp/rm/ to be used as a resource when determining allowable indirect costs.</p> | <p><i>Please provide a description of the internal controls which will be implemented to ensure the nonprofit school food service account is not charged directly for charges that are included in the indirect cost pool.</i></p> |

12	Sufficient documentation could not be provided to support the indirect costs charged to the nonprofit school food service account. In order for costs to be allowable they must be adequately documented as required in 2 CFR 200.403 (g).	Discussed cost allowability requirements for federal awards and that all costs charged to a federal award must be adequately documented. Referred to 2 CFR 200.403 (g). Reviewed requirements that indirect costs be charged consistently across the SFA as required in 2 CFR 200.412-414. Referred to the USDA's Indirect Cost Guidance Manual located at: http://www.azed.gov/hns/nsfp/rm/ to be used as a resource when determining allowable indirect costs.	<i>Please provide written procedures that will be implemented to ensure all indirect costs charged to the nonprofit school foodservice account and any necessary supporting documentation are adequately documented and kept on file.</i>
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General Program Compliance: Civil Rights

13	The USDA nondiscrimination statement used on program materials 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>
14	The font size of USDA's nondiscrimination statement is smaller than the rest of the text on notification letters.	Discussed printing requirements for the nondiscrimination statement. Referred to FNS Instruction 113-1 and SNP Guidance Manual.	<i>Please provide a copy of an updated notification letter which demonstrates compliance. Additionally, please provide written assurance that the font size of the nondiscrimination statement on all notification letters will be no smaller than the text of the document.</i>

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

15	The recent assessment of the LWP did not completely meet the Final Rule requirements. Specifically, the assessment conducted meets the requirement to compare the LWP to a model policy, however, plans were not in place to assess how the LEA is complying with their own LWP.	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/nsfp/lwp/ . Also discussed feasible means for notifying the public of the results of the most recent assessment.	<i>None required at this time.</i>
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General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

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| 16 Professional Standards training hours are not being adequately tracked. Specifically, one kitchen manager training tracker is missing job duties for the employee, training codes and length (hours) for training. | Referred to ADE's Training Tracking forms found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/ . | Please provide written assurance that all required sections of the Professional Standards training trackers will be completed. Additionally, provide the updated kitchen manager training tracker with required sections completed. |
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General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

No findings.

General Program Compliance: Reporting & Recordkeeping

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| 17 Production record crediting and recipe crediting are inconsistent. Specifically, Recipe 000650 - Fresh Vegetables serving size is 3/4c, however, production record serving size is 1/2c. | Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage - http://www.azed.gov/hns/nslp/mealpattern/ . | Please provide updated recipes and production records with consistent crediting. |
| 18 The following recipes are missing meal preparation instructions: Recipe 000655 - Turkey & Swiss Sandwich, Recipe 000532 - Chef Salad Chicken, Recipe 000343 - Chef Salad Ham, Recipe 000544 - Bean Dip, Recipe 000149 - Cheeseburger, Recipe 000102 - Italian Veggies and Recipe 000657 - Western Chicken Wrap Meal. | Discussed updating recipes to include meal preparation instructions. | Please provide written assurance that all recipes will include meal preparation instructions. Additionally, provide an updated recipe for: Turkey & Swiss Sandwich, Chef Salad Chicken, Chef Salad Ham, Bean Dip, Cheeseburger, Italian Veggies and Western Chicken Wrap Meal. |
| 19 The following recipes are missing meal preparation instructions and HACCP instructions: Recipe 000654 - Big Daddy Buffalo Pizza, Recipe 000337 - Black Bean and Corn Salad, Recipe 000650 - Fresh Vegetables, Recipe 000562 - Hot n Spicy Chic Sandwich, Recipe 000488 - Mexican Corn Salad, Recipe 000341 - Spaghetti Sauce and Recipe 000658 - Sub Meal. | Discussed updating recipes to include meal preparation instructions and HACCP instructions. | Please provide written assurance that all recipes will include meal preparation instructions and HACCP instructions. Additionally, provide an updated recipe for: Big Daddy Buffalo Pizza, Black Bean and Corn Salad, Fresh Vegetables, Hot n Spicy Chic Sandwich, Mexican Corn Salad, Spaghetti Sauce and Sub Meal. |

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

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| 20 | SBP outreach was insufficient. Specifically, SFA provided Media Release, Monthly Menus and Student Handbook to families, however, serving times and availability was not indicated. Discussed SBP reminders must include: serving times, SBP cost and availability. | 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> |
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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

No findings.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable.

Comments/Recommendations:

Congratulations! Florence Unified School District has completed the Administrative Review for the 2019-2020 school year. You are doing an outstanding job implementing the NSLP. It is evident that you are working hard to ensure your students are fed healthy meals.

Congratulations! Based on your menu documentation provided for the week of review, you are serving 100% whole grain-rich items! If this extends to your entire menu, please take a moment to sign ADE's Whole Grain Pledge at <https://www.surveymonkey.com/r/WholeGrainRichPledge> and be recognized for providing 100% whole grain-rich items. ADE appreciates your efforts in continuing to provide quality meals to Arizona students.

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	\$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 June 3, 2020 to Jennifer.McDonald@azed.gov.



5/6/2020

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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