



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Globe Unified District

CTD: 04-02-01

Site: Copper Rim Elementary School

Contacts: Jerry Jennex, Superintendent and Craig Hagen, Food Service Director

Review Date: May 8, 2020

Review Period: March 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

1	One student who was identified as a Potential Direct Certification Match via "Partial Match" was not confirmed for free eligibility prior to receiving free meal benefits. This contributed towards fiscal action calculations.	Discussed if the LEA can confirm that the partially-matched student is the individual shown in CNP Direct Certification, the user will certify him/her as a "Match." Additionally, discussed if the LEA confirms that the partially-matched student is not the individual described in CNP Direct Certification, the user will declare him/her as a "No Match." Regardless of whether the student is identified as a Match or No Match, the user is required to review and accurately make a decision regarding the students match status using the Partial Match confirmation. Step by Step Instruction: How to Directly Certify a Partial Match can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/verification/">http://www.azed.gov/hns/nslp/verification/</a> .	<i>Corrections have been made to the certification status of this student. Please provide written procedures for how partially matched students will be processed and written assurance that students who are identified as Potential Direct Certification Matches via "Partial Match" will be confirmed as a match prior to certifying them for free meal benefits.</i>
2	Meal eligibility was extended to all members of a household when one person in that household matched as Foster, Homeless, Migrant and/or in direct certification. This contributed toward fiscal action calculations.	Referred to Assistance Program Participants in The Direct Certification Process section in USDA's Eligibility Manual for School Meals found on ADE's website at <a href="http://www.azed.gov/hns/nslp/programguidance/">http://www.azed.gov/hns/nslp/programguidance/</a> under The Eligibility Manual for School Meals.	<i>Corrections have been made to certification errors. Please describe the process that will be implemented to ensure that only eligibility benefits from an Assistance Program (SNAP/TANF/FDPIR) will be extended to children who are members of the household.</i>

<p>One application was certified incorrectly or utilized incomplete information. Specifically, Social Security Number information was missing. This did not contribute toward fiscal action calculations.</p>	<p>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. Suggested completing the training: Step by Step Instruction: How to Process Household Applications found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a> under the 3000-Administration tab.</p>	<p><i>Corrections have been made to the certification error. 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></p>
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**Performance Standard 1: Meal Counting & Claiming- Critical Area**

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*No findings.*

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**Performance Standard 2: Meal Components & Quantities- Critical Area**

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*No findings.*

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

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*No findings.*

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**Meal Access & Reimbursement: Certification & Benefit Issuance**

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<p>An individual separate from the application approval process has not been designated as the hearing official.</p>	<p>Referred to Hearing Procedure section in USDA's Eligibility Manual for School Meals. Discussed school official who could be designated.</p>	<p><i>Please provide the name and title of the individual designated as the hearing official. Additionally, please provide documentation to demonstrate where households are notified of the hearing official.</i></p>
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**Meal Access & Reimbursement: Verification**

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*No findings.*

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**Meal Access & Reimbursement: Meal Counting & Claiming**

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<p>SFA did not communicate their local meal charge policy in writing to all households during the school year for new students.</p>	<p>Discussed the Unpaid Meal Charge Policy and referred to memos SP29-2017, SP29-2017a, SP23-2017 and HNS14-2017, which can be found on ADE's website at <a href="http://www.azed.gov/hns/memos/">http://www.azed.gov/hns/memos/</a>.</p>	<p><i>Please provide the written notification that will be provided to the households at the beginning of the school year and during the school year for new students. Additionally, please provide written assurance that, moving forward, all households will be notified in writing of the local meal charge policy at the beginning of the school year and any new student will be notified of the policy after registration.</i></p>
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Meal Pattern & Nutritional Quality: Offer Versus Serve		
6	<p>Offer versus Serve (OVS) was implemented at lunch for preschool students who were not comingled with other grade groups.</p> <p>Discussed preschool meal service requirements, specifically that Offer versus Serve (OVS) is not allowable for preschoolers who are not comingled with other grade groups. Referred to SP 01-2018 Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers.</p>	<i>None required at this time.</i>
Meal Pattern & Nutritional Quality: Meal Components & Quantities		
7	<p>Meals served to preschool students did not meet requirements. Specifically, juice was served during more than one meal service for preschool students on 03/02/2020 and 03/04/2020.</p> <p>Discussed preschool meal pattern, specifically that juice cannot be served in more than one meal service and grain based desserts may not be credited at breakfast. Referred to SP 01-2018 Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers. Resources for the new preschool meal pattern can be found at:  <a href="http://www.azed.gov/hns/cacfp/cacfpmealpattern/">http://www.azed.gov/hns/cacfp/cacfpmealpattern/</a>.</p>	<i>None required at this time.</i>
8	<p>Meals served to Pre-K students did not meet requirements. Specifically, flavored milk was served to Pre-K students at lunch.</p> <p>Discussed new Pre-K meal pattern, specifically that flavored milk is not allowable. Referred to SP 01-2018 Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers. Resources for the new Pre-k meal pattern can be found at:  <a href="http://www.azed.gov/hns/cacfp/cacfpmealpattern/">http://www.azed.gov/hns/cacfp/cacfpmealpattern/</a>.</p>	<i>None required at this time.</i>
Resource Management		
9	<p>Lunches served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-lunch 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.</p> <p>Discussed ways to determine adult meal prices which included the paid meal price plus the amount of reimbursement received for a paid meal plus the per meal value of entitlement and bonus commodities for pricing programs.</p>	<i>Please provide a written description of the steps which have been taken to increase adult lunch prices, including the exact formula used to price adult lunches. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i>

10	Compliance with the Revenue from Nonprogram Foods requirements via either the Nonprogram Food Revenue Tool or 5-Day Reference Period as described in FNS Policy Memo SP 20-2016 was not assessed during the 2018-2019 school year.	Discussed revenue from nonprogram foods requirements and provided with Nonprogram Food Revenue Tool.	<i>Please complete and submit either the USDA Nonprogram Foods Revenue Tool or 5-Day Reference Period as evidence of compliance with revenue from nonprogram foods requirements.</i>
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#### General Program Compliance: Civil Rights

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11	The public/media release was not provided to local media, the unemployment office and local employers considering large layoff at the beginning of the school year.	Discussed requirements and timeframe for public/media release, and best options locally for submitting the release to. Showed where template release can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a> . Discussed who would be responsible for doing this.	<i>Please provide written procedures for distributing the public/media release and written assurance that the public/media release will be submitted to the local media, the unemployment office and local employers considering large layoffs prior to the start of each school year.</i>
12	Sufficient documentation to support accommodations for special diets has not been maintained. Specifically, there is no form made available to accommodate students with dietary needs that diverge from meal pattern requirements.	Discussed requirements for accommodating special diets and the need for sufficient documentation.	<i>Please provide written procedures for how households will be made aware of the process for special dietary accommodations and written assurance that sufficient documentation to support accommodations for special diets will be maintained.</i>
13	The Civil Rights Compliance form is not being completed every year by December 15. Specifically, the Civil Rights Compliance form was completed on January 20. Additionally, not all enrolled students were reported in the required charts.	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 <a href="http://www.azed.gov/hns/civilrights/">http://www.azed.gov/hns/civilrights/</a> . The Step by Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</a> .	<i>Please provide written assurance that the Civil Rights Compliance form will be completed by December 15 each year reflecting all enrolled students and kept on file for 5 years. Additionally, please indicate who will be responsible for completing this form.</i>

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#### General Program Compliance: SFA On-Site Monitoring

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14	On-site reviews of the lunch meal counting and claiming procedures for all sites within the SFA are not being conducted each year prior to February 1.	Discussed requirement and where to find a template Internal On-Site Monitoring Form-Lunch of the Meal Counting and Claiming System found on ADE's website at <a href="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a> under Additional Forms. Discussed who would be responsible for completing this each year.	<i>Please provide a written description of the process that has been put in place to ensure that all sites receive an on-site review of the lunch meal counting and claiming procedures each year prior to February 1.</i>
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15	On-site reviews of the breakfast meal counting and claiming procedures for 50% of the sites within the SFA are not being conducted each year prior to February 1.	Discussed requirement and where to find a template Internal On-Site Monitoring Form-Breakfast of the Meal Counting and Claiming System found on ADE's website at <a href="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a> under Additional Forms. Discussed who would be responsible for completing this each year.	<i>Please provide a written description of the process that has been put in place to ensure that 50% of the sites operating breakfast will receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i>
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#### General Program Compliance: Local Wellness Policy

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16	Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the local wellness policy.	Discussed feasible means of notifying potential stakeholders of their ability to participate.	<i>None required at this time.</i>
17	The recent assessment of the local wellness policy did not completely meet the Final Rule requirements. Specifically, a WellSAT was conducted which meets the requirement to compare the local wellness policy to a model policy however, plans were not in place to assess how the LEA is complying with their own local wellness policy nor progress made in attaining the goals within the policy.	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 <a href="http://www.azed.gov/hns/nslp/lwp/">http://www.azed.gov/hns/nslp/lwp/</a> .	<i>None required at this time.</i>

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#### General Program Compliance: Competitive Food Services

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18	Foods and beverages sold and served to students in grades K-8 during the school day do not meet Smart Snacks standards. Specifically, student workers in grades 6-8 were served Starbursts as a snack to reward them for helping in the kitchen.	Discussed Smart Snacks requirements for grades K-8 and why Starbursts did not meet standards. The Alliance for a Healthier Generation Smart Snacks Product Calculator can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/smartsnacks/">http://www.azed.gov/hns/nslp/smartsnacks/</a> . Smart Snacks Summary Chart can be found on USDA's website at <a href="https://www.fns.usda.gov/school-meals/tools-schools-focusing-smart-snacks">https://www.fns.usda.gov/school-meals/tools-schools-focusing-smart-snacks</a> . The Online Course: Smart Snacks and Competitive Foods Standards in Arizona can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a>	<i>Please provide written procedures for assessing whether a product meets Smart Snacks standards and written assurance that Starbursts will no longer be served or sold during the school day and that Smart Snacks standards will be adhered to.</i>
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**General Program Compliance: Professional Standards**

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19	Two School Nutrition Program Managers did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	Discussed 10 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training/">http://www.azed.gov/hns/nslp/training/</a> . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a> .	<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 Manager is registered for.</i>
20	Three 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 <a href="http://www.azed.gov/hns/nslp/training/">http://www.azed.gov/hns/nslp/training/</a> . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a> .	<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 full-time School Nutrition Program staff are registered for.</i>
21	One 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 <a href="http://www.azed.gov/hns/nslp/training/">http://www.azed.gov/hns/nslp/training/</a> . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a> .	<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 Part-time School Nutrition Program staff is registered for.</i>
22	Professional Standards training hours are not being adequately tracked. Specifically, training codes are missing from all manager, full-time, and part-time trackers and some trainings are missing the length of training.	Referred to ADE's Training Tracking forms found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/">http://www.azed.gov/hns/nslp/trainings/</a> . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a> .	<i>Please provide a fully completed training tracker. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i>

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**General Program Compliance: Water**

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*No findings.*

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**General Program Compliance: Food Safety, Storage and Buy American**

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23	The written food safety plan was not updated to reflect site-specific practices. Specifically, menu items grouped according to the Process Approach were not included, SOPs for programs that are not implemented at the site were included, and staffing information was not current.	Discussed required components of a food safety plan and resources available on ADE's website at <a href="http://www.azed.gov/hns/nslp/foodsafety/">http://www.azed.gov/hns/nslp/foodsafety/</a> .	<i>Please provide a copy of a the updated food safety plan.</i>
24	Documentation justifying a Buy American exception was not sufficient. Specifically, the Buy American exception document was not fully completed and no documentation was provided to support the exceptions.	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 can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a> . Buy American Recorded Webinar and FAQ can be found on ADE's website at <a href="http://www.azed.gov/hns/sfp/">http://www.azed.gov/hns/sfp/</a> .	<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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25	Sponsor application in CNPWeb indicated that SFA is using ADE's Notification of Benefits letter when the SFA is using a custom Notification of Benefits letter generated by their software system.	Discussed steps required to update sponsor application in CNPWeb to reflect current practice of utilizing a custom notification letter.	<i>Please resubmit a sponsor application indicating that a custom Notification of Benefits letter is being used. Additionally, please provide written assurance that the sponsor application in ADE's CNPWeb will accurately reflect current practices.</i>
26	Production records for breakfast and lunch did not contain all required sections: recipe numbers for all recipes and quantities planned, served, and left over for milk.	Discussed required sections of production records. Parts of a Production Record Guidance can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern/">http://www.azed.gov/hns/nslp/mealpattern/</a> . Production Record Template can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern/">http://www.azed.gov/hns/nslp/mealpattern/</a> . The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/">http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/</a> .	<i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</i>

27	<p>Recipes provided for Biscuits &amp; Gravy, Honey Glazed Carrots, and Caesar Salad did not include recipe yields.</p>	<p>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 <a href="http://www.azed.gov/hns/nslp/mealpattern/">http://www.azed.gov/hns/nslp/mealpattern/</a>.</p>	<p><i>Recipes were revised and resubmitted during the review process. Please provide written assurance that all recipes will include a recipe yield.</i></p>
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**General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach**

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28	<p>Outreach to families regarding the availability of the School Breakfast Program was not conducted at the beginning of or during the school year.</p>	<p>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.</p>	<p><i>Please provide documentation that demonstrates how households are notified of the availability of the SBP at the beginning of and during the school year. Additionally, 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></p>
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29	<p>Households were not notified of the availability of the SFSP prior to the end of the school year.</p>	<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 <a href="http://www.eatwellbewell.org/">http://www.eatwellbewell.org/</a>. Call 1(800) 5-HUNGRY for more information and/or go to <a href="http://www.whyhunger.org/">http://www.whyhunger.org/</a>.</p>	<p><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></p>
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**Other Federal Program Reviews: Afterschool Snack Program**

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*Not applicable.*

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2020 if applicable.

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**Other Federal Program Reviews: Fresh Fruit & Vegetable Program**

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*Not applicable.*

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**Other Federal Program Reviews: Special Milk Program**

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*Not applicable.*

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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*Not applicable.*



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**Comments/Recommendations:**

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Congratulations! Globe Unified District has completed the Administrative (Desk) Review for the 2019-2020 school year. Thank you for your hospitality and organization during the review process. It is evident that you are working hard to ensure your students are fed healthy meals.

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. Thank you!

**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/>.

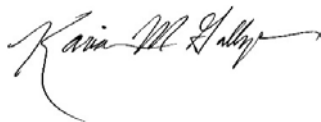
**Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at** <http://www.azed.gov/hns/nslp/trainingsps/>.

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 18, 2020 to Kariann Gallegos at [Kariann.Gallegos@azed.gov](mailto:Kariann.Gallegos@azed.gov) or 1535 West Jefferson Street Bin #7, Phoenix, AZ 85007.



5/18/2020

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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