



Arizona Department of Education
Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Canon Elementary District

CTD: 13-03-50

Site: Canon School

Contacts: Angela Jangula, Superintendent & Elizabeth Servin, Nutrition Director

Review Date: March 12, 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			
No findings.			

Performance Standard 1: Meal Counting & Claiming- Critical Area

1	Canon School operates the Community Eligibility Program (CEP) and, when students from other districts visit, these students are charged for meals.	Discussed that, per SP 54-2016, CEP schools should not accept payment from visiting students. Meals served to visiting students are to be included as part of the total count of meals served in the CEP school and are reimbursed based on the CEP claiming percentage.	<i>Please provide written procedures for counting and claiming meals for visiting students and written assurance that visiting students will not be charged for meals.</i>
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Performance Standard 2: Meal Components & Quantities- Critical Area

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| <p>2 Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern: specifically, the weekly oz./eq. grain not met. A PB&J Uncrustable is offered daily crediting as 1 oz./eq. grain. Over the course of the week, only 5 oz./eq. grain offered to students when 8 oz./eq. grain needed to meet weekly minimum amount required by the K-8 lunch meal pattern. This was determined to be a repeat finding from cycle two and contributed towards 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 (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. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly grain quantities meet minimum amounts required by the meal pattern.</i></p> |
| <p>3 Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern: specifically, the weekly minimum M/MA not met . A PB&J Uncrustable is offered daily crediting as 1 M/MA. Over the course of the week, only 5 M/MA offered to students when 9 M/MA needed to meet weekly minimum amount required by the K-8 lunch meal pattern. This was determined to be a repeat finding from cycle two and contributed towards 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 (i.e. changes in serving utensils, recipes, etc.).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly M/MA quantities meet minimum amounts required by the meal pattern.</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

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| 4 | Net cash resources available in the nonprofit school food service account exceed the three month expenditure limit and approval from the ADE was not obtained. | Discussed requirement that net cash resources must be limited to an amount that does not exceed 3 months average expenditures without prior approval from the ADE. Referred to 7 CFR 210.19. | <i>Please provide documentation reflecting that net cash resources are below the 3 month average expenditure limit or provide a detailed spending plan to ADE for approval to maintain a balance in excess of the net cash resource limit.</i> |
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General Program Compliance: Civil Rights

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| 5 | The shortened USDA nondiscrimination statement used on monthly menu is not the most current USDA statement. | Discussed where to find nondiscrimination statement on ADE's website at http://www.azed.gov/hns/civilrights/ . | <i>Please provide an updated monthly menu with the correct nondiscrimination statement.</i> |
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General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

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| 6 | 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>None required at this time.</i> |
| 7 | 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 posters, menu boards, etc. | <i>None required at this time.</i> |

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| 8 | A recent assessment of the implementation of the LWP has not been conducted nor have plans been developed to complete the assessment. | 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/ . | None required at this time. |
| 9 | A plan is not in place to notify the public of the results of the most recent assessment of the implementation of the LWP, once completed. | Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. The USDA's Local Wellness Policy Outreach Toolkit can be found at https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit . | None required at this time. |

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

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| 10 | The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. | Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/hns/nslp/training/ . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ . | <i>Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that the School Nutrition Program Director is registered for.</i> |
| 11 | The School Nutrition Program Manager 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. | <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> |
| 12 | Full-time School Nutrition Program staff member has 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. | <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 member is registered for.</i> |

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

13	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: Bountiful Harvest Mandarin Oranges (product of China) and Tomatoes (product of Puerto Rico). Additionally, documentation justifying a Buy American exception was not maintained/on file.	Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the non-profit food service account must be used to procure food products that comply with the Buy American Provision. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at http://www.azed.gov/hns/nsfp/forms/ . Buy American Recorded Webinar and FAQ can be found on ADE's website at http://www.azed.gov/hns/sfp/ .	<i>Please provide a written description of the changes that have been made to procurement and/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

14	Site application in CNPWeb indicates that SFA is operating an offer vs. serve (OVS) meal pattern at lunch when the SFA is operating serve only meal pattern at lunch.	Discussed steps required to update sponsor/site application in CNPWeb to reflect current practices.	<i>Please resubmit a site/sponsor application indicating that site is operating OVS meal pattern at lunch.</i>
15	Although specification sheet/advertising literature was provided for JTM macaroni & cheese and credited towards meal pattern, required documentation (CN label or PFS) was not provided to reviewer.	Discussed when processed products are used in Child Nutrition Programs to meet the meal pattern requirement, the product's contributions must be determined. CN Labels and/or Product Formulation Statements provide valuable crediting information; and only these will be accepted as proper crediting documentation. Guidance on Product Formulation Statements and CN Labels can be found on ADE's website under the Processed Product Documentation section found at www.azed.gov/hns/nsfp/mealpattern . The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nsfp/trainingps/snparchivedwebinars/ .	<i>Please provide a CN label and/or Product Formulation Statement for the JTM macaroni & cheese. If unable to provide a CN label or PFS, please provide written assurance that the product will no longer be offered/served to students. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. Additionally, the certificate of completion of CN Labels and Product Formulation Statements must be provided.</i>

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

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| 16 | Households were not notified of the availability of the SFSP prior to the end of the school year. | Discussed which entities in the local area operate the SFSP and how to notify families. 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/ . - AND/OR- 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 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> |
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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

Not applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable.

Comments/Recommendations:

Congratulations! Canon Elementary District has completed the Administrative Review in the 2019-2020 SY. Thank you for your hospitality during my visit and all of your hard work and organization throughout the AR process. It was a pleasure meeting you all- thank you for working so diligently to assure that your students are receiving nutritious meals. Please let me know if you have any questions.

Based on your menu documentation provided for the week of review, it appears that you have opted to utilize the flexibility to serve a select number of enriched grain rich items. Please consider switching to serve 100% whole grain-rich items and join your peers who have already signed ADE's Whole Grain Pledge at: <https://www.surveymonkey.com/r/WholeGrainRichPledge>. ADE appreciates your efforts in providing 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?

☒ No- SBP ☐ Yes- SBP \$0
☐ No- NSLP ☒ Yes- NSLP **\$805.19**

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **May 6, 2020** to Taryn Kunkel at Taryn.Kunkel@azed.gov or AZ Dept. of Education/Health & Nutrition 1701 N. 4th St. Flagstaff, AZ 86004.



Reviewer Signature Date 4/1/2020



Program Director Signature Date 4/1/2020

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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