

# Arizona Department of Education



## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Aguila Elementary District

CTD: 07-03-63

Site: Aguila Elementary School

Contacts: Rosa Garcia, Cafeteria Manager; Andrew Wannemacher, Superintendent

Review Date: March 13, 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
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**Performance Standard 1: Certification & Benefit Issuance- Critical Area**

1	<p>Multiple applications were certified incorrectly. This contributed toward fiscal action calculations. Specifically, two applications did not have the correct number of household members and should have been certified as paid. One application was certified as free when it should have been certified as reduced. These errors contributed 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. Referred SFA to 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/trainingsps/online/">http://www.azed.gov/hns/nslp/trainingsps/online/</a> under the 3000- Administration tab.</p>	<p><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></p>
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**Performance Standard 1: Meal Counting & Claiming- Critical Area**

No findings.

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

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| 2 | <p>Documentation did not support that all required meal components were offered and served on one day during the review period. Specifically the entree scrambled eggs and hash browns served at breakfast on February 6, 2020 did not contain the grain component. No other grain was served to the students that selected that entree. This contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</p>  | <p>Discussed meal pattern requirements for the grade groups served. Discussed specific missing items and suggested changes.</p>  | <p><i>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. Please provide a written description of the changes that have been made to the menu to bring it into compliance with the meal pattern requirements.</i></p>  |
| 3 | <p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically on February 7, 2020 1/2 cup of fruit was served at breakfast. As a result the daily fruit quantity (1 cup) and weekly fruit quantity (5 cups) requirements of the breakfast meal pattern were not met. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</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 Breakfast Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a>. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingsps/online/">http://www.azed.gov/hns/nslp/trainingsps/online/</a>. 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 and weekly fruit quantities served at breakfast meet minimum amounts required by the breakfast meal pattern. Please also provide one week of completed breakfast production records verifying the requirements of the breakfast meal pattern were met. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p> |
| 4 | <p>Quantities during the review period did not meet minimum amounts required by the meal pattern. Specifically, 4 ounce equivalent of grains were served at breakfast during the week of review. This does not meet the breakfast weekly minimum grain requirement of 8 ounce equivalent of grains.</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 Breakfast Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a>. 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 breakfast meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p>   |

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| <p>5 During the week of review, juice was served more than 50% of the time during breakfast.</p>   | <p>Discussed that juice may not be used to meet more than half of the weekly fruit requirement. Referred to Meal pattern requirements for the National School Breakfast Program, which 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>. Please note that repeated violations involving juice requirement 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 juice is not served more than 50% of the time. Additionally, please provide a written description of the changes that have been made to ensure that juice requirements are met.</i></p> |
| <p>6 Documentation did not support that all required meal components were offered and served during the review period. Specifically the nutrition facts label and product formulation statement received for the entree, Pork Egg Rolls, served at lunch on February 3, 2020 indicates the SFA served a vegetable egg roll that did not contain any creditable meat/meat alternate. According to the production record no other meat/meat alternate was served that day. This contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</p> | <p>Discussed requirements for recordkeeping and/or meal pattern requirements for the grade groups served. Discussed specific missing items and suggested changes.</p>  | <p><i>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>   |
| <p>7 Documentation did not support that all required meal components were offered and served during the review period. Specifically the production record received indicates a grain was not served at lunch on February 6, 2020. This contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</p>  | <p>Discussed requirements for recordkeeping and/or meal pattern requirements for the grade groups served. Discussed specific missing items and suggested changes.</p>  | <p><i>Please provide a written description of the changes that have been made to the menu to bring it into compliance with the meal pattern requirements.</i></p>   |

- 8 The following products could not be credited towards the lunch meal pattern due to insufficient documentation: Chicken Chimichanga served February 5, 2020 and Pepperoni Pizza served February 7, 2020. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met for the daily and weekly grain and meat/meat alternate components. This was determined to be a repeat finding from cycle two and contributed towards fiscal action calculations.
- Discussed requirements regarding processed product documentation and provided examples. 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/nslp/mealpattern](http://www.azed.gov/hns/nslp/mealpattern). USDA Food Fact Sheets can be found on USDA's website at [www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets](http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets). The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainingps/sn-archivedwebinars/>. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a CN label and/or Product Formulation Statement for Chicken Chimichanga served February 5, 2020 and Pepperoni Pizza served February 7, 2020. If a CN label and/or Product Formulation Statement does not exist for the Chicken Chimichanga served February 5, 2020 and/or the Pepperoni Pizza served February 7, 2020, instead provide a statement explaining those products will no longer be served and provide a nutrition facts label and a CN label or product formulation statement for similar products the SFA will serve in their place. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. The certificate of completion of CN Labels and Product Formulation Statements Webinar must be submitted as well.*
- 9 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically the daily minimum of 1/2 cup of fruit required by the lunch meal pattern was not met on two days during the review period, February 4, 2020 (1/4 cup served) and February 7, 2020 (1/4 cup served). This also resulted in the weekly minimum of 2 1/2 cups of fruit not being met as required by the lunch meal pattern. This was not a repeat finding from cycle two therefore did not contribute toward towards fiscal action calculations.
- 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](http://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/on-line/>. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that daily and weekly fruit quantities meet minimum amounts required by the lunch meal pattern. Please also provide one week of completed lunch production records verifying the requirements of the lunch meal pattern were met. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu must be submitted.*

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| <p>10 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically the daily minimum of 3/4 cup vegetables required by the lunch meal pattern were not served on three days during the review period, February 3, 2020 (5/8 cup served), February 4, 2020 (1/2 cup served), and February 7, 2020 (3/8 cup served). This also resulted in the minimum weekly vegetable requirement of 3 3/4 cups not being met. 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 (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 <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a>. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingsps/online/">http://www.azed.gov/hns/nslp/trainingsps/online/</a>.</p>                 | <p><i>Please provide a written description of the changes that have been made to ensure that the daily and weekly vegetable quantities meet minimum amounts required by the meal pattern.</i></p>                 |
| <p>11 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically the weekly minimum 1/2 cup dark green vegetable subgroup required by the lunch meal pattern was not served during the review period. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</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 <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a>. The Step by Step Instruction: How to Plan a Lunch Menu 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 the dark green vegetable subgroup quantities meet weekly minimum amounts required by the lunch meal pattern.</i></p> |

- 12 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically the weekly minimum 1/2 cup beans/peas (legumes) vegetable subgroup required by the lunch meal pattern was not served during the review period. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.
- 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](http://www.azed.gov/hns/nslp/mealpattern). The Step by Step Instruction: How to Plan a Lunch Menu Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that the beans/peas (legumes) vegetable subgroup quantities meet weekly minimum amounts required by the lunch meal pattern.*
- 13 Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically only 3/4 cup of fruit was served to students at breakfast. This did not meet the daily minimum requirement of 1 cup of fruit to be served. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.
- 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 Breakfast Program can be found on ADE's website at [www.azed.gov/hns/nslp/mealpattern](http://www.azed.gov/hns/nslp/mealpattern). The Step by Step Instruction: How to Plan a Lunch Menu -AND-OR 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/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/sn\\_parchivedwebinars/](http://www.azed.gov/hns/nslp/trainingps/sn_parchivedwebinars/). Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that fruit quantities at meet minimum amounts required by the breakfast meal pattern.*

<p>14 Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically only 3/8 cup of vegetables was served to students during lunch. This did not meet the daily minimum requirement of 3/4 cup vegetables to be served. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</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 <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a>. The Step by Step Instruction: How to Plan a Lunch Menu -AND-OR The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingsps/online/">http://www.azed.gov/hns/nslp/trainingsps/online/</a>. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingsps/snarchivedwebinars/">http://www.azed.gov/hns/nslp/trainingsps/snarchivedwebinars/</a>. 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 vegetable quantities meet minimum amounts required by the lunch meal pattern.</i></p>
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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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No findings.

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**Meal Access & Reimbursement: Verification**

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<p>15 Verification procedures were not followed correctly. Specifically, net pay was used, instead of gross pay, when verifying income documentation.</p>	<p>Discussed proper verification procedures. Referred to Online Training: Verification Review ADE's website at <a href="http://www.azed.gov/hns/nslp/verification/">http://www.azed.gov/hns/nslp/verification/</a>. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at <a href="http://www.azed.gov/hns/nslp/programguidance/">http://www.azed.gov/hns/nslp/programguidance/</a>.</p>	<p><i>Please provide written procedures that will be followed when verifying a household's income documentation.</i></p>
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<p>16 Verification procedures were not followed correctly. Specifically, benefits were not decreased no later than 10 operating days from the final decision on the benefit issuance document.</p>	<p>Discussed proper verification procedures and referred to ADE's Verification Tracking Form and Online Training: Verification Review on ADE's website at <a href="http://www.azed.gov/hns/nslp/verification">http://www.azed.gov/hns/nslp/verification</a>. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at <a href="http://www.azed.gov/hns/nslp/programguidance/">http://www.azed.gov/hns/nslp/programguidance/</a>.</p>	<p><i>Please provide written assurance that benefits will be increased no later than 3 operating days and decreased no later than 10 operating days from the final decision and the benefit issuance document will reflect the change in benefits.</i></p>
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**Meal Access & Reimbursement: Meal Counting & Claiming**

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<p>17 At the time of the on-site date, March 13, 2020, the SFA was not conducting daily edit checks.</p>	<p>Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. The Daily Edit Check Worksheet 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>. The Step by Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingsps/online/">http://www.azed.gov/hns/nslp/trainingsps/online/</a>.</p>	<p><i>Please provide an accurate and complete daily edit check worksheet(s) for the month of March 2020 for breakfast and lunch. Please also provide written assurance that daily edit checks will be conducted moving forward every month of meal service operation. Additionally, the certificate of completion of Step by Step Instruction: How to Complete Daily Edit Checks must be submitted.</i></p>
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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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Not applicable.

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**Meal Pattern & Nutritional Quality: Meal Components & Quantities**

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No findings.

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**Resource Management**

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<p>18 Meals 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. Specifically the SFA's adult meal prices were \$2.00 for breakfast and \$3.00 for lunch which is less than the minimum required adult meal prices of \$2.20 for breakfast and \$3.75 for lunch.</p>	<p>Discussed ways to determine adult meal prices which included a per meal cost analysis or 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.</p>	<p><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></p>
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**General Program Compliance: Civil Rights**

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| 19 | The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs. | 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>  |
| 20 | 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 <a href="http://www.azed.gov/hns/civilrights/">http://www.azed.gov/hns/civilrights/</a> .  | <i>Please provide written assurance that all food service staff will be trained at hire and as needed 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.</i>  |
| 21 | The Civil Rights Compliance form was not completed by December 15 of the current school year.                                    | 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/trainingsps/online/">http://www.azed.gov/hns/nslp/trainingsps/online/</a> . | <i>Please provide written assurance that the Civil Rights Compliance form will be completed by December 15 each year and kept on file for 5 years. Additionally, please indicate who will be responsible for completing this form. Additionally, the certificate of completion of Step by Step Instruction: How to Complete the Civil Rights Compliance Form must be submitted.</i> |

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

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No findings.

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**General Program Compliance: Local Wellness Policy**

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| 22 | 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 Polices can be found at <a href="http://www.azed.gov/hns/nslp/lwp">http://www.azed.gov/hns/nslp/lwp</a> . Alliance for a Healthier Generation resources and a Model Local Wellness Policy can be found at <a href="https://www.healthiergeneration.org/take_action/schools/wellness_committees_policies/">https://www.healthiergeneration.org/take_action/schools/wellness_committees_policies/</a> . | <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. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i> |
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<p>23 A recent assessment of the implementation of the LWP has not been conducted nor have plans been developed to complete the assessment.</p>	<p>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 <a href="http://www.azed.gov/hns/nslp/lwp/">http://www.azed.gov/hns/nslp/lwp/</a>. Also discussed feasible means for notifying the public of the results of the most recent assessment.</p>	<p><i>None required at this time.</i></p>
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**General Program Compliance: Competitive Food Services**

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No findings.

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**General Program Compliance: Professional Standards**

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<p>24 At the time of review, the School Nutrition Program Director hired after July 1, 2015 had not completed the required 8 hours of food safety training within 5 years prior to hire date.</p>	<p>Discussed requirement and feasibility for attending an available certification training within current school year. Food Safety Online Courses can be found on ICN's website at <a href="http://www.theicn.org/ResourceOverview.aspx?ID=573">http://www.theicn.org/ResourceOverview.aspx?ID=573</a>.</p>	<p><i>Please provide verification that the required 8 hours of food safety certification training has been completed by the School Nutrition Program Director.</i></p>
<p>25 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.</p>	<p>Discussed 12 hour 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/trainingsps/online/">http://www.azed.gov/hns/nslp/trainingsps/online/</a>.</p>	<p><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></p>
<p>26 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.</p>	<p>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/trainingsps/online/">http://www.azed.gov/hns/nslp/trainingsps/online/</a>.</p>	<p><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></p>

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| 27 | 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 <a href="http://www.azed.gov/hns/nslp/trainingsps/">http://www.azed.gov/hns/nslp/trainingsps/</a> .   | <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> |
| 28 | 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/trainingsps/online/">http://www.azed.gov/hns/nslp/trainingsps/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 are registered for.</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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| 29 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Bountiful Harvest frozen California Vegetable Blend and Vista Verde canned jalapenos, both from Mexico. 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 <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 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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| <p>30 Production records for breakfast provided were not completed correctly. Specifically, the breakfast production record for February 5, 2020 indicates a total of 47 meals served. However, the used servings column of the record indicates a total of 37 entrees were served. Since the SFA operates serve only at breakfast, the total number of entrees in the used column of the production record should be greater than or equal to the total number of meals served.</p> | <p>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 Overview Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingsps/sn_parchivedwebinars/">http://www.azed.gov/hns/nslp/trainingsps/sn_parchivedwebinars/</a>.</p> | <p><i>Please provide copies of completed breakfast production records for one week demonstrating the records were completed correctly. Additionally, the certificate of completion of Production Record Overview must be provided.</i></p> |
| <p>31 Production records for lunch on day of review was not completed correctly. Specifically, the production record for lunch on March 13, 2020 does not indicate any milk was served. However, on day of reviewer the Reviewer observed 1% and fat-free milk was served to participants.</p>   | <p>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 Overview Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingsps/sn_parchivedwebinars/">http://www.azed.gov/hns/nslp/trainingsps/sn_parchivedwebinars/</a>.</p> | <p><i>Please provide copies of completed breakfast production records for one week demonstrating the records were completed correctly. Additionally, the certificate of completion of Production Record Overview must be provided.</i></p> |
| <p>32 Site application in CNPWeb does not have the correct site address for Aguila Elementary School.</p>  | <p>Discussed steps required to update sponsor application in CNPWeb to reflect current practice of utilizing a custom notification letter.</p>   | <p><i>Please resubmit a site application with the correct physical address for Aguila Elementary School.</i></p>   |

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

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| <p>33 Households were not notified of the availability of the SFSP prior to the end of the school year.</p> | <p>Discussed which entities in the local area operate the SFSP and how to notify families. Also 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 <a href="http://www.eatwellbewell.org/">http://www.eatwellbewell.org/</a>. AND/OR- 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 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> |
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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:**

Congratulations on the completion of the School Year 2019/2020 Administrative Review. Please note corrective action is due no later than June 8, 2020.

**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/trainings/>.

**Fiscal Action Assessed?**

Yes- SBP     No- SBP                      \$638.58  
 Yes- NSLP    No- NSLP                      \$2,925.93

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 8, 2020 to Bekah McLeod at [bekah.mcleod@azed.gov](mailto:bekah.mcleod@azed.gov) or 1535 W. Jefferson St., BIN #7, Phoenix, AZ 85007.

                      5/8/2020  
\_\_\_\_\_  
Reviewer Signature                      Date

                      5/12/2020  
\_\_\_\_\_  
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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