



**Arizona Department of Education**  
**Health and Nutrition Services Division**

**Administrative Review Summary Report**

School Food Authority Name: Duncan Unified District

CTD: 06-02-02

Site: Duncan Elementary School

Contacts: Eldon Merrell, Superintendent; Karen Hamilton, Executive Assistant; Shiloh Patten, Cafeteria Manager

Review Date: Exit Conference Date March 31, 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
<b>Performance Standard 1: Certification &amp; Benefit Issuance- Critical Area</b>			
	No findings.		
<b>Performance Standard 1: Meal Counting &amp; Claiming- Critical Area</b>			
	No findings.		
<b>Performance Standard 2: Meal Components &amp; Quantities- Critical Area</b>			
	No findings.		
<b>Performance Standard 2: Dietary Specifications &amp; Nutrient Analysis- Critical Area</b>			
	No findings.		
<b>Meal Access &amp; Reimbursement: Certification &amp; Benefit Issuance</b>			
	No findings.		
<b>Meal Access &amp; Reimbursement: Verification</b>			
	No findings.		

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

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| <b>1</b> Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims. | 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/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</a> . | Please provide a corrected completed daily edit check worksheet for the month of February 2020 with the correct attendance factor of . Additionally, please provide written assurance that daily edit checks will be conducted. Additionally, the certificate of completion of Step by Step Instruction: How to Complete Daily Edit Checks must be submitted. |
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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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No findings.

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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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| <b>2</b> 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 insufficient to cover the overall cost of the meal. | 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. | 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. |
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**General Program Compliance: Civil Rights**

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| <b>3</b> The USDA nondiscrimination statement used on program materials is not the most current USDA statement, specifically on the eligibility notification letters. | Discussed where to find nondiscrimination statement on ADE's website at <a href="http://www.azed.gov/hns/civilrights/">http://www.azed.gov/hns/civilrights/</a> and whether long or short statement would be most appropriate. | 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. |
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| <p><b>4</b> Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place.</p> | <p>Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food &amp; Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights). The SFA's procedures must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at:<br/> <a href="http://www.azed.gov/hns/civilrights/">http://www.azed.gov/hns/civilrights/</a>.<br/> The Step by Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at<br/> <a href="http://www.azed.gov/hns/nsfp/trainingps/online/">http://www.azed.gov/hns/nsfp/trainingps/online/</a>.</p> | <p><i>Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs. Additionally, the certificate of completion of Step by Step Instruction: How to File a Civil Rights Complaint must be submitted.</i></p> |
| <p><b>5</b> Program staff have not been trained on civil rights topics.</p>  | <p>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<br/> <a href="http://www.azed.gov/hns/civilrights/">http://www.azed.gov/hns/civilrights/</a>.</p>   | <p><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></p>        |

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

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| <b>6</b> 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 completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System. Additionally, 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 meal counting and claiming procedures each year prior to February 1.</i>                                 |
| <b>7</b> 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 completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System. Additionally, 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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No findings.

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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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| <b>8</b> 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/trainingps/">http://www.azed.gov/hns/nslp/trainingps/</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/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</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. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i> |
| <b>9</b> 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 <a href="http://www.azed.gov/hns/nslp/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</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/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/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 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>   |

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| <p><b>10</b> 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/trainings/online/">http://www.azed.gov/hns/nslp/trainings/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. 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><b>11</b> 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.</p>  | <p>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>.</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 Part-time School Nutrition Program staff are registered for.</i></p>  |
| <p><b>12</b> Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training. Specifically there are 4 employees outside of the School Nutrition Program that have not received training applicable to their responsibilities in assisting the operation of the NSLP and SBP.</p> | <p>Discussed 4 hour training requirement, employees' job duties and applicable trainings that could be provided and feasible timeline. Trainings for School Nutrition Professionals can be found on ADE's website at <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>.</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 these employees will receive. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i></p>                                |

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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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No findings.

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**General Program Compliance: Reporting & Recordkeeping**

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- 13** Production records for breakfast provided did not contain all required sections: Specifically, production records planned, used/left over section is not completed adequately for all menu items.
- Discussed required sections of production records. Parts of a Production Record Guidance can be found on ADE's website at <http://www.azed.gov/hns/nslp/mealpattern/>. **Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/>.**
- Please provide copies of completed breakfast 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.***

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

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No findings.

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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 on the completion of your Administrative Review. Please contact your reviewer, Bekah McLeod, at [bekah.mcleod@azed.gov](mailto:bekah.mcleod@azed.gov) or 602-364-1335 with any questions.

**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?

☒ No- SBP

☐ Yes- SBP

☒ No- NSLP

☐ Yes- NSLP

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by July 6, 2020 to Bekah McLeod at [bekah.mcleod@azed.gov](mailto:bekah.mcleod@azed.gov).



6/8/2020

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>

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