



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

**Provision 2 Base Year - Administrative Review Summary Report**

School Food Authority Name: Union Elementary District

CTD: 07-04-62

Site: Dos Rios Elementary, Hurley Ranch Elementary, Union Elementary School

Contacts: Kristine Moore, Administrator | Kendell Paty, Director of Food Service

Review Date: January 30, 2020

Review Period: December 2019

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>			
1	Multiple applications were certified incorrectly or utilized incomplete information. This contributed toward fiscal action calculations.  1 application was certified for reduced-price eligibility when it should have been certified for free meal benefits 14 applications were certified using incomplete application information missing the correct number of household members 1 application was certified for benefits with an invalid case number application 5 applications were incorrectly certified with missing social security number information or adult signature	Discussed errors found and required corrective action. Referred to 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.	<i>Corrections have been made to certification errors. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student.</i>

**Performance Standard 1: Meal Counting & Claiming- Critical Area**

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| 2 | Meal count totals by category for the month of review were not correctly combined and recorded. This was deemed a systemic error in the breakfast in the classroom operations. | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. | <i>Changes to the procedures of meal counting and claiming have been made and a recalculation was conducted. No further corrective action is required at this time.</i> |
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A full fiscal recalculation of the breakfast program meal counts was conducted for SY19-20. Due to COVID-19 school closures, 19 days of breakfast counts were collected using the approved counting system for Breakfast in the Classroom.	Union Elementary District implemented procedures for counting Breakfast in the Classroom meal service using ID cards for each student. Teachers verify that the reimbursable breakfast was served and place those students' ID cards in a zippered pouch. A food service staff member scans the barcodes of the ID cards in the pouches and returns the pouches to the teachers for the next meal service.
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Fiscal action calculations resulted in a under-claim. Fiscal action calculations were disregarded.

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

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| 3 | The Free and Reduced-Price Policy Statement provided by the SFA does not align with current practices and procedures. | Referred them to FRPPS template on ADE's website at <a href="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a> . | <i>Please provide an updated and signed Free and Reduced-Price Policy Statement. Additionally, please provide written assurance that moving forward, the Free and Reduced Price Policy Statement will reflect current practices.</i> |
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Specifically, the FRPPS states the food service director is the designated official to make eligibility determinations while in practice the site managers perform this duty.

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| 4 | The household application approval process is not being completed within ten operating days of receipt of the application. | Referred to Application Processing Timeframe 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> . Discussed best practices (e.g. date stamp, secretary receives all incoming applications...) | <i>Please provide written procedures that will be implemented to ensure income applications are processed within ten operating days of receipt.</i> |
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**Meal Access & Reimbursement: Verification**

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| 5 | The verification sample size used was not correct based on the number of applications eligible for verification. Specifically, 10 application should have been verified, but 16 were actually verified. | Discussed correct calculation of sample size and which applications are subject to verification. Discussed attending ADE's Drop-in Workshop: Preparing for Verification. Referred to Verification Sample Size Calculator and Online Training: Verification Review found 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> . | <i>Please provide written procedures for how the verification sample size will be determined in the future.</i> |
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<p>6 The most recent verification report was not accurate.</p> <p>The report indicates that verification was completed by November 15th. However, review documentation indicated that verification activities were still occurring on 11/26/19.</p>	<p>Discussed that verification report must reflect actual verification process and results, discussed specific discrepancies. Discussed attending ADE's Drop-in Workshop: Submitting for Verification. Referred to Step by Step Instruction: How to Submit the Verification Report on CNP Verification found 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 a written description of the changes that have been implemented to ensure that the verification report will accurately reflect the verification practices and results that occurred.</i></p>
<p>7 Direct verification was not conducted appropriately. Specifically, record of direct verification matches was not maintained in the verification tracking records.</p>	<p>Referred to Step by Step Instruction: How to Conduct Direct Verification found 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 procedures for conducting direct verification and written assurance that direct verification will be conducted according to requirements on all applications selected for verification.</i></p>
<p>8 Households that failed to respond to verification were not given adequate follow-up.</p> <p>Specifically, the SFA provided documentation that did not show that the SFA made at least one attempt to contact the household when the household did not respond to the request for verification.</p>	<p>Discussed options for conducting follow-up for households that failed to respond to verification and potential timelines. Referred to Verification Tracking Form found on ADE's Verification webpage: <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 for following up with households that fail to respond to verification will be conducted.</i></p>
<p>9 Households selected for verification were not notified adequately. Specifically, the verification notice to households did not include a telephone number the household can call at no-cost for assistance.</p>	<p>Discussed the LEA may establish a toll-free number or allow the household to reverse the charges if any household in the LEA are outside of the local calling area. 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 households selected for verification will be notified according to requirements. Please also provide a copy of the notification letter that will be used for this purpose.</i></p>

- 10 Verification was not completed by November 15. Discussed requirement for completion of *Please provide written assurance that verification activities by November 15, as will be completed by November 15 each year, as well as specifics on what those activities well as the steps that will be taken to ensure this requirement is adhered to.*
- Specifically, review documentation indicated that verification activities were still occurring on 11/26/19.
- are. Referred to Verification Best Practices Calendar and Online Training: Verification Review found on ADE's Verification webpage:  
<http://www.azed.gov/hns/nslp/verification/>.

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

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No findings.

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**Comments/Recommendations:**

Congratulations! Union Elementary District has completed the Provision 2 Base Year administrative review for the 2019-2020 school year. Thank you for your effort during the review process! It is evident that you are working hard to ensure the program is operated well. ☺

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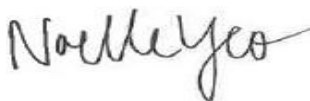
**To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at**  
<http://www.azed.gov/hns/nslp/>.

**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	-\$32,772.69
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	\$11,805.79

Please submit corrective action response by June 26, 2020 to Noelle Yeo at 1535 West Jefferson St. Bin #7, Phoenix AZ 85007 or [Noelle.Yeo@azed.gov](mailto:Noelle.Yeo@azed.gov).



6/5/2020

Reviewer Signature

Date



6/5/2020

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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