



Arizona Department of Education Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Pima Unified District

CTD: 05-02-06

Sites: Pima Elementary School and Dan Hinton Accommodation School

Contacts: Sean Rickert, District Superintendent and Jennifer Roberts, School Food Authority

Review Date: March 31, 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			
1	1 application was certified incorrectly or utilized incomplete information. Specifically, 1 application (1 student) was approved as free via extended direct certification eligibility when they did not reside in the household of a matched student. This contributed toward fiscal action calculations.	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 http://www.azed.gov/hns/nslp/trainingsps/online/ under the 3000- Administration tab.	<i>Corrections have been made to 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>
2	Multiple students who did not have any SY 19-20 certification documentation on file were provided free meal benefits past the 30-day carryover. This contributed towards fiscal action calculations.	Referred to Section 3: Establishing Eligibility in USDA's Eligibility Manual for School Meals found on ADE's website at http://www.azed.gov/hns/nslp/programguidance/ under The Eligibility Manual for School Meals.	<i>Corrections have been made to certification status of these students. Please provide written assurance that students eligible for meal benefits the previous school year who have not submitted certification documentation for the current school year will be placed in the paid category until further documentation is processed to certify the student in the free or reduced category.</i>
3	In multiple instances, the eligibility determined was not transferred correctly to the benefit issuance document. This contributed toward fiscal action calculations.	Discussed best practices (like having someone double check) for ensuring eligibility status is transferred to the benefit issuance document on a regular basis. The Step by Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingsps/online/ .	<i>Corrections have been made to the benefit issuance document. Please provide a written description of the process that will be implemented to ensure that the benefit issuance document matches all current students and their eligibility status.</i>

Performance Standard 1: Meal Counting & Claiming- Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities- Critical Area

4	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily fruit requirements were not met at breakfast throughout the week of review for grades K-12. This was not a repeat finding from cycle two and did not contribute 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 (e.g., increasing portions, offering additional fruit at breakfast, etc.). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. 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/trainingsps/online/. 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 fruit quantities at breakfast meet minimum amounts required by the K-12 meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p>
5	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly fruit requirements were not met at breakfast for grades K-12. This was not a repeat finding from cycle two and did not contribute 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 (e.g., increasing portions, offering additional fruit at breakfast, etc.). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. 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/trainingsps/online/. 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 fruit quantities at breakfast meet minimum amounts required by the K-12 meal pattern.</i></p>
6	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily grain quantities were not met at lunch on 02/12/20 for grades 9-12. This was not a repeat finding from cycle two and did not contribute 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 (e.g., revising the recipe, adding another grain to the entree, etc.). 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/trainingsps/online/. 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 grain quantities at lunch meet minimum amounts required by the 9-12 meal pattern.</i></p>

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly grain quantities were not met at lunch on 02/12/20 for grades 9-12. This was not a repeat finding from cycle two and did not contribute toward 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 (e.g., revising the recipe, adding another grain to the entree, etc.). 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/trainingsps/online/ . Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<i>Please provide a written description of the changes that have been made to ensure that weekly grain quantities at lunch meet minimum amounts required by the 9-12 meal pattern.</i>
7		

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

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

An individual separate from the application approval process has not been designated as the hearing official.	Referred to Hearing Procedure section in USDA's Eligibility Manual for School Meals. Discussed school official who could be designated.	<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>
8		

Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

SFA did not communicate their local meal charge policy in writing to all households at the beginning of the school year and/or during the school year for new students.	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 http://www.azed.gov/hns/memos/ .	<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>
9		

Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No findings.

Resource Management		
10	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.	Discussed ways to determine adult meal prices which included pricing adult meals to reflect the paid meal price plus the amount of reimbursement received for a paid meal plus the per meal value of entitlement and bonus commodities. <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>
General Program Compliance: Civil Rights		
<i>No findings.</i>		
General Program Compliance: SFA On-Site Monitoring		
11	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 http://www.azed.gov/hns/nsfp/forms/ 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 meal counting and claiming procedures each year prior to February 1.</i>
12	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 http://www.azed.gov/hns/nsfp/forms/ 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>
General Program Compliance: Local Wellness Policy		
13	Documentation was not provided to support that potential stakeholders are 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>
	<u>Observation:</u> Due to school closures as a result of COVID-19, the triennial assessment of the implementation of the local wellness policy (LWP) will not be conducted by June 30, 2020. The public must be notified of the results of the most recent assessment of the implementation of the LWP.	Per COVID-19: Child Nutrition Response #18, Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs- issued April 23, 2020- requirement to conduct a triennial assessment of the local wellness policy by June 30, 2020 has been waived. Discussed requirement to complete an assessment. 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/nsfp/lwp/ . Also discussed feasible means for notifying the public of the results of the most recent assessment. <i>None required at this time.</i> <i>Pima Unified District will complete their assessment by June 30, 2021.</i>

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

14	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. 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/trainingsps/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 Manager 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>
15	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 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/trainingsps/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 full-time School Nutrition Program staff are registered for.</i>
16	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 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/trainingsps/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 part-time School Nutrition Program staff are registered for.</i>

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

No findings.

General Program Compliance: Reporting & Recordkeeping

17	Meal contribution crediting is not accurate for all recipes. Specifically, pancakes credit as 1.75 oz eq grain, not 2.0 oz eq grain; graham crackers credit as 0.5 oz eq grain, not 1.0 oz eq grain; and Doritos used in walking tacos credit as 1.0 oz eq grain, not 1.5 oz eq grain.	Discussed updating recipes to reflect current products being used.	<i>Please provide an updated recipes and production records reflecting accurate crediting documentation for pancakes, graham crackers, and walking tacos.</i>
18	Production records for the salad bar did not contain accurate information. Specifically, salad bar production records stated that the salad bar offerings were for grades K-8 when they were offered to all grades (K-12).	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 for Multiple Grades can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/ . The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingsps/snparchivedwebinars/ .	<i>Please provide copies of a revised template for salad bar production records, as well as written assurance that all records will be maintained for 5 years.</i>

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

19	Although monthly menus are posted on district website and copies are available on-site, sufficient outreach to families regarding the availability of the SBP was not conducted at the beginning of or during the school year.. Specifically, the serving times, locations, and costs are not communicated at the beginning of and during the school year.	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. Additionally, discussed SBP reminders must include: serving times, SBP cost and availability.	<i>Please provide a 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>
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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.

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! Pima 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, 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/>.

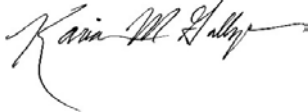
Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at
<http://www.azed.gov/hns/nslp/trainings/>.

Fiscal Action Assessed?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$178.05
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$508.43

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by July 24, 2020 to Kariann Gallegos at Kariann.Gallegos@azed.gov or 1535 West Jefferson Street Bin #7, Phoenix, AZ 85007.



6/16/2020

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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