



Arizona Department of Education Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Pinal County Juvenile Detention

CTD: 21-10-22

Site: HOPE School

Contacts: Jill Broussard, Superintendent; Blanca Molina, Juvenile Detention Supervisor

Review Date: September 27, 2019

Review Period: August 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
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Performance Standard 1: Certification & Benefit Issuance- Critical Area

No findings.

Performance Standard 1: Meal Counting & Claiming- Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities- Critical Area

1	Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum daily 2 oz. eq. requirement for meat/meat alternate were not met for Aug 5, Aug 6, Aug 9. Inaccurate crediting of taco meat recipe and insufficient crediting documentation of chicken patty and beef and bean burrito contributed to the finding.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (i.e. accurate recipes and labels for crediting). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program - can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern . The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ . 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 meat/meat alternate quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu</i>
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| <p>2 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum daily 2 oz. eq. requirement for grain were not met for Aug 5 and Aug 9. Insufficient crediting documentation of beef and bean burrito contributed to the finding and poor menu planning of chicken patty and pasta.</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. accurate recipes and labels for crediting). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program - can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/. 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 grain quantities meet minimum amounts required by the meal pattern.</i></p> |
| <p>3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum weekly 14 oz. eq. requirement for meat/meat alternate were not met. Inaccurate crediting of taco meat recipe and insufficient crediting documentation of chicken patty and beef and bean burrito contributed to the finding.</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. accurate recipes and labels for crediting). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program - can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/. 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 meat/meat alternate quantities meet minimum amounts required by the meal pattern.</i></p> |

<p>4 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum weekly 14 oz. eq. requirement for grain were not met. Insufficient crediting documentation of chicken patty and beef and bean burrito contributed to the finding.</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. accurate recipes and labels for crediting). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program - can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/. 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 grain quantities meet minimum amounts required by the meal pattern.</i></p>
<p>5 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum daily 1 cup requirement for vegetable was not met on Aug 5.</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. accurate recipes and labels for crediting). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program - can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/. 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 vegetable quantities meet minimum amounts required by the meal pattern.</i></p>

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

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification		
No findings.		
Meal Access & Reimbursement: Meal Counting & Claiming		
No findings.		
Meal Pattern & Nutritional Quality: Offer Versus Serve		
No findings.		
Meal Pattern & Nutritional Quality: Meal Components & Quantities		
No findings.		
Resource Management		
No findings.		
General Program Compliance: Civil Rights		
6	Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, process does not include identify the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights).	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 & Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights). 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: http://www.azed.gov/hns/civilrights/ . The Step by Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ .
		<i>Please provide a written description of the updated process and procedures for processing complaints alleging discrimination which meets requirements. Additionally, the certificate of completion of Step by Step Instruction: How to File a Civil Rights Complaint must be submitted.</i>
General Program Compliance: SFA On-Site Monitoring		
No findings.		
General Program Compliance: Local Wellness Policy		
No findings.		
General Program Compliance: Competitive Food Services		
No findings.		
General Program Compliance: Professional Standards		
No findings.		
General Program Compliance: Water		
No findings.		

General Program Compliance: Food Safety, Storage and Buy American

7	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools or at off-site storage facilities: Suncup apple juice. Additionally, documentation justifying a Buy American exception was not on file for this item.	Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the non-profit food service account must be used to procure food products that comply with the Buy American Provision. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at http://www.azed.gov/hns/nslp/forms/ . Buy American Recorded Webinar and FAQ can be found on ADE's website at http://www.azed.gov/hns/sfp/	<i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>
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General Program Compliance: Reporting & Recordkeeping

8	Production records for lunch provided did not contain all required sections: Specifically, production records used/left over section is not completed adequately.	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/trainings/snparchivedwebinars/ .	<i>Please provide copies of completed lunch 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.</i>
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9	Although advertising literature was provided for beef and bean burrito and breaded chicken patty, required documentation (CN label or PFS) was not provided to reviewer.	Discussed when processed products are used in Child Nutrition Programs to meet the meal pattern requirement, the product's contributions must be determined. CN Labels and/or Product Formulation Statements provide valuable crediting information; and only these will be accepted as proper crediting documentation. Guidance on Product Formulation Statements and CN Labels can be found on ADE's website under the Processed Product Documentation section found at www.azed.gov/hns/nslp/mealpattern . The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/ .	<i>Please provide a CN label and/or Product Formulation Statement for the beef and bean burrito and breaded chicken patty. If unable to provide a CN label or PFS, please provide written assurance that the product will no longer be offered/served to students. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. Additionally, the certificate of completion of CN Labels and Product Formulation Statements must be provided.</i>
10	Records documenting meal components and quantities were not kept on file for the minimum required 5 years. Specifically, menus and production records accurately reflecting NSLP meals served to students is not being maintained. For the week of review, Reviewer was provided two different menus and two different sets of production records.	Discussed record keeping requirements and timeframe of 5 years.	<i>Please provide written assurance that all documents pertaining to the school meal programs will be retained on file for at least 5 years, as is required by Arizona law, as well as a written plan for ensuring that this requirement is met.</i>
11	Production record crediting and recipe crediting are inconsistent. Specifically, production record credits rice as a vegetable and recipe credits as a grain.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage - http://www.azed.gov/hns/nslp/mealpattern/ .	<i>Please provide an updated recipe and production record with consistent crediting of rice.</i>
	Meal contribution crediting is not accurate for all recipes. Specifically, Taco meat credits as 1.75 oz. eq meat/meat alternate, not 2 oz. eq meat/meat alternate.	Discussed updating recipes to reflect current products being used.	<i>Please provide an updated recipe for Taco meat.</i>

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

No findings.

Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2020 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not applicable.

Other Federal Program Reviews: Special Milk Program

Not applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable.

Comments/Recommendations:

Congratulations! Pinal County Juvenile Detention has completed the Administrative Review for the 2019-2020 school year. Thank you for your hospitality during the review process.

Congratulations! Based on your menu documentation provided for the week of review, you are serving 100% whole grain-rich items! If this extends to your entire menu, please take a moment to sign ADE's Whole Grain Pledge at <https://www.surveymonkey.com/r/WholeGrainRichPledge> and be recognized for providing 100% whole grain-rich items. ADE appreciates your efforts in continuing to provide quality meals to Arizona students. Thank you!

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

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

Fiscal Action Assessed?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$0.00
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$0.00

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by July 22, 2020 to Sandy.Fitzner@azed.gov.



6/30/2020

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
1535 West Jefferson Street, Phoenix, Arizona 85007 • (602) 542-5460 • www.azed.gov
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