



Arizona Department of Education

Health and Nutrition Services Division

Seamless Summer Option Administrative Review Summary Report

Sponsor: Kin Dah Lichii Olta, Inc.

CTD: 01-91-12

Site: Kin Dah Lichi'i Olta

Contact: George Waybenais, Principal and Ronnie James, Operations Manager

Review Date: July 9, 2020

Review Period: April 2020

Review Type: ☒ SSO

Review Findings	Technical Assistance Provided	Required Corrective Action
SFA Operations		
1. In addition to operating the SSO at Kin Dah Lichi'i Olta, the SFA is operating five bus route "sites" that have not been approved in CNPWeb.	Discussed the necessary steps to add bus routes as sites in CNPWeb. Discussed requirements of submitting site applications in CNPWeb and getting these site applications approved by SFSP Specialist.	<i>SSO program ended on May 7, 2020 and SFA is no longer operating. Please provide written assurance that CNPWeb site applications will be submitted and approved for all sites operating the SSO/SFSP in the future.</i>
2. Advertising materials did not contain the required nondiscrimination statement. Specifically, emailed communication advertising the SSO on 4/13/20 did not contain the nondiscrimination statement.	Discussed where to find nondiscrimination statement on ADE's website at http://www.azed.gov/hns/civilrights / and whether long or short statement would be most appropriate.	<i>SSO program ended on May 7, 2020 and SFA is no longer operating. Please provide written assurance that all advertising materials will include the required nondiscrimination statement in the future.</i>

Site Agreement

No findings.

Site Eligibility

No findings.

Menu Planning

<p>3. Documentation did not support that all required meal components were offered and served during the review period. Specifically, SFA was not able to provide reviewer with lunch/snack production records for 4/22 and 4/23. Production records for 4/22 and 4/23 were either not completed, or were misplaced. Reviewer was unable to validate or determine if reimbursable lunch and snack meals were served to participants on these days. This contributed toward fiscal action calculations.</p>	<p>Discussed requirements for recordkeeping and meal pattern requirements for the grade groups served.</p>	<p><i>SSO program ended on May 7, 2020 and SFA is no longer operating. 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 are met. 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.</i></p>
<p>4. Production records did not support that all required meal components were offered and served for snack on 4/21. A 1.16 ounce package of raisins were served crediting as 1/2 cup fruit when 3/4 cup fruit needed to meet snack meal pattern requirement. Additionally, no other item/component was listed on production records. This contributed toward fiscal action calculations.</p>	<p>Discussed recordkeeping requirements. Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at http://www.azed.gov/hns/nslp/ascs p/.</p>	<p><i>SSO program ended on May 7, 2020 and SFA is no longer operating. Please provide a written description of the changes that have been made to the snack menu to bring it into compliance with the meal pattern requirements. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times.</i></p>
<p>5. SFA did not submit a waiver to ADE and did not keep daily records of meals with meal pattern deficiencies by component, per meal service when the meal pattern was not followed. Specifically: 4/20 = vegetable component was missing. Lead Cook was aware of meal pattern flexibilities in effect until June 1, 2020; however, she was not aware that a waiver must be submitted to ADE in order to utilize flexibility and that daily records for meals with meal pattern deficiencies, by component, must be kept on file to support use of meal pattern waiver. This did not contribute towards fiscal action calculations.</p>	<p>Discussed that ADE is permitted to provide SSO meal reimbursements when the meal pattern is unable to be met by the SFA providing the meals due to shortages and/or supply chain issues. SFAs must maintain daily records of meals with meal pattern deficiencies by component, per meal service. To support the claim for reimbursement of meals, the SFA is required to provide a meal pattern waiver request form to ADE. Effective June 1, 2020, all meals claimed for reimbursement must meet the meal pattern.</p>	<p><i>SSO program ended on May 7, 2020 and SFA is no longer operating. Please submit a waiver to ADE for each occurrence where the meal pattern was not met.</i></p>

<p>6. SFA did not submit a waiver to ADE and did not keep daily records of meals with meal pattern deficiencies by component, per meal service when the meal pattern was not followed.</p> <p>Specifically: Specifically: 4/20 = milk variety/fat content was not met (2% white milk served) and 4/21 = milk variety/fat content was not met (2% white milk served). Lead Cook was aware of meal pattern flexibilities in effect until June 1, 2020; however, she was not aware that a waiver must be submitted to ADE in order to utilize flexibility and that daily records for meals with meal pattern deficiencies by component must be kept on file to support use of meal pattern waiver. This did not contribute towards fiscal action calculations.</p>	<p>Discussed that ADE is permitted to provide SSO meal reimbursements when the meal pattern is unable to be met by the SFA providing the meals due to shortages and/or supply chain issues. SFAs must maintain daily records of meals with meal pattern deficiencies by component, per meal service. To support the claim for reimbursement of meals, the SFA is required to provide a meal pattern waiver request form to ADE. Effective June 1, 2020, all meals claimed for reimbursement must meet the meal pattern.</p>	<p><i>SSO program ended on May 7, 2020 and SFA is no longer operating. Please submit a waiver to ADE for each occurrence where the meal pattern was not met.</i></p>
<p>7. Production records did not support that all required meal components were offered and served on 4/21. Specifically, milk was not recorded on lunch production record on 4/21; however, reviewer determined that 2% white milk was served on 4/21.</p>	<p>Discussed requirements for recordkeeping and meal pattern requirements for the grade groups served.</p>	<p><i>SSO program ended on May 7, 2020 and SFA is no longer operating. 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>8. Quantities during the review period did not meet minimum amounts required by the meal pattern. Specifically, SFA did not provide reviewer with production records from 4/22 and 4/23; therefore, reviewer was unable to determine if the following daily or weekly quantity requirements were met: fruit requirement, vegetable requirement, M/MA requirement, grain requirement, milk requirement, and red/orange vegetable subgroup.</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 recordkeeping processes, 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/trainings/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 fruit, vegetable, M/MA, grain, milk, and red/orange subgroup 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 must be submitted.</i></p>

9. The following vegetable subgroups were not offered during the review period: dark green, bean/pea (legume), and other. Specifically, SFA did not provide reviewer with production records from 4/22 and 4/23; therefore, reviewer was unable to determine if these vegetable subgroups were met during week of menu review.	Discussed vegetable subgroup requirements for the age/grade groups served. Vegetable Subgroup Quick Guide 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 vegetable sub-groups may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<i>SSO program ended on May 7, 2020 and SFA is no longer operating. Please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu must be submitted.</i>
10. Production records for snack provided did not contain all required sections. Lunch and snacks were recorded daily on the same production records. However, snack production records used/left over section was 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/trainingsps/snparchivedwebinars/ .	<i>SSO program ended on May 7, 2020 and SFA is no longer operating. Please provide written assurance that production records used/left over section will be completed adequately. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>

Counting & Claiming

11. Meal count totals for the month of review (April 2020) were not correctly combined and recorded. By the time the SSO review docs were submitted to reviewer, and reviewed, the 60-day deadline to resubmit/revise the April 2020 claim had passed and the SFA does not have a 36-month One Time Exception claim available at this time. This was deemed a non-systemic error and contributed 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.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal counts will be accurately transcribed into monthly claims.</i>
12. Meal counts for each meal service during the month of review were not correctly recorded. Specifically, one meal count sheet was used for both lunch and snack counts.	Discussed that each meal service (lunch and snack) is required to have a separate meal counting sheet even if the meals are served at the same time. Referred to Memo HNS #21-2020: https://cms.azed.gov/home/GetDocumentFile?id=5e98766203e2b3173c94997f .	<i>SSO program ended on May 7, 2020 and SFA is no longer operating. Please provide written assurance that, in the future, meal counts for each meal service will be recorded separately.</i>

Media Release

No findings.

SFA Monitoring Responsibilities

13. SFA did not conduct an off-site review at least once during the site's operation. This monitoring requirement was not waived during the recent unanticipated school closure related to the COVID-19 pandemic.

Discussed the current requirement that monitoring shall be conducted by the sponsor at meal service sites to the maximum extent practicable, however the on-site portion of monitoring located at 7 CFR 225.15(d) has been waived. Effective July 1, 2020, SFAs must conduct on-site monitoring of all sites in operation.

SSO program ended on May 7, 2020 and SFA is no longer operating. Please provide a written description of how you will ensure that a site review will be conducted at least once during the site's operation if you plan on operating the SFSP in the future.

Civil Rights

14. The "And Justice for All" poster was not displayed at each point of service. Specifically, the "And Justice for All" poster was not displayed in view of program participants on each bus route.

Discussed requirements of where poster must be placed and where to find a printable "And Justice For All" poster on ADE's website at <http://www.azed.gov/hns/civilrights/>.

SSO program ended on May 7, 2020 and SFA is no longer operating. Please provide a written description of where the "And Justice For All" poster will be displayed if mobile sites are used in the future.

Food Safety

No findings.

Water

No findings.

Comments/Recommendations:

Congratulations, Kin Dah Lichii Olta, Inc. has completed the SSO Administrative Review for the 2019-2020 school year. You should be proud of the effort your team made to ensure your students received healthy school meals during this unprecedented time.

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
<input checked="" type="checkbox"/> No - SSO	<input type="checkbox"/> Yes- SSO	\$6,024.22

SSO portion of the NSLP Administrative Review resulted in an underclaim of \$6,024.22. ADE does not pay back Fiscal Action underclaims, so Fiscal Action will not be assessed on the SSO underclaim of \$6,024.22.

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **August 28, 2020** to Taryn Kunkel at Taryn.Kunkel@azed.gov.

Tamyn L. Kuhl

7/29/2020

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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