



State of Arizona
Department of Education

Administrative Review Summary Report

School Food Authority Name: Painted Desert Demonstration Projects, Inc.

CTD: 03-87-53

Site(s): STAR Charter School

Contact: Robyn David, Food Service Manager

Review Date: 09/20/2016

Review Period: August 2016

Programs Reviewed: National School Lunch School Breakfast Afterschool Snack
 Fresh Fruit & Vegetable Special Milk

Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
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Performance Standard 1: Certification & Benefit Issuance- Critical Area

Multiple applications were certified incorrectly or utilizing incomplete information. This contributed toward fiscal action calculations.	Discussed errors found and required corrective action. Referred to Processing Applications and Determining Completion of Submitted Application section in USDA's Eligibility Manual for School Meals.	<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>
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Performance Standard 1: Meal Counting & Claiming- Critical Area

In multiple instances, the eligibility determined was not transferred correctly to the benefit issuance document and/or the POS rosters. 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 and POS rosters on a regular basis.	<i>Please describe the process that will be implemented to ensure that the benefit issuance document and POS rosters match all current students and their eligibility status.</i>
August claims were inputted incorrectly as participants eligible per category and meal count totals per category were switched	Discussed errors found which were corrected before review date.	<i>Please provide a written description of changes that have been made to ensure accurate meal claims.</i>

Performance Standard 2: Meal Components & Quantities- Critical Area

On the day of review, it was observed that 4 meals counted for reimbursement did not contain all of the required meal components (milk).	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. 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. Please note that this finding contributed toward fiscal action calculations.	<i>Please provide a written description of the changes that have been made to ensure that all meals counted for reimbursement contain all of the required meal components.</i>
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Portion sizes observed on the day of review did not meet minimum amounts required by the meal pattern. 1/2 cup vegetable was being served when the meal pattern states 3/4 cup daily requirement for Serve Only.

Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (plan to serve additional 1/4 cup vegetable with chicken/veggie stir-fry). 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 AE's website at <http://www.azed.gov/health-nutrition/meal-pattern/>. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 6 cents).

Please provide a written description of the changes that have been made to ensure that portion sizes meet minimum amounts required by the meal pattern.

Diced Ham and Ham Patties could not be credited towards the meal pattern due to insufficient documentation.

Discussed when processed products are used in Child Nutrition Programs to meet the meal pattern requirement, the products' 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 <http://www.azed.gov/health-nutrition/meal-pattern/>. USDA Fact Sheets can be found on ADE's website at <http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets>.

Please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. Additionally, a CN label and/or Product Formulation Statement for the Diced Ham and Ham Patties must be provided.

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

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

Applications to be verified were not selected from error-prone applications.	Discussed requirement of selecting from error-prone applications and potential methods of identifying them. Referred to Error-Prone Worksheet found on ADE's website at http://www.azed.gov/health-nutrition/files/2016/04/error-prone-worksheet_16_17.pdf	<i>Please provide a written description of how error-prone applications will be identified and written assurance that applications to be verified will be selected from error-prone applications.</i>
Households that failed to respond to verification were not given adequate follow-up.	Discussed options for conducting follow-up for households that failed to respond to verification and potential timelines for conducting.	<i>Please provide written assurance that adequate follow-up will be conducted for households that fail to respond to verification.</i>
The notice of adverse action was not adequate.	Discussed requirements for notifying households of adverse action, including timelines and dates to be included on the notice. Referred to ADE's Letter of Verification Results found on ADE's website at http://www.azed.gov/health-nutrition/files/2016/08/v-5.-eng-letter-of-verification-results-english_16_17.docx .	<i>Please provide written assurance that an adequate notice of adverse action will be provided to households that will have a decrease in benefits. Please also provide a copy of the form that will be used for this purpose.</i>

Meal Access & Reimbursement: Meal Counting & Claiming

No findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

Not applicable.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No findings.

Resource Management

Expenditure "SUTA/ER EXPENSE" (unemployment) should not have charged \$6.32 to Nonprofit School Food Service Account	Discussed unallowable charges with the Business Manager.	<i>Please provide documentation showing that \$6.32 was credited to the Nonprofit School Food Service Account.</i>
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A process to sufficiently ensure compliance with the revenue from non-program foods requirements was not in place for adult meals.

Discussed Adult Meal price will vary every year due to changes in reimbursements and per meal value of USDA Foods. Suggested Adult Meal Price Formula: Federal reimbursement for a free student lunch + per meal value of USDA Foods = Minimum Adult Meal Price. Current per meal value of USDA Foods can be found at: <http://www.fns.usda.gov/fdd/value-donated-foods-notice>.

Please provide written assurance that the adult meal price will be updated yearly to reflect adjustments in USDA per meal value and reimbursements rates. If SFA chooses not to use the suggested Adult Meal Price Formula, please provide a description of how Adult Meal Prices will be calculated to ensure food cost, labor, and per value of USDA foods is covered.

General Program Compliance: Civil Rights

The public/media release was not customized to SFA. SFA is non-pricing which is not indicated in public/media release.

Discussed requirements for public/media release and strategies for customization of ADE template to accurately communicate non-pricing meal program to households.

Please provide copy of a customized public/media release that communicates non-pricing to households.

Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, the SFA's procedures involves the SFA attempting to resolve ~~complaints internally~~

Discussed identifying the outside agency to which complaints are forwarded (i.e. ADE, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights).

Please provide the updated written procedures for processing complaints alleging discrimination within FNS School Meal Programs which designate the outside agency to which complaints are forwarded.

The Civil Rights Compliance form is not being completed every year by December 15 and kept on file.

Discussed requirement for completing form and how to collect racial/ethnic data from program participants. Showed where form can be found on ADE's website at <http://www.azed.gov/health-nutrition/files/2012/01/civil-rights-compliance.doc>.

Please provide written assurance that the Civil Rights Compliance form will be completed by December 15 each year and kept on file for 5 years.

General Program Compliance: SFA On-Site Monitoring

Not applicable.

General Program Compliance: Local Wellness Policy

The LWP did not contain goals for nutrition promotion.

Discussed LEAs must fully comply with the requirements of the final rule by June 30, 2017. Reviewed handouts and discussed feasible options for nutrition promotion goals that can be written into the LWP. Activity ideas: Offering contests, surveys, promotions and/or taste testing. Providing information to families to encourage consumption of healthy foods at home. Posting nutrition and health posters. Team Nutrition Resources can be found at <http://teammnutrition.usda.gov>.

None required at this time.

The LWP did not contain policies for food and beverage marketing.

Discussed LEAs must fully comply with the requirements of the final rule by June 30, 2017. Additionally, discussed including policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Applies to : exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing.

None required at this time.

The public was not notified of the results of the most recent assessment of the implementation of the LWP.

Discussed LEAs must fully comply with the requirements of the final rule by June 30, 2017. Discussed the final rule requires that LEAs must make available to the public: The wellness policy, including any updates to and about the wellness policy on an annual basis, at a minimum. The Triannual Assessment, including progress towards meeting the goals of the policy. Additionally, discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP.

None required at this time.

General Program Compliance: Competitive Food Services

Not applicable.

General Program Compliance: Professional Standards

The School Nutrition Program Director hired after July 1, 2015 was not able to provide documentation of required 8 hours of food safety training within 30 days of being hired or within 5 years prior to hire date

Discussed requirement and feasibility for attending an available certification training within current school year. Food Safety Online Courses can be found on ICN's website at <http://www.nfsmi.org/Templates/TemplateDefault.aspx?q=cEIEPTIzNw==>.

Please provide either documentation of 8 hours of food safety training or the expected date that food safety certification training will be completed by the School Nutrition Program Director.

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 <http://www.azed.gov/health-nutrition/ncn/training/>

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.

Professional Standards training hours are not being adequately tracked on an annual basis.

Referred to ADE's Training Tracking forms found on ADE's website at <http://www.azed.gov/health-nutrition/usda-professional-standards-new/>

Please provide written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis. Additionally, provide a copy of the tracker that will be used

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

The written food safety plan is not being implemented. On day of review, Lactaid Milk was not held properly to ensure proper temperature during meal service.	Discussed keeping Lactaid Milk held on ice during meal service to ensure proper temperature.	<i>Please provide written assurance that Lactaid Milk will be held on ice during meal service to ensure proper temperature.</i>
The most recent food safety inspection report was not posted in a publicly visible location.	Discussed making copies of most recent report and feasible places for posting.	<i>Please provide written assurance that the most recent food safety inspection report has been posted in a location where the program participants can view it.</i>

General Program Compliance: Reporting & Recordkeeping

Outdated USDA recipes were provided listing enriched wheat products.	Discussed updating all recipes to reflect Whole Grain Rich requirements are being met.	<i>Please provide written assurance that all recipes will be updated with Whole Grain-Rich Requirements. Additionally, provide an updated recipe.</i>
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General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

Families were not notified of the availability of the SFSP prior to the end of the school year.	Discussed methods of notifying families of the availability of the SFSP prior to the end of the school year and determined which was most feasible. Summer feeding locations can be found at http://www.eatwellbewell.org/ . Call 1(800) 5-HUNGRY for more information and/or go to http://www.whyhunger.org/ . Discussed contacting CACFP Specialist of the Day in regards to participating in Summer Feeding.	<i>Please provide a description of how families will be notified of the availability of the SFSP prior to the end of the school year, and written assurance that this will occur. If you do not plan to operate the SFSP and no other entities reasonably close to your school operate the SFSP, please provide a description of other community resources that will be provided to families prior to the end of the school year.</i>
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Other Federal Program Reviews: Afterschool Snack Program

Production records do not support that the ASP meal pattern was met on the following dates: Only 1/2 cup of fruit was served on 8/23/16; Meal Pattern requires 3/4 cup fruit/vegetable.	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/wp-content/uploads/PDF/ASCPMealPattern.pdf .	<i>Please provide copies of completed ASP production records and supporting menu documentation for 5 consecutive days showing that ASP meal pattern requirements have been met, as well as written assurance that the ASP meal pattern will be adhered to at all times.</i>
The ASP monitoring review was not conducted within the first four weeks of operation.	Discussed ASP monitoring requirements must be conducted within the first four weeks of operation and one additional time during the school year. A sample ASP monitoring form can be found on ADE's website at: http://www.azed.gov/wp-content/uploads/PDF/SnackOnSiteReviewForm.pdf .	<i>Please provide written assurance that the ASP will be monitored once within the first four weeks of operation and one additional time during the school year, and that documentation to support this will be maintained.</i>

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2017 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not applicable.

Other Federal Program Reviews: Special Milk Program

Not applicable.

Comments/Recommendations:

Congratulations! Painted Desert Demonstration Projects, Inc. has completed the Administrative Review in the 2016-2017 school year. You are doing a wonderful job implementing the National School Lunch, School Breakfast, and Afterschool Snack Programs. Please keep up the great work and remember to contact ADE Health & Nutrition with any questions or concerns. Thank you for your hard work and hospitality throughout this review, it was a pleasure working with all of you.

To stay on track with NSLP requirements checkout the NSLP at a Glance Calendar & Monthly Checklist on our website at http://www.azed.gov/health-nutrition/files/2016/07/sy-16_17-nslp-calendar7.20.16.pdf

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

Fiscal Action Assessed?

Yes- SBP No- SBP Yes- NSLP No- NSLP

Please submit corrective action response by November 4, 2016 to Kariann Gallegos, 1535 West Jefferson Street, Phoenix, Arizona 85007.



10/20/2016

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the Administrative Review Appeal Procedures found in your Child Nutrition Programs Guidance Manual.