



State of Arizona
Department of Education

HNS# 050-13
SP 55-2013

MEMORANDUM

To: Sponsors of the National School Lunch Program

From: Mary Szafranski, Deputy Associate Superintendent
Arizona Department of Education, Health & Nutrition Services

Cara Peczkowski, Director
Arizona Department of Education, School Nutrition Programs

Date: September 1, 2013

RE: Questions and Answers Related to 6 cents Certification during School Year
2013-2014

Original Signed

Attached are questions and answers related to certification of compliance with meal pattern requirements during School Year (SY) 2013-2014. The Food and Nutrition Service (FNS) has received many comments and questions on the certification process in SY 2013-2014. As a result, FNS is providing these questions and answers to assist with the certification process during SY 2013-2014.

It should be noted that these questions and answers apply specifically to SY 2013-2014.

Please contact your School Nutrition Programs Specialist for questions concerning this guidance. Contact information can be found on the CNP Web homepage once logged into Common Logon.



Background

The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) provides the additional 6 cents per lunch reimbursement to School Food Authorities (SFAs) certified by the Arizona Department of Education (ADE) to be in compliance with the new meal pattern requirements.

In implementing the new meal requirements, many SFAs have found it challenging to meet the weekly maximum limits for grains and meat/meat alternates. To help SFAs make the transition to the new requirements, ADE issued CN 26-13, FNS Guidance to School Food Authorities: Flexibility in the Meat/Meat Alternate and Grain Maximums for School Year 2012-2013, providing flexibility to SFAs regarding the weekly grains and meat/alternates maximums for SY 2012-2013. These flexibilities were later extended through SY 2013-2014 in HNS 018-13, and USDA recently announced that they will be made permanent. For the purposes of Certification for the additional 6 cents reimbursement, ADE will consider SFAs compliant with these component requirements even if they have exceeded the weekly maximums for lunch and breakfast.

In general, the certification process in SY 2013-2014 works as follows:

- SFA is certified by one of two methods:
 - 1.) SFA submits certification documentation to ADE; or
 - 2.) SFA is certified during an administrative review
- If SFA submits documentation, ADE makes a certification determination within 60 days.
- Certified SFAs must annually attest to ongoing compliance with the meal patterns each year through SY 2014-2015.
- Ongoing compliance with the meal pattern requirements is monitored during administrative reviews.

Certification in SY 2013-2014

Q1. Can SFAs apply for certification in SY 2013-2014?

Yes, SFAs that have not yet applied for certification may apply for certification in SY 2013-2014. Generally, the certification process will work the same as it did in SY 2012-2013 with SFAs applying for certification as they are ready to be certified. Those SFAs wishing to submit certification documentation should use either Option 1 or 2 for certification (refer to HNS 008-13 for more information on Options 1 or 2). FNS has updated the FNS-developed 6 cents certification tools for lunch and breakfast to reflect new meal pattern requirements in SY 2013-14. These tools can be accessed through the ADE webpage - Certification for the Additional 6 Cents: <http://www.azed.gov/health-nutrition/nslp/menu-certification/>.

ADE will conduct an on-site certification of those SFAs that have not yet been certified when conducting administrative reviews of these SFAs in SY 2013-2014.



Q2. What process should ADE follow when conducting on-site certifications during administrative reviews in SY 2013-2014?

When conducting on-site certifications, ADE will evaluate a menu representing each menu type within the SFA. This includes using a USDA-approved Menu Planning Tool for Certification for 6 Cents Reimbursement to assess meal components. Additionally, ADE must also conduct a nutrient analysis of calories and saturated fats.

In addition to the usual requirements for administrative reviews, ADE conducting certification during the administrative review must also visit one school representing each menu type being certified. In each of the visited schools, ADE will observe meal service and review production records for the observed meals to ensure they are consistent with the menus on which certification was based and that observed meals meet the updated meal pattern requirements and certification documentation.

Q3. May SFAs use and be certified based on a Nutrient Standard Menu Planning approach for breakfasts in SY 2013-2014?

No. SY 2012-2013 was the last year for Nutrient Standard Menu Planning for breakfast. Beginning SY 2013-2014, all schools must adopt the food based menu planning approach for breakfast. There is no additional certification required if SFAs were certified in SY 2012-2013 on the basis of the Nutrient Standard Menu Planning approach for breakfast. All SFAs, including those certified on the previous breakfast meal pattern, must annually attest to ongoing compliance with the meal pattern; which includes the implementation of the updated breakfast pattern.

Q4. What certification documentation must be submitted by SFAs for breakfast in SY 2013-2014?

SFAs must submit certification documentation reflective of the meal pattern requirement in effect at the time they apply for certification. Therefore, if an SFA applies for certification in SY 2013-2014, they need to demonstrate compliance with the breakfast requirements in effect for SY 2013-2014.

ADE will require the following for each breakfast menu type within the SFA:

Option 1: One-Week Menu, *Breakfast Menu Worksheet, Nutrient Analysis

Option 2: One-Week Menu, *Breakfast Menu Worksheet with the completed Simplified Nutrient Assessment tab

*The FNS Breakfast Menu Worksheet has been updated to include the SY 2013-2014 requirements. The worksheet also includes a simplified nutrient assessment of calories and saturated fat. During this year of transition for breakfast requirements, FNS will not be approving alternative software for breakfast certification. SFAs wishing to use software other than the FNS-provided breakfast tool should consult with their School Nutrition Programs Specialist.



For more information on the Certification submission, please refer to the ADE webpage - Certification for the Additional 6 Cents: <http://www.azed.gov/health-nutrition/nsfp/menu-certification/>.

Q5. Can ADE conduct a validation review in SY 2013-2014?

No, ADE was required to conduct validation reviews of 25 percent of the SFAs certified in SY 2012-2013 only.

Q6. How will ADE prioritize SFAs for administrative review in the first administrative review cycle?

During SY 2013-2014, ADE must include any SFA scheduled for review in SY 2012-2013 whose review was postponed. In addition, ADE is required to conduct an administrative review early in the review cycle for any SFA that has not applied for certification or whose certification request was denied during the certification process, or “turned off” during a validation review for significant meal pattern violations.

Q7. What happens when ADE conducts an on-site certification during an administrative review but the SFA is unable to be certified?

In this scenario, ADE, in conjunction with the SFA, should develop a corrective action plan with specific steps (i.e. required trainings and/or technical assistance) and reasonable timeframes for the SFA to begin serving meals compliant with the meal pattern requirements and become certified.

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