



Arizona Department of Education
Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Tolleson Elementary District

CTD: 07-04-17

Site: Sheely Farms Elementary School

Contacts: Dr. Lupita Hightower, Superintendent and Dr. Myriam Roa, Executive Director of Business Services

Review Date: January 17, 2019

Review Period: December 2018

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

<p>In multiple instances, the eligibility determined was not transferred correctly to the benefit issuance document. Specifically, four application eligibility determinations were not transferred to the benefit issuance document accurately to reflect eligibility changes. This contributed toward fiscal action calculations.</p>	<p>Discussed best practices of verifying updates in the benefit issuance document manually for ensuring eligibility status is transferred to the benefit issuance document on a regular basis.</p>	<p><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></p>
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Performance Standard 1: Meal Counting & Claiming- Critical Area

<p>On the day of review, it was observed meals counted for reimbursement did not contain all of the required meal components. Specifically, during breakfast in the classroom, meals counted were not reimbursable meals. This was deemed a systemic error and contributed towards fiscal action calculations. A full recalculation of breakfast for the months of August through April was conducted.</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Discussed with classroom and kitchen staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal.</p>	<p><i>Changes to the procedures of meal counting and claiming have been made and a recalculation was conducted. Fiscal action calculations were assessed. No further corrective action is required at this time.</i></p>
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<p>During the review period, breakfast service counts did not support that reimbursable meal counts are accurate. Specifically, manual counts obtained from breakfast in the classroom rosters and electronic POS breakfast counts were inconsistent. This was deemed a systemic error and contributed towards fiscal action calculations. A full recalculation of breakfasts served for the months of August through April was conducted.</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Classroom rosters were updated to effectively obtain counts by category correctly used in the claim for reimbursement.</p>	<p><i>Changes to the procedures of meal counting and claiming have been made and a recalculation was conducted. Fiscal action calculations were assessed. No further corrective action is required at this time.</i></p>
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Performance Standard 2: Meal Components & Quantities- Critical Area

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, during the week of review 7.5 oz. eq. of Grain was offered and not the weekly minimum of 8 oz. eq. of Grain required. This was not a repeat finding and, therefore, did not contribute to 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 such as verifying weekly Grain oz. eq. totals. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern . Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 6 cents).	<i>Please provide a written description of the changes that have been made to ensure that weekly Grain quantities meet minimum amounts required by the meal pattern.</i>
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Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No Findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

The benefit issuance document does not correctly reflect the date eligibility status changes were made. Specifically, a household that failed to respond to verification had benefits terminated, but the date eligibility status changed was not accurately reflected on the BID.	Referred to Step by Step Instruction: How to Create a Benefit Issuance Document (BID) on ADE's website found at http://www.azed.gov/hns/nslp/trainingps/ .	<i>Please provide written assurance that the benefit issuance document will provide accurate dates of eligibility changes.</i>
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Meal Access & Reimbursement: Verification

The most recent verification summary report was not accurate. Specifically, eight household applications with a total of nine students were directly verified, but the SFA reported ten students as directly verified on the Verification Summary Report.	Discussed that verification report must reflect actual verification process and results, discussed specific discrepancies. Discussed attending ADE's Drop-in Workshop: Submitting for Verification. Referred to Step by Step Instruction: How to Submit the Verification Report on CNP Verification found on ADE's Verification webpage: http://www.azed.gov/hns/nslp/verification/ .	<i>Please provide written assurance that the verification report will accurately reflect the verification practices and results that occurred.</i>
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Verification procedures were not followed correctly. Specifically, Direct Verification was conducted on the entire enrollment and not just the students selected for verification.	Discussed how to conduct direct verification in ADEConnect CNP Direct Certification/Direct Verification. Referred to Step by Step Instruction: How to Conduct Direct Verification found on ADE's Verification webpage: http://www.azed.gov/hns/nslp/verification/ .	<i>Please provide written assurance that direct verification will be conducted according to the required procedures.</i>
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Households that failed to respond to verification were not given adequate follow-up. Specifically, the households who failed to respond to verification were not provided 10 days of notice before terminating benefits.	Discussed requirements for notifying households of adverse action, including timelines and dates to be included on the notice.	<i>Please provide written assurance that an adequate notice of adverse action will be provided to households that will have a decrease in benefits.</i>
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Verification procedures were not followed correctly. Specifically, benefits were not decreased no later than 10 operating days from the final decision. Letters of adverse action were sent out on November 15th stating that the change of benefits would take effect on November 16th.	Discussed proper verification procedures and referred to ADE's Verification Tracking Form on ADE's website at http://www.azed.gov/hns/nslp/verification . Online Training: Verification Review can be found at http://www.azed.gov/hns/nslp/trainings/online .	<i>Please provide written assurance that benefits will be increased no later than 3 operating days and decreased no later than 10 operating days from the final decision.</i>
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Meal Access & Reimbursement: Meal Counting & Claiming

Daily edit checks are not being conducted appropriately. Specifically, the Attendance Factor was not on the Daily Edit Check.	Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. The Daily Edit Check Worksheet can be found on ADE's website http://www.azed.gov/hns/nslp/forms/ .	<i>Please provide written assurance that daily edit checks will be conducted. Additionally, provide a copy of a completed daily edit check worksheet.</i>
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Meal Pattern & Nutritional Quality: Offer Versus Serve

Signage which explains what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit for breakfast was not displayed to students. Specifically, only one classroom had signage explaining what constitutes a reimbursable meal for breakfast.	Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/	<i>Please provide written assurance that signage explaining to students what constitutes a reimbursable breakfast has been displayed.</i>
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OVS was not implemented properly. Specifically, classroom teachers administering Breakfast in the Classroom were not adequately trained on the requirements of a reimbursable breakfast.	Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be found on ADE's website at http://www.azed.gov/hns/nslp/programguidance/ .	<i>Please provide written assurance that OVS will be properly implemented.</i>
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Meal Pattern & Nutritional Quality: Meal Components & Quantities

Pre-K students were not co-mingled and the SFA was not utilizing the new preschool meal pattern. , therefore they need to be implementing the new preschool meal pattern.	Discussed requirements for pre-k students who are not co-mingled, specifically utilizing a separate menu and production record to support meal pattern compliance. Referred to SP 01-2018 Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers. Referred to CACFP New Meal Pattern Requirements webpage: http://www.azed.gov/hns/cacfp/cacfpmealpattern/ .	<i>None required at this time.</i>
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Resource Management

Net cash resources available in the nonprofit school food service account exceed the three month expenditure limit and a spending plan has not been approved by ADE.	Discussed requirement that net cash resources must be limited to an amount that does not exceed 3 months average expenditures without prior approval from the ADE. Referred to 7 CFR 210.19.	<i>SFA is currently working with their School Nutrition Programs Specialist on getting a spending plan approved. No further corrective action is required at this time.</i>
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General Program Compliance: Civil Rights

The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, an older version of the nondiscrimination statement was being utilized on program menus.	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>Please provide written assurance that all program materials have been updated with the proper language. Additionally, an updated program material with the correct nondiscrimination statement must be provided to the reviewer.</i>
Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, complaints alleging discrimination within the school meal programs are handled internally.	Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded to USDA Office of Civil Rights. The SFA's procedures must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, 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/ .	<i>Please provide a written description of the updated process and procedures for processing complaints alleging discrimination which meets requirements.</i>

Medical statement for students with special dietary accommodations includes "Diagnosis requiring diet modification."

Referred to SP 26-2017: Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers (Q&As), question 15, the State agency or SFA may not require that the written medical statement provide a specific diagnosis by name or use the term "disabled" or "disability." Additionally, discussed updating Special Dietary Needs Form to include the language "a physical or mental impairment that restricts the child's diet" as outlined in policy memorandum SP 59-2016: Modifications to Accommodate Disabilities in the School Meal Programs.

Please provide written assurance that the Special Dietary Needs Form will be updated to include the language "a physical or mental impairment that restricts the child's diet". Additionally, provide a copy of the updated Special Dietary Needs Form.

General Program Compliance: SFA On-Site Monitoring

No Findings.

General Program Compliance: Local Wellness Policy

A recent assessment of the implementation of the LWP has not been conducted nor have plans been developed to complete the assessment.

Discussed requirement to complete an assessment once every three years, at a minimum. 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/nslp/lwp/>. Also discussed feasible means for notifying the public of the results of the most recent assessment.

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 requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. The USDA's Local Wellness Policy Outreach Toolkit can be found at <https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit>.

None required at this time.

General Program Compliance: Competitive Food Services

No Findings.

General Program Compliance: Professional Standards

The School Nutrition Program Director hired after July 1, 2015 did not complete the 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.theicn.org/ResourceOverview.aspx?ID=573 .	<i>Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.</i>
The School Nutrition Program Directors 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/hns/nslp/training/	<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 Directors are registered for.</i>
Professional Standards training hours are not being adequately tracked. Specifically, staff were incorrectly inputted in training tracker with incorrect job category.	Discussed feasibility of different tracking methods for school year 2019-2020. Suggested updating their own training tracker with all required information or upgrading current software system which does provide a sufficient tracking report.	<i>Please provide a written description of how Professional Standards training hours will be tracked accurately per staff job category and utilized to ensure that all School Nutrition Program staff meet their training requirements.</i>

General Program Compliance: Water

No Findings.

General Program Compliance: Food Safety, Storage and Buy American

The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: pineapple (Asia), bananas (Asia), jalapeno (Mexico) items. Additionally, documentation justifying a Buy American exception was not maintained/on file.	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/nslp/trainingps/ .	<i>Please provide a written description of the changes that have been made to recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>
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Storage violations were observed. Specifically, cooked ground beef was left in the walk-in uncovered.

Discussed specific violations and feasible solutions. Referred to Arizona's School Food Safety Guidance found on ADE's website at <http://www.azed.gov/hns/nslp/foodsafety/>.

Please provide a written description of the changes that have been made to correct the storage violations found.

General Program Compliance: Reporting & Recordkeeping

No Findings.

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

No Findings.

Other Federal Program Reviews: Afterschool Snack Program

No Findings.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2019 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not Applicable.

Other Federal Program Reviews: Special Milk Program

Not Applicable.

Comments/Recommendations:

Congratulations! Tolleson Elementary District has completed the Administrative Review for the 2018-2019 school year. Thank you for your hospitality during the review process. It is evident that you are working hard to ensure your students are fed healthy meals.

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/>.

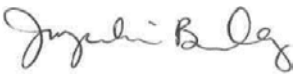
Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainingsps/>.

Fiscal Action Assessed?

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

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by August 30, 2019 to Joyce Benally at 1535 West Jefferson Street Bin #7 Phoenix, Arizona 85007 and/or Joyce.Benally@azed.gov.



8/27/2019

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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