



**Arizona Department of Education
Health and Nutrition Services Division**

Administrative Review Summary Report

School Food Authority Name: Morenci Unified District

CTD: 06-02-18

Site: Metcalf Elementary School

Contacts: David Woodall, Superintendent; Deborah Lucero, Cafeteria Manager

Review Date: March 31, 2020; Exit Conference Date: June 12, 2020

Review Period: February 2020

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

No findings.

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

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

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| 1 | Direct certification matches were not conducted according the proper time frames, which is at least once at or around the beginning of the school year, three months after the initial effort and six months after the initial effort). | Referred to Direct Certification for Assistance Programs section in USDA's Eligibility Manual for School Meals. Used school calendar to plot timeframes for running reports. The NSLP At A Glance Calendar which contains timeframes to run DC can be found on ADE's webpage at http://www.azed.gov/hns/nslp/ . | <i>Please provide a written description of the changes that have been implemented to ensure direct certification will be conducted according to the proper time frames. Additionally, please provide written assurance that, moving forward, direct certification will be run according to the prescribed timeframes for all students enrolled.</i> |
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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

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| 2 | Net cash resources available in the nonprofit school food service account exceed the three month expenditure limit and approval from the ADE was not obtained. | 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>Please provide documentation reflecting that net cash resources are below the 3 month average expenditure limit or provide a detailed spending plan to ADE for approval to maintain a balance in excess of the net cash resource limit.</i> |
| 3 | Compliance with the Revenue from Nonprogram Foods requirements via either the Nonprogram Foods Tool or 5-Day Reference Period as described in FNS Policy Memo SP 20-2016 was not assessed. | Discussed revenue from non-program foods requirements and provided with Non-Program Food Revenue Tool. Referred to FNS Instruction 782-5 REV. 1 for more information about pricing for non-program adult meals. | <i>Please complete and submit either the USDA Non-Program Foods Tool or 5-Day Reference Period as evidence of compliance with revenue from nonprogram foods requirements.</i> |

General Program Compliance: Civil Rights

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| 4 | Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically the policy does not state the SFA will forward the complaint to the appropriate outside agency (ex. ADE, FNS) for investigation. | Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., SA, FNSRO, FNS Office of Civil Rights, or 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/ . 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/trainingsps/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> |
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General Program Compliance: SFA On-Site Monitoring

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| 5 | On-site reviews of the lunch meal counting and claiming procedures for all sites within the SFA are not being conducted each year prior to February 1. | Discussed requirement and where to find a template Internal On-Site Monitoring Form- Lunch of the Meal Counting and Claiming System found on ADE's website at http://www.azed.gov/hns/nslp/forms/ under Additional Forms. Discussed who would be responsible for completing this each year. | <i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System. Additionally, please provide a written description of the process that has been put in place to ensure that all sites receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i> |
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General Program Compliance: Local Wellness Policy

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| 6 | The public is not being notified of the existence and contents of the LWP. | Discussed feasible means of notifying the public about the LWP. | <i>None required at this time.</i> |
| 7 | The review and update of the LWP, as specified in the policy itself, is not occurring nor is documentation being kept on file to support this. | Discussed why the review and update is not occurring and what can be done to ensure this occurs as specified in the LWP. Discussed maintaining records to document compliance. | <i>None required at this time.</i> |

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| 8 | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the LWP. | Discussed feasible means of notifying potential stakeholders of their ability to participate. | <i>None required at this time.</i> |
| 9 | 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. | <i>None required at this time.</i> |
| 10 | The public was not notified of the results of the most recent assessment of the implementation of the LWP because and assessment was not completed. | 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 . | <i>None required at this time.</i> |

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

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| 11 | Full-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. | Discussed 6 hour training 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/ . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingsps/online/ . | <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 full-time School Nutrition Program staff are registered for. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i> |
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| 12 | Part-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. | Discussed 4 hour training 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/ . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingsps/online/ . | <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 Part-time School Nutrition Program staff are registered for.</i> |
| 13 | Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training. | Discussed 4 hour training requirement, employees' job duties and applicable trainings that could be provided and feasible timeline. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/hns/nslp/training/ . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingsps/online/ . | <i>Please provide name(s) and job title(s) of any non-program employees whose responsibilities assist in the operation of the NSLP/SBP, along with the expected date that the training requirement will be met as well as the name, date and content information of trainings that these employees will receive.</i> |

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 14 | Documentation was not provided to support that the school received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department. | Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year. | <i>Please provide the two most recent food safety inspections from the 2019/2020 school year. If two food safety inspections were not received in SY2019/2020, please written assurance that documentation to show that two food safety inspections were received and/or requested from the local health department each school year</i> |
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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

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 on the completion of your Administrative Review. Please contact your reviewer, Bekah McLeod, at bekah.mcleod@azed.gov or 602-364-1335 with any questions.

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/trainings/>.

Fiscal Action Assessed?

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

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by July 15, 2020 to Bekah McLeod at bekah.mcleod@azed.gov.



6/23/2020

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
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