



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Pima County Doc Work Center

CTD: 10-10-02

Site: Pima County Jail

Contacts: Chuck Huckelberry, County Administrator and Frieda Stafford, Kitchen Manager

Review Date: November 24, 2020

Review Period: October 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

1	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly Meat/Meat Alternate quantities were insufficient during lunch for grades 9-12. This was not a repeat finding from cycle two and did not contribute toward fiscal action calculations.</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., maintaining crediting documentation to credit meat/meat alternate toward the meal pattern and increasing meat/meat alternate on insufficient days to meet weekly minimum). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. 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 weekly Meat/Meat Alternate quantities meet minimum amounts required by the meal pattern for grades 9-12.</i></p>
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| 2 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily Meat/Meat Alternate quantities were insufficient on 10/5/20, 10/6/20, 10/8/20, 10/9/20 and 10/10/20 during lunch for grades 9-12. This was not a repeat finding from cycle two and did not contribute 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 (e.g., maintaining crediting documentation to credit meat/meat alternate toward the meal pattern and increasing meat/meat alternate on insufficient days to meet minimum). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents). | <i>Please provide a written description of the changes that have been made to ensure that daily Meat/Meat Alternate quantities meet minimum amounts required by the meal pattern for grades 9-12.</i> |
| 3 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily Grain quantities were insufficient on 10/5/20, 10/6/20, 10/8/20 and 10/10/20 during lunch for grades 9-12. This was not a repeat finding from cycle two and did not contribute 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 (e.g., increasing grain on insufficient days to meet minimum). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).   | <i>Please provide a written description of the changes that have been made to ensure that daily Grain quantities meet minimum amounts required by the meal pattern for grades 9-12.</i>               |
| 4 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily Vegetable quantities were insufficient on 10/6/20 and 10/9/20 during lunch for grades 9-12, not providing the 1 cup daily minimum required. This was not a repeat finding from cycle two and did not contribute 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 (e.g., increasing vegetable servings on insufficient days to meet daily required minimum). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).   | <i>Please provide a written description of the changes that have been made to ensure that daily Vegetable quantities meet minimum amounts required by the meal pattern for grades 9-12.</i>           |

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| 5 | <p>The following products could not be credited towards the meal pattern due to insufficient documentation: Chicken Fajitas, Turkey Franks, Turkey Bologna, Waffles and Ham. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met. This was not a repeat finding from cycle two and did not contribute toward fiscal action calculations.</p>  | <p>Discussed requirements regarding processed product documentation and provided examples. USDA Food Fact Sheets can be found on USDA's website at <a href="http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/">http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/</a>. The CN Labels and Product Formulation Statements Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Recorded Webinars tab. 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 CN label and/or Product Formulation Statement for Chicken Fajitas, Turkey Franks, Turkey Bologna and Ham. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. Additionally, the certificate of completion of CN Labels and Product Formulation Statements must be submitted.</i></p> |
| 6 | <p>Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically, daily Meat/Meat Alternate quantities were insufficient during lunch for grades 9-12 providing 1.75 oz eq Meat/Meat Alternate and not 2.0 oz eq daily minimum required. This was not a repeat finding from cycle two and did not contribute toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., maintaining crediting documentation to credit meat/meat alternate toward the meal pattern and increasing meat/meat alternate on insufficient days to meet daily minimum). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. 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 daily Meat/Meat Alternate quantities meet minimum amounts required by the meal pattern for grades 9-12.</i></p>  |
| 7 | <p>Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically, daily Grain quantities were insufficient during lunch for grades 9-12, providing 1.75 oz eq of Grain and not the 2.0 oz eq daily minimum required. This was not a repeat finding from cycle two and did not contribute toward fiscal action calculations.</p>                     | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., increasing grain on insufficient days to meet daily minimum). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. 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 daily Grain quantities meet minimum amounts required by the meal pattern for grades 9-12.</i></p>  |

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

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No Findings.

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**Meal Access & Reimbursement: Certification & Benefit Issuance**

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| 8 | The documentation sheet for all children residing in the RCCI did not contain all of the required information. Specifically, the list did not contain the income, date of birth, date of admission, date of release, or the official's signature, title, and contact information. | Reviewed requirements for certification documentation for residents. Referred to the "Special Situations when Determining Eligibility" of USDA's Eligibility Manual for School Meals found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals tab. | <i>Please provide written assurance that the certification list for residents will contain all of the required information henceforth. Additionally, please provide a copy of the updated Master List which contains all of the required information.</i> |
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**Meal Access & Reimbursement: Verification**

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No Findings.

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**Meal Access & Reimbursement: Meal Counting & Claiming**

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| 9 | Daily edit checks are not being conducted. | 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 at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. The Step by Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> | <i>Please provide a completed daily edit check worksheet for the month of December 2020. Additionally, please provide written assurance that daily edit checks will be conducted. Additionally, the certificate of completion of Step by Step Instruction: How to Complete Daily Edit Checks must be submitted.</i> |
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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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| 10 | Offer versus Serve (OVS) was not implemented properly. Specifically, there is no training documentation for staff to ensure understanding of OVS. | 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 <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals tab. | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide a tentative schedule of when OVS training will be scheduled and completed.</i> |
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11 Offer versus Serve (OVS) was not implemented properly. Specifically, signage says students must take at least one type of milk and not both kinds and does not specify they have an option to decline the milk.	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 <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals tab.	<i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS milk signage will not say students must take a milk and are given an option to decline.</i>
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**Meal Pattern & Nutritional Quality: Meal Components & Quantities**

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12 Signage which explains what constitutes a reimbursable meal was not displayed to students at meal services.	Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab.	<i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at meal services. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i>
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**Resource Management**

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No Findings.

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**General Program Compliance: Civil Rights**

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No Findings.

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**General Program Compliance: SFA On-Site Monitoring**

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Not Applicable.

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**General Program Compliance: Local Wellness Policy**

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13 The Local Wellness Policy (LWP) did not contain goals for nutrition education.	Discussed developing a LWP with goals for nutrition education. Discussed nutrition education activity ideas which included integrating nutrition into health education classes, promoting skill development and integrating nutrition into core subjects.	<i>Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the elements to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i>
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| 14 | The Local Wellness Policy (LWP) did not contain goals for nutrition promotion.  | Discussed feasible options for nutrition promotion goals that can be written into the LWP. Discussed activity ideas which included offering contests, surveys, promotions and/or taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Team Nutrition Resources can be found at <a href="http://www.teamnutrition.usda.gov/">http://www.teamnutrition.usda.gov/</a> .   | <i>None required at this time.</i> |
| 15 | The public is not being notified of the existence and contents of the Local Wellness Policy (LWP).  | Discussed feasible means of notifying the public about the LWP. Potentially a small flyer on the bulletin dedicated to the School Nutrition Programs could be possible to post notices.  | <i>None required at this time.</i> |
| 16 | The Local Wellness Policy (LWP) does not specify how and when a review and update of the policy is to occur.  | Discussed the best setting and timeframe for the periodic review and update of the LWP as well as how this can be included in the LWP.   | <i>None required at this time.</i> |
| 17 | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy (LWP). | Discussed feasible means of notifying potential stakeholders of their ability to participate. Potentially surveys to have stakeholders input might be feasible considering circumstances of site.  | <i>None required at this time.</i> |
| 18 | A recent assessment of the implementation of the Local Wellness Policy (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 <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals tab. Also discussed feasible means for notifying the public of the results of the most recent assessment. | <i>None required at this time.</i> |

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**General Program Compliance: Competitive Food Services**

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No Findings.

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**General Program Compliance: Professional Standards**

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| 19 | 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Courses tab.  | <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 Director is 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> |
| 20 | Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training. Specifically, Pima County Jail cafeteria staff assist with the jail facility food preparations and counting meals served for all inmates and program participants. | 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 <a href="http://www.azed.gov/hns/nslp/training/">http://www.azed.gov/hns/nslp/training/</a> . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Courses tab. | <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 these employees will receive.</i>   |
| 21 | Professional Standards training hours are not being tracked on an annual basis.  | Referred to ADE's Training Tracking forms found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Professional Standards tab. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Courses tab.   | <i>Please provide the tracker that will be used to track Professional Standards training hours on an annual basis for all School Nutrition Program staff. Additionally, please provide written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis.</i>  |

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**General Program Compliance: Water**

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No Findings.

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**General Program Compliance: Food Safety, Storage and Buy American**

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| 22 | 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. Additionally, please specify where the report has been posted.</i> |
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<p>23 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools or at off-site storage facilities: bananas. Additionally, documentation justifying a Buy American exception was not maintained/on file.</p>	<p>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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. Buy American Recorded Webinar and FAQ can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Recorded Webinars (Program Year 2020 and Earlier) tab.</p>	<p><i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i></p>
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**General Program Compliance: Reporting & Recordkeeping**

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<p>24 Site application in CNPWeb indicated that SFA serves grades 1-12 at site when the SFA is serving only grades 9-12.</p>	<p>Discussed steps required to update sponsor/site application in CNPWeb to reflect current practice of serving grades 6-12.</p>	<p><i>Please resubmit a site/sponsor application indicating that 'Grades Served at Site' are 9-12. Additionally, please provide written assurance that the sponsor application in ADE's CNPWeb will accurately reflect current practices.</i></p>
<p>25 Records documenting meal components were not kept on file for the minimum required 5 years. Specifically, production records are not maintained daily.</p>	<p>Discussed record keeping requirements and timeframe of 5 years.</p>	<p><i>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, as well as a written plan for ensuring that this requirement is met</i></p>
<p>26 Production records for meal services provided did not contain all required sections: Specifically, production records date, recipe #, planned servings, prepared servings, used/left over section is not completed adequately.</p>	<p>Discussed required sections of production records. Parts of a Production Record Guidance can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab. Production Record Overview Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Recorded Webinar (Program Year 2020 and Earlier) tab.</p>	<p><i>Please provide copies of completed breakfast and lunch production records for 7 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</i></p>

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

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No Findings.



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**Other Federal Program Reviews: Afterschool Snack Program**

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| 27 | Site application in CNPWeb indicated that "Entity Administering the Afterschool Care Snack Program: The facility provides a snack at 3:00 pm" when it should reflect Pima County Jail.                          | Discussed steps required to update sponsor/site application in CNPWeb to reflect current Entity Administering the Afterschool Care Snack Program.  | <i>Please resubmit a site/sponsor application indicating that the correct 'Entity Administering the Afterschool Care Snack Program'. Additionally, please provide written assurance that the sponsor application in ADE's CNPWeb will accurately reflect current practices.</i> |
| 28 | Snack production records are not being completed daily and maintained for 5 years, as is required. Specifically, no snack production records are maintained and only daily food records with counts are logged. | Discussed record keeping requirements of the ASP. A sample production record for the ASP can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab. | <i>Please provide copies of completed Afterschool Snack Program (ASP) production records for 5 consecutive days. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>  |

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2021 if applicable.

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**Other Federal Program Reviews: Fresh Fruit & Vegetable Program**

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Not Participating.

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**Other Federal Program Reviews: Special Milk Program**

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Not Participating.

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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Not Participating.

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Comments/Recommendations:

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Congratulations! Pima County Doc Work Center has completed the Administrative Review for the 2020-2021 school year. It is evident you are ensuring your students are fed nutritious meals.

**To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <https://www.azed.gov/hns/nslp/forms> under the Calendars and Checklists tab.**

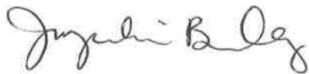
**Training: In-person classes, Web-based training and How-To guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.**

Fiscal Action Assessed?

No- SBP       Yes- SBP      \$0  
 No- NSLP       Yes- NSLP      \$0

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by February 4, 2021 to Joyce Benally at [Joyce.Benally@azed.gov](mailto:Joyce.Benally@azed.gov).



1/4/2021

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the [School Food Authority Appeal Procedure for the Administrative Review](#) found on the National School Lunch Program Administrative Review tab on the ADE website.

Equity for all students to achieve their full potential  
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