



Arizona Department of Education Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Santa Cruz Elementary District

CTD: 12-03-28

Site: Little Red Schoolhouse

Contacts: Kathy Romero, Superintendent and Jennifer Wiley, Food Service Admin

Review Date: December 8, 2020

Review Period: November 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

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| 1 | <p>Multiple applications were certified incorrectly or utilized incomplete information. Specifically, nine selected students were certified while missing social security information.</p> | <p>Discussed errors found and required corrective action. Referred to Processing Applications, Reviewing Applications Based on Income, Assessing Completeness of Categorically Eligible Applications, Determining Eligibility for Categorically Eligible Applications sections in USDA's Eligibility Manual for School Meals found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals tab.</p> | <p><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></p> |
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Performance Standard 1: Meal Counting & Claiming- Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities- Critical Area

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| <p>2 Quantities observed on the day of review did not meet minimum amounts required by the breakfast meal pattern. Specifically, daily fruit served was 1/2c, not the required 1c.</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., changes in serving utensils, recipes, etc.). 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. National School Breakfast Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the How-To Guides tab. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training 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 written description of the changes that have been made to ensure that daily fruit quantities meet minimum amounts required by the breakfast meal pattern.</i></p> |
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| <p>3 Quantities observed on the day of review did not meet minimum amounts required by the lunch meal pattern. Specifically, daily vegetable served was 1/2c, not the required 3/4c.</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., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the How-To Guides tab. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training 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 written description of the changes that have been made to ensure that vegetable quantities meet minimum amounts required by the meal pattern.</i></p> |
| <p>4 During the week of review, all grains served at lunch were not whole grain rich. Specifically, the pepperoni pizza served on Thursday of the week of review was not whole grain rich.</p> | <p>Discussed whole grain-rich requirements. USDA's Whole Grain Resource for the National School Lunch and Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning 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 one week of lunch production records and supporting documentation (CN Label, PFS, ingredient lists, nutrition fact labels, etc.) that demonstrate all grains served at lunch were whole grain-rich.</i></p> |

- 5 Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, daily vegetable served on Tuesday, Wednesday and Thursday of the week of review was 1/2c, not the required 3/4c. Weekly minimum vegetable requirement of 3c was not met due to not meeting daily vegetable requirements.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). 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 ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that daily and weekly vegetable quantities meet minimum amounts required by the lunch meal pattern.*
- 6 Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, vegetable subgroup red/orange served during the week of review was 5/8c, not the required 3/4c.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). 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 ADE's website at <http://www.azed.gov/hns/nslp> 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).
- Please provide a written description of the changes that have been made to ensure that vegetable subgroup red/orange quantities meet minimum amounts required by the lunch meal pattern.*

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| 7 | The following vegetable subgroups were not offered during the review period: dark green and beans/peas (legumes) | Discussed vegetable subgroup requirements for the age/grade groups served. Vegetable Subgroup Quick Guide can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the How-To Guides tab. Please note that repeated violations involving vegetable subgroups may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents). | <i>Please provide one week of lunch production records which demonstrate compliance with the vegetable subgroups. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements.</i> |
| 8 | Quantities observed during the review period did not meet minimum amounts required by the breakfast meal pattern. Specifically, daily fruit served on Monday, Tuesday, Wednesday and Thursday of the week of review was 1/2c, not the required 1c. Weekly minimum fruit requirement of 4c was not met due to not meeting daily fruit requirements. | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). 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 Breakfast Program can be found on ADE's website at http://www.azed.gov/hns/nslp 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 breakfast daily and weekly fruit quantities meet minimum amounts required by the meal pattern.</i> |

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

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

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| 9 | Verification procedures were not followed correctly. Proof of income provided for one selected student was not acceptable for self-employed income. Specifically, the parent provided a self written letter indicating wages. | Discussed acceptable proof of income for self-employed individual include: business or farming documents, such as ledger books; last quarterly taxes and last years' tax return. Referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals tab. | <i>Please provide a written description of changes to the system that have been implemented to ensure that verification will be conducted according to the required procedure.</i> |
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Meal Access & Reimbursement: Meal Counting & Claiming

No findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

Not applicable.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

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| 10 | Signage which explains what constitutes a reimbursable meal was not displayed to students during breakfast and lunch mobile meal service. | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. | <i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see during mobile meal service.</i> |
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Resource Management

No findings.

General Program Compliance: Civil Rights

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| 11 | The "And Justice for All" poster was not displayed during mobile meal service. | Discussed requirements of where poster must be placed and where to find a printable "And Justice For All" poster on ADE's website at https://www.azed.gov/hns/civilrights . | <i>Please provide pictures to demonstrate the posters are now displayed near all points of service. Additionally, please provide written assurance that the "And Justice For All" poster has been displayed near all points of service where program participants can view it.</i> |
| 12 | The USDA nondiscrimination statement was not printed on the December breakfast/lunch menu. | Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate. | <i>Please provide an updated breakfast/lunch menu with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

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| 13 The Local Wellness Policy (LWP) did not contain policies for food and beverage marketing. | Discussed updating the LWP to include policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Explained that this requirement applies to exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing. | <i>None required at this time.</i> |
| 14 The required stakeholders are not being permitted to be involved in the review and update of the Local Wellness Policy (LWP). | Discussed LEAs must permit participation by the general public and school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in the wellness policy process. Guidance on assembling a Local Wellness Policy Team can be found on Team Nutrition's website at https://www.theicn.org/cnss/community-connection/assembling-the-team/ . | <i>None required at this time.</i> |
| 15 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. | <i>None required at this time.</i> |

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| 16 | Observation: Due to school closures as a result of COVID-19, the triennial assessment of the implementation of the LWP was not conducted. | Per COVID-19: Child Nutrition Response #18, Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs- issued April 23, 2020- requirement for Santa Cruz Elementary District to conduct a triennial assessment of their local wellness policy by June 30, 2020 was waived. Instead, Santa Cruz Elementary District is required to complete their LWP assessment by June 30, 2021. Additionally 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. Also discussed feasible means for notifying the public of the results of the most recent assessment. | <i>None required at this time. Santa Cruz Elementary District will complete their assessment by June 30, 2021.</i> |
| 17 | A plan is not in place to notify the public of the results of the most recent assessment of the implementation of the Local Wellness Policy (LWP), when assessment is conducted. | 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

- 18 The School Nutrition Program Director hired after July 1, 2015 did not meet the hiring standard requirement. Referred to hiring standard requirements and discussed with appropriate school staff. Discussed in LEA's with fewer than 500 students, ADE has the discretion to allow an SFA to hire a candidate that meets the educational standards but has less than three years relevant food service experience. Additionally, discussed contacting assigned NSLP Specialist to request Professional Standards Hiring Flexibility approval. *Please provide the Professional Standards Hiring Flexibility approval letter.*
- 19 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 <https://theicn.org/icn-resources-a-z/food-safety/> *Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.*
- 20 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 <https://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 <https://www.azed.gov/hns/nslp/training> under the Online Courses tab. *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.*
- 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 <https://www.azed.gov/hns/nslp/forms> 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 <https://www.azed.gov/hns/nslp/training> under the Online Courses tab. *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.*

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 22 | A written food safety plan has not been developed. | Discussed required components of a food safety plan and resources available on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety tab. | <i>Please provide a copy of a written food safety plan.</i> |
| 23 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) at off-site storage facilities: Suncup Juice violations. 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 https://www.azed.gov/hns/nslp/forms under the Operational tab. Buy American Recorded Webinar and FAQ can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Recorded Webinars (Program Year 2020 and Earlier) tab. | <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> |

General Program Compliance: Reporting & Recordkeeping

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| 24 | Caterer (Nogales Unified School District) did not provide the license/permit to operate for the location preparing meals for Little Red Schoolhouse. | Discussed ensuring Nogales Unified School District provides the license/permit to operate for the location preparing meals for Little Red Schoolhouse. | <i>Please provide the license/permit to operate for the location preparing meals for Little Red Schoolhouse.</i> |
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General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

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| 25 | Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year. | Discussed which entities in the local area operate the SFSP and how to notify families. Summer feeding locations can be found at https://www.azhealthzone.org/ . | <i>Please provide a description of how households 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 site operate the SFSP, please provide a description of other community resources that will be provided to households prior to the end of the school year.</i> |
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Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2021 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! Santa Cruz Elementary District has completed the Administrative Review in the 2020-2021 SY. Thank you for all of your hard work and organization throughout the AR process. It was a pleasure working with you. Thank you for working so diligently to assure that your students are receiving nutritious meals. I appreciate your enthusiasm and willingness to learn. Please let me know if you have any questions.

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 5, 2021 to Jennifer McDonald at Jennifer.McDonald@azed.gov.



1/8/2021

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.

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