



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Fort Thomas Unified District

CTD: 05-02-07

Site: Mt. Turnbull Elementary School

Contacts: Shane Hawkins, District Superintendent and Derrick Bryce, Business Manager

Review Date: December 15, 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

No Findings.

#### Performance Standard 1: Meal Counting & Claiming- Critical Area

<b>1</b>	Meal count totals by category for the month of review were not correctly combined and recorded. Specifically, Daily Meal Count were not correctly entered into the Daily Edit Check used for Month of Review Claim Submission. This was deemed a non-systemic error and contributed 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.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines provide an accurate count by eligibility category.</i>
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**Performance Standard 2: Meal Components & Quantities- Critical Area**

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<b>2</b> Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily Grain requirements were not met during lunch. 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 toward the meal pattern). 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 <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu 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 How-To Guides tab. The Using Appropriate Serving Utensils Recorded Webinar & 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).	<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. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu must be submitted.</i>
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- 3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly Grain requirements were not met during lunch. 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 toward the meal pattern). 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. 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).
- 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.*

- 4 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily Meat/Meat Alternate requirements were not met during lunch. 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 toward the meal pattern). 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. 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).
- 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.*

- 5 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly Meat/Meat Alternate requirements were not met during lunch. 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 toward the meal pattern). 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. 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).
- 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.*

- 6 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily vegetable requirements were not met during lunch on 11/16/20, 11/17/20 and 11/18/20. 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 serving size). 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. 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).
- 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. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.*

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| <p><b>7</b> Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly vegetable requirements were not met during lunch, providing 2 1/2 cups and not the required 3 cups. 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 serving size). 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 <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu 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 How-To Guides tab. The Using Appropriate Serving Utensils 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 written description of the changes that have been made to ensure that weekly vegetable quantities meet minimum amounts required by the meal pattern.</i></p>  |
| <p><b>8</b> The following vegetable subgroups were not offered during the review period: Red/Orange, Beans/Peas (Legumes), or Starchy vegetables. A waiver was not submitted to ADE for meals with meal pattern deficiencies by component, per meal service when the meal pattern was not followed. This was not a repeat finding from cycle two and did not contribute towards fiscal action calculations due to meal pattern waiver request.</p> | <p>Discussed vegetable subgroup requirements for the age/grade groups served. Vegetable Subgroup Quick Guide 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. The Step by Step Instruction: How to Plan a Lunch Menu 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 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).</p>   | <p><i>Please submit a meal pattern waiver to ADE for Vegetable subgroup weekly requirement not met. Additionally, please provide written assurance that if the meal pattern cannot be adhered to for all meal services at all times, a meal pattern waiver will be submitted to ADE.</i></p> |

- 9** The following products could not be credited towards the meal pattern due to insufficient documentation: Ham, Turkey, IW Grilled Cheese, Frozen Bean & Cheese Burrito. 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 contribute towards fiscal action calculations.
- Discussed requirements regarding processed product documentation and provided examples. USDA Food Fact Sheets can be found on USDA's website at <http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/>. The CN Labels and Product Formulation Statements 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).
- Please provide a CN label and/or Product Formulation Statement for Ham, Turkey, IW Grilled Cheese, Frozen Bean & Cheese Burrito. 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.*
- 10** 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 on 12/15/20; Turkey and Cheese Sandwich (crediting as 0.50 oz eq Meat/Meat Alternate) was served when a minimum of 1 oz eq Meat/Meat Alternate is required at lunch. 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 sufficient crediting documentation for processed products to credit toward the meal pattern). 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. 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).
- Please provide a written description of the changes that have been made to ensure that Meat/Meat Alternate quantities meet minimum amounts required by the meal pattern.*



<p><b>11</b> Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically, daily vegetable quantities were insufficient during lunch on 12/15/20; 1/2 cup of celery was served when a minimum of 3/4 cup of vegetable is required at lunch. 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., changes in serving sizes). 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 <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu 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 How-To Guides tab. The Using Appropriate Serving Utensils 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 written description of the changes that have been made to ensure that Meat/Meat Alternate quantities meet minimum amounts required by the meal pattern.</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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No Findings.

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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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<p><b>12</b> Meal counts for each meal service during the month of review were not correctly recorded. Specifically, one meal count sheet for both breakfast and lunch meal counts was used.</p>	<p>Discussed that each meal service (breakfast and lunch) is required to have a separate meal counting sheet even if the meals are served at the same time.</p>	<p><i>Please provide a written description of changes to the system that will be implemented to ensure that meal counts for each meal service are recorded separately.</i></p>
<p><b>13</b> Separate meal counts were not taken per meal service. Specifically, four days of breakfast and lunch meal services were recorded on one meal count sheet.</p>	<p>Discussed that counting records for meals served must align to the day the meal is intended to be consumed.</p>	<p><i>Please provide a written description of changes to the system that have been implemented to ensure that meal service counts are recorded separately per meal provided.</i></p>

<p><b>14</b> Daily edit checks are not being conducted appropriately. Specifically, Daily Edit Check reflects 93.00% and does not indicate the accurate Attendance Factor of 93.01%.</p>	<p>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  <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>  under the How-To Guides tab.</p>	<p><i>Please provide a completed daily edit check worksheet for the month of January. Additionally, please provide written assurance that daily edit checks will be conducted utilizing the accurate Attendance Factor percentage.</i></p>
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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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Not Applicable.

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**Meal Pattern & Nutritional Quality: Meal Components & Quantities**

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<p><b>15</b> A waiver was not submitted to ADE for meals with meal pattern deficiencies by component, per meal service when the meal pattern was not followed. Specifically, a Meal Pattern Waiver Request Form was submitted on 08/26/2020 for the timeframe of 08/05/2020 - 05/27/2021 for 1)Milk variety or fat content not met, 2)Vegetable subgroup weekly requirement not met, 3)Whole grain-rich weekly requirement not met, and 4)Target 2 Weekly Sodium requirement not met; but were rejected due to unallowable timeframe and no new requests resubmitted.</p>	<p>Discussed that ADE is permitted to provide meal reimbursements when the meal pattern is unable to be met by the SFA providing the meals due to shortages and/or supply chain issues. SFAs must maintain daily records of meals with meal pattern deficiencies by component, per meal service. To support the claim for reimbursement of meals, the SFA is required to provide a meal pattern waiver request form to ADE. Referred to HNS 33-2020 Procedures for Opting into National School Lunch Program (NSLP) Meal Pattern and Parent/Guardian Pickup Waivers and Providing Meals for Multiple Days in SY 20-21 found on ADE's website at  <a href="https://www.azed.gov/hns/covid19">https://www.azed.gov/hns/covid19</a>.  Step-by-Step Instruction: How to Submit a Meal Pattern Waiver and Step-by-Step Instruction Quick Guide: How to Submit a Meal Pattern Waiver 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 How- To Guides tab.</p>	<p><i>Please submit a meal pattern waiver to ADE for Vegetable subgroup weekly requirement not met. Additionally, please provide written assurance that if the meal pattern cannot be adhered to for all meal services at all times, a meal pattern waiver will be submitted to ADE.</i></p>
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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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<b>16</b> Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, complaints are filed at district or site office and then a group of selected staff review, investigate and determine action, if necessary to be taken.	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 <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> . The Step by Step Instruction: How to File a Civil Rights Complaint 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 How-To Guides.	<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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No Findings.

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**General Program Compliance: Local Wellness Policy**

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<b>17</b> 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.	<i>None required at this time.</i>
<b>18</b> The review and update of the Local Wellness Policy (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>

<p><b>19</b> The required stakeholders are not being permitted to be involved in the review and update of the Local Wellness Policy (LWP). Specifically, student involvement is not included.</p>	<p>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 <a href="https://www.theicn.org/cnss/community-connection/assembling-the-team/">https://www.theicn.org/cnss/community-connection/assembling-the-team/</a>.</p>	<p><i>None required at this time.</i></p>
<p><b>20</b> Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy (LWP). Specifically, there is no notice of the LWP review dates informing the required stakeholders.</p>	<p>Discussed feasible means of notifying potential stakeholders of their ability to participate.</p>	<p><i>None required at this time.</i></p>
<p><b>21</b> 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.</p>	<p>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.</p>	<p><i>None required at this time.</i></p>
<p><b>22</b> 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.</p>	<p>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 <a href="https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit/">https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit/</a>.</p>	<p><i>None required at this time.</i></p>

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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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- 23** 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. Specifically, no documentation was provided to reviewer for the listed School Food Authority.
- 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.*
- 24** The School Nutrition Program Manager did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. Specifically, no documentation was provided to reviewer for the district kitchen supervisor who should be categorized as the School Nutrition Program Manager.
- Discussed 10 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 <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 Manager is registered for.*
- 25** 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. Specifically, no documentation was provided to reviewer for all food service staff from each school sites.
- 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 <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 full-time School Nutrition Program staff are registered for.*
- 26** Professional Standards training hours are not being adequately tracked. Specifically, documentation was not provided to reviewer to confirm training hours are completed/planned 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.*

<p><b>27</b> Employees were not appropriately categorized per Professional Standards definitions. Specifically, the designated School Food Authority is categorized incorrectly under Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP, should be categorized under School Nutrition Program Director and meet the 12 hour training requirement. Additionally, the district food service manager is categorized incorrectly under School Nutrition Program Director, should be categorized as the School Nutrition Program Manager and meet the 10 hour training requirement.</p>	<p>Reviewed all employees with NSLP related responsibilities and helped SFA categorize employees appropriately. 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.</p>	<p><i>Please provide a written description of how it will be ensured that employees are appropriately categorized per Professional Standards definitions.</i></p>
<p><b>28</b> Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training. Specifically, school staff that assist food services with meal distribution and counts at the Point of Sale (POS) (e.g. teachers, custodians, cafeteria monitors).</p>	<p>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.</p>	<p><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></p>

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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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<p><b>29</b> A written food safety plan has not been developed. Specifically, copy of food safety plan was not provided to reviewer to confirm written food safety plan has been developed.</p>	<p>Discussed required components of a food safety plan and resources available on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Food/Health Safety tab.</p>	<p><i>Please provide a copy of a written food safety plan.</i></p>
<p><b>30</b> Documentation was not maintained 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. Specifically, copies of food safety inspections were not provided to reviewer to confirm food safety inspections were conducted.</p>	<p>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.</p>	<p><i>Please provide written assurance that documentation to show that two food safety inspections were received and/or requested from the local health department each school year will be maintained.</i></p>

<p><b>31</b> The most recent food safety inspection report was not posted in a publicly visible location. Specifically, copies of food safety inspections were not provided to reviewer to confirm food safety inspections were conducted.</p>	<p>Discussed making copies of most recent report and feasible places for posting.</p>	<p><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></p>
<p><b>32</b> The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Dole Pineapple Fruit Cup (Thailand), Dole Peaches Fruit Cup (Thailand), Dole Mandarin Orange Fruit Cup (China), Dole Mixed Fruit Cup (Thailand). Additionally, documentation justifying a Buy American exception was not 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 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><b>33</b> Site application in CNPWeb indicated that SFA is participating in Afterschool Care Snack Program when the SFA is currently not participating. Specifically, for Mt. Turnbull Elementary.</p>	<p>Discussed steps required to update sponsor and site application in CNPWeb to reflect current practice of not participating in Afterschool Care Snack Program.</p>	<p><i>Please resubmit a site/sponsor application indicating that Mt. Turnbull Elementary is not participating in the Afterschool Care Snack Program. Additionally, please provide written assurance that the site application in ADE's CNPWeb will accurately reflect current practices.</i></p>
<p><b>34</b> Site application in CNPWeb indicated that SFA is operating Offer Versus Serve (OVS) when the SFA is currently operating Serve-Only meal service. Specifically, at Mt. Turnbull Elementary due to COVID-19 and Multiple Day Meal Distribution, site is implementing Serve-Only meal service.</p>	<p>Discussed steps required to update sponsor and site application in CNPWeb to reflect current practice of not implementing OVS and operating Serve-Only meal service.</p>	<p><i>Please resubmit a site/sponsor application indicating that Mt. Turnbull Elementary is not implementing OVS and is Serve-Only meal service. Additionally, please provide written assurance that the site application in ADE's CNPWeb will accurately reflect current practices.</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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Not Participating.

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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! Fort Thomas Unified District has completed the Administrative Review for School Year 2020-2021. It is recommended that trainings and meal count documentation are completed throughout the year. Thank you for your cooperation during the review process.

**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  
 No- NSLP       Yes- NSLP

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by February 24, 2021 to Joyce Benally at [Joyce.Benally@azed.gov](mailto:Joyce.Benally@azed.gov).



1/20/2021

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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