



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Mingus Mountain Estate Residential Center, Inc.

CTD: 13-21-16

Site: Casa Grande Academy

Contacts: Michael Napier, Principal and Michael Dandola, Food Service Director

Review Date: December 22, 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

1	Lunch count totals for the month of review were not correctly combined and recorded. Specifically, 21 lunch meals were underclaimed. This was deemed a non-systemic error.	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 lunch meal counts are counted and claimed correctly.</i>
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#### Performance Standard 2: Meal Components & Quantities- Critical Area

2	Vegetable quantities during the review period did not meet minimum amounts required by the meal pattern. Only 1/2 cup of vegetable was served on November 4 and this did not meet the daily minimum requirement of 1 cup vegetable required by the meal pattern. Additionally, only 7/8 cup of vegetable was served on November 7 and this did not meet the daily minimum requirement of 1 cup vegetable. As a result of these daily vegetable quantity issues, the weekly minimum vegetable servings were not met. This was determined to be a repeat finding from cycle two 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, such as ensuring menu planning is focused on daily and weekly vegetable servings. 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. 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 and weekly vegetable 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 | Grain quantities during the review period did not meet minimum amounts required by the meal pattern. Only 1.25 oz. eq. of grains were served on November 7 and this did not meet the daily minimum requirement of 2 oz. eq. of grains required by the meal pattern. As a result of this daily grain quantity issues, the weekly minimum grain servings were not met. This was determined to be a repeat finding from cycle two 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, such as ensuring menu planning is focused on daily and weekly grain servings. 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. 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 and weekly grain quantities meet minimum amounts required by the meal pattern.</i>   |
| 4 | During the day of review, all grains served at breakfast were not whole grain rich. Specifically, the pancakes served on the day of review were not whole grain rich.   | 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 <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 one week of breakfast production records and supporting documentation (CN Label, PFS, ingredient lists, nutrition fact labels, etc.) that demonstrate all grains served at breakfast were whole grain-rich. Additionally, please provide written assurance that moving forward, all grains served at breakfast will be whole grain rich.</i> |
| 5 | During the review period, all grains served at lunch were not whole grain rich. Specifically, the tostada served on November 7 was not whole grain rich.  | 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 <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 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. Additionally, please provide written assurance that moving forward, all grains served at lunch will be whole grain rich.</i>             |

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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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No findings

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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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No findings

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

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| 6 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch. | Discussed feasible options for signage and potential content, plan for creating and posting. Printable signs 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 breakfast and lunch .<br/>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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| 7 | SFA was unable to demonstrate how general funds are used to pay for meals provided free of charge to teachers, administrators, custodians and other adults. | Discussed ways to determine the adult meal price that should be transferred from the general fund to the nonprofit school foodservice account, such as pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs. | <i>Please provide a written description of the steps which have been taken to reimburse the nonprofit school foodservice account from general funds for meals provided to adults free of charge.<br/>Additionally, please submit supporting documentation which demonstrates the transfer of funds from July 1, 2020 - November 30, 2020.</i> |
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**General Program Compliance: Civil Rights**

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| 8 | Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place. | Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, 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 tab. | <i>Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs.</i> |
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**General Program Compliance: SFA On-Site Monitoring**

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| 9 | Off-site monitoring reviews of the breakfast and lunch meal counting and claiming procedures for all sites within the SFA are not being conducted each year. The on-site portion of the monitoring is not required this school year due to COVID-19: Child Nutrition Response #41 - Nationwide Waiver of Onsite Monitoring Requirements in the School Meals Programs – Revised – EXTENSION 2 | Discussed requirement and where to find the monitoring form template 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. Discussed who would be responsible for completing this each year. | <i>Please provide a completed Internal Breakfast and Lunch Monitoring Form of the Meal Counting and Claiming System (off-site portion only) for all sites. Additionally, please provide a written description of the process that has been put in place to ensure that all sites receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i> |
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**General Program Compliance: Local Wellness Policy**

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| 10 | 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>  |
| 11 | 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, such as posting the policy on the website and/or having paper copies of the policy available at the LEA.   | <i>None required at this time.</i>  |
| 12 | <u>Observation:</u> Due to school closures as a result of COVID-19, the triennial assessment of the implementation of the Local Wellness Policy (LWP) was not conducted by June 30, 2020. The public must be notified of the results of the most recent assessment of the implementation of the LWP. | 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, the requirement for MIngus Mountain Estate Residential Center, Inc. to conduct a triennial assessment of their local wellness policy by June 30, 2020 has been waived. Discussed requirement to complete an assessment. 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="http://www.azed.gov/hns/nslp/lwp/">http://www.azed.gov/hns/nslp/lwp/</a> . Also discussed feasible means for notifying the public of the results of the most recent assessment. | <i>None required at this time. MIngus Mountain Estate Residential Center, Inc. will complete their assessment by June 30, 2021.</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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No findings

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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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| 13 | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Food/Health Safety tab.   | <i>Please provide a copy of a written food safety plan.</i>   |
| 14 | The following reviewed product indicated violations of the Buy American Provision in 7CFR 210.21(d): Ardmore juice. 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 <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. | <i>Please provide a written description of the changes that have been made to procurement and recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i> |

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**General Program Compliance: Reporting & Recordkeeping**

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| 15 | The site application in CNPWeb for Casa Grande Academy is incorrect. The application states the site is serving students in Grades 6-12, but only students in Grades 9-12 are served. Additionally, the site application indicates Offer vs Serve is implemented during breakfast and lunch meal service and this is incorrect. | Discussed steps required to update the site application in CNPWeb to reflect current practices. | <i>Please resubmit a site sponsor application indicating that Grades 9-12 are served at Casa Grande Academy and OVS is not implemented at breakfast and lunch. Additionally, please provide written assurance that the applications in ADE's CNPWeb will accurately reflect current practices.</i> |
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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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| 16 | The Afterschool Snack Program (ASP) did not conduct acceptable education or enrichment activities before, during or after the snack meal service during holidays and school closure days during the review period (Nov 11, 25-27) and these snacks were claimed for reimbursement. This contributed towards fiscal action.  | Discussed students must be provided with regular scheduled activities in an organized, structured, and supervised environment. The ASP must include educational or enrichment activities (e.g., mentoring or tutoring programs) that are open to all students. | <i>Please provide a written description of the changes that have been made to the Afterschool Snack Program in regards to claiming afterschool snacks on holidays and/or school closures.</i>  |
| 17 | Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met during the week of review. Specifically, the SFA did not have documentation on file demonstrating the Cheez-its served on November 2 and November 5 could be credited as 1 oz. eq. Additionally, only 1/2 cup of fruit was served on November 3 and this did not meet the minimum requirement of 3/4 cup. | Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at <a href="https://www.azed.gov/hns/afterschool">https://www.azed.gov/hns/afterschool</a> under the Meal Pattern tab.                            | <i>Please provide a Product Formulation Statement (PFS) that demonstrates the Cheez-its can be credited as 1 oz. eq. Additionally, please provide ASP production records for 5 consecutive days that demonstrate that the ASP meal pattern requirements have been met. Lastly, please provide written assurance that the ASP meal pattern will be adhered to at all times.</i> |
| 18 | The Afterschool Snack Program (ASP) monitoring review was not conducted within the first four weeks of operation and one additional time during the school year.  | Discussed ASP monitoring requirements. A sample ASP monitoring form 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.  | <i>Please provide written assurance that the ASP will be monitored once within the first four weeks of operation and one additional time during the school year and that documentation to support this will be maintained.</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 applicable

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

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Not applicable

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

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Not applicable

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Comments/Recommendations:

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Thank you for your cooperation and organization during the Administrative 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

\$0.00

No- NSLP

Yes- NSLP

\$120.24

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by March 12, 2021 to Kerrie Zigler at [Kerrie.Zigler@azed.gov](mailto:Kerrie.Zigler@azed.gov) or 1535 W. Jefferson St., Bin #7, Phoenix, AZ 85007.



1/29/2021

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.

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